

**Comment 1 for LEVIII GHG and ZEV (leviiidtc12) - 45 Day.**

First Name: Julia

Last Name: Rege

Email Address: jrege@globalautomakers.org

Affiliation: Association of Global Automakers

Subject: Global Automakers' Comments on the Proposed LEVIIDTC12 Comments  
Comment:

Please find attached comments being submitted by the Association of Global Automakers on ARB's "Proposed Amendments to the New Passenger Motor Vehicle Greenhouse Gas Emission Standards for Model Years 2017-2025 to Permit Compliance Based on Federal Greenhouse Gas Emissions Standards and Additional Minor Revisions to the LEV III and ZEV."

Attachment: [www.arb.ca.gov/lists/leviiidtc12/2-global\\_automakers\\_letter\\_on\\_arb\\_onp\\_amendments\\_11\\_12\\_2012\\_\\_id\\_4252\\_\\_id\\_4257\\_.pdf](http://www.arb.ca.gov/lists/leviiidtc12/2-global_automakers_letter_on_arb_onp_amendments_11_12_2012__id_4252__id_4257_.pdf)

Original File Name: Global Automakers Letter on ARB ONP Amendments 11 12 2012 (ID 4252) (ID 4257).pdf

Date and Time Comment Was Submitted: 2012-11-12 09:15:21

No Duplicates.

## **Comment 2 for LEVIII GHG and ZEV (leviiidtc12) - 45 Day.**

First Name: Joseph

Last Name: Kubsh

Email Address: jkubsh@meca.org

Affiliation: MECA

Subject: MECA support for GHG compliance flexibilities

Comment:

The Manufacturers of Emission Controls Association (MECA) is pleased to indicate our industry's support of the California Air Resources Board's proposal to permit compliance with federal greenhouse gas emission standards for light-duty vehicles to serve as compliance with ARB's vehicle greenhouse gas emission standards.

These amendments provide needed flexibility that ensure a single national program to reduce climate change emissions and improve vehicle fuel economy. MECA applauds ARB and EPA for finalizing a comprehensive and largely harmonized set of proposals covering light-duty vehicle greenhouse gas emissions that will result in a single national program for reducing the climate impacts of future vehicles (through 2025).

MECA is a non-profit association of the world's leading manufacturers of emission control technology for mobile sources. Our members have over 40 years of experience and a proven track record in developing and manufacturing emission control technology for a wide variety of on-road and off-road vehicles and equipment, including extensive experience in developing exhaust and evaporative emission controls for gasoline and diesel light-duty vehicles in all world markets. Our industry has played an important role in the emissions success story associated with light-duty vehicles in California, and has continually supported efforts to develop innovative, technology-forcing, emissions programs to deal with California's unique air quality problems.

The experience of our industry over the last 40 years vividly demonstrates the connection between vehicle emission regulation and economic development. Prior to 1970, our industry did not exist. But, with the enactment of the Clean Air Act in 1970, our industry has flourished, developing successive generations of technology to meet ever tightening regulatory standards. Since the introduction of the catalytic converter in 1975, more than 500 million light-duty vehicles have been sold in the United States equipped with exhaust and evaporative emission control technologies developed by our industry. This generated an estimated \$250-\$300 billion in economic activity since 1975. In 2010 alone, our industry generated \$12 billion of economic activity and accounted for 65,000 U.S. jobs, mostly in manufacturing. ARB's LEV III amendments and greenhouse gas emission standards on light-duty vehicles will provide additional support for the continued development of a thriving U.S. industry focused on a wide range of technologies that can reduce vehicle criteria and greenhouse gas emissions.

Dr. Joseph Kubsh

Executive Director, MECA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-11-13 08:14:13

No Duplicates.

**Comment 3 for LEVIII GHG and ZEV (leviiidtc12) - 45 Day.**

First Name: Jaime

Last Name: Knepper

Email Address: jkk@vnf.com

Affiliation:

Subject: Ferrari Comment on the GHG ISOR

Comment:

Please accept Ferrari's attached comment on the proposed amendments to the new passenger motor vehicle greenhouse gas emissions standards. Thank you.

Attachment: [www.arb.ca.gov/lists/leviiidtc12/4-ferrari\\_comments\\_on\\_carb\\_ghg\\_isor.pdf](http://www.arb.ca.gov/lists/leviiidtc12/4-ferrari_comments_on_carb_ghg_isor.pdf)

Original File Name: Ferrari Comments on CARB GHG ISOR.pdf

Date and Time Comment Was Submitted: 2012-11-13 09:48:21

No Duplicates.

**Comment 4 for LEVIII GHG and ZEV (leviidtc12) - 45 Day.**

First Name: Samantha

Last Name: Harmon

Email Address: saharmon@pa.gov

Affiliation: PA Dept of Environmental Protection

Subject: Pennsylvania Comments on CARB Rulemaking

Comment:

Please find attached Pennsylvania's comments on CARB's proposed rulemaking for model years 2017-2025 to approve compliance with the National Program as compliance with CARB's program, and to make other minor amendments to the LEV III regulations.

Attachment: [www.arb.ca.gov/lists/leviidtc12/5-pennsylvania\\_comments\\_to\\_carb\\_2017-2025\\_national\\_program\\_compliance\\_\\_signed\\_.pdf](http://www.arb.ca.gov/lists/leviidtc12/5-pennsylvania_comments_to_carb_2017-2025_national_program_compliance__signed_.pdf)

Original File Name: Pennsylvania Comments to CARB 2017-2025 National Program Compliance (Signed).pdf

Date and Time Comment Was Submitted: 2012-11-14 07:54:33

No Duplicates.

**Comment 5 for LEV III GHG and ZEV (leviiidtc12) - 45 Day.**

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autoalliance.org

Affiliation: Alliance of Automobile Manufacturer

Subject: Alliance Comments on LEV III Deemed to Comply Changes

Comment:

Attached are the Alliance comments on the "Proposed Amendments to the New Passenger Motor Vehicle Greenhouse Gas Emission Standards for Model Years 2017-2025 to Permit Compliance Based on Federal Greenhouse Gas Emissions Standards and Additional Minor Revisions to the LEV III and ZEV."

Attachment: [www.arb.ca.gov/lists/leviiidtc12/6-2012-11-14\\_alliance\\_lev\\_iii\\_deemed\\_to\\_comply.pdf](http://www.arb.ca.gov/lists/leviiidtc12/6-2012-11-14_alliance_lev_iii_deemed_to_comply.pdf)

Original File Name: 2012-11-14 Alliance LEV III Deemed to Comply.pdf

Date and Time Comment Was Submitted: 2012-11-14 07:58:28

No Duplicates.

**Comment 6 for LEVIII GHG and ZEV (leviiidtc12) - 45 Day.**

First Name: Azita

Last Name: Khalili

Email Address: azita.khalili@bmwna.com

Affiliation: BMW

Subject: BMW Comments on Proposed Deem To Comply Rulemaking  
Comment:

Please find attached BMW comments on "Amendments to the New Passenger Motor Vehicle Greenhouse Gas Emission Standards for Model Years 2017-2025 to Permit Compliance Based on Federal Greenhouse Gas Emissions Standards and Additional Minor Revisions to the LEV III and ZEV Regulations".

Attachment: [www.arb.ca.gov/lists/leviiidtc12/7-bmw\\_comments\\_to\\_arb\\_-\\_deem\\_to\\_comply\\_rulemaking.pdf](http://www.arb.ca.gov/lists/leviiidtc12/7-bmw_comments_to_arb_-_deem_to_comply_rulemaking.pdf)

Original File Name: BMW comments to ARB - Deem To Comply rulemaking.pdf

Date and Time Comment Was Submitted: 2012-11-14 08:20:58

No Duplicates.

**Comment 1 for LEVIII GHG and ZEV (leviiidtc12). (At Hearing)**

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autoalliance.org

Affiliation:

Subject: LEV III - GHG Deemed to Comply

Comment:

Attached Powerpoint Presentation was presented at the November 15, 2012 Board Meeting.

Attachment: [www.arb.ca.gov/lists/leviiidtc12/9-12-8-3\\_commenter\\_steven\\_douglas.pdf](http://www.arb.ca.gov/lists/leviiidtc12/9-12-8-3_commenter_steven_douglas.pdf)

Original File Name: 12-8-3 Commenter Steven Douglas.pdf

Date and Time Comment Was Submitted: 2012-11-27 14:42:03

No Duplicates.



**Comment 1 for LEV III GHG and ZEV (leviiidtc12) - 15-1.**

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autoalliance.org

Affiliation: Alliance of Automobile Manufacturer

Subject: Alliance Comments on LEV III DTC 15-Day Notice

Comment:

Attached are the comments of the Alliance of Automobile Manufacturers on the LEV III Deemed to Comply 15-Day Notice changes.

Best regards,  
Steve Douglas

Attachment: [www.arb.ca.gov/lists/leviiidtc12/10-autoalliance\\_dtc\\_15-day\\_notice\\_comments.pdf](http://www.arb.ca.gov/lists/leviiidtc12/10-autoalliance_dtc_15-day_notice_comments.pdf)

Original File Name: AutoAlliance DTC 15-Day Notice Comments.pdf

Date and Time Comment Was Submitted: 2012-12-05 14:01:10

No Duplicates.