April 19, 2013

Robert Perciasepe
Acting Administrator
U.S. Environmental Protection Agency
Mail code: 4101M
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Subject: Request for an Extension of the Public Comment Period on EPA’s Proposal for Tier 3
EPA-HQ-OAR-2011-0135

Dear Mr. Perciasepe:

As you know, the Agency released a proposal for Tier 3 motor vehicle and fuel standards on March 29, 2013. This proposal has not yet been published in the Federal Register.

In a hearing notice published in the Federal Register on April 8, 2013, EPA announced that the public comment period would end on June 13, 2013. The length of this comment period is inadequate for a broad technical rulemaking such as this, especially one that includes diverse topics of vehicle emissions standards, fuel standards and the distinct unrelated issue of Performance Based Measurement System. Each of these issues requires different technical expertise to analyze.

The docket was opened on April 15. There are over 600 documents now in the Tier 3 docket in the Supporting and Related Material category. It is virtually impossible to review and analyze this volume of supporting technical information in the time allotted for public comment. Accordingly, we request additional time to prepare informed comments on the proposal.

AFPM requests that the public comment period be extended to 90 days after publication of the proposal in the Federal Register.

Sincerely,

Richard S. Moskowitz

cc: G. McCarthy
    C. Grundler
    P. Machiele