



Heavy-Duty Low NO_x Program

Emission Warranty Information Reporting Amendments

Public Workshop
Diamond Bar, CA
September 26, 2019

MSCD/ECCD

Outline

- Emission Warranty Information Reporting (EWIR) Overview
- January 23, 2019 Workshop Recap
- New Proposed Amendments for HD EWIR and Corrective Action Regulation
- Contact information

EWIR Overview

- Manufacturers are required to track and report warranty claims/failure rates for the full warranty period
- Warranty reporting is a critical tool for monitoring and assessing in-use performance
- Manufacturers must take corrective action (typically recalls or extended warranties) when corrective action thresholds are exceeded
- Corrective action plans are reviewed prior to implementation to ensure that they will meet regulatory requirements and adequately address the in-use issue

January 23, 2019 Workshop

- Non-compliance with EWIR and corrective action requirements would affect current and new EO
- Lower thresholds for reporting and corrective action requirements starting 2022MY

	Current	Proposed
EWIR	1% or 25 unscreened claims	1% or 12 unscreened claims
FIR	4% or 50 unscreened claims	4% or 25 unscreened claims
EIR	4% or 50 failures	4% or 25 failures
Corrective Action	4% or 50 failures	4% or 25 failures

To account for small volume engine families

*Whichever is greater

January 23, 2019 Workshop

- Recalls and extended warranties shall be required for primary emission control components and computers
- Extended warranties shall be required for other emission-related components
- Recall required for other emission-related components with failure rates $\geq 25\%$
- Track and report warranty data throughout the extended warranty period for components for which an extended warranty was issued
- Track and report warranty data throughout the useful life period for components replaced under recall
- EIRs must include a corrective action implementation date no later than 180 days after the EIR is due
- Manufacturers shall retain warranty parts that were analyzed for warranty reports throughout the useful life of the engine family
- Amendments will explicitly state that good engineering judgement must be applied when investigating failures, generating warranty reports, and conducting testing

New Sept. 2019 Proposal for the HD EWIR and Corrective Action Amendments

- Non-compliance with EWIR, corrective action, and in-use testing (new) requirements would affect current and new EO condition only applied to carryover and carry across
- Lower thresholds for reporting and corrective action for 2022MY and later (unchanged from 1/23/2019)
- Lower thresholds for reporting and corrective action for 2027MY and later to match HD UL and Step 2 Warranty Amendments (new)

New Sept 26, 2019 Proposed Lower Thresholds*

- Lower thresholds for reporting and corrective action:

Model Years	EWIR	FIR	EIR	Corrective Action
Current	1% or 25 Unscreened Claims	4% or 50 Unscreened Claims	4% or 50 Failures	4% or 50 Failures
Starting 2022 MY (as of 01/23/2019)	1% or 12 Unscreened Claims	4% or 25 Unscreened Claims	4% or 25 Failures	4% or 25 Failures
2022-2026 (as of 09/26/2019)	1% or 12 Unscreened Claims	4% or 25 Unscreened Claims	4% or 25 Failures	4% or 25 Failures
2027 and Later (as of 09/26/2019)	1% or 12 Unscreened Claims	<u>Years 1-5</u> 4% or 25 Unscreened Claims <u>Years 6-10</u> 7% or 50 Unscreened Claims <u>Years 11-14</u> 10% or 70 Unscreened Claims	<u>Years 1-5</u> 4% or 25 Failures <u>Years 6-10</u> 7% or 50 Failures <u>Years 11-14</u> 10% or 70 Failures	<u>Years 1-5</u> 4% or 25 Failures <u>Years 6-10</u> 7% or 50 Failures <u>Years 11-14</u> 10% or 70 Failures

To account for small volume engine families and lengthened warranty periods

*Whichever is greater

New Sept. 26 2019 Proposal for the HD EWIR and Corrective Action Amendments

- Recalls and extended warranties shall be required for primary emission control components and computers. Extended warranties for other components (unchanged from 1/23/2019)
- Recall other emission-related components with failure rates $\geq 25\%$, but also require an extended warranty (new)
- Tracking/reporting (unchanged from 1/23/2019)
- Engineering judgment, corrective action implementation 180 days after EIR (unchanged from 1/23/2019)
- Parts only need to be retained for 2 years (new)

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