

MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION

"The auto manufacturers are already meeting today's pollution control standards. Why on earth relax them?"

— The Chicago Tribune, August 11, 1981

October 27, 1981

The Honorable Robert Dole
United States Senate
2213 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Senator Dole:

The Manufacturers of Emission Controls Association (MECA) represents American businesses that are engaged in the development and manufacture of motor vehicle emission control systems. We are deeply concerned about current efforts to revise Title II of the Clean Air Act to relax existing auto pollution standards for carbon monoxide (CO) and the oxides of nitrogen (NO_x). Such action would constitute a very short-sighted policy that is not good for American business or the American people.

There is one central question in the debate about rolling back auto emission standards and that is: Will it really help the troubled auto industry? We think not. Some of the following points will tell you why. We urge you to consider these facts and to reject attempts to turn back the clock on auto emission controls.

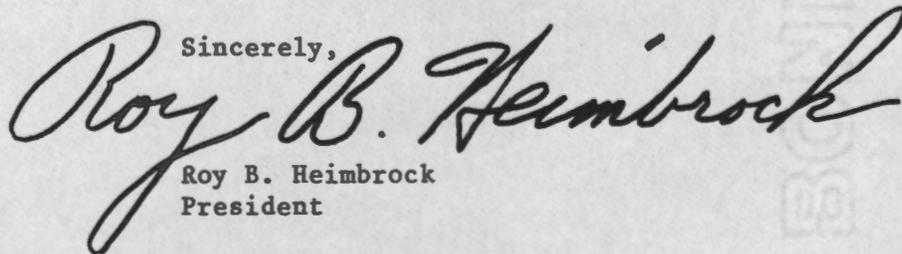
- DOMESTICS VS FOREIGN AUTO MAKERS: Claims that easing auto emission standards will enhance the domestic auto-makers' ability to compete with foreign auto manufacturers are illusory. The competitive position of domestic manufacturers will not be enhanced since all vehicles, domestic and imported, must meet the same standards. In fact, a rollback of the standards may well allow imports, with their small, highly refined engines to adopt very simple control methods — thus allowing a greater cost reduction than is available to our domestics.
- CAPITAL INVESTMENT: The emission control systems are already on our 1981 cars. The investment in technology and equipment has been made. Why throw it away?
- FUEL ECONOMY AND EMISSION CONTROLS: Since the Clean Air Act Amendments of 1970 were enacted, the fuel economy of the American Automobile has increased 68 percent. More than one-half of this bonus derives from technology spurred by emission control standards. In the 1981 model cars, which meet the final strict standards, auto makers have been able to improve fuel economy by 11 percent, discounting the gains due to weight reduction.

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- COSTS TO THE CONSUMER: Relaxation of emission standards will not guarantee large savings to the consumer. In testimony before Congress, Ford stated that CO and NOx rollback is estimated to reduce costs by \$80 per car. Chrysler estimated that only \$145 per automobile could be saved by rollback. Lastly, General Motors predicted that the savings could run as high as \$300, but admitted that it and other manufacturers would most likely not take advantage of all possible savings because eliminating certain emission control systems would cause an unacceptable reduction in performance and fuel economy. Based on an average of \$10,000 for a new car today, the savings achieved through rollback of the standards would amount to only 1 to 1-1/2% of the new car price.
- HEALTH EFFECTS: Virtually all of the cars made in 1981 are meeting the prescribed standard for nitrogen oxides and 70% are meeting the standard for carbon monoxide. Any rollback of the standards will jeopardize our ability to meet public health standards, but the rollbacks being proposed by the Administration and others would allow emission of twice as much CO and NOx as we get from today's 1981 cars. It should be emphasized that these health standards protect not only the general public, but are designed to safeguard particularly susceptible groups, primarily people suffering from respiratory or heart disease and the very young and the very old. These groups constitute about one-fifth of the total population.
- PUBLIC OPINION: The public supports retaining our strong auto emission standards. Recent polls by Newsweek, Harris, Roper, and Opinion Research Corporation show a majority of Americans -- regardless of political persuasion, economic status or geographical location -- oppose reducing motor vehicle controls, even if such relaxations were to decrease the purchase price of those vehicles.

The past decade has brought astonishing achievement toward the dual objectives of clean air and improved fuel economy. The cost of rolling back the auto emission standards in terms of its adverse impact on the nation's health and on other areas of our economy is too huge to buy so little. The Manufacturers of Emission Controls Association urges you to take the more prudent course and oppose these ill-conceived attacks on our existing auto pollution standards. Please contact us for more detailed information on these issues.

Sincerely,



Roy B. Heimbrock
President