




A STAR ALLIANCE MEMBER 

May 24, 2006

**VIA E-MAIL AND FACSIMILE**

Clerk of the Board  
California Air Resources Board  
1001 I Street, 23rd Floor  
Sacramento, CA 95814  
Fax: 916-322-3928  
Electronic submission: <http://www.arb.ca.gov/lispub/comm/bclist.php>

Re: Notice Of Public Hearing To Consider Adoption Of New Emission Standards,  
Fleet Requirements, And Test Procedures For Forklifts And Other Industrial  
Equipment

To the Clerk of the Board:

United Airlines, Inc. ("United") submits the following comments regarding the California Air Resources Board's ("ARB's") proposed "New Emission Standards, Fleet Requirements, And Test Procedures For Forklifts And Other Industrial Equipment" ("LSI Rule"). United had previously submitted written comments to ARB regarding the prior LSI Rule proposal on June 17, 2005. United reserves the right to supplement its comments based upon further revisions by ARB to the proposed LSI Rule.

As one of the major airlines operating in California, with among the largest airport ground support equipment ("GSE") fleets in the state, United has a significant interest in the proposed LSI Rule.

A. **United Supports ARB's Decision to Allow GSE Fleet Operators to Include Less Than 25 Horsepower Electric-Powered Equipment Performing Work Equivalent to an LSI Engine-Powered Unit in their GSE Fleets**

United supports ARB's commitment to provide GSE fleet operators with the flexibility to incorporate any combination of retrofits, low-emission equipment, and zero-emission electric equipment to meet the fleet average emission level.

The LSI Rule defines "Airport Ground Service Equipment" to mean "any large spark-ignition engine or electric-powered equipment contained in the 24 categories of equipment included in section B.3. of Appendix 2 of the South Coast Ground Support Equipment Memorandum of Understanding, dated November 27, 2002." See Article 2, Section 2775(d).

Additionally, the LSI Rule provides that "[e]lectric-powered equipment of less than 19 kilowatts [25 horsepower] shall be allowed to be included in the fleet average calculation provided that the operator can demonstrate that the equipment performs the work equivalent of an LSI engine-powered piece of equipment." See Article 2, Section 2775(d) (Fleet Average Emission Level). In calculating the fleet average, load factor, horsepower, or hours of use is not incorporated.

Allowing GSE fleet operators to include in their fleets electric-powered units with lower horsepower that perform equivalent work to LSI engine-powered units is an important component of the LSI Rule. In the context of airline operations, low horsepower electric-powered units perform the same work as LSI engine-powered units with higher horsepower, but on a far more efficient basis.

**B. United Requests ARB's Confirmation that it may include its Electric Carts and Other Less Than 25 Horsepower Electric-Powered Equipment in its GSE Fleet**

In California, United operates a substantial number of less than 25 horsepower electric-powered units that perform work equivalent or identical to LSI engine-powered units. For example, United operates electric carts with less than 25 horsepower that perform tasks that would otherwise be performed by baggage carts, baggage tractors, light trucks and vans. These electric carts play an important role as transport vehicles in the terminal, hangar and garage areas.

Under the provisions of the LSI Rule referenced above, United is entitled to include such electric carts and other low horsepower electric-powered GSE in its GSE fleet. Based on a previous discussion with ARB staff, it is United's understanding that ARB has agreed to allow United to include such small horsepower electric-powered equipment in its GSE fleet. United respectfully requests confirmation from ARB that United's understanding is accurate. If ARB staff has questions or requires additional information concerning this matter, please feel free to contact members of United's environmental management team directly.

A handwritten signature in black ink, appearing to read "Daniel D. Tisoncik". The signature is fluid and cursive, with the first name being the most prominent.

Very truly yours,

UNITED AIR LINES, INC.

By

Daniel D. Tisoncik

cc: Air Transport Association, c/o Tim A. Pohle (via e-mail)