



November 30, 2011

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1200 Pennsylvania Ave. NW
Washington, DC 20460 (also via fax)

Director Margo T. Oge
EPA Office of Transportation and Air Quality
1200 Pennsylvania Ave. NW 20460
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Deputy Director Chris Grundler
EPA National Vehicle and Emissions Laboratory
2000 Traverwood Drive
Ann Arbor, MI 48105 (also via fax)

RE: EPA MPG for 2011, 2012 Hyundai Elantra, request for re-test

Dear Ms. Jackson, Ms. Oge and Mr. Grundler,

We admire the success of this administration and your agency in achieving consensus on substantially improved automotive fleet MPG, after years of inaction by previous administrations. Your action has resulted in the active marketing of new models based on high MPG, a market response that comports with the EPA's aims.

As the holiday season commences, automakers are touting discounts and year-end deals; record-high gasoline prices for the season will make MPG a significant part of their red-bow advertising. Consumers will actively count MPG in their calculation of a holiday deal, for both pocketbook and air quality reasons.

This makes the accuracy of EPA MPG estimates all the more important, to prevent any maker from marketing autos on a stated city or highway MPG that substantially misstates the result that drivers will get on the road. In general, the new EPA MPG estimates seem to comport closely to real-world results. For instance, driver reports to the EPA on the last few model years of the Honda Civic show average on-road results about 2 mpg above the EPA estimate. The same is true for the Toyota Corolla. (The two models cited are among the few that had enough reports to be credible for a single model).

Overall, the EPA estimates and on-road results for gasoline engines are quite close in tests by enthusiast magazines. The general lack of discrepancies is very good news,

However, a notable exception to this rule has caught the attention of Consumer Watchdog. For the two most recent model years, Hyundai Motors has actively marketed its base models of the Elantra on their very high 29/40 MPG, and 33 MPG average, leaving a trail of disappointed drivers. An Edmunds online Town Hall

discussion on the Elantra attracted scores of drivers who can't, no matter how hard they try, duplicate such numbers.

One very public example of this was USA Today tech writer Jefferson Graham, whose Sept. 22 article on his new Elantra expressed his disappointment that he averaged only 22 MPG, a gap that no "break-in" period seems likely to fill.

Additionally, while Motor Trend named the 2011 Elantra Car of the Year in its class, the magazine's on-road testers achieved only a very disappointing 25.9 MPG average [ED: corrected from 26.5], bad enough to get special note in the review. Consumers Union found similar fault in with the 2012 Elantra, a redesign. While CU's highway mileage was 39, its city mileage, with experienced drivers who know how to drive a low-mileage auto, was only 20 MPG--very far from the listed 29 MPG.

Elantra drivers reporting their Elantra MPG to the EPA (there were 18 reports, an unusually high number, for the 2012 model), found they averaged only 28.9.5 MPG, also far from 33.

Consumers are increasingly buying new and used cars on the basis of their fuel economy, which makes significant discrepancies in listed and real mileage an important consumer issue. The Elantra's MPG discrepancies appear to be far more serious than those of similar models by other makers, disappointing and angering buyers who can't reach the listed MPG no matter how gently they try to drive.

Consumer Watchdog requests that the EPA re-test the 2011 and 2012 Elantra models in its own facility, to seek an explanation for the MPG disappointments of so many Elantra buyers. For instance, was Hyundai's own testing overly reliant on its low-power ECO mode (Which could be dangerous for drivers trying to enter a freeway, pass another driver or stay with traffic in hilly areas)? If so, do other makers with similar low-power modes test their cars in identical fashion? If not, that would make the Elantra's MPG claims deceptive.

What consumers need when buying a car is full and accurate information. Hyundai and other makers actively trade on the EPA's seal of approval when marketing their cars, and any manipulation or errors in MPG tests can only harm the EPA's reputation.

If your re-testing finds the Elantra's manufacturer testing inaccurate even by a few MPG we ask that you assess a substantial penalty on the manufacturer, including fines, notification to buyers of its recent Elantra models and rebates that cover drivers' added cost of fuel for average yearly miles driven.

Gasoline prices remain at record high levels for this season, making efficiency a top purchasing issue for consumers. Neither Hyundai for any other car company should be allowed to misrepresent its efficiency standards or dupe consumers into buying its cars. We ask you, through prompt re-testing and action as needed, to send a message to the company and the auto industry that MPG misrepresentation will not be tolerated.

Sincerely,



Jamie Court



Judy Dugan