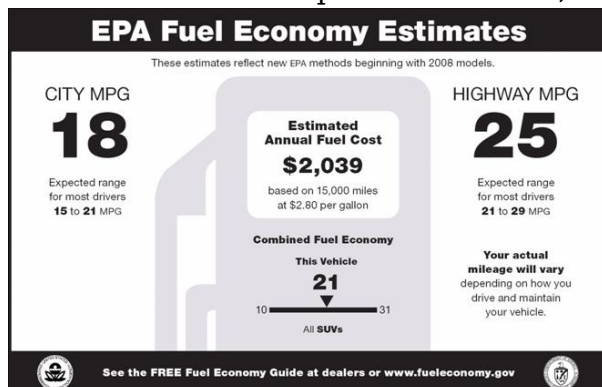


If you go shopping for a new car in model year 2013, you'll see a new sort of [fuel economy window sticker](#), like the one to the left.

This is a fascinating example of the challenges of making labels both easy to absorb and informative. (It's definitely going in my environmental law casebook update.) It's far more informative than the previous version, effective with model year 2008, shown below.



(And that one already had more information than the ones I encountered last time I was in a showroom, many years before that.)

The new label tells you how many gallons you'll burn to go 100 miles rather than just how many miles you'll get per gallon, a number which can be misleading in comparisons (see [this explanation](#)). It provides not only an estimated annual fuel cost, which may be the most relevant number for most consumers, but also a comparison with the fuel cost of an "average" mileage vehicle. It offers sliding scale ratings for fuel economy/GHG emissions and smog. And, for today's techno-savvy consumers, it includes a pointer to the fueleconomy.gov website for more information, and even a smartphone-readable code.

But will consumers find the forest in all these trees?

Some of the complexity is attributable to changes in the marketplace. In 1977, when the first generation of labels was mandated, there were just conventional gasoline internal combustion cars. Now there are all kinds of fuels and technologies. The agencies have

worked hard to try to come up with metrics for comparing fuel economy and environmental performance across the range of current and foreseeable technologies. Some of the complexity is attributable to Congress, which has mandated that the labels contain quite a lot of information.

The final rule rejected a visually simpler version dominated by a single large letter grade.



The National Automobile Dealers Association and Alliance of Automobile Dealer Manufacturers opposed the letter grade labels, while most environmental and consumer groups supported them. In the final rule, EPA chose two separate sliding scale ratings instead of a single letter grade because

While a letter grade rating can be readily understood, the agencies agree with some commenters' concerns that it may imply more meaning about overall vehicle attributes—such as an assessment of overall quality on a number of factors—than was intended. We recognize that the letter grade is a fairly significant departure from the current fuel economy label, which provides absolute numerical values and no relative ratings.

What do you think? Did EPA make the right choice?

(If you're a complete geek, you can read the entire [Federal Register explanation](#) for the new labels.)