

July 19, 2021

AHCERT: 210506

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814**Re: CARB Proposed Amendments to OBD II Regulation Section 1968.2**

Dear California Air Resources Board Members:

American Honda Motor Co., Inc. (Honda) appreciates the opportunity to provide our comments to the California Air Resources Board's (CARB) proposed revisions to On-Board Diagnostic (OBD) System Requirements and Associated Enforcement Provisions for Passenger Cars, Light-Duty Trucks, Medium-Duty Vehicles and Engines, and Heavy-Duty Engines. Honda thanks CARB for your continued work to improve the OBD regulations.

Over the past several months, Honda has been engaged through Alliance for Automotive Innovation discussions with CARB and also have had direct meetings with CARB to better understand the regulatory intent and to better explain Honda's positions on the proposed regulation changes. Honda expresses our support to the comments submitted by the Alliance for Automotive Innovation. In this letter, Honda is submitting additional comments for your careful consideration. We look forward to further discussions with CARB.

Proposed Gasoline Cold Start Emissions Reduction System (CSERS) Malfunction Criteria

Under the new gasoline CSERS system monitor requirement in (e)(11.2.3), CARB is proposing a malfunction criteria as defined in (e)(11.2.3)(A)(i). The malfunction criteria is when cold start exhaust heat energy delivery fails to achieve at least 20 percent of the additional element commanded by the cold start strategy. The additional element commanded by the cold start strategy shall be determined by comparing the commanded value of the element in a properly functioning vehicle during an FTP test cold start with the commanded value of the element in a properly functioning fully warmed-up vehicle. Based on this requirement, the malfunction criteria will remain constant regardless of the condition.

The intention of the proposed regulation of (e)(11.2.3) was a clarification of current CSERS OBD requirement. It was not intending to burden manufacturers with significant development; therefore, CARB proposed 100% implementation by 26MY.

Honda has expressed concerns related to varying conditions and uses that customer vehicles encounter which the CSERS system design must account for. The CSERS system monitor fixed malfunction criteria is likely to result in false failure detection in the market causing an inconvenience to customers and a

poor perception of the OBD program. To maintain the fixed malfunction criteria and avoid the false failure detection in the market, the CSERS system needs time for significant development.

Since more development is needed than expected, this proposed regulation change makes it exceptionally challenging to meet 100% implementation by 26MY. Honda requests development relief by changing this requirement to a phase-in of 20 percent of 2026MY, 50 percent of 2027MY, and 100 percent of 2028MY vehicles to match the phase-in period of the new engine stall monitor of (e)(15.2.2)(B)(iii).

#### Proposed In-Use Monitor Performance Ratio (IUMPR) Data Reporting Requirement

CARB is proposing to require additional data to be reported under (j)(3.2.2)(B). The additional reporting data must include (g)(4.1) through (g)(4.9), and (g)(6). There is no clear rationale to include (g)(4.1) through (g)(4.5) and (g)(6) in IUMPR reporting under (j)(3). These data are vehicle status/value and are not related to IUMPR, which is an average performance of OBD monitors.

We believe this additional reporting data is inappropriate for IUMPR reporting and the reporting of data (g)(4.1) through (g)(4.5) and (g)(6) should be removed. If not removed, Honda requests clarification of the necessity and value of such data under IUMPR reporting.

Please contact Mr. Matthew Hinsley ([matthew\\_hinsley@ahm.honda.com](mailto:matthew_hinsley@ahm.honda.com)) at (310) 781-6397.

Respectfully,

AMERICAN HONDA MOTOR CO., INC.



Alice Lee  
Senior Manager  
Environment Division

AL/mh