



**Consumer Federation of America**



**The Center for  
Auto Safety**

July 28, 2016

Office of the Secretary  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Suite CC-5610 (Annex B)  
Washington, DC 20580

Re: Fuel Economy Guide Amendments (R711008), Request for Extension to File  
Comments

Dear Sir or Madam:

The Center for Auto Safety (CAS) and the Consumer Federation of America (CFA) request that the Commission extend the deadline for filing comments in the above matter be extended from August 8, 2016 to September 7, 2016, a 30 day extension.

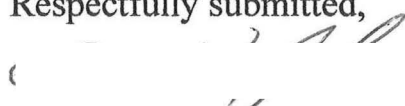
On July 20, 2016, the undersigned informed Division of Enforcement Attorney Hampton Newsome that consumer groups were pursuing performing their own study to introduce key extrinsic evidence in this matter, and therefore might be requesting an extension to the comment deadline. Funding for the study had not yet been obtained so CAS and CFA did not want to request an extension until they were certain a study would happen. Funding has been made available and it was thought that the study was sufficiently focused that results could be obtained quickly enough to be included in comments to be filed by the original August 8, deadline. Yesterday was a key deadline if the study was to be completed in time; unfortunately, CAS and CFA were unable to meet that deadline.

CAS and CFA are confident the study will be completed in plenty of time for results to be incorporated in comments to be filed by September 7, 2016. The Commission has recognized the importance of extrinsic evidence in this matter by

contracting for its own study, the results of which are included in the docket and discussed in the Federal Register notice. CAS and CFA believe the results of their study will produce additional important extrinsic evidence that needs to be considered in this matter. We apologize for requesting the extension at this late date but didn't want to request the extension unless absolutely necessary. As of yesterday, the extension became necessary and we have moved as quickly as possible to file this request.

CAS and CFA would very much appreciate the granting of this request.

Respectfully submitted,

  
Evan W. Johnson  
Counsel for CAS and CFA