



NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY

ANN ARBOR, MI 48105

September 28, 2026

IACD-2026-17 (LDV/LDT/ICI/LIMO)

SUBJECT: Towing Modes

Dear Manufacturer,

The purpose of this letter is to update previous U.S. Environmental Protection Agency (EPA) guidance on towing modes.

EPA Drive mode guidance ([CISD-09-19](#) for ICE/HEV/PHEV and [CD-2022-12](#) for BEV) describes how manufacturers may incorporate “soft latch” features in production vehicles. One possible use of a soft latch feature is for towing modes. Some vehicles can automatically determine if a trailer is in place on the vehicle. The EPA recognizes that turning off towing mode to meet the requirements of CD-09-19 when the vehicle senses the presence of a trailer is not necessary or helpful. Therefore, the EPA is allowing and encouraging manufacturers with automatic trailer detection to keep the vehicle in tow mode across key cycles (*i.e.*, to remain latched in towing mode) when the operator has selected tow/haul mode and a trailer is detected. If the vehicle operates in this manner and reverts to default mode (or equivalent) when the trailer is removed, this mode will not be considered latching within the requirements of the EPA’s fuel economy test procedures. The manufacturer should describe this operation in their application for certification in the Auxiliary Emission Control Device (AECD) section.

The EPA believes this change will increase vehicle operator satisfaction with vehicle performance without negatively impacting vehicle compliance. If you have any questions, please contact your certification representative or Daniel Cullen at cullen.daniel@epa.gov.

Sincerely,

Byron Bunker, Director
Implementation, Analysis and Compliance Division
Office of Transportation and Air Quality