Air Resources Board

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August 7, 2008

MANUFACTURERS ADVISORY CORRESPONDENCE (MAC) 2008-02

TO: ALL MANUFACTURERS OF
- PASSENGER CARS
- LIGHT-DUTY TRUCKS
- MEDIUM-DUTY VEHICLES AND ENGINES USED IN SUCH VEHICLES
- HEAVY-DUTY VEHICLES AND ENGINES USED IN SUCH VEHICLES
- ALL OTHER INTERESTED PARTIES

SUBJECT: Amendments to the Emission Warranty Information Report (EWIR) for 2010 and Subsequent Model Year (MY) Passenger Cars (PCs), Light-Duty Trucks (LDTs), Medium-Duty Vehicles (MDVs) and Engines Used in These Vehicles (MDEs), And Heavy-Duty Vehicles (HDVs), Engines Used in These Vehicles (HDEs), and Motorcycles

This letter transmits a Manufacturers Advisory Correspondence (MAC) that clarifies the emission warranty information reporting regulations for 2010 and subsequent MY PCs, LDTs, MDVs, MDEs, HDVs, HDEs, and Motorcycles, and also provides guidelines allowing manufacturers to opt-in early to the requirements of Title 13, California Code of Regulations, Section 2167, which became effective on January 4, 2008.

If you have any questions regarding this guidance, please contact Tom Valencia, Manager, Field Inspection/Testing Section, at (626) 575-6741 or by e-mail at tvalenci@arb.ca.gov.

Sincerely,

Annette Hebert, Chief
Mobile Source Operations Division

Attachment

State of California
AIR RESOURCES BOARD

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SUBJECT: Amendments to the EWIR for 2010 and Subsequent Model Year (MY) Passenger Cars (PCs), Light-Duty Trucks (LDTs), Medium-Duty Vehicles (MDVs) and Engines Used in These Vehicles (MDEs), Heavy- Duty Vehicles (HDVs) and Engines used in These Vehicles (HDEs), and Motorcycles

APPLICABILITY: 2010 and Subsequent Model Year (MY) PCs, LDTs, MDVs, MDEs, HDVs, HDEs, and Motorcycles

REFERENCES: "Procedures for Reporting Failures of Emission-Related Equipment and Required Corrective Action", [Title 13, California Code of Regulations, Sections 2166-2174] and "Procedures for Reporting Failures of Emission –Related Components", [Title13, California Code of Regulations, Sections 2141-2149]

POLICY:

A. EWIR New Reporting Format

The format for submitting the electronic EWIRs required by 13 CCR Section 2167(b), is provided below:

1. Test Group

The test group field (field name: Test_Group) will be set at a variable character string length of 12 characters.

2. Part Number

The part number field (field name: Part_Num) will be set at a variable character string length of no more than 30 characters.

3. Component

The warranty component description field (field name: Component) will be set at a variable character string length of no more than 70 characters.

4. Repair Code

The repair code field (field name: Repair) will be set at a character string length of one. This field is used to determine whether a warranty claim involved an emission component replacement or repair. If an emission component was replaced, the designated code will be populated as N, and if the emission component was only repaired, the designated code will be populated as Y. (note: computer reflash warranty claims will be considered to be a repair).

5. Warranty Period

The warranty period code field (field name: Warranty_Period) will be set at a variable character string length of no more than 8 characters. This field is used to denote the warranty period of the reported emission component. The warranty period is determined by the type of vehicle which is set forth in the table below:

Type	Warranty Period	Code Designation	Termination Point
Light or Med. Duty Gas/Diesel	3 yrs/ 50,000 miles	L	3 years
Light or Med. Duty Gas/Diesel	7 yrs/ 70,000 miles	H	5 years
PZEV Vehicles	15 yrs/ 150,000 miles	P	12 years
Battery Coverage Used for Vehicle Propulsion	10 yrs/ 150,000 miles	B	10 years
Diesel Engines (Heavy Duty)	5 yrs/ 100,000 miles	D	5 years
Gas Engines (Heavy Duty)	5 yrs/ 50,000 miles	G	5 years
Light or Med. Duty (Gas/Diesel) Split Class*	3 yrs/ 50,000 miles	S	3 years
Light or Med. Duty (Gas/Diesel) Split Class*	7 yrs/ 70,000 miles	T	5 years
Lev II Vehicles	8 yrs/ 100,000 miles	V	8 years
Diesel Engines (Heavy Duty) Split Class*	5 yrs/ 100,000 miles	F	5 years
Class I-Motorcycles	5 yrs/12,000 km	M1	5 years
Class II-Motorcycles	5 yrs/18,000 km	M2	5 years
Class III-Motorcycles	5 yrs/30,000 km	M3	5 years

*A Split Class Designation occurs when a manufacturer builds and sells an engine in a multi-year chassis (e.g., engines certified for the 2003 MY are installed into a 2003 and 2004 MY chassis.) In this case, the manufacturer's EWIR would only report a 2003 MY test group or engine family when in fact, 2004 MY vehicles are being sold with the 2003 MY certified engine. As indicated in this example, the manufacturer will have to report the 2003 MY vehicles for one additional year.

6. Sales

The sales field (field name: Sales) will be set as a numeric digit with a string length of no more than 10 digits. It will specifically identify the California production sales. **[Commas must not be added to this field.]** (e.g., 1,243 is incorrect; instead, the number must be entered as 1243.)

7. Cumulative Claims

The cumulative claims field (field name: Cum_Claims) will be set as a numeric character with a string length of no more than 10 digits and will be updated cumulatively on an annual basis. **[Commas must not be added to this field**.] (e.g., 1,243 is incorrect; instead, the number must be entered as 1243).

8. Percent

The percent field (field name: Percent) will be identified as a decimal character limited to one significant digit and a string length of no more than 8 digits. The cumulative warranty claims percentage will be compiled cumulatively on an annual basis. The data will be represented without percent ("%") signs (e.g., 7.2% or 0.072 is incorrect; the data must be represented as 7.2).

9. Time Frame

The time frame field (field name: Annual) will be set at a variable character string length of 6 using the following format, YYYYQx. Even though reports will be submitted annually under the new EWIR reporting regulations, this field will retain the quarter format used in the current EWIR reporting regulations. Manufacturers will use the last quarter of the year being reported for reporting their annual EWIR (e.g., 2010 reporting will be shown as 2010Q4).

10. Models

The models field (field name: Models) will be set at a variable character string length of no more than 120 characters. The make/model or car-line for the given test group or engine family will be identified. Manufacturers that utilize model codes must provide the Air Resources Board (ARB) with a model code decoder table defining the make/model of each model code in a separate document at the time the EWIR is submitted to ARB.

11. Action Status Code

The action status code field (field name: ASC) will be identified by the following character string identifiers which provide the current status for a given warranted component:

- R-Recalled
- E-Extended Warranty
- C-Other Corrective Action
- N-On-Going Negotiation
- A-No Action Required, as approved by ARB
- M-Early Warranty Failure (Infant Mortality)
- F-Below 4% True Failure Based On Manufacturer's Supplemental EWIR
- B-Below an Unscreened 10% Reporting Level

Manufacturers must not include any of the following characters as part of their EWIR submissions:

- **commas, &-ampersand signs, %-percent signs, or quotation marks**

Use of any of these characters will cause the data to fail in the upload process. Should these characters be detected, or if other problems are identified in the manufacturers' EWIR data, the manufacturer will be required to reformat their EWIR data until the data can be uploaded into ARB's warranty reporting database. Also, manufacturers must submit the EWIR file in a comma delimited format (i.e., a *.csv file).

B. Early Opt-In to EWIR Regulations

Title 13, CCR Section 2167 requires the submission of EWIRs for 2010 and subsequent model-years. However, ARB will accept EWIRs that comply with Section 2167's requirements for engine families certified prior to the 2010 MY as follows:

1. Early Opt-in to 13 CCR Section 2167

- Manufacturers can opt-in to the EWIR provisions of 13 CCR 2167 for any test groups or engine families certified prior to the 2010 MY provided they first notify ARB.

- Manufacturers can utilize split reporting for filing their emission warranty reports. For example: a manufacturer can report all warranty activity under the current warranty regulations 13 CCR, 2144 for all test groups or engine families through the 2008 MY. Starting with the 2009 MY, the manufacturer would report all warranty activity under the provisions of 13 CCR Section 2167. Note: manufacturers will not be allowed to conduct partial filing in both regulatory requirements for a specific model year (i.e., the test groups or engine families for the 2008 MY cannot be partially reported under both 2144 and 2167). Also, once a manufacturer opts into the new reporting requirements, the manufacturer will not be allowed to transfer back to the previous method. Manufacturers must formally notify ARB that they intend to utilize a split reporting format and must be granted approval by ARB before instituting the early opt-in option.