

Heavy-Duty Fuel Efficiency Leadership Group
Statement of Principles
April 2010

The Heavy-Duty Fuel Efficiency Leadership Group, a diverse coalition of medium- and heavy-duty fleets and technology providers, was formed in January 2010 with the goal of informing and supporting a workable national program to reduce GHG emissions and improve the fuel efficiency of medium- and heavy-duty vehicles.

The Leadership Group has developed a set of principles that are consistent with our corporate values and supportive of a national medium-and heavy-duty vehicle fuel efficiency and greenhouse gas emission reduction program:

- **Achieve U.S. Environmental, Economic and Energy Security Benefits:** Important national environmental, economic and energy security goals can and should be achieved through the rulemaking by requiring significant fuel efficiency improvements to medium- and heavy-duty vehicles. A properly designed GHG/fuel efficiency program for medium- and heavy-duty vehicles (Class 2B-8) will achieve significant energy security benefits and GHG emission reductions while lowering the cost of fuel as a percentage of overall operating costs to fleets. A strong national program should be balanced by pragmatic phase-in schedules to allow for positive returns on investment in order to minimize the downstream costs that will be passed along to shippers and consumers.
- **Utilize Existing Technologies to Achieve Substantial Timely Gains:** Improved engine and transmission efficiency, reduced rolling resistance, improved aerodynamics and axle configuration are among the existing and emerging technologies that can help achieve substantial fuel efficiency gains in the 2014-2020 timeframe. The rule should emphasize the prompt deployment of existing cost-effective technologies while recognizing and accounting for fleet diversity limitations.
- **Recognize Fleet Diversity:** The rule should align any standards with the technology needed for different applications. Fleets are diverse in terms of weights, sizes and capabilities in order to perform the wide range of tasks required of these vehicles. The rule should maximize achievable gains in medium-and heavy-duty vehicle fuel efficiency and GHG emission reductions by taking advantage of the technology improvement opportunities across the entire vehicle and its operation.
- **Avoid Unintended Consequences:** The rule should seek to avoid unintended consequences by building on existing programs, including the use of proven protocols. The rule should recognize current market structure. It should achieve significant short-term fuel efficiency improvements without restricting customer choice of product specifications to perform the actual work needed.

- **Supplemental Certification:** Existing certification test methods should be supplemented to recognize the efficiency improvements of technologies not accounted for at this time. Some hybrid systems, for example, deliver greater fuel efficiency and GHG reduction benefits than would be estimated based on current engine test protocols. New supplemental testing and certification procedures should be capable of differentiating fuel efficiency across novel technologies.
- **Harmonized Program:** Inconsistencies between regulatory agencies must be avoided. A single national MDV/HDV fuel efficiency/GHG program is essential to provide vehicle manufacturers, suppliers and the user community with the certainty necessary for capital investment. A patchwork of different state requirements or conflicting standards for GHG and fuel efficiency will compromise the achievement of improvement goals as well as program compliance.
- **Complementary Policies:** Financial and other incentives—including investment tax credits; accelerated depreciation of new capital investment; increased highway infrastructure spending and increased size and weight of vehicles—will accelerate the deployment of new, more fuel efficient trucks. These policies and others (increased speed limits, driver training and congestion mitigation) will drive environmental, economic and energy security benefits and will greatly assist rapid fleet turnover of existing stock.
- **Con-way Inc.**
- **Cummins Inc.**
- **Eaton Corporation**
- **FedEx Corporation**
- **Wabash National Corporation**
- **Waste Management, Inc.**