

Institute *for* Policy Integrity

New York University School of Law

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VIA ELECTRONIC SUBMISSION

National Highway Transportation Safety Board
U.S. Department of Transportation
Attention Docket ID No. NHTSA-2009-0059

Subject: Comments on Proposed Rulemaking to Establish Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, 74 Fed. Reg. 49,453 (Sep. 28, 2009), Docket ID Nos. EPA-HQ-OAR-2009-0472 and NHTSA-2009-0059

The Institute for Policy Integrity strongly supports the efforts of the Environmental Protection Agency (EPA) and the National Highway Transportation and Safety Administration (NHTSA) to address the problem of greenhouse gas (GHG) emissions from light-duty vehicles in this joint rulemaking. The Institute for Policy Integrity (IPI) at New York University School of Law is a non-partisan advocacy organization and think-tank dedicated to improving the quality of government decisionmaking in the areas of environmental, public health, and safety regulation.

Attached to this letter are IPI's comments to EPA and other supporting documents. Several of these comments also relate to NHTSA's proposal, particularly the comments on the agencies' calculations of certain costs and benefits. In particular:

- For policy and legal reasons, the agencies must—to the best of their abilities—quantify any potential lost consumer welfare. However, economic concepts like the Positional Goods Effect predict that any loss will be limited and temporary.
- The agencies should employ a distributional analysis to address the energy security gains related to demand/monopsony effects.
- IPI has also submitted separate comments jointly with Environmental Defense Fund on the agencies' calculation of the social cost of carbon (SCC).

IPI hopes NHTSA will make the adjustments suggested in these comments in its final rulemaking.

Respectfully submitted,

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