STATEMENT BY CLARENCE M. DITLOW
ON FUEL ECONOMY INFORMATION
BEFORE THE FEDERAL TRADE COMMISSION
WASHINGTON, D. C. DECEMBER 2, 1974

Thank you for the opportunity to express some comments on fuel economy information for consumers. My name is Clarence M. Ditlow, III. I am a member of the Public Interest Research Group, a group of engineers, lawyers and scientists established by Mr. Ralph Nader in 1970.

Accurate and widely disseminated information on fuel economy can result in significant consumers savings and slow the depletion of our scarce petroleum reserves. Consider the 1975 model year vehicles as their fuel economy is measured by the Environmental Protection Agency (EPA) urban test cycle. The sales weighted average fuel economy gain in 1975 is 13.5% with General Motors vehicles showing the largest percentage gain with 28.3%. Chrysler and American Motors show lesser gains of 12.1% and 20.5% respectively. Ford actually shows a decrease of 2.2%.

Since the sales weighted average fuel economy for 1974 vehicles is approximately 13.5 miles per gallon (MPG), the average for 1975 vehicles is about 15.3 MPG. Taken over the 100,000 mile useful life of the vehicle, this results in a consumer savings of 871 gallons of gasoline or $479.05 at $0.55 per gallon. Because of the differences in the various manufacturers' approaches to emission controls, two very similar models can have very large differences in fuel economy. A 2900 pound, 6-cyclinder Ford Maverick without a catalyst obtained 14 MPG and 18 MPG on the EPA urban and highway driving cycles respectively while a 3040 pound, 6-cylinder Plymouth Valiant with catalyst got 18 and 23 MPG respectively. The consumer purchasing the Valiant rather than the Maverick will save 1427 gallons of gasoline or $784.85 over the useful life of the car. And the base price of the Valiant is only $186 more than the Maverick.

There is a great deal of controversy over what test procedure should be used to determine fuel economy which should be resolved in favor of the EPA test procedure. In testing emissions, the EPA inherently generates fuel economy data for a 7.5 mile urban driving cycle that is representative of about 55% of the vehicle miles driven in the U.S. each year. With the assistance of the Society of Automotive Engineers, the EPA has developed a fuel economy test representative of non-urban driving which constitutes the remaining 45% of the vehicle miles driven. Beginning with the 1975 model year, the EPA generates both urban and highway fuel economy data.

Criticism of the EPA test procedure as being unreal because it is conducted on a dynamometer is unfounded. Since the same driving cycle within specified, close tolerances is used for every test, the large effect on fuel economy of driver habits is eliminated. A detailed set of instructions for running the city and highway test assures that the tests can be performed the same way each time, both in the EPA lab and in any other competent lab, including auto company labs. The dominance of the auto companies in simply possessing test tracks is eliminated since many organizations are equipped with dynamometer and emission measurement equipment and can perform such tests. Even aerodynamic drag or streamlining can be accounted for in dynamometer testing. If a particular car is more streamlined than the average car, EPA permits the manufacturer to submit data showing this; whereupon EPA will adjust the dynamometer setting accordingly. (See 40 C.F.R. § 85-075-15(e)(2).)

Manufacturer certification of fuel economy should not be permitted. The EPA already permits the manufacturers to conduct their own emission durability testing with selective EPA testing of the durability vehicles. In 1972, Ford Motor Company massively cheated on their emission control certification tests. Ford subsequently bought off criminal prosecution and potential jail sentences for its responsible officials by paying a seven million dollar fine with Justice Department approval. The temptation to cheat on fuel economy testing may be even greater since the consumer pays much greater attention to fuel economy than emission levels in purchasing a new vehicle.

The EPA fuel economy data should be the only fuel economy figures permitted in any industry fuel economy advertising. To permit the auto manufacturers to develop and convey their own fuel economy information on new models would exacerbate the public's confusion over fuel economy. The attached consumer complaints about two sets of national magazine advertisements are exemplary. Note that the same 2.0 liter Porsche 914 went from 23 MPG to 29 MPG between the January and February 1974 ads.

Merely listing an EPA fuel economy figure is not sufficient. The figures given must be specific versus average. The attached 1975 Chevelle ad merely refers to a 28% gain for Chevelles generally. Yet an individual purchasing a 1975 Chevelle 454 cid V-8 with automatic transmission and air conditioning would undoubtedly find a decrease in fuel economy from a 6-cylinder 1974 Chevelle with standard transmission and no air conditioning. And there should be deviations with even less contrasting options. Such printed model ads could and should include a box for fuel economy on each engine, transmission, carburetor/fuel injection and catalyst option. In this regard, published EPA fuel economy data are lacking for they do not include transmission option. Yet an automatic transmission can easily cause a 15 percent fuel penalty. The Federal Trade Commission (FTC) should insure this is furnished in future publications.

Media ads present a more difficult problem due to time and screen limitations. At the very least, such ads should include a strong request that each consumer consult the EPA fuel economy information for specific mileage data before purchasing a new car. Any specific fuel economy claim must be limited to EPA fuel economy data and include that for the specific model shown.

A crucial issue is what types of auto industry ads should include EPA fuel economy information. In a society where the motor vehicle accounts for one-third of our total consumption of scarce petroleum resources, all auto ads must include a reference

to fuel economy information. Those ads which specifically cite fuel economy or otherwise refer to the operating economy of the vehicle must supply EPA fuel economy data. Other ads which merely extol the virtues of the "Belchfire Eight" or the "Slinky Six" must contain a warning that motor vehicle require one-third of our total petroleum consumption and that consumers should consult EPA fuel economy data before purchasing a new car in order to make the best use of our petroleum resources. This positive requirement by the FTC would give a needed boost to this nation's energy conservation program and would be in full accord with the requirements of the National Environmental Policy Act of 1969.

Unless the EPA is given the legislative authority to require mandatory labeling of new motor vehicles with fuel economy stickers, the FTC should require such labeling. As the Northern California Public Interest Research Group has testified, very few dealers are showing new cars with stickers for fuel economy on them. The Michigan Public Interest Research Group conducted a survey of 44 Michigan auto dealers and found no cars with EPA labels on them. My group surveyed a small sample of eight Washington area dealers and did not find a single new car with an EPA fuel economy label. And we found only one dealer with the EPA fuel economy pamphlet which all dealers are supposed to have. Significantly, this was a Volkswagen dealer whose vehicles did rather well in the EPA fuel economy test program. (The results of this mini-survey are attached.)

In conclusion, the FTC should act quickly to make fuel economy information readily available to the public. The EPA fuel economy data should be used since they are already available and serve as a yardstick accurate enough for all practical purposes. Adoption of any other fuel economy measurement would result in needless delay. The specific FTC fuel economy information program should adequately respond to the issues discussed above.

PUBLIC INTEREST RESEARCH GROUP SURVEY
NOVEMBER 1974

Manufacturer	Dealer	Window Stickers	Phamplets
FORD	Butler Lee 1121 21st St. Wash, D.C.	no	no- didn't know about it
	Bill Bogley Lincloln-Mersury 7809 Wisconsin Bethesda, Md.	no	no-didn't know about it
GM	Capitol Cadillac 1260 22nd St. Wash, D.C.	no	no-claimed they had them but ran out
	Chevy Chase Chevrolet 7725 Wisconsin Ave. Bethesda, Md.	no	no
	Williams Chevrolet, INC. 3307 M St. Wash, D.C.	no	no
CHRYSLER	Steuart L P Inc. 1110 E.-W. Highway Chevy Chase, Md.	no	n0-didn't know what I was talking about
Volkswagon	Silver Spring Auto City 1200 E.-W. Highway Silver Spring, Md.	n0	yes
Volvo	Volvo of Washington, Inc. 4800 Wisconsin Ave. NW Washington, D. C.	no	no

22% HIGHER GAS MILEAGE: 1975 CHEVELLE.

If you're seriously looking for a mid-size car this year, this ad is written for you.

It is clear. It is informative. It is to the point.

In a time when people like yourself are comparing new car models and prices and efficiencies more carefully perhaps than ever before, Chevelle is America's favorite mid-size car.

This ad will tell you several reasons why.

801 fewer gallons of gas to go 50,000 miles.

Let's compare a 1975 Chevelle (standard 350 V8 engine) with its 1974 counterpart.

Based on Environmental Protection Agency Urban Mileage Tests, which emphasize stop-and-go city-type driving, a 1975 Chevelle using unleaded fuel with our new Chevrolet Efficiency System shows a mileage improvement of 28% compared to a '74 model using leaded fuel. Our own proving ground tests, which emphasize suburban-type driving conditions, show a mileage improvement of 22%.

Even using this lower percentage figure, this would amount to at least 801 fewer gallons of gasoline over 50,000 miles, or about four years' average use.

What you could save in fuel.

If you paid 56¢ per gallon, allowing 1¢ per gallon increase for unleaded fuel as permitted by Federal regulation, this would represent a net savings of $404 (calculations could vary, of course, higher or lower, depending on the prices of leaded and unleaded fuel in your area).

$754 less operating expense.

Again, let's compare our '74 and '75 models over a 50,000-mile period.

While parts and labor costs will vary throughout the country, we've used current list prices for parts and a figure of $11 an hour for labor and found this: If you follow the Owner's Manual for recommended service, a 1975 Chevelle could save you nearly $350 in parts, lubricants and labor over a '74 model using leaded fuel.

Now do this: Add this $350 savings to the $404 just mentioned.

And now do this: Keep that total of $754 less operating expense in mind as you consider our final few paragraphs.

A serious invitation.

We invite you, right now, to inspect and test drive a 1975 Chevelle for yourself. We mean it. There's so much more to Chevelle this year than an advertisement can communicate.

There are surer starts and smoother engine performance.

There's comfort. Room for six. Good ride. Easy handling.

There's a wide choice. Malibu Classic is our most distinctive Chevelle (shown above). Laguna Type S-3 is our sportiest Chevelle. And Malibu is once again the lowest-priced intermediate in the country. The Malibu Sedan with a six-cylinder engine is the lowest-priced four-door, at $3415.* The Malibu Coupe with six cylinders is the lowest-priced two-door, at $3420.*

Highest used car values in years.

There is one other thing you may find extremely valuable to know: the trade-in value of your own car. You see, most used car trade-in values have risen dramatically these past months. So your actual cost difference with a trade-in on a new Chevelle may be less than you think.

Chevelle. America's favorite mid-size car.

See all the reasons why, at your Chevrolet dealer's.

*Manufacturer's Suggested Retail Price, including dealer new vehicle preparation charge. Destination charges, optional equipment, state or local taxes are additional.

CHEVROLET MAKES SENSE FOR AMERICA

Chevrolet

BUSINESS WEEK 11-23-74, 89

C. G. HUMPHREY
1371 Sierra St.
Redwood City, CA 94061

2 2017

In January the gas mileage was 23 miles per gallon.

In February (due gas shortage) the same car gets 29 miles per gallon.

~~It~~ Is this the way you see it?

Mr. CG Humphrey
1371 Sierra St.
Redwood City, Calif. 94061

If you've been searching for the perfect New Year's resolution for 1974, consider this.

The new 2.0-liter Porsche 914.

It gives you all the things you thought you had to give up in a sports car.

Like comfort. There's plenty of headroom and legroom in this new 914.

And loads of luggage room. There are two trunks, front and rear, that will hold up to 15 cu. ft.

The 1974 Porsche 2.0

of anything.

And economy. The kind that delivers up to 23 miles per gallon. Which lets you travel over 350 miles on just one tank of gas.

There's a rough-tough roof that will surprise you also. If you want to bask in the sun, the roof slips off easily (in seconds) and stores in the rear trunk with room to spare.

But the feature that will surprise you the most is what this Porsche is most famous for.

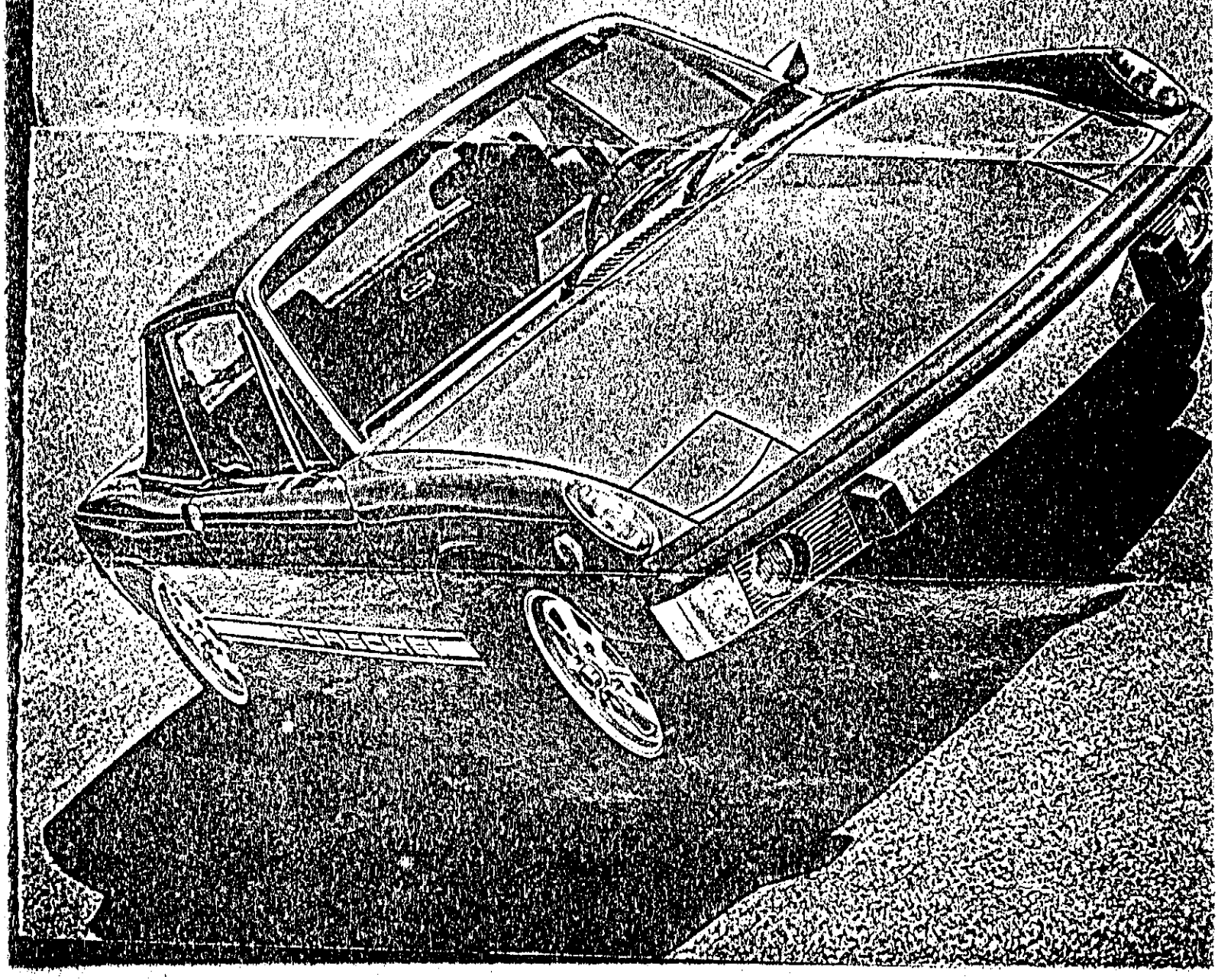
The unbelievable road balance and handling you get from its mid-engine design and rack-and-pinion steering.

There's virtually no corner or curve you can't straighten out.

And with the powerful 2.0-liter engine (that Porsche engineers took over a year and a half to develop) coupled with a 5-speed gearbox, straight roads are something to look forward to.

The 1974 Porsche 2.0.

Already, it's a very good year.



If you like the idea of having your cake and eating it too, the new 2.0-liter Porsche 914 should be very appealing.

Not only does this superbly engineered sports car get an incredible 29 miles to the gallon, but if you figure in the fuel tank capacity (16.4 gallons) you could conceivably travel from New York to Washington and back on one tank of gas!

And what's more, the gas it uses is regular, not premium.

All this economy while you're driving in style in one of the finest handling cars ever designed.

With its mid-engine balance and rack-and-pinion steering, the Porsche 914 is renowned for its cornering ability and for hugging the road.

And with the big fuel-injected 2.0-liter engine (that Porsche engineers specially developed), coupled to a five-speed gearbox, even 50 miles an hour can't take the fun out of driving.

So if you've been thinking the Porsche 914 is the right car at the wrong time, think again.

The 29 mpg Porsche

420 Stanford Hall
University of Notre Dame
Notre Dame, Indiana 46556

March 20, 1974

Gentlemen;

Enclosed are three (advertisement) pages which appeared in the March 18 (1974) issue of Newsweek magazine. Am I incorrect in assuming that such discrepancies are not only highly improbable but impossible, and if so, isn't this illegal? Who is the consumer to believe? Are such (gross) discrepancies even remotely possible? If not, who is lying, the U.S. Environmental Protection Agency, under the "auspices" of the American Honda Motor Co., Inc. or Ford? Someone is, in my mind, unquestionably guilty of FALSE advertising! This concludes yet another chapter in the unfortunate saga of consumer fraud. Thank you for your time.

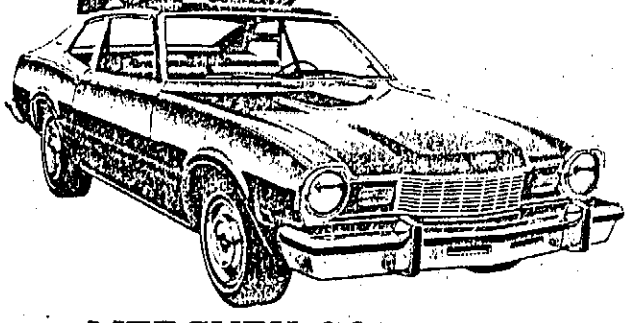
Sincerely,

Bradley Marcotte

Bradley Marcotte

(1)

26.6 MPG

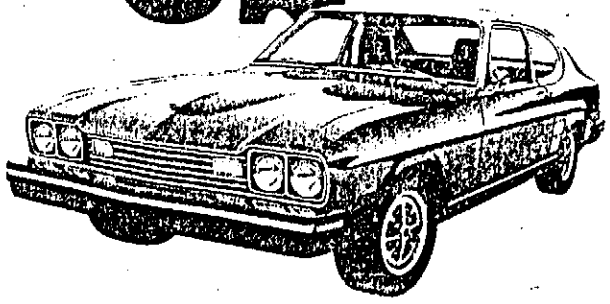


MERCURY COMET.

- Driver: Fillip Roye.
- Model: two-door sedan.
- Engine: 200 CID six-cylinder.
- Options: white sidewall tires, wheel covers, vinyl roof.

(2)

32.4 MPG



MERCURY'S CAPRI.

- Driver: Roger Rutherford.
- Model: Sport Coupe.
- Engine: 2.0 liter four-cylinder.
- Options: none.

(3)

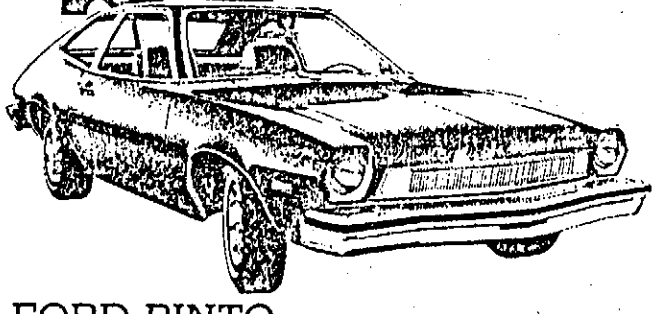
28.3 MPG

FORD MUSTANG II.

- Driver: Hugh Downs.
- Model: two-door hardtop.
- Engine: 2.3 liter four-cylinder.
- Options: white sidewall tires.

(4)

28.1 MPG

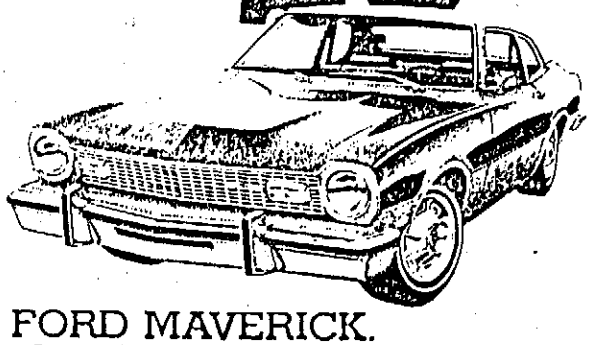


FORD PINTO.

- Driver: Mickey Sholder.
- Model: two-door sedan.
- Engine: 2.0 liter, four-cylinder.
- Options: white sidewall tires, wheel covers and Accent Group.

(5)

26.7 MPG



FORD MAVERICK.

- Driver: Jana Milo.
- Model: two-door sedan.
- Engine: 200 CID six-cylinder.
- Options: white sidewall tires, wheel covers and Exterior Decor Group.

Ford and Lincoln-Mercury dealers offer 35 different small car models and engines, 20 with sticker prices under the best-selling import model.

FORD

MERCURY LINCOLN

HONDA PRESENTS THE 1974 EPA TEST RESULTS. FOR OBVIOUS REASONS.

What you're looking at are the results of a gas mileage test performed on 1974 cars by the U.S. Environmental Protection Agency.

The test simulated an average trip under city driving conditions.

If you're in the market for a new car, we suggest you make use of these results as follows.

1. Go down the list until you find the car you're considering.

2. Compare its mileage to the car at the top of the list.

3. Then decide.

This list is being published by the makers of the car at the top of the list. Partly as a public service.

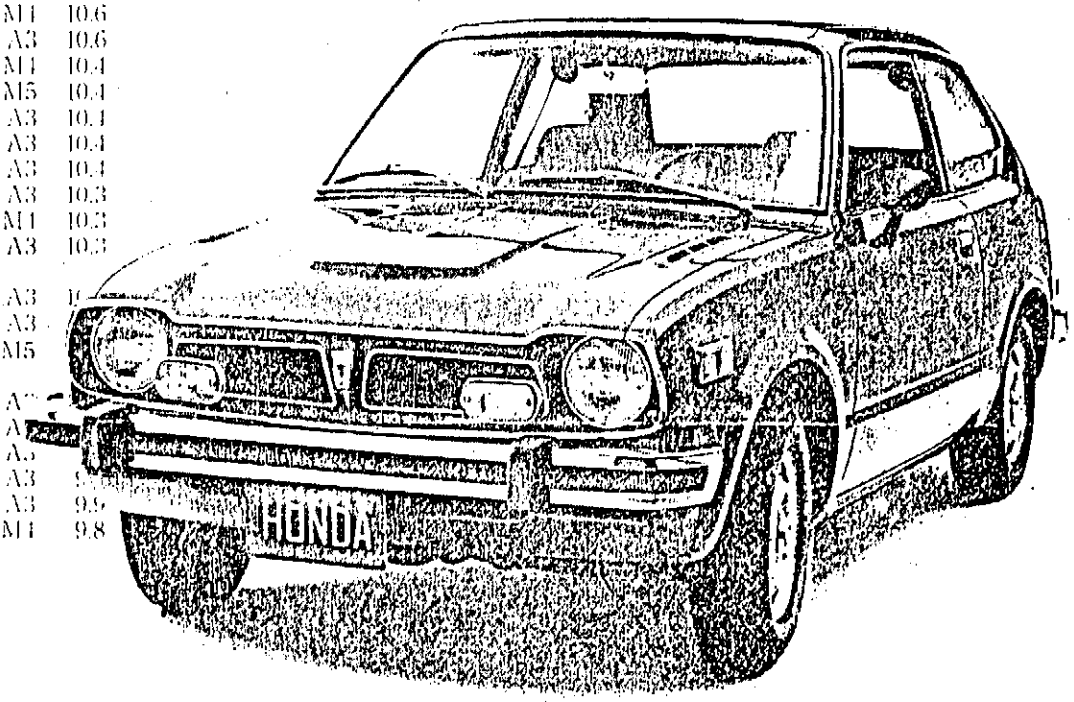
	TRANS	MPG
Honda Civic	M4	29.1
Volkswagen 412 Wagon	M4	27.9
Toyota Corolla 1200 Coupe	M4	27.1
Lotus Europa Special	M5	25.2
Datsun B210	M4	24.9
Toyota Corolla 1200 Sedan	M4	24.8
Volkswagen 412 Wagon	A3	24.6
Chevrolet Vega Hatchback	M3	24.6
Lotus Europa	M4	24.5
Volkswagen Dasher Sedan	M4	24.3
Volkswagen Dasher Wagon	A3	23.7
Volkswagen Dasher Sedan	A3	23.3
Triumph Spitfire	M4	23.1
Ford Pinto	M4	22.8
Dodge Colt Wagon	M4	22.8
Dodge Colt Coupe	A3	22.7
Subaru Wagon	M4	22.7
Toyota Corolla 1600 Sedan	M4	22.6
Volkswagen Convertible	SA	22.6
BMW 2002	A3	22.6
Dodge Colt Coupe	M4	22.5
MG Midget	M4	22.4
Datsun B210	A3	22.2
Renault 17 Gordini	M5	22.2
Renault 12 Wagon	A3	22.2
Audi Fox	M4	22.0
Dodge Colt Wagon	A3	21.9
Honda Civic	SA	21.8
Saab 97	M4	21.7
Volkswagen Karman Ghia	M4	21.7
Subaru Coupe	M4	21.7
Toyota Corolla 1600 Wagon	A3	21.1
Volkswagen 181 "Thing"	M4	21.0
Volkswagen Super Beetle	M4	20.9
Toyota Corolla 1600 Sedan	A2	20.8
Datsun 710	A3	20.7
Datsun 610	M4	20.6
Fiat X1/9	M4	20.4
BMW 2002 tii	M4	20.3
Fiat 124 Special TC	M4	20.2
Ford Mustang*	M4	20.1
Datsun 710	M4	20.0
Mazda 808 Coupe	M4	20.0
Chevrolet Vega Panel Express	M3	20.0
Chevrolet Vega Kammback	A3	20.0
Lincoln-Mercury Comet	M3	19.9
Opel Manta Rallye	M4	19.8
Lincoln-Mercury Capri	M4	19.8
Datsun 610	A3	19.8
Alfa Romeo 2000 Berlina	M5	19.7
Ford Pinto Wagon	M4	19.7
Volkswagen Kombi-22 (Microbus)	M4	19.6
Chevrolet Vega Hatchback	A3	19.6
Saab 99 LE	M4	19.4
Toyota Mark II Wagon	A3	19.4
Alfa Romeo 2000 GTV	M5	19.1
Renault 12 Sedan	A3	19.1
Porsche 911-T	M4	19.1
TVR 2500 M	M4	19.0
Volkswagen Kombi-22 (Microbus)	A3	19.0
Mazda 808 Coupe	A3	18.9
Renault 12 Sedan	M4	18.8
MGB	M4	18.7
Toyota Corona SR Sedan	M4	18.4
Toyota Corona SR Sedan	A3	18.4
Volvo 145	M4	18.4
Opel Manta	M4	18.2
Opel 1900	A3	18.2
Fiat 124 Sport Sedan	M5	18.0
Renault 15 TL Coupe	M4	17.9
Opel Manta Luxus	A3	17.9
Fiat 124 Special TC	A3	17.9
Fiat 128 Wagon	M4	17.8
Fiat 124 Wagon	A3	17.7
Porsche 914-4	M5	17.5
Renault 17 TL Coupe	M4	17.5
Volvo 142	M5	17.5
Fiat 128 Sedan	M4	17.4
Chevrolet Vega Hatchback	M4	17.4
Ford Mustang*	M4	17.2
Porsche 911 S	M5	17.2
Ford Pinto*	A3	17.1
Peugeot 504 Sedan	A3	17.0
Volvo 144	A3	17.0
Ford Mustang*	A3	16.9
Lincoln-Mercury Capri	A3	16.9
Porsche 911 S	SA	16.9
Triumph TR-6	M4	16.9
Peugeot 504 Sedan	M4	16.8
Plymouth Valiant Duster	A3	16.7
Ford Maverick	A3	16.7
Ford Pinto Wagon	A3	16.6
MGB/GT	M4	16.3
Datsun 260Z	M4	16.2
Porsche 911 T	M5	16.1
Audi 100	M4	16.1
Saab 99 LE	A3	16.1
Fiat 124 Sport Coupe	M5	16.0
Dodge Dart	A3	16.0
AMC Gremlin	A3	15.9
Datsun 260Z	A3	15.8
Chevrolet Nova Hatchback	A3	15.7
AMC Gremlin	M3	15.6
Ford Maverick	A3	15.6
Lincoln-Mercury Comet	A3	15.5
AMC Hornet Sportabout	A3	15.5
Chevrolet Vega Panel Express	M4	15.4
Toyota Mark II Sedan	A3	15.4
Toyota Mark II Wagon	A3	15.2
Toyota Mark II Sedan	M4	15.2
Chevrolet Nova Hatchback	A3	15.2
AMC Hornet Sedan	A3	14.7
Volvo 164	A3	14.5
Mercedes Benz 230	A4	14.3
Mercedes Benz 280	A4	14.1
Ford Torino	A3	14.0
BMW Bavaria	M4	13.8

Checker Sedan	A3	13.8
Volvo 164	M5	13.1
AMC Gremlin	M4	13.2
AMC Javelin	M3	13.2
BMW Bavaria	A3	12.7
Plymouth Valiant Duster	M3	12.5
AMC Matador	A3	12.4
AMC Matador Wagon	A3	12.3
AMC Javelin	A3	12.1
Citroen SM	A4	11.9
Plymouth Satellite	M4	11.8
AMC Hornet	M3	11.7
Plymouth Satellite	A3	11.6
Maserati Bora	M5	11.6
Ford Torino Wagon	A3	11.4
Lincoln-Mercury Montego Wagon	A3	11.4
Citroen SM	M5	11.2
Avanti Coupe	A3	11.0
Chevrolet Impala Sports Sedan	A3	11.0
Lincoln-Mercury Montego	M3	11.0
AMC Javelin	M4	10.8
AMC Ambassador	A3	10.8
Mazda RX 3 Wagon	M4	10.8
Ford	A3	10.7
Mazda RX 3 Coupe	A3	10.7
Mazda RX 2 Coupe	M4	10.6
Mercedes Benz 450	A3	10.6
Mazda RX 4 Wagon	M4	10.4
Ford Pantera	M5	10.4
Buick Century 350	A3	10.4
Buick LeSabre	A3	10.4
Cadillac Eldorado	A3	10.4
Mazda RX 4 Coupe	A3	10.3
Jaguar E Type V-12	M4	10.3
Oldsmobile Cutlass	A3	10.3
Chevrolet Impala Custom Coupe	A3	10
Pontiac Trans Am	A3	
Ferrari Dino 246 GT	M5	
Chevrolet Impala Estate Wagon	A	
Pontiac Ventura	A	
Lincoln-Mercury Montego	A	
Chevrolet Malibu Classic	A3	9
Pontiac LeMans	A3	9.9
Ford Torino	M4	9.8
Buick Century Wagon	A3	9.7
Jaguar E Type V-12	A3	9.7
Buick Estate Wagon	A3	9.6
Chevrolet Caprice Wagon	A3	9.6
Lincoln-Mercury Cougar	A3	9.5
Ford Wagon	A3	9.5
Oldsmobile Cutlass Supreme	A3	9.5
Pontiac LeMans	M4	9.4
Rolls Royce Silver Shadow	A3	9.3
Pontiac Catalina	A3	9.2
Pontiac LeMans	A3	9.2
Buick Grand Sport	A3	9.1
Chrysler	A3	9.1
Oldsmobile Delta 88 Royal	A3	9.0
Pontiac Ventura GTO	A3	8.9
Pontiac Ventura GTO	M4	8.9
Chrysler Wagon	A3	8.9
Plymouth Fury Wagon	A3	8.9
Cadillac DeVille	A3	8.9
Buick Regal	A3	8.8
Pontiac Grand Am	A3	8.8
Chevrolet Caprice Classic	A3	8.8
Oldsmobile Vista Cruiser	A3	8.7
Cadillac Fleetwood	A3	8.7
Pontiac Trans Am	M4	8.6
Pontiac LeMans Safari	A3	8.6
Excalibur II	A3	8.5
Dodge Sport Wagon	A3	8.5
Pontiac Grand Safari	A3	8.4
Oldsmobile Toronado	A3	8.3
Buick Electra 225	A3	8.3
Pontiac Catalina Safari	A3	8.3
Jensen Interceptor	A3	8.2
Pontiac Grand Ville	A3	8.1
Mercury Wagon	A3	8.1
Lincoln Continental	A3	7.9
Maserati 120	M5	7.8
Pontiac Bonneville	A3	7.8
Chevrolet Chevelle Laguna	M4	7.6
Oldsmobile 98 Regency	A3	7.6
Oldsmobile Delta 88 Wagon	A3	7.6
Lamborghini Jarama	M5	7.3
Lamborghini Espada	M5	7.2
Ferrari 365 GTB-4	M5	6.5

In transmission listings, A is automatic and M is manual, i.e. A3 is a three speed automatic and M4 is a four-speed manual. SA is semi automatic.

Where two or more cars of the same make, model and transmission were tested, we have listed the best mileage figure recorded for that model, regardless of variances in weight, engine size and axle ratio.

Data is based on information available as of Feb. 19, 1974.



The Honda Civic. More miles per gallon than anybody.