

Manufacturer Comments and EPA Responses on Verify Documentation

Document	Assumptions	Comment	Response
Confirmatory Test Data Requirements		Timing of data is a major issue. Can the LOD section be filled from the VI section of VERIFY or does EPA intend to receive each VI section with the test data submission?	The intention is that the mfr will have entered the basic vehicle information used in the TDI section prior to TDI. If the Cert Rep decides to test, then the remaining 'LOD' information will be entered by the mfr.
Confirmatory Test Data Requirements		Manufacturers must be able to download TDI/LOD for a given configuration especially if the EPA browser input form is used for the TDI and a batch process is used for the LOD	Manufacturers will be able to enter all data via batch mode, machine-to-machine, or web browser
Confirmatory Test Data Requirements	My assumption is that the 28 questions in the Test Decision Info(TDI) section represent the equivalent of the existing test waiver now faxed to EPA, while the Supplemental (LOD) Test vehicle Info represents questions now found in the VI section of CFEIS.	Section 5.11.2 Must include an option to send the manufacturer some form of XML along with the confirmatory report. This will allow the manufacturer to readily store the confirmatory results in the local manufacturer database for use in other processes.	EPA didn't include this in any of the process models. If it's a requirement, then EPA need to modify them.
Confirmatory Test Data Elements		Vehicle Configuration # - Is this the same as the current EPA Version number for a vehicle? Or does it identify a unique set of data? For example, is a city test one Vehicle Configuration number, and a US06 test for the same vehicle then another Vehicle Configuration number ? Is this an indicator of a unique set of data ?	There is no 'EPA Version Number' in CFEIS. There is instead a 'Vehicle Configuration #'. The manufacturer code plus the vehicle ID plus the vehicle configuration # identifies a unique vehicle configuration. That unique vehicle configuration can be used for different test procedures just as it's done now in CFEIS.
Confirmatory Test Data Elements		Test Vehicle Make - The vehicle make is not normally a consideration when determining if a confirmatory test should be run. Suggest that this data element be eliminated.	This has been done.
Confirmatory Test Data Elements		Carline Name - Please clarify. Is this the Carline Name of the actual vehicle for which a confirmatory test decision is requested, or is this the Carline Name of the representative vehicle ?	This field has been renamed to 'Vehicle Model (Carline)' and should be used to describe the represented carline/model of the test vehicle. It is a text field and therefore will not be tied to carlines (via carline code) that'll be entered for certification or fuel economy.

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Confirmatory Test Data Elements		Driver selectable transmission? - This data element is typically required when performing an actual test. It is not normally a consideration when deciding if a confirmatory test should be run. Suggest that this data element be included with the Supplemental (LOD) Test Vehicle Info data below.	This data element has been moved to the Supplemental Test Vehicle Info.
Confirmatory Test Data Elements		Transmission mode tested description - This data element is typically required when performing an actual test. It is not normally a consideration when deciding if a confirmatory test should be run. Suggest that this data element be included with the Supplemental (LOD) Test Vehicle Info data below.	This data element is part of the Supplemental Test Vehicle Info.
Confirmatory Test Data Elements		Manufacturer test procedures used - Please clarify. If multiple test procedures are indicated, how are other data elements such as 'Emissions > 90% of standard' entered? The answer to 'Emissions > 90% of standard' may apply to only one of the multiple tests listed in this data element.	The questions must be entered for each test procedure originally conducted by the manufacturer.
Confirmatory Test Data Elements		Failed an emission test? - Please clarify. Does this apply to the specific test for which a confirmatory test decision is requested, or does it apply to any one of all of the emission tests run for the vehicle.	This question applies to any of the tests conducted by the manufacturer which are referenced on the test waiver form.
Confirmatory Test Data Elements		Drive code - Suggest that an option for all wheel drive be included.	EPA will add a field for left or right steering wheel location and harmonize the drive code descriptions with the corresponding field in the certification data elements spreadsheet.
Confirmatory Test Data Elements		Model code - Suggest that this data element be eliminated. It is not needed when running a vehicle test.	Manufacturers will no longer have to enter a value for Model code.
Confirmatory Test Data Elements		Test procedure code - Please clarify. Will only one Test procedure code be allowed per set of Supplemental (LOD) Test Vehicle info? If yes, then the same Supplemental (LOD) Test Vehicle information will need to be submitted multiple times; one for each test procedure. Suggest that multiple Test procedure codes be permitted to eliminate the redundant submission of data providing the data is the same for all Test procedures.	Multiple test procedures will be allowed. LOD Information that applies to all test procedures will be entered once, LOD Information that can be different for different test procedures will be entered repeatedly for as many test procedures as required.

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Confirmatory Test Data Elements		Test purpose code - Suggest that this data element be eliminated. It is not needed when preparing a vehicle for testing.	EPA is still discussing whether this field should be deleted.
Confirmatory Test Data Elements		Nominal main tank capacity - Please clarify. Is this the Nominal main tank capacity of the actual vehicle for which a confirmatory test decision is requested, or is this the Nominal main tank capacity of the representative vehicle ? This data element could be replaced by an indication of how much fuel to put in the vehicle to run a test.	This is the nominal main fuel tank capacity of the test vehicle.
Confirmatory Test Data Elements		Nominal auxiliary tank capacity - Please clarify. Is this the Nominal auxiliary tank capacity of the actual vehicle for which a confirmatory test decision is requested, or is this the Nominal auxiliary tank capacity of the representative vehicle ?	This is the nominal auxiliary tank capacity of the test vehicle.
Confirmatory Test Data Elements		Target Coastdown Time - This data element is considered to be obsolete. Suggest that it be removed.	This is an optional field. Mfr's don't need to enter data.
Confirmatory Test Data Elements		Canister(s) working capacity - Will units be needed ?	The canister hydrocarbon working capacity is entered in grams.
Confirmatory Test Data Elements		Vehicle side cooling fan - Suggest that this not be defined as a separate data element. Rather, an option to indicate side cooling fan should be included in the Fan Placement Code above.	Additional vehicle cooling (including side fans) is being added as a separate data element.
Confirmatory Test Data Elements		Wheel base - Please clarify. Is this the Wheel base of the actual vehicle for which a confirmatory test decision is requested, or is this the Wheel base of the representative vehicle ?	This is the wheelbase for the actual test vehicle.

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Document	Field	Comments	EPA Responses
Fuel Economy Data Requirements - CAFÉ	(General Comment)	GM noticed that there are many data elements that appear to indicate that the EPA intends to re-calculate mile-per-gallon (MPG) values. GM believes that the EPA should accept mpg values as calculated by the manufacturer, and as needed, audit these calculations. This is a point that has been previously suggested.	With increasing attention on fuel economy and potential changes to fuel economy regulations in a foreseeable future, CISC has decided not to make any significant data requirement changes at this time. EPA's capability to do calculation is also needed to maintain a level playing field, to do necessary audits and to help SVMs who rely on CFEIS/VERIFY to do their calculations.
Fuel Economy Data Requirements - CAFÉ	(General Comment)	GM would also like to express concern that the lead time for developing an XML interface to the new VERIFY system is diminishing, however, XML schemas are not yet available. GM requests that the EPA announce when these XML schemas will be published.	EPA will work with all mfrs to set up a realistic date.
Fuel Economy Data Requirements - CAFÉ	Average FE Unadjusted, 4 Decimal	<p>1. GM believes this value should be 1.2 thru model year 2010, then 0.9 thereafter.</p> <p>2. What provision is there for other credits such as Test Procedure Adjustments (TPA)?</p>	<p>1) Agree, change will be made.</p> <p>2) TPA credit, calculated per 600.510-93(c), is included.</p>

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Fuel Economy Data Requirements - CAFÉ	CAFE type indicator	1. Row 22, CAFE Type indicator - the 2008 - 2011 LDT CAFE rulemaking sets the unrefined and refined standards, not the 2005 Energy Bill.	<p>1. Agree. Comment accepted.</p> <p>2, 4, 5, 6, 7, 8: Comments noted. The final requirements will be determined by the final regulations.</p> <p>3. Current regulations 600.512-86c(7) and 600.002-93(32) defines the production volume requirement. By policy, EPA allows mfrs to exclude the units that are produced but not saleable/sold. For the reformed CAFE data requirement, EPA will be consistent with the final regulation.</p> <p>9. No, it is not GVWR. GVW is kinda curb wt + payload. EPA will be consistent with the definition in NHTSA's final regulation.</p>
Fuel Economy Data Requirements - CAFÉ	NHTSA truck class	2. Is there a need to identify the model for which data is submitted here? For example, carline code and body style?	
Fuel Economy Data Requirements - CAFÉ	Production units	3. Row 24, Production units - We do not report units that are produced but not saleable/sold (i.e., test units that are scrapped).	
Fuel Economy Data Requirements - CAFÉ	Wheelbase (inches)	4. Row 25, Wheelbase - the wheelbase definition is not the same as NHTSA's. It would be better to say "Enter according to NHTSA's definition" as in row 29.	
Fuel Economy Data Requirements - CAFÉ	Front Width (inches)	5. Row 26, Front width - Why is there a note to enter zero if there's only one front wheel? Those units would not be in CAFE.	
Fuel Economy Data Requirements - CAFÉ	Rear Width (inches)	6. Row 26/27, Front and Rear Width - the Help Description definition of the width is wrong. It would be better to say "Enter according to NHTSA's definition" as in row 29.	
Fuel Economy Data Requirements - CAFÉ	Truck, Pay Load (lbs)	7. Row 25-27, Wheelbase, Front Width and Rear Width - We do not agree with reporting to the nearest hundredth of an inch. External/marketing/media reporting is currently to the nearest tenth. CAD data can vary in the hundredth decimal b	
Fuel Economy Data Requirements - CAFÉ	Vehicle footprint	8. Row 28, Truck Payload - Why is payload needed? It is not is not determined on the subconfiguration level. This information would be better supplied on a higher level.	
Fuel Economy Data Requirements - CAFÉ		9. GM would like clarification of this data element. Is this GVWR ?	

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Fuel Economy Data Requirements - CAFÉ	Model Type Index (Index Number)	Row 25, Wheelbase - the wheelbase definition is not the same as NHTSA's. It would be better to say "Enter according to NHTSA's definition" as in row 29.	
Fuel Economy Data Requirements - CAFÉ	Mfr code	This data element appears to be redundant unless it will be used when a manufacturer is reporting data for another manufacture. GM assumes that this is why this data element is here. Otherwise its redundant.	GM's assumption is correct. Mfr code is used for identifying the manufacturer of a specific model type which can be different from the submitting mfr. EPA will add the clarification in the help menu.
Fuel Economy Data Requirements - CAFÉ	Abbreviated Model name	We always used the same "short" and "long" carline names	Verify will require all mfrs to do so.
Fuel Economy Data Requirements - CAFÉ	Transmission Type	This is a better method for defining transmission class	Acknowledged.
Fuel Economy Data Requirements - CAFÉ	Transmission Class Link		Acknowledged.
Fuel Economy Data Requirements - CAFÉ	Transmission Type		Acknowledged.
Fuel Economy Data Requirements - CAFÉ	Transmission Type Other Description		Acknowledged.
Fuel Economy Data Requirements - CAFÉ	Total Number of Transmission Gears		Acknowledged.
Fuel Economy Data Requirements - CAFÉ	Transmission Lock-Up		Acknowledged.
Fuel Economy Data Requirements - CAFÉ	Transmission Creeper Gear		Acknowledged.

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Fuel Economy Data Requirements - CAFÉ	Drive System	<p>1. Is part-time 4wd a transmission class separate from full-time 4wd or AWD?</p> <p>2. What is the rationale for requesting this data?</p> <p>3. Row 47, Drive System - What is the difference between 4 wheel drive, part-time 4 wheel drive, and all wheel drive? We'd like better definitions so that we could set up our database appropriately.</p> <p>4. GM would like clarification of full time 4 wheel drive versus part time 4 wheel drive versus all wheel drive. What is the specific definition of each value in this data element ?</p>	<p>1, 3 and 4: EPA will be consistent with SAE J1930. The data requirement will be the same as for Certification. A4WD = Automatic 4-wheel Drive F4WD = Full time 4-wheel Drive (All Wheel Drive) S4WD = Selectable 4-wheel Drive (Part-time 4-wheel Drive) F = 2-wheel Drive, front R = 2-wheel drive, rear</p> <p>2. Mfrs may optionally subdivide carlines based on the drive system. "Drive System" is a car-line determination (ref: A/C 89). EPA expect fuel economy differences depending on type of the drive system. For example, F4WD vehicles may have different MPG than A4WD or S4WD vehicles.</p>
Fuel Economy Data Requirements - CAFÉ	Engine management System (Stop/Start engine device)	Why the (Stop/Start engine device) in brackets, when the Field is directly related to the question of the fitment of an EMS driven stop start device? Remove the brackets to make the statement true.	EPA agrees. EPA will delete the parentheses
Fuel Economy Data Requirements - CAFÉ	Carline-Model Link Code	GM would like clarification of the purpose and scope of this data element.	This element is designed to automatically populate all the CAFE Model Type elements if the identical information is previously entered for the General Label. Codes are model year specific.
Fuel Economy Data Requirements - CAFÉ	Engine Displacement (Liters)	Is this consistent with NHTSA ? NHTSA requires displacement in cubic inches	Using "liters" is consistent with the General Label and Fuel Economy Guide requirements. EPA will discuss with NHTSA.
Fuel Economy Data Requirements - CAFÉ	Power Source	Row 65, Power Source - Why not add a fuel cell option, instead of coupling it with electric?	EPA will change the name of this element to "drive source" to be more clear. Fuel cell is one of the "fuel usage" elements which provide energy to drive source
Fuel Economy Data Requirements - CAFÉ	Vehicle Fuel Category	Row 77, Vehicle Fuel Category - What is the difference between a dual fuel and a bi-fuel? We'd like better definitions so that we could set up our database appropriately.	EPA will delete "Bi-fuel".
Fuel Economy Data Requirements - CAFÉ	Fuel Usage	What goes here for dual fuel or flex fuel vehicles? For hybrid?	You may choose an appropriate first fuel then use a button (on the web) called "add another fuel usage" to entry the second fuel in these cases. Similar mechanisms will also be build to allow entering 2nd fuel usage for data transferred through batch file.
Fuel Economy Data Requirements - CAFÉ	Unadj&Unround City MPG	Is data element required for 'unreformed' cafe only ? If it's required for 'reformed' cafe, then manufacturers will need to do an extra and unnecessary calculation.	Comment noted. The final requirements will be determined by the final regulations for 'reformed'.
Fuel Economy Data Requirements - CAFÉ	Unadj&Unround Hwy MPG		
Fuel Economy Data Requirements - CAFÉ	Unadj&Unround comb MPG		
Fuel Economy Data Requirements - CAFÉ	Transmission configuration code	<p>1. Could this value be alpha-numeric (A-Z,0-9) rather than strictly alpha? That would match Chrysler Group internal coding.</p> <p>2. How is this data element associated to the model transmission class index ?</p>	<p>1. Agree and accepted. EPA will allow this element to be alpha-numeric.</p> <p>2.Each transmission class will have one or more transmission configurations. A unique code should be assigned by mfr to each transmission configuration.</p>

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Fuel Economy Data Requirements - CAFÉ	Gear-Range-Number	<p>1. A good decision to remove. This data was difficult to compile, and provides little benefit.</p> <p>2. GM noticed that the basic definition of an 'index' in the CAFE data appears to have been changed. Previously an index could contain multiple transmission configurations. The new structure for CAFE data elements will require that each transmission configuration be in its own index. This will result in less flexibility for the manufacturer and may result in more CAFE data being prepared by the manufacturer and more data that may need to be processed by the VERIFY system.</p>	<p>1. Comment acknowledged.</p> <p>2. No, the definition has not been changed. The new VERIFY reduces the data entry for mfrs by allowing mfr to specify a unique code to represent a unique transmission configuration.</p>
Fuel Economy Data Requirements - CAFÉ	Gear-Ratio-First		
Fuel Economy Data Requirements - CAFÉ	Gear-Ratio-Second		
Fuel Economy Data Requirements - CAFÉ	Gear-Ratio-Third		
Fuel Economy Data Requirements - CAFÉ	Gear-Ratio-Fourth		
Fuel Economy Data Requirements - CAFÉ	Gear-Ratio-Fifth		
Fuel Economy Data Requirements - CAFÉ	Gear-Ratio-Sixth		
Fuel Economy Data Requirements - CAFÉ	Lockup-Range-Number		
Fuel Economy Data Requirements - CAFÉ	Lockup-RPM-First		
Fuel Economy Data Requirements - CAFÉ	Lockup-RPM-Second		
Fuel Economy Data Requirements - CAFÉ	Lockup-RPM-Third		
Fuel Economy Data Requirements - CAFÉ	Lockup-RPM-Fourth		
Fuel Economy Data Requirements - CAFÉ	Lockup-RPM-Fifth		
Fuel Economy Data Requirements - CAFÉ	Lockup-RPM-Sixth		
Fuel Economy Data Requirements - CAFÉ	RPM-at-Lockup-#		
Fuel Economy Data Requirements - CAFÉ	Lockup-Override		

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Fuel Economy Data Requirements - CAFÉ	Test Procedure City Highway Indicator	Row 142, Test Procedure - Why would the US06, SC03, and Cold CO test results be needed? We've been told that those were not going to be part of CAFE.	Comment noted. The final requirements will be determined by the final regulations.
Fuel Economy Data Requirements - CAFÉ	(General Comment)	GM noticed that there are many data elements that appear to indicate that the EPA intends to re-calculate mile-per-gallon (MPG) values. GM believes that the EPA should accept mpg values as calculated by the manufacturer, and as needed, audit these calculations. This is a point that has been previously suggested.	With increasing attention on fuel economy and the potential regulation changes in a foreseeable future, EPA decides to not make any significant data requirement changes at this time. In addition, EPA's computer capability to do calculation is needed to maintain a level playing field, to do necessary audits and to help SVMs who rely on CFEIS/VERIFY to do their calculations.
Fuel Economy Data Requirements - CAFÉ	(General Comment)	GM would also like to express concern that the lead time for developing an XML interface to the new VERIFY system is diminishing, however, XML schemas are not yet available. GM requests that the EPA announce when these XML schemas will be published.	EPA will work with all mfrs to set up a realistic date.

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Document	Field	Comments	EPA Response
Fuel Economy Data Requirements - General Label	Abbreviated Model name	We always used the same "short" and "long" carline names	Acknowledged
Fuel Economy Data Requirements - General Label	Transmission Type	This is a better method for defining transmission class	Acknowledged
Fuel Economy Data Requirements - General Label	Transmission Class Link		Acknowledged
Fuel Economy Data Requirements - General Label	Transmission Type		Acknowledged
Fuel Economy Data Requirements - General Label	Transmission Type Other Description		Acknowledged
Fuel Economy Data Requirements - General Label	Total Number of Transmission Gears		Acknowledged
Fuel Economy Data Requirements - General Label	Transmission Lock-Up		Acknowledged
Fuel Economy Data Requirements - General Label	Transmission Creeper Gear		Acknowledged
Fuel Economy Data Requirements - General Label	Drive System		Is part-time 4wd a transmission class separate from full-time 4wd or AWD? What is the rationale for requesting this data?
Fuel Economy Data Requirements - General Label	Number of inlet Valves Per Cylinder	This is a new data element although it is not so indicated on the list received from the EPA.	Yes, they are new elements. They replace the old element 'numbers of valves per cylinder.'
Fuel Economy Data Requirements - General Label	Number of exhaust Valves Per Cylinder		
Fuel Economy Data Requirements - General Label	Engine Type Description	This appears to be a new data element although it is not so indicated on the data element list received from the EPA	This element is a replacement for "Engine block descriptor" in CEFIS
Fuel Economy Data Requirements - General Label	Fuel Usage	What goes here for dual fuel or flex fuel vehicles? For hybrid?	You may choose an appropriate first fuel then use a button (on the web) called "add another fuel usage" to entry the second fuel in these cases. Similar mechanisms will also be build to allow entering 2nd fuel usage for data transferred through batch file.

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Fuel Economy Data Requirements - General Label	Energy Storage Device	GM would like clarification regarding these data elements. Are these data elements for the vehicle tested or for the representative model ?	These elements are used in the Fuel Economy Guide for the representative model as listed in the Guide.
Fuel Economy Data Requirements - General Label	Energy Storage Device if other		
Fuel Economy Data Requirements - General Label	Battery Type		
Fuel Economy Data Requirements - General Label	Type of battery, if other		
Fuel Economy Data Requirements - General Label	Number of Batteries		
Fuel Economy Data Requirements - General Label	Battery Energy Capacity (Ah)		
Fuel Economy Data Requirements - General Label	Total Voltage of Battery Pack(s) (Volts)		
Fuel Economy Data Requirements - General Label	Battery Charger Type		
Fuel Economy Data Requirements - General Label	Number of Capacitors		
Fuel Economy Data Requirements - General Label	Capacitor Rating In Farads		
Fuel Economy Data Requirements - General Label	Capacitor Comments		
Fuel Economy Data Requirements - General Label	Motor/Generator Type		
Fuel Economy Data Requirements - General Label	Motor/Generators Type if "Other"		
Fuel Economy Data Requirements - General Label	Rated Motor/Generator Power (kW)		
Fuel Economy Data Requirements - General Label	Hybrid and Fuel Cell Comments		

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Fuel Economy Data Requirements - General Label	EPA calculated Rounded Adjusted City FE MPG	Does EPA enter these values?	Verify will calculate this value (note: Whenever a "n" entered under Column "collect from mfr?" The element is not entered by mfr)
Fuel Economy Data Requirements - General Label	FE Guide Rounded Adjusted City FE MPG		Verify will calculate this value (note: Whenever a "n" entered under Column "collect from mfr?" The element is not entered by mfr)
Fuel Economy Data Requirements - General Label	EPA calculated Rounded Adjusted Hwy FE MPG	Does EPA enter these values?	Verify will calculate this value (note: Whenever a "n" entered under Column "collect from mfr?" The element is not entered by mfr)
Fuel Economy Data Requirements - General Label	FE Guide Rounded Adjusted Hwy FE MPG		Verify will calculate this value (note: Whenever a "n" entered under Column "collect from mfr?" The element is not entered by mfr)
Fuel Economy Data Requirements - General Label	EPA calculated Rounded Adjusted Combined FE MPG	Does EPA enter these values?	Verify will calculate this value (note: Whenever a "n" entered under Column "collect from mfr?" The element is not entered by mfr)
Fuel Economy Data Requirements - General Label	FE Guide Rounded Adjusted Combined FE MPG		Verify will calculate this value (note: Whenever a "n" entered under Column "collect from mfr?" The element is not entered by mfr)
Fuel Economy Data Requirements - General Label	EPA calculated Unadj&Unround City MPG	This appears to also be a new element. Does EPA enter this?	This is not new. It was calculated by CFEIS and transparent to mfrs. Verify will calculate this value (note: Whenever a "n" entered under Column "collect from mfr?" The element is not entered by mfr)
Fuel Economy Data Requirements - General Label	EPA Calculated Unadj&Unround Hwy MPG	This appears to also be a new element. Does EPA enter this?	This is not new. It was calculated by CFEIS and transparent to mfrs. Verify will calculate this value (note: Whenever a "n" entered under Column "collect from mfr?" The element is not entered by mfr)
Fuel Economy Data Requirements - General Label	EPA calculated Unadj&Unround comb MPG	This appears to also be a new element. Does EPA enter this?	This is not new. It was calculated by CFEIS and transparent to mfrs. Verify will calculate this value (note: Whenever a "n" entered under Column "collect from mfr?" The element is not entered by mfr)
Fuel Economy Data Requirements - General Label	Actual Model Sales Area	GM would like clarification on why is this data element is required ?	This element is needed for EPA's Green Vehicle Guide. (ref: 86.1844-01(b) and for the Tax Credit and HOV Lane regulations contained in the latest Energy Bill.
Fuel Economy Data Requirements - General Label	Tax Incentive Vehicle and Tax Incentive Veh Parameters	GM would like clarification on why is this data element is required ?	These elements are needed for Fuel Economy Guide and the final parameters and format will be determined after IRS's regulation is final.
Fuel Economy Data Requirements - General Label	Model Type Comments	Could this data element be used for information such as different engine features ?	Yes, however engine features should be entered in the 'Engine type description'. In general, this element is used to capture comments on transmission class and carline features.
Fuel Economy Data Requirements - General Label	Transmission configuration code	Could this value be alpha-numeric (A-Z,0-9) rather than strictly alpha? That would match Chrysler Group internal coding.	Agree and accepted. EPA will allow this element to be alpha-numeric.

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Fuel Economy Data Requirements - General Label	Gear-Range-Number	A good decision to remove. This data was difficult to compile, and provides little benefit.	Acknowledged
Fuel Economy Data Requirements - General Label	Gear-Ratio-First		
Fuel Economy Data Requirements - General Label	Gear-Ratio-Second		
Fuel Economy Data Requirements - General Label	Gear-Ratio-Third		
Fuel Economy Data Requirements - General Label	Gear-Ratio-Fourth		
Fuel Economy Data Requirements - General Label	Gear-Ratio-Fifth		
Fuel Economy Data Requirements - General Label	Gear-Ratio-Sixth		
Fuel Economy Data Requirements - General Label	Lockup-Range-Number		
Fuel Economy Data Requirements - General Label	Lockup-RPM-First		
Fuel Economy Data Requirements - General Label	Lockup-RPM-Second		
Fuel Economy Data Requirements - General Label	Lockup-RPM-Third		
Fuel Economy Data Requirements - General Label	Lockup-RPM-Fourth		
Fuel Economy Data Requirements - General Label	Lockup-RPM-Fifth		
Fuel Economy Data Requirements - General Label	Lockup-RPM-Sixth		
Fuel Economy Data Requirements - General Label	RPM-at-Lockup-#		
Fuel Economy Data Requirements - General Label	Lockup-Override		
Fuel Economy Data Requirements - General Label	Analytically Derived Fuel Economy (ADFE)?	It seems this data would be associated with individual test info in section 4.4 below. It may need to be revisited depending on the implementation of 5-cycle testing.	<ol style="list-style-type: none"> 1. Agree and accepted. This element will be moved to Section 4.4 test veh info. 2. Agree. Requirements TBD