

## **Comment 1 for Heavy-Duty OBD and OBD II 2012 (hdobd12) - 45 Day.**

First Name: Rasto

Last Name: Brezny

Email Address: [rbrezny@meca.org](mailto:rbrezny@meca.org)

Affiliation: Manufacturers of Emission Controls Assoc

Subject: MECA Comments in Support of HD-OBD and OBDII Amendments

Comment:

Please find attached the supportive comment of the Manufacturers of Emission Controls Association to the ARB's proposed changes to this regulation. If you need additional information, please let me know.

Rasto Brezny  
Deputy Director  
MECA

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/3-meca\\_comments\\_on\\_hd-obd\\_amend\\_082312.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/3-meca_comments_on_hd-obd_amend_082312.pdf)'

Original File Name: MECA comments on HD-OBD Amend 082312.pdf

Date and Time Comment Was Submitted: 2012-08-20 10:10:58

No Duplicates.

**Comment 2 for Heavy-Duty OBD and OBD II 2012 (hdobd12) - 45 Day.**

First Name: Lisa

Last Name: Stegink

Email Address: [lstegink@emamail.org](mailto:lstegink@emamail.org)

Affiliation:

Subject: COMMENTS OF THE TRUCK AND ENGINE MANUFACTURERS ASSOCIATION

Comment:

Please see the attached comments of the Truck & Engine Manufacturers Association

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/4-arb\\_biennial\\_review\\_-\\_ema\\_comments\\_and\\_attachments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/4-arb_biennial_review_-_ema_comments_and_attachments.pdf)'

Original File Name: ARB Biennial Review - EMA Comments and Attachments.pdf

Date and Time Comment Was Submitted: 2012-08-20 10:15:33

No Duplicates.

### **Comment 3 for Heavy-Duty OBD and OBD II 2012 (hdobd12) - 45 Day.**

First Name: Christopher  
Last Name: Jones  
Email Address: christopher.c.jones@baesystems.com  
Affiliation: BAE Systems

Subject: Comments on Impacts of OBD timeline on Heavy Duty Hybrid

Comment:

Please see the attached document for detailed comments on the impacts of the new OBD requirements on Heavy Duty Hybrids. I have also requested the opportunity to have a brief statement at the hearing.

Thank you for this opportunity to comment and your consideration.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/5-arb\\_hearing\\_letter\\_82212.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/5-arb_hearing_letter_82212.pdf)'

Original File Name: ARB hearing Letter 82212.pdf

Date and Time Comment Was Submitted: 2012-08-22 07:03:01

No Duplicates.

## **Comment 4 for Heavy-Duty OBD and OBD II 2012 (hdobd12) - 45 Day.**

First Name: Ashim  
Last Name: Manchanda  
Email Address: ashim.manchanda@daimler.com  
Affiliation: Mercedes Benz

Subject: Proposed Clarifications to Proposed Amendments to 1968.2, Title 13 (OBD II Regulations)

Comment:

Please find attached Mercedes Benz requests for clarification to the proposed amendments to the 1968.2, Title 13.

Regards,

Ashim Manchanda

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/6-mercedes\\_benz\\_proposed\\_clarifications\\_to\\_1968.2\\_\\_title\\_13\\_amendmant\\_aug23\\_board\\_meeting\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/6-mercedes_benz_proposed_clarifications_to_1968.2__title_13_amendmant_aug23_board_meeting_final.pdf)'

Original File Name: Mercedes Benz\_Proposed Clarifications to 1968.2, Title 13 Amendmant\_Aug23 Board Meeting\_FINAL.pdf

Date and Time Comment Was Submitted: 2012-08-22 08:47:24

No Duplicates.

## **Comment 5 for Heavy-Duty OBD and OBD II 2012 (hdobd12) - 45 Day.**

First Name: Julie

Last Name: Becker

Email Address: [jbecker@autoalliance.org](mailto:jbecker@autoalliance.org)

Affiliation: Alliance of Automobile Manufacturers

Subject: Comments of the Alliance of Automobile Manufacturers

Comment:

Attached please find the comments on the Alliance of Automobile Manufacturers.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/7-082212\\_alliance\\_comments\\_on\\_revisions\\_to\\_ca\\_obd\\_regs\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/7-082212_alliance_comments_on_revisions_to_ca_obd_regs_final.pdf)'

Original File Name: 082212 Alliance Comments on Revisions to CA OBD Regs Final.pdf

Date and Time Comment Was Submitted: 2012-08-22 10:30:42

No Duplicates.

**Comment 6 for Heavy-Duty OBD and OBD II 2012 (hdobd12) - 45 Day.**

First Name: Kevin  
Last Name: Rodgers  
Email Address: [kevin.rodgers@allisontransmission.com](mailto:kevin.rodgers@allisontransmission.com)  
Affiliation: Allison Transmission Inc.

Subject: Comments of Impacts of Proposed OBD Timeline for Heavy-Duty Hybrid Vehicles  
Comment:

Please see the attached letter from Allison Transmission Inc.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/8-comment\\_by\\_allison\\_transmission\\_inc\\_for\\_hd\\_oobd\\_22aug2012.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/8-comment_by_allison_transmission_inc_for_hd_oobd_22aug2012.pdf)'

Original File Name: Comment by Allison Transmission Inc for HD OBD 22Aug2012.PDF

Date and Time Comment Was Submitted: 2012-08-22 10:54:29

No Duplicates.

**There are no comments posted to Heavy-Duty OBD and OBD II 2012 (hdobd12) that were presented during the Board Hearing at this time.**

## **Comment 1 for Heavy-Duty OBD and OBD II 2012 (hdobd12) - 15-1.**

First Name: Ashim  
Last Name: Manchanda  
Email Address: ashim.manchanda@daimler.com  
Affiliation: Mercedes Benz

Subject: Clarification to the Proposed Reg. Language for 1968.2

Comment:

To  
Members of the Board,  
California Air Resources Board,

On behalf of Mercedes Benz I would like to submit a request for clarification to the proposed amendment the OBD2 regulation, posted during the 15 day notice period , on Jan 4, 2013.

See attached document for clarification.

Regards,

Ashim Manchanda  
Mercedes Benz Research and Development North America

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/9-mercedes\\_benz\\_proposed\\_clarifications\\_to\\_1968.2\\_\\_title\\_13\\_amendment\\_jan\\_2013\\_15day\\_notice\\_period.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/9-mercedes_benz_proposed_clarifications_to_1968.2__title_13_amendment_jan_2013_15day_notice_period.pdf)

Original File Name: Mercedes Benz\_Proposed Clarifications to 1968.2, Title 13  
Amendment\_Jan 2013\_15day notice period.pdf

Date and Time Comment Was Submitted: 2013-01-22 09:24:48

No Duplicates.

## **Comment 2 for Heavy-Duty OBD and OBD II 2012 (hdobd12) - 15-1.**

First Name: Joseph  
Last Name: Policarpio  
Email Address: [jpolicarpio@gillig.com](mailto:jpolicarpio@gillig.com)  
Affiliation: GILLIG LLC

Subject: HD OBD Comments

Comment:

See attached document

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/10-james\\_goldstene\\_-\\_carb\\_ltr\\_012413.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/10-james_goldstene_-_carb_ltr_012413.pdf)

Original File Name: James Goldstene - CARB Ltr 012413.pdf

Date and Time Comment Was Submitted: 2013-01-24 09:02:17

No Duplicates.

## **Comment 3 for Heavy-Duty OBD and OBD II 2012 (hdobd12) - 15-1.**

First Name: James

Last Name: Wilhelm

Email Address: James.Wilhelm@vta.org

Affiliation:

Subject: Regulation 1971.1 as it relates to Transit buses

Comment:

Please see attached letter from the Santa Clara Valley Transportation Authority (VTA). We are concerned that the ARB's efforts to force compliance with On Board Diagnostics of regulation 1971.1 on heavy duty Diesel Hybrid applications, and the requirement for a single party certification of OBD, will have the unintentional effect of eliminating new Diesel Hybrid Transit buses from California.

The Transit bus market is separate and much smaller than the truck market, and in the case of Diesel Hybrid systems, the supplier base is different. The additional development costs of complying are spread over a relatively small number of vehicles. Since this is an effort only California is requiring at this time, the total number of vehicles involved is even smaller, making compliance economically impractical. Rather than endure the extra costs of development and the risk of fines if they are unable to do so, Diesel Hybrid Transit bus suppliers will simply abandon the California market.

Please refer to the attached letter for details on the situation in the Transit bus market and the supporting reasoning for VTA's position.

VTA requests that for the Transit bus segment of the Diesel Hybrid market, the ARB instead match the EPA schedule for compliance. This will allow Californians to continue to enjoy the undeniable environmental benefits of Diesel Hybrid buses, while allowing the ARB to have confidence that progress will proceed on the certifications issues surrounding OBD.

James Wilhelm  
VTA  
Senior Engineer

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/11-carb\\_regression\\_1971\\_1comments\\_\\_2\\_.docx](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/11-carb_regression_1971_1comments__2_.docx)

Original File Name: CARB regulation 1971 1Comments (2).docx

Date and Time Comment Was Submitted: 2013-01-24 18:37:15

No Duplicates.

## **Comment 4 for Heavy-Duty OBD and OBD II 2012 (hdobd12) - 15-1.**

First Name: Lisa

Last Name: Stegink

Email Address: [lstegink@emamail.org](mailto:lstegink@emamail.org)

Affiliation:

Subject: EMA Comments on 15-day Notice

Comment:

EMA Comments on 15-day Notice

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/12-ema\\_comments\\_on\\_arb\\_hdobd\\_15-day\\_notice\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/12-ema_comments_on_arb_hdobd_15-day_notice_.pdf)

Original File Name: EMA Comments on ARB HDOBD 15-Day Notice .pdf

Date and Time Comment Was Submitted: 2013-01-25 12:26:11

No Duplicates.

## **Comment 5 for Heavy-Duty OBD and OBD II 2012 (hdobd12) - 15-1.**

First Name: Amy

Last Name: Kopin

Email Address: amy.kopin@daimler.com

Affiliation:

Subject: Comments from Daimler Trucks North America

Comment:

Please see the attached comments on behalf of Daimler Trucks North America.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/14-daimler\\_trucks\\_hdobd\\_15\\_day\\_notice\\_comments.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/hdobd12/14-daimler_trucks_hdobd_15_day_notice_comments.doc)

Original File Name: Daimler Trucks HDOBD 15 day Notice Comments.doc

Date and Time Comment Was Submitted: 2013-01-25 14:09:24

No Duplicates.

## **Comment 6 for Heavy-Duty OBD and OBD II 2012 (hdobd12) - 15-1.**

First Name: Joseph

Last Name: Williams

Email Address: Josehgijoe@aol.com

Affiliation:

Subject: Carbon Captureing Emissions System

Comment:

This is to inform the ARB that there are new ways to stop emissions from Heavy trucks and passenger cars, light-Duty Trucks, this is the first of its kind. that my grant proposal are requesting, this is the carbon capture emissions system. Designed to capture the tale pipe particulates that's emitted. into the Air, from all gas and other fuels emitted from there tale pipes, this system dose not reduce green house gases but it captures and store the particulate matter in its self contain filter system, there will be a Diagram or copy of the functions of the proposed new carbon capture emission system at the ARB's request. this is a pending patent on this new Invention, we have been presently developing other new systems for capturing power stacks and other coal powered factory's. since before the project was past though legislature and then though Denmark's capital we at J.W. Advanced Ideas take pride in our work and will continue striving toward better products to capture the worlds green house gases and make a Healthy state to live.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-01-25 13:32:52

No Duplicates.