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August 16, 2016

Christopher Grundler
Director, Office of Transportation and Air Quality
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW, Room 6420
Washington, DC 20460

Re: August 16, 2016 (date of EPA release of Phase 2 HDV Regulation)

Dear Mr. Grundler,

Today the EPA and NHTSA released their final regulations requiring increased efficiency and fuel economy in the medium- and heavy-duty vehicle sector from 2019 to 2027. We applaud the two agencies for doing a thorough, professional, and comprehensive assessment of the current state and potential of future technology.

We need and can achieve much higher efficiency in our trucks. The fuel economy targets established by the agencies are both forward looking and, we think, feasible, as well as potentially cost-effective. We believe the long lead times should allow the truck manufacturers and suppliers ample time to plan for and prepare for the implementation of the necessary technologies.

We have heard claims that some technologies may not be reliable enough by 2027. This can be avoided if manufacturers avoid delays, and if there is sufficient funding for development and testing of new technologies, so that they are fully ripe before deployment. This is also essential to ensure that there are multiple suppliers to enable a competitive market in time for compliance with the regulations at truck and component prices that are cost-effective in light of the fuel savings,

We know technologies validated in programs like Super Truck and in labs across the country are ready for market introductions. We call on the truck and engine makers to speed the validation and deployment of higher efficiency systems and technologies. And we call on the Department of Energy and other federal and state agencies to work with the manufacturers and suppliers to provide critical funding for the development and testing of advanced truck technologies and components.

We work with companies worldwide pursuing a broad array of new technologies and approaches. But we know the technology exists in the United States for significantly greater fuel economy. This new set of regulations will encourage innovation and has the potential to spur domestic economic growth.

In the long-run, these regulations will make trucking operations in the United States stronger by reducing its dependence on oil and making our economy less vulnerable to the fluctuations of a single global commodity.

We look forward to work working with the truck manufacturers, suppliers, and other fleets to successfully implement this important new set of regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael G. Britt Sr.", written in a cursive style.

Michael G. Britt Sr.

UPS

Sr. Director of Maintenance & Engineering

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