



**Testimony of Mike Hartrick on Behalf of Alliance for Automotive Innovation  
Re: Proposed “SAFE” Vehicles Rule III for Model Years 2022 to 2031 CAFE  
January 7, 2026**

Thank you for the opportunity to speak on behalf of the Alliance for Automotive Innovation (Auto Innovators), representing the automakers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers.

We have been clear and consistent: The CAFE rules finalized under the previous administration are extremely challenging for automakers to achieve given the current marketplace for electric vehicles (EVs).

Auto Innovators supports a reset of the CAFE standards focused on economic practicability that returns the CAFE program to its roots, realigning it with statutory requirements.

The previous administration’s CAFE standards require a rapid transition to electric vehicles and cannot be met in an economically practicable manner. NHTSA estimated that MY 2024 standards would be met with 15 percent EVs.<sup>1</sup> Excluding EV-only automakers, less than half of that was sold. For model year 2026, which is on sale today, over 20% electric vehicles sales were projected by NHTSA.<sup>2</sup> Given the slowing growth of EV sales in the U.S.<sup>3</sup> and reduced government policy support, the previously finalized CAFE standards are simply unachievable.

A reset of CAFE standards is also needed to align with statutory requirements. In this proposal, NHTSA entirely excludes EVs from its standard-setting analysis. We agree with NHTSA that the

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<sup>1</sup> NHTSA, Final Regulatory Impact Analysis: CAFE Data Book Appendix I – Standard Setting Analysis (May 2024) at I-397.

<sup>2</sup> *Ibid.*

<sup>3</sup> See Alliance for Automotive Innovation, *Get Connected* (2<sup>nd</sup> Quarter, 2025) at 2 (EV Market Share, Quarterly, 2020-2025). Available at <https://www.autosinnovate.org/posts/papers-reports/get-connected-ev-quarterly-2025-q2>.

statute prohibits the agency from considering EVs when setting standards<sup>4</sup> and supports the approach taken by NHTSA for this rulemaking.

NHTSA is also considering changes to light truck classification requirements, which would result in moving many SUVs and minivans to the more stringent passenger car standards. The association has concerns about these changes and the data analysis supporting them. We will provide comment on potential revisions that are consistent with NHTSA's intent and to address excessive reporting requirements that would result from NHTSA's proposals.

Auto Innovators is supportive of efforts to make pragmatic revisions to CAFE standards that are necessary near-term fixes. In the longer term, automakers and suppliers need a stable regulatory environment with balanced, reasonably achievable standards that continue to improve fuel economy. This is the approach that will preserve consumer choice and keep the U.S. auto industry globally competitive.

We look forward to expanding on these themes and providing comment on additional areas of the proposal.

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<sup>4</sup> 49 U.S.C. § 32902(h)(1) and (2).