

January 25, 2012

Via Electronic Submission (<http://www.arb.ca.gov/lispub/comm/bclist.php>)

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, California 95814

Re: Notice of Public Hearing to Consider the “LEV III” Amendments to the California Greenhouse Gas and Criteria Pollutant Exhaust and Evaporative Emission Standards and Test Procedures and to the On-Board Diagnostic System Requirements for Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles, and to the Evaporative Emission Requirements for Heavy-Duty Vehicles (the “Proposed Regulation”)

The Truck and Engine Manufacturers Association (“EMA”) is the national organization representing worldwide manufacturers of medium- and heavy-duty vehicles and engines which are the subject of the Proposed Regulation. EMA and its members have worked closely with the Air Resources Board (“ARB”) Staff throughout the development of previous iterations of the LEV III and On-Board Diagnostic requirements, and we continue to have a substantial interest in all aspects of the Proposed Regulation and the amendments at issue in this proposal. The scope of this rulemaking is extremely broad and we appreciate ARB Staff’s efforts to work with EMA and its members cooperatively to develop requirements that are technologically feasible, cost-effective and protective of air quality.

EMA supports the comments and recommendations of the Alliance of Automobile Manufacturers (the “Alliance”) submitted to the Air Resources Board. EMA offers the following comments focused on two areas of the Proposed Regulation relating to medium-duty vehicles (8,501-14,000 lbs. GVWR): the LEV III Amendments and On-Board Diagnostic (“OBD”) System Requirements.

LEV III Amendments for Medium-Duty Vehicles

EMA offers the following comments on the SFTP requirements for medium-duty vehicles. The LEV III amendments impose SFTP requirements on Medium-duty vehicles for the very first time. The inclusion of this test procedure will require manufacturers to undertake additional engineering development work and testing. The US06 test cycle imposes a new and difficult challenge for Medium-duty vehicles. We appreciate the efforts of ARB Staff to provide a phase-in approach to allow manufacturers to spread the additional compliance burden over a feasible time

frame. The phase-in approach and other flexibilities proposed by ARB are vital to provide industry the necessary lead-time to achieve compliance.

Nonetheless, EMA has serious concerns with the SFTP PM standards for Medium-duty vehicles as proposed. The standards are extremely stringent and pose significant measurement challenges including variability and repeatability. Moreover, manufacturers are concerned that the technology developments anticipated to meet forthcoming GHG requirements may be inherently challenged by the SFTP test cycle and PM standards proposed.

Additionally, for the 10,001-14,000 lbs GVWR weight class, the FTP and SFTP PM standards as proposed by ARB Staff lead to an effective LA92 PM standard that is negative when the LA92 is back-calculated assuming SC03 PM equal to the FTP PM standard.

EMA recommends the following Medium-duty vehicle SFTP composite PM standards:

- 8,501-10,000 lbs (≤ 0.024 Hp/GVWR) 10 mg/mi
- 8,501-10,000 lbs (> 0.024 Hp/GVWR) 13 mg/mi
- 10,001-14,000 lbs 13 mg/mi

EMA believes that these standards represent an environmentally protective approach with significant PM control, while recognizing the competing and equally important goal of facilitating GHG compliance.

EMA looks forward to discussing these issues with ARB staff as they work towards the release of the 15-day package.

On-Board Diagnostic System Requirements for Medium-Duty Vehicles

EMA has commented extensively on many proposed regulatory requirements to the on-board diagnostic systems for light- and medium-duty engines and vehicles in the past several years. EMA further understands that ARB Staff is intending to propose amendments to the heavy-duty engine OBD (“HDOBD”) requirements in a biennial review later this year, and EMA and its members have already begun meeting with Staff regarding those amendments.

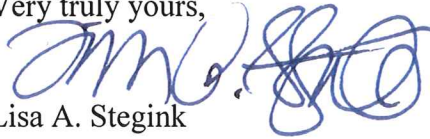
EMA supports the changes that ARB Staff has proposed to make to the OBD system requirements in the Proposed Regulation, as they are directionally appropriate and necessary to address certain limited technological feasibility concerns in the short term. Nevertheless, EMA also recognizes and acknowledges that these changes are short-term adjustments that require future modification. We understand that ARB Staff is committed to working with manufacturers to address those concerns in comprehensive, longer-term amendments to the medium- and heavy-duty OBD regulations during the upcoming HDOBD biennial review. EMA looks forward to working with ARB on those amendments.

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Please do not hesitate to contact EMA if you have any questions or need further information on the foregoing.

Very truly yours,

Lisa A. Stegink

A handwritten signature in blue ink, appearing to read 'Lisa A. Stegink', written over the printed name.