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**Alliance of Automobile Manufacturers**  
**Comments to the**  
**FTC Fuel Economy Consumer Study, Project No. P134202**  
**79 FR 62618**  
**November 19, 2014**

The Alliance of Automobile Manufacturers (Alliance) is a trade association of twelve car and light truck manufacturers comprised of BMW Group, Chrysler Group LLC, Ford Motor Company, General Motors Company, Jaguar Land Rover, Mazda, Mercedes-Benz USA, Mitsubishi Motors, Porsche Cars, Toyota, Volkswagen Group and Volvo Cars. Together, Alliance members account for roughly three out of every four new vehicles sold in the U.S. each year. Auto manufacturing is a cornerstone of the U.S. economy, supporting eight million private-sector jobs, \$500 billion in annual compensation, and \$70 billion in personal income-tax revenues.

The Alliance appreciates the opportunity to offer comments on the Federal Trade Commission's (FTC's) proposed information collection activities in connection with its review of the Guide Concerning Fuel Economy Advertising for New Automobiles (Guide). In July 2014, the Alliance submitted comments on the FTC's proposed modifications to the Guide. Following up on those comments, we would like to offer our thoughts regarding the proposed consumer research study.

In general, the Alliance supports the collection of information that will help us better understand how consumers perceive fuel economy advertising. Information of this nature can help the industry ensure that the fuel-economy related statements in its advertisements are as straightforward, informative and helpful to consumers as possible. Of course, in order to be

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useful, it is critical that the information be as reliable as possible. The study must accurately capture the collective views of auto-buying consumers, which is the population that the Guide was developed to protect.

The Federal Register notice (Notice) indicates that the FTC expects approximately a 50% response rate for an Internet survey that requires about 20 minutes to complete. While this is certainly a possible outcome, we are somewhat surprised at this projected response rate. In market research conducted by the auto industry, we often encounter response rates of 25% or less for surveys and other consumer research activities that are less time-consuming than this one. A large percentage of consumers avoid surveys altogether, and many others will participate only if it involves a few minutes of their time. We recommend that the FTC be prepared for the possibility that the response rate is substantially lower than projected, and consider the possible impacts on the validity of the study if that turns out to be the case.

In conducting a survey such as this, it is important that the questionnaire be properly designed to be understandable to the target population, and worded in a way that avoids skewed or biased responses. While the Notice indicates that there will be a pretest with approximately 100 respondents, in our experience it is often necessary to go through several iterations of a questionnaire in order to weed out biases and problems from survey questions. It is also important that the sampling methodology be carried out so as to capture a representative cross-section of the auto-buying public, without significantly over-representing or under-representing different segments of that population. The Notice indicates that “Participants will be drawn from an Internet panel maintained by a commercial firm,” but it does not elaborate on the nature of that panel or the sampling methodology used to select respondents from that panel. To the extent that the FTC would be willing to make available to the public advance copies of its proposed questionnaire, and/or additional details on its sampling methodology, the Alliance and its members would be willing to review the material promptly and share our thoughts based on the industry’s expertise in market research.

Finally, once the study is completed, we strongly urge the FTC to make available to the public not just a summary of the results, but also the raw data generated by the study, including the actual questionnaire responses and related consumer data (edited as necessary to avoid any

privacy concerns). The raw data may contain information that is useful to manufacturers and others, and it may lend itself to various kinds of analyses beyond those undertaken by the FTC. Since the study is being funded by the public, it only makes sense to make the data available to members of the public who may have an interest in the details.

The Alliance appreciates the FTC's consideration of these comments. Please feel free to contact me if you have any questions about the Alliance's position or would like to discuss any aspect of these comments.

Sincerely,

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