Comment 1 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Julie
Last Name: Becker
Email Address: jbecker@autoalliance.org
Affiliation: Alliance of Automobile Manufacturers

Subject: Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedure
Comment:

```
Please see the attached letter to Catherine Witherspoon from the
Alliance of Automobile Manufacturers.
```

Attachment: www.arb.ca.gov/lists/recall06/2-recall06-1.pdf

Original File Name: recall06-1.pdf

Date and Time Comment Was Submitted: 2006-11-02 15:17:47

No Duplicates.

Comment 2 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Julie
Last Name: Becker
Email Address: jbecker@autoalliance.org
Affiliation: Alliance of Automobile Manufacturers

Subject: Failure to Respond to the Alliance October 3, 2006 Letter Concerning ISOR Deficiencies
Comment:

```
Please see the attached letter from the Alliance of Automobile
Manufacturers.
```

Attachment: www.arb.ca.gov/lists/recall06/4-recall06-2.pdf

Original File Name: recall06-2.pdf

Date and Time Comment Was Submitted: 2006-11-28 10:55:59

No Duplicates.

Comment 3 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: john
Last Name: duerr
Email Address: john.duerr@detroitdiesel.com
Affiliation:

Subject: Emission Warranty Information Reporting
Comment:

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Comments in Attachment
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Attachment: www.arb.ca.gov/lists/recall06/5-ddccomments.pdf

Original File Name: DDCcomments.pdf

Date and Time Comment Was Submitted: 2006-11-29 13:05:52

No Duplicates.

Comment 4 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: David
Last Name: Munoz
Email Address: david@munozauto.com
Affiliation:

Subject: Expansion of Vehicle Warranty Status
Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

1. The proof required to demonstrate violations of ARB's emission standards or test procedures;
2. The corrective actions available to ARB to address the violations;
3. The way emissions warranty information is reported to ARB.

As part of the “Corrective Action”, ARB staff state, “Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component.”

However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states “The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period.”

Any expansion of the vehicle warranty status will negatively impact my business and other independent repairers in the State of California. I believe this is a major change in the vehicle warranty and a major rulemaking initiative. I implore the ARB to conduct a thorough economic analysis of this proposal's impact on the California independent repair industry. This proposal will have a negative impact on small businesses, the economy of our state and should be rejected.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2006-12-01 13:57:39

No Duplicates.

Comment 5 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 6 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Bob
Last Name: Renteria
Email Address: brenteria@americanauto-body.com
Affiliation:

Subject: Oppose Expansion of Vehicle Warranty Status
Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;
The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB.
As part of the “Corrective Action”, ARB staff state, “Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component.”
However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states “The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period.”

Any expansion of the vehicle warranty status will negatively impact my business and other independent repairers in the State of California. I believe this is a major change in the vehicle warranty and a major rulemaking initiative. I implore the ARB to conduct a thorough economic analysis of this proposal's impact on the California independent repair industry. This proposal will have a negative impact on small businesses, the economy of our state and should be rejected.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2006-12-01 14:12:58

No Duplicates.

Comment 7 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Bob
Last Name: Little
Email Address: bl75cc@sbcglobal.net
Affiliation:

Subject: emission waranty
Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;
The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB.
As part of the “Corrective Action”, ARB staff state, “Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component.”
However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states “The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period.”

Any expansion of the vehicle warranty status will negatively impact my business and other independent repairers in the State of California. I believe this is a major change in the vehicle warranty and a major rulemaking initiative. I implore the ARB to conduct a thorough economic analysis of this proposal's impact on the California independent repair industry. This proposal will have a negative impact on small businesses, the economy of our state and should be rejected.
Thank you,
Bob Little
CEO Ed Little Auto Service, Inc

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2006-12-01 15:30:59

No Duplicates.

Comment 8 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Brad
Last Name: Kyle
Email Address: brad_kyle@hotmail.com
Affiliation:

Subject: Recall 06
Comment:

To whom it may concern,

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;
The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB.
As part of the “Corrective Action”, ARB staff state, “Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component.”
However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states “The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period.”

Any expansion of the vehicle warranty status will negatively impact my business and other independent repairers in the State of California. I believe this is a major change in the vehicle warranty and a major rulemaking initiative. I implore the ARB to conduct a thorough economic analysis of this proposal's impact on the California independent repair industry. This proposal will have a negative impact on small businesses, the economy of our state and should be rejected.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2006-12-01 20:59:14

No Duplicates.

Comment 9 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Matthew
Last Name: Corson
Email Address: matts515t@sbcglobal.net
Affiliation:

Subject: Oppose Expansion of Vehicle Warranty Status
Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;
The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB.
As part of the “Corrective Action”, ARB staff state, “Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component.”
However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states “The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period.”

Any expansion of the vehicle warranty status will negatively impact my business and other independent repairers in the State of California. I believe this is a major change in the vehicle warranty and a major rulemaking initiative. I implore the ARB to conduct a thorough economic analysis of this proposal's impact on the California independent repair industry. This proposal will have a negative impact on small businesses, the economy of our state and should be rejected.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2006-12-02 11:54:55

No Duplicates.

Comment 10 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Nick
Last Name: Modesti
Email Address: nmodemir@covad.net
Affiliation:

Subject: Please oppose amendement to California emission warranty
Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;
The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB.
As part of the “Corrective Action”, ARB staff state, “Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component.”
However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states “The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period.”

Any expansion of the vehicle warranty status will negatively impact my business and other independent repairers in the State of California. I believe this is a major change in the vehicle warranty and a major rulemaking initiative. I implore the ARB to conduct a thorough economic analysis of this proposal's impact on the California independent repair industry. This proposal will have a negative impact on small businesses, the economy of our state and should be rejected.
Thank you,
Nick A. Modesti
Manager

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2006-12-04 10:08:50

No Duplicates.

Comment 11 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Aaron
Last Name: Lowe
Email Address: aaron.lowe@aftermarket.org
Affiliation: Automotive Aftermarket Industry Assoc.

Subject: EWIR Comments
Comment:

```
Please see attached document in regards to EWIR.

I have submitted this document once before on December 1, 2006.
Please disregard previous document and use this document as
official comments.

Thank you.
```

Attachment: www.arb.ca.gov/lists/recall06/14-carb_extended_warranty_testimony_12-1-06.doc

Original File Name: CARB Extended Warranty Testimony 12-1-06.doc

Date and Time Comment Was Submitted: 2006-12-04 13:06:22

No Duplicates.

Comment 12 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Chuck
Last Name: Spiteri
Email Address: Spiteri@carsupport.com
Affiliation:

Subject: Oppose Expansion of Vehicle Warranty Status
Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;
The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB.
As part of the “Corrective Action”, ARB staff state, “Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component.”
However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states “The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period.”

Any expansion of the vehicle warranty status will negatively impact my business and other independent repairers in the State of California. I believe this is a major change in the vehicle warranty and a major rulemaking initiative. I implore the ARB to conduct a thorough economic analysis of this proposal's impact on the California independent repair industry. This proposal will have a negative impact on small businesses, the economy of our state and should be rejected.

Thank you for your consideration,
Chuck Spiteri
Spiteri's Auto Service

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2006-12-04 15:35:25

No Duplicates.

Comment 13 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Pamela
Last Name: Amette
Email Address: pamette@mic.org
Affiliation: Motorcycle Industry Council

Subject: Motorcycle Industry Council Comments
Comment:

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Attached are comments of the Motorcycle Industry Council regarding
the Proposed Amendments to CARB Emission Warranty Information
Reporting and Recall Regulations and Emission Test Procedures
(Hearing Date:  December 7, 2006).
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Attachment: www.arb.ca.gov/lists/recall06/17-mic_comments_re_warrrptgrecall_120406.pdf

Original File Name: MIC_Comments Re WarrRptgRecall_120406.pdf

Date and Time Comment Was Submitted: 2006-12-04 16:02:38

No Duplicates.

Comment 14 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Leonard
Last Name: Kata
Email Address: leonardkata@vw.com
Affiliation: Volkswagen of America, Inc.

Subject: Comments on Amendments to Warranty Reporting, Recall, and Emission Test Procedures
Comment:

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Volkswagen Comments in Response to Amendments to California's
Emission Warranty Information Reporting and Recall Regulations and
Emission Test Procedures.
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Attachment: www.arb.ca.gov/lists/recall06/18-recall06-14.pdf

Original File Name: recall06-14.pdf

Date and Time Comment Was Submitted: 2006-12-05 10:53:32

No Duplicates.

Comment 15 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Mike
Last Name: Howe
Email Address: mike@mikehowesautomotive.com
Affiliation: Automotive Shop Owner

Subject: Proposed Regulations
Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;
The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB.
As part of the “Corrective Action”, ARB staff state, “Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component.”
However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states “The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period.”

Any expansion of the vehicle warranty status will negatively impact my business and other independent repairers in the State of California. I believe this is a major change in the vehicle warranty and a major rulemaking initiative. I implore the ARB to conduct a thorough economic analysis of this proposal's impact on the California independent repair industry. This proposal will have a negative impact on small businesses, the economy of our state and should be rejected.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2006-12-05 16:45:30

No Duplicates.

Comment 16 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Scott
Last Name: Brown
Email Address: scott@connieanddicks.com
Affiliation: Independent Automotive Service Provider

Subject: Concerns regarding the proposed extended warranties
Comment:

I am first concerned about your conclusion that this proposal would have little to no economic impact on small businesses in California. Where is the public record on this study?

Second, extending the warranty threatens the very livelihood of an entire industry (the automotive aftermarket repair industry) with no data to show that extending the warranty will improve air quality in any substantial way. According to the CARB "Motor Vehicle Service Information Rule" it states the following:

"to ensure that independent service facilities and aftermarket parts companies have access to information and tools necessary to diagnose and repair emissions-related malfunctions and produce emissions-related replacement parts for California Vehicles"

If the fleet is under warranty for 15 years / 150k mi then how and why would we want to continue to tool up for these vehicles when it is likely that we will never see them?

In fact is is my experience that customers who do not have long warranties are more likely to maintain their vehicles better than those with the warranty, over the life of the car, which is far more likely to prevent excessive emissions. Preventing failure by proper maintenance (better maintenance than the manufacturer prescribes) is more appealing based upon the inconvenience alone.

In closing I ask that you look at this from my perspective. We are an important piece to this puzzle.

Regards,

Scott Brown
Connie & Dick's Service Center Inc.
150 Olive Street
Claremont, CA 91711

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2006-12-06 08:55:24

No Duplicates.

Comment 17 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Craig
Last Name: Wells
Email Address: craigwells@inlandsmog.com
Affiliation:

Subject: recall06
Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006,
Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission
Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;
The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB.
As part of the “Corrective Action”, ARB staff state, “Depending on
the type of the defective emission-control component and whether or
not OBD is able to detect the problem, corrective action would be
either the recall of all affected vehicles or the extension of the
emission warranty for that specific component.”
However, in the staff evaluation of the Potential Impacts on Other
Businesses, the report states “The proposed amendments should have
minimal impact on the independent service and repair industry and
aftermarket parts manufacturers since the proposal deals with
relatively new vehicles and engines that are still within their
certified useful life period.”

Any expansion of the vehicle warranty status will negatively
impact my business and other independent repairers in the State of
California. I believe this is a major change in the vehicle
warranty and a major rulemaking initiative. I implore the ARB to
conduct a thorough economic analysis of this proposal's impact on
the California independent repair industry. This proposal will
have a negative impact on small businesses, the economy of our

state and should be rejected.

Thank You,
Craig Wells
Owner
Inland Smog and Repair

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2006-12-06 09:16:15

No Duplicates.

Comment 18 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: robert
Last Name: redding
Email Address: b.redding@att.net
Affiliation: automotive service association

Subject: Comments
Comment:

```
Please see attached Comments for 12-7-06 hearing.
Robert L. Redding, Jr.
Washington, D.C. Representative
ASA
```

Attachment: www.arb.ca.gov/lists/recall06/22-asa_carb_statement__kahler__12-7-06.doc

Original File Name: ASA CARB Statement (Kahler) 12-7-06.doc

Date and Time Comment Was Submitted: 2006-12-06 09:37:19

No Duplicates.

Comment 19 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Gordon
Last Name: Gerber
Email Address: Gerber_Gordon_R@Cat.com
Affiliation: Caterpillar Inc

Subject: Caterpillar Comments to Agenda Item $06-11-5
Comment:

```
Please see the attached comments from Caterpillar on this Agenda
item.
```

Attachment: www.arb.ca.gov/lists/recall06/23-12-06-06_caterpillar_submittal__arb_defect_reporting.pdf

Original File Name: 12-06-06 Caterpillar Submittal, ARB Defect Reporting.pdf

Date and Time Comment Was Submitted: 2006-12-06 10:01:19

No Duplicates.

Comment 20 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Lygeri
Last Name: Kokkinakos
Email Address: lygeri.kokkinakos@na.mitsubishi-motors.com
Affiliation: Mitsubishi Motors

Subject: Submittal of Comments to Board
Comment:

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Submittal of Comments to the Board Attached.
```

Attachment: www.arb.ca.gov/lists/recall06/24-mmc_comments_to_board.pdf

Original File Name: MMC Comments to Board.pdf

Date and Time Comment Was Submitted: 2006-12-06 10:27:59

No Duplicates.

Comment 21 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Brent
Last Name: Black
Email Address: bwblackp@gmail.com
Affiliation: iATN

Subject: Recall006: Impact of warranty extensions on California small businesses, and consumers.
Comment:

Dear California Air Resource Board Members, and all other concerned parties.

I am writing to express serious concerns about the impact of the proposed mandated warranty extension, and all previously-mandated emissions warranty extensions, on the future of the independent automotive aftermarket, and of the well-being of the automotive technicians working on these vehicles. In addition, these warranty extensions will have a significant effect on the solvency of the car manufacturers, and ultimately on the prices that automobiles can be offered to the consumer.

The continued trend of mandatory extensions of emissions warranties in California will result in driving the cost of new cars up, while restricting the consumer to using only new car dealers for warranty service. This will cause a massive loss in routine maintenance and other service repair revenue to the shops that would ordinarily receive the business, and effectively prevent them from doing emissions repair for the covered vehicles. The subsequent lack of service options will cause a backlog in service, further exacerbating the problem. Unfortunately, by the time anyone realizes what has happened, the industry as we know it today could be gone.

Consumers who have convenient access to quality auto service are much more likely to maintain their vehicles and in turn keep their vehicle emissions low, even between smog checks. A solid infrastructure of both dealers and independent repair shops is good for the country from both an economic and an environmental standpoint, and is a critical part of maintaining clean air, in addition to a solid economy. Your actions threaten the very existence of this industry and directly clash with your stated goals in your Information Availability rules.

The threat is so significant that over 60% of iATN (a network of nearly 50,000 automotive professionals) members polled (see attached) consider the advent of the 15/150 warranty to be a threat to the very future of the Automotive Aftermarket. These members are the very people affected by previous emissions warranty extensions and they should certainly know.

Your actions, both now and previously, seem to imply a belief that the vehicle will be better maintained by the consumer if it is

under warranty through the car manufacturer. You must have some statistical data or research to back this assumption, but I have not see it presented. This is especially critical, considering the potential effect on the thousands of small businesses, repair shops, technicians, and consumers, who will all be negatively impacted by these changes if you are wrong.

Is there a new study on the impact on California small businesses, and the California consumer as a result of the proposed mandated warranty extensions? The previous study results, while arguable, no longer apply due to the increase in the number of potentially covered vehicles.

What about the impact of these vehicles going out of warranty in an environment where an entire industry had no incentive (demand) to tool up on the vehicle since they were warranteed for 150k? How will the emissions be impacted when that fleet hits the aftermarket?

Expecting the consumer to keep their vehicle properly maintained and repaired seems reasonable. Placing their responsibility on the car manufacturer and their dealer repair facilities exclusively, will effectively destroy the existing aftermarket infrastructure. Currently, the independent automotive repair shops are instrumental in helping to maintain a very large portion of our country's mobile fleet, and assist in supporting a large segment of our economy. The destruction of this industry can't be good for California.

Continually extending the length of mandated automotive warranties will ultimately cause vehicle prices to go up considerably. If the OE is forced to warranty vehicles for 15 years, the cost of this must be passed on to the consumer. The impact on the car companies, the consumer, and the automotive aftermarket could be catastrophic. Does CARB expect that these companies, some of whom are already on the verge of bankruptcy, are going to redesign the way they build vehicles in order to prepare for this unknown expense anytime in the near future? Can you imagine the cost in 1991 dollars if GM were forced to cover emissions failures on a 1991 Buick 15 years after it was sold, and the eventual, and extreme cost to the consumers who purchase new cars in the future? This expense must be passed on to the consumer. This older fleet is currently maintained primarily by the aftermarket industry which you aim to take out of the picture.

These repairs are currently done at a relatively reasonable cost. The aftermarket industry is supported by the large number of consumers who choose this option for their vehicle maintenance. What will the world look like when that industry is not available for the older fleet?

What the consumer probably does not realize is that these mandated warranties will add considerable cost to the vehicles they purchase in the future. And, to make things worse, some consumers purchase an extended warranty never knowing they were forced to pay for the cost of a built-in mandatory warranty for many of the same things covered by the optional warranty they paid for.

A large percentage of new car buyers will not keep a car for 15 years or 150k miles. These consumers are forced to pay for warranty repairs for the next owner, even if they know they will not be keeping the car. What about the impact on the fixed income

community, many of whom will not need a 15 year warranty, and surely should not be forced to buy one?

What about consumer choice on this issue? Why not give them the option to pay for their own warranty (one where they can go to any shop they please) if they wish, or simply pay for the repairs, if they prefer not to purchase this government mandated insurance?

There is no question that we need a program that requires vehicle owners to responsibly and properly maintain and repair their vehicles. The additional cost of this warranty punishes those very people who do just that. Properly maintained vehicles are less likely to need longer warranties in the first place.

Perhaps I am missing something, a study, or some kind of proof that the CARB has that validates this action. An action that has the potential to damage or even destroy an industry, and in turn negatively impact a very large segment of our economy, demands serious substantiation. If this data exists I have been unable to locate it.

This industry has stepped up to help clean the air on many occasions. I am sure that most would love nothing more than to continue to participate in partnering with the CARB in keeping the air clean, and in keeping the economy growing. We cannot do this if we are no longer in business. It would be a sad day in American history to see the Independent Automotive Repair business regulated out of existence, in the false hope that somehow this would be good for the environment, the economy, or the citizens of California. Most Californians very much enjoy their cars, and their freedom to have them serviced and maintained where they wish.

I would like to end this letter with a very important quote:

"ensure that independent service facilities and aftermarket parts companies have access to information and tools necessary to diagnose and repair emissions-related malfunctions and produce emissions-related replacement parts for California Vehicles"

This quote is directly from YOUR Motor Vehicle Service Information rule.

How can the CARB recognize the critical needs of the automotive aftermarket in regard to access to emissions service information, and the importance of the aftermarket segment having the information and parts to diagnose and repair these systems, and then on the other hand effectively exclude that very same market segment from even working on the very same systems covered in the rule?

Forcing consumers to take their emissions repair work to OEM repair facilities exclusively, in addition to all the other concerns above, negates the benefits of your very own Vehicle Service Information rule by effectively locking out the aftermarket from the majority of repairs covered by that rule.

Submitted respectfully for your consideration.

Thank you.

Brent Black
President and Founder

International Automotive Technicians' Network
Brea, California

Attachment: www.arb.ca.gov/lists/recall06/25-warranty-poll.pdf

Original File Name: warranty-poll.pdf

Date and Time Comment Was Submitted: 2006-12-06 10:35:18

No Duplicates.

Comment 22 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Dean
Last Name: Saito
Email Address: dsaito@aqmd.gov
Affiliation: South Coast AQMD

Subject: Agenda Item 6-11-5 Comment Letter
Comment:

```
Dec. 07, 2006 Agenda No. 06-11-5: Public Hearing to Consider
Amendments to California's Emission Warranty Information Reporting
and Recall Regulations and Emission Test Procedures.

To follow via Federal Express.
```

Attachment: www.arb.ca.gov/lists/recall06/26-120606_commenty_letter_warranty_info.pdf

Original File Name: 120606 Commenty Letter Warranty Info.pdf

Date and Time Comment Was Submitted: 2006-12-06 10:59:00

No Duplicates.

Comment 23 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Sara
Last Name: Rudy
Email Address: srudy@ford.com
Affiliation: Ford Motor Company

Subject: Emission Warranty InformationReporting and Recall Regulations and Emission Test Procedures
Comment:

```
Please find attached Ford Motor Company comments in response to
Notice of Public hearing to consider amendments to California's
Emission Warranty Information Reporting and Recall Regulations and
Emission Test Procedures, dated October 10, 2006.
```

Attachment: www.arb.ca.gov/lists/recall06/27-ford_warranty_defect_comments_2006_12_06.pdf

Original File Name: Ford Warranty Defect comments 2006_12_06.pdf

Date and Time Comment Was Submitted: 2006-12-06 11:02:29

No Duplicates.

Comment 24 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Diane
Last Name: Bailey
Email Address: dbailey@nrdc.org
Affiliation: Natural Resources Defense Council

Subject: SUPPORT—Proposed Amendments to Emission Warranty
Comment:

```
Please see attachment for comments from the Natural Resources
Defense Council, Union of Concerned Scientists, Environmental
Defense, Sierra Club, American Lung Association of California,
Coalition for Clean Air.
```

Attachment: www.arb.ca.gov/lists/recall06/28-emission_warranty_info._reporting_and_recall_regulations_.pdf

Original File Name: Emission Warranty Info. Reporting and Recall Regulations .pdf

Date and Time Comment Was Submitted: 2006-12-06 11:12:40

No Duplicates.

Comment 25 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Kevin
Last Name: McCartney
Email Address: crashh@prodigy.net
Affiliation:

Subject: Warranty vs Repair Assistance
Comment:

The state bases most of it’s justification for a "super warranty" on it’s failures to win judgements against the Original Equipment Manufacturers (OEM). This seems to indicate that the OEMs will win similar judgements concerning warranty coverage of catalytic converters, EGR systems and other emission control systems.

A much more effective alternative exists. The state has very effective low income repair assistance program (LIRAP) that successfully reduces emissions in a very efficient and cost effective manor without any potential for legal challenges to eliminate positive results. The state also has a very popular program that allows consumers to voluntarily pay a fee at the time of new car purchases to avoid future smog inspection expenses. Clearly, consumers are willing to pay the state to reduce their future emission related expenses.

A state-controlled program that allows consumers to choose ANY state approved repair shop best handles high mileage emission repairs. The state then has control over what gets repaired without legal challenges. Licensed technicians under strict oversight and direct approval of state employees perform the repairs. Any super warranty option will be subject to legal challenges that the state has a well-established history of loosing. And, any repairs that actually are performed under a super warranty program would be legally performed by technicians that do NOT posses the state required smog license.

Consumers will NOT be well served by a super warranty that causes them to be redirected to a dealership who charges them diagnostic fees only to confirm that the needed repair is not covered under the super warranty. A state run system similar to the very successful LIRAP program would allow consumers to have emission-related repairs performed with great efficiency and competence by their choice of state approved service providers.

Phosphorous poisoning is a leading cause of catalyst failure. Phosphorous poisoning is believed to be responsible for over 90% of catalyst failures under existing warranty and and even higher percentage of higher mileage catalyst failures. Sulfur, sulfated ash and zinc also damage catalysts. But, this is ignored by consumers and California BAR has refused to convey this information to technicians (other states have informed technicians through newsletters, etc). The vast majority of consumers, technicians and service managers (including dealerships) are ignorant of the many compounds in readily available automotive

products that will and do degrade catalytic converters.

The catalytic converters that degraded due to phosphorous or other common contamination would not be covered under the existing super warranty proposal. Likewise, EGR failures and deposit related failures would often NOT be covered under this super warranty because such failures are often prevented by the use of OEM approved fuels. California clean air would be far better served by outlawing substandard fuels lubricants and lubricant products that are linked to the majority of emission system failures.

A Super warranty would NOT cover most catalyst and EGR system failures because most such failures are caused by the use of OEM prohibited products. Catalytic converters in properly functioning cars eliminate about 99% of harmful exhaust emissions. A typical 1000 PPM NOx is reduced to 10 PPM by normal catalyst reduction. A super warranty that excludes that is useless if the OEM can argue that the catalyst failure was caused by the use of prohibited compounds (Phosphorous, sulfur, sulfated ash, zinc, chlorine, etc – all commonly used by consumers, shops and dealerships)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2006-12-06 11:50:28

No Duplicates.

Comment 26 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Pamela
Last Name: Amette
Email Address: Non-web submitted comment
Affiliation: Motorcycle Industry Council

Subject: ARB Staff's Process for Continuation of the Dec. 7, 2006 Hearing Re: Recall Regulations
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/47-recall06-27.pdf

Original File Name: recall06-27.pdf

Date and Time Comment Was Submitted: 2007-01-16 11:45:18

No Duplicates.

Comment 27 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Steven
Last Name: Douglas
Email Address: sdouglas@autoalliance.org
Affiliation: Alliance of Automobile Manufacturers

Subject: Defect & Warranty Reporting
Comment:

```
The attached documents have not been added to the record.
```

Attachment: www.arb.ca.gov/lists/recall06/48-122206_malik_attachment_3.zip

Original File Name: 122206 Malik Attachment 3.zip

Date and Time Comment Was Submitted: 2007-02-01 12:12:09

No Duplicates.

Comment 28 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Barry
Last Name: Wallerstein
Email Address: Non-web submitted comment
Affiliation: SCAQMD

Subject: Comments of SCAQMD Regarding Proposed Adoption of Amendments to CA's Emission Warranty...
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/50-recall06-28.pdf

Original File Name: recall06-28.pdf

Date and Time Comment Was Submitted: 2007-03-20 08:46:35

No Duplicates.

Comment 29 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Paul
Last Name: Frech
Email Address: pfrech@aol.com
Affiliation:

Subject: 15 year 150,000 warranty
Comment:

C & F Auto
2090 Placentia Avenue
Costa Mesa, CA 92627
949-646-6910

March 19, 2007
California Air Resources Board
c/o Clerk of the Board
1001 I Street
Sacramento, Ca 95814

Re: Notice of public hearing to consider amendments to California's emission warranty information reporting and recall regulations and emission test procedures.

Dear Members of the California Air Resources Board:

For more than forty years I have owned and operated a mom and pop, neighborhood auto service and repair shop. I precede the Bureau of Automotive Repair and the Smog Check Program, and do remember the dirty air. The 15 year 150,000 mile warranty proposal is an example of "the road to clean air is paved with the best intensions." Let me explain.

In the sixties, seventies and the eighties I serviced and repaired only two brands of cars, Volkswagen and Audi. Volkswagen sales slid in the late seventies, but the good news was that Audi sales were expanding at the same time. As luck would have it a news program call Sixty Minutes aired a program the purported to show Audi's having unintended acceleration. You know that Audi was completely cleared of any wrong doing, but the damage was done.

Audi fought back by bring on new models and renaming all their cars, but the one thing that they did that brought my business to its knees was to offer a 10 year 100,000 mile power train warranty. Normally we expect to see new cars remain with the dealer for the first three years, but when Audi went to ten years, we lost the next seven years of service and repairs. Talks with our then current customers to ask why we were not getting their business were answered with, "Audi has given us a ten year warranty and they say if we miss a service or the factory parts

are not used that we will forfeit the warranty.” We tried to explain that any qualified person could keep the warranty in effect, but to no avail. Many asked if we were willing to go to court with them to fight Audi on these matters. A business decision had to be made.

We abandoned all hopes of getting Audi service and repair work and looked to other German makes that we were compatible with. With a major invest in tools, training,
parts, and information and we took on BMW, Porsche, and Mercedes. We lost money for a few years, but not sight of our dream.

The 15 year 150,000 warranty will kill the entire aftermarket. Unlike my predicament with Audi, there are no other cars to work on and we will never survive for fifteen years with out any work.

Paul Frech

Owner, C & F Auto

President, Automotive Trade Organizations of California

Past president and current Newsletter Editor, Automotive Service Councils of California Orange coast Chapter

Executive Board Member, California Automotive Business Coalition

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-03-20 10:03:55

No Duplicates.

Comment 30 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Aaron
Last Name: Lowe
Email Address: aaron.lowe@aftermarket.org
Affiliation: AAIA

Subject: Aftermarket Comments
Comment:

```
Please see enclosed joint comments from the independent vehicle
aftermarket.
```

Attachment: www.arb.ca.gov/lists/recall06/53-carb_testimony-extended_warranty-march_20_2007.doc

Original File Name: CARB Testimony-Extended Warranty-March 20 2007.doc

Date and Time Comment Was Submitted: 2007-03-20 11:51:18

No Duplicates.

Comment 31 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Pamela
Last Name: Amette
Email Address: pamette@mic.org
Affiliation: Motorcycle Industry Council

Subject: MIC Comments 3/22/07 - CARB Warranty Recall and Reporting Amendments
Comment:

```
The attached zip file includes:

1.  MIC 3/22/07 Comments to CARB Proposed Emission Warranty &
Recall Amendments

2.  6 documents previously submitted to the Board and staff.
```

Attachment: www.arb.ca.gov/lists/recall06/54-mic_comments_re_warrrptgrecall_attachmentb.zip

Original File Name: MIC Comments Re WarrRptgRecall_AttachmentB.zip

Date and Time Comment Was Submitted: 2007-03-20 12:06:57

No Duplicates.

Comment 32 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Sara
Last Name: Rudy
Email Address: srudy@ford.com
Affiliation: Ford Motor Company

Subject: Emission Warranty InformationReporting and Recall Regulations and Emission Test Procedures
Comment:

```
Please find attached Ford Motor Company comments in response to
Notice of Public Hearing to consider amendments to California's
Emission Warranty Information Reporting and Recall Regulations and
Emission Test Procedures
```

Attachment: www.arb.ca.gov/lists/recall06/55-ford_warranty_defect_comments_2007_03_20.pdf

Original File Name: Ford Warranty Defect comments 2007_03_20.pdf

Date and Time Comment Was Submitted: 2007-03-20 14:09:42

No Duplicates.

Comment 33 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Michael
Last Name: Mahneke
Email Address: Mike@Mahneke.com
Affiliation: I. A. P. A.

Subject: amendments to California's emission warranty information reporting and recall regulations
Comment:

There is no evidence extending the warranty will provide any real benefit to the consumer. You will give the new car dealers an unfair advantage over the independent repair segment of the industry, should you decide to pass the proposed regulation. I and most of the independent repair facilities invest many thousands of dollars each year to remain current with the changing technology, so we have a true vested interest in repairing and servicing today's automobiles.

The price of the new vehicles will rise just due to the cost of the litigation alone. It is unheard of to require a manufacturer to warranty any product beyond its useful life. Most automobile owners do not keep a vehicle for 15 years, yet they will be paying the price of the warranty for the second and third owners in the initial purchase.

Please really think about what this pending legislation will do not only to the new car manufacturers but the consumers and the aftermarket industry. Please VOTE NO on the proposed amendments to extending the emission warranty regulations.

Thank you,

Mike Mahneke
Mahneke Motors
Goleta, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-03-20 15:59:58

No Duplicates.

Comment 34 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Nikki
Last Name: Ayers
Email Address: nikki@ayersrepairs.com
Affiliation: Independent Automotive Professionals Ass

Subject: CA Emission Warranty Information Reporting & Recall
Comment:

See attached file.

Attachment: www.arb.ca.gov/lists/recall06/57-carb_hearing_letter.doc

Original File Name: CARB Hearing Letter.doc

Date and Time Comment Was Submitted: 2007-03-20 21:02:51

No Duplicates.

Comment 35 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Timothy
Last Name: Kitt
Email Address: tk@swedemasters.com
Affiliation: IAPA

Subject: 15/150 Bad for business
Comment:

```
To whom it may concern,
  As a small automotive repair business owner I am very concerned
with the possibility of the "15/150" legislation and the effect it
will have on my business and on other small businesses like mine.
  I urge you to consider the consequences that such legislation
may lead to, such as driving repair business into the
dealerships and away from the aftermarket.
  I thank you for your consideration.

  Sincerely,
  Tim Kitt
  President, Swedemasters inc. Santa Barbara CA.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-03-20 21:31:16

No Duplicates.

Comment 36 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Gordon
Last Name: Gerber
Email Address: Gerber_Gordon_R@Cat.com
Affiliation: Caterpillar Inc

Subject: Written Comments of Caterpillar Inc
Comment:

```
Caterpillar comments to the "Amendments to California's Emissions
Warranty Information and Recall Regulations" included in the
attachment provided.
```

Attachment: www.arb.ca.gov/lists/recall06/59-03-21-07_caterpillar_submittal__arb_defect_reporting.pdf

Original File Name: 03-21-07 Caterpillar Submittal, ARB Defect Reporting.pdf

Date and Time Comment Was Submitted: 2007-03-21 08:21:56

No Duplicates.

Comment 37 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Michael
Last Name: Self
Email Address: johnself@west.net
Affiliation: private citizen

Subject: do not extend warrantee emissions
Comment:

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

Re: Notice of public hearing to consider amendments to California's emission warranty information reporting and recall regulations and emission test procedures

Dear Members of the California Air Resources Board:

The Independent Automotive Professionals Association (IAPA) opposed the above referenced proposed rulemaking that would change the way CARB staff addresses emissions parts in California. The IAPA members are dedicated independent automotive repair shop owners and aftermarket parts distributors both wholesale and retail.

This pending rule will ruin our businesses and livelihoods. The CARB staff through a commissioned study completed by the RAND Corporation stated that if the pending regulation is implemented it will have a significant impact on the automotive aftermarket by 2010 and will cost our business segment millions of dollars in revenue. It will have a negative impact on our economic survival in California and will impact other departments' revenue such as the Employment Development Department, Franchise Tax Board, State Board of Equalization and Bureau of Automotive Repair. Several of our members have attended the hearing in Bakersfield and the workshops held by the department and we are really dismayed that the CARB staff has totally dismissed our concerns in this matter.

Your Board has heard from many members of the industry that there is no evidence extending the warranty will provide any real benefit to the consumer. And you will give the new car dealers an unfair advantage over the independent repair segment of the industry, should you decide to pass the proposed regulation. Most of the independent repair facilities invest thousands of dollars each year to remain current with the changing technology, so we have a true vested interest in repairing and servicing today's automobiles.

Also, your Board must be fully aware CARB does not have the authority to extend the warranty beyond the current 3 year/50,000 mile warranty which is the current statute in California. Even if

you do pass this pending regulation, this whole process will end up in the courts and the only segment of the California population that will get hurt is the consumer. The price of the vehicles will rise just due to the cost of the litigation alone. It is unheard of to require a manufacturer to warranty any product beyond its useful life. Most automobile owners do not keep a vehicle for 15 years, yet they will be paying the price of the warranty for the second and third owners in the initial purchase.

Please really think about what this pending legislation will do not only to the new car manufacturers but the consumers and the aftermarket industry. Please VOTE NO on the proposed amendments to extending the emission warranty regulations.

Sincerely,

Michael Self

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-03-21 08:37:43

No Duplicates.

Comment 38 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Diane
Last Name: Bailey
Email Address: dbailey@nrdc.org
Affiliation:

Subject: Support Recall/Warranty Item
Comment:

```
Please find our comments attached.
Thanks.
-diane
```

Attachment: www.arb.ca.gov/lists/recall06/61-emissions_waranty_and_recall_arb_letter__3_.doc

Original File Name: Emissions waranty and recall ARB letter (3).doc

Date and Time Comment Was Submitted: 2007-03-21 10:22:05

No Duplicates.

Comment 39 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Craig
Last Name: Johnson
Email Address: cjauto@verizon.net
Affiliation:

Subject: 15 year warranty
Comment:

```
Please consider to NOT have the manufactures extend their emmission
warranty to 15 years, or 150,000 miles. Everytime I take my vehicle
in for a recall, I get sold things My vehicle does not need. They
bring me a laundry list of things my car needs.
 I then take my car to my independent garage, and they show me the
items do NOT need replacing, and they even show me in my owners
manual that the items are not replaced yet.
 Thank you for considering my request.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-03-21 10:22:08

No Duplicates.

Comment 40 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: K. Martin
Last Name: Keller
Email Address: Non-web submitted comment
Affiliation: CalABC

Subject: Notice of public hearing to consider amendments to CA's emission warranty info. reporting
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/63-recall06-38.pdf

Original File Name: recall06-38.pdf

Date and Time Comment Was Submitted: 2007-03-21 10:23:30

No Duplicates.

Comment 41 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Steven
Last Name: Douglas
Email Address: sdouglas@autoalliance.org
Affiliation: Alliance of Automobile Manufacturers

Subject: Alliance Comments on Defect & Warranty Reporting
Comment:

```
Attached are the Alliance comments and attachements A, B, and C.
Legal comments will be provided separately.
```

Attachment: www.arb.ca.gov/lists/recall06/64-alliance_comments.zip

Original File Name: Alliance Comments.zip

Date and Time Comment Was Submitted: 2007-03-21 10:56:40

No Duplicates.

Comment 42 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: John
Last Name: Cabaniss
Email Address: jcabaniss@aiam.org
Affiliation: Assoc of International Automobile Mfrs

Subject: AIAM Comments on EWIR Proposal
Comment:

```
Attached are the comments of AIAM on the subject of proposed
amendments to California's emission warranty information reporting
and recall regulations and test procedures, to be considered at the
March 22 hearing of the Board.
```

Attachment: www.arb.ca.gov/lists/recall06/65-aiam_ewir_comments_3.22.2007.pdf

Original File Name: AIAM EWIR Comments 3.22.2007.pdf

Date and Time Comment Was Submitted: 2007-03-21 11:11:46

No Duplicates.

Comment 43 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.

First Name: Karl
Last Name: Simon
Email Address: Non-web submitted comment
Affiliation: U. S. EPA

Subject: Comments by the U.S. EPA regarding proposed amendments to CA's emission warranty
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/66-recall06-43.pdf

Original File Name: recall06-43.pdf

Date and Time Comment Was Submitted: 2007-03-21 14:27:15

No Duplicates.

Comment 1 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: Daniel
Last Name: Goycochea
Email Address: dgoycochea@sbcglobal.net
Affiliation: Independent/ Educator

Subject: Emissions Warranty
Comment:

I ask that you consider the impact of expanding the emissions warranty. In an already sluggish industry that is trying to rebound, we can not afford to lose more business. It is a fact that consumers also choose to do business with there local independent repair facilities. This industry needs the work that is available to us. Losing this battle would be detrimental to the independent repair industry. As a political machine the independent repair industry can be a very strong ally to those that support our concerns. I thank you for your time and consideration.

Sincerely Daniel Goycochea

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2006-12-07 09:08:29

No Duplicates.

Comment 2 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 3 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: John
Last Name: Cabaniss
Email Address: JCabaniss@AIAM.org
Affiliation: AIAM

Subject: Comments on Proposed Amendments to CA Emission Warranty Info.Reporting & Recall Regs.
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/36-recall06-ws-2.pdf

Original File Name: recall06-ws-2.pdf

Date and Time Comment Was Submitted: 2006-12-12 13:23:46

No Duplicates.

Comment 4 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: Denny
Last Name: Kahler
Email Address: Non-web submitted comment
Affiliation: Automotive Service Association

Subject: Comments on Proposed Amendments to CA Emission Warranty Info.Reporting & Recall Regs.
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/37-recall06-ws-3.pdf

Original File Name: recall06-ws-3.pdf

Date and Time Comment Was Submitted: 2006-12-12 13:27:50

No Duplicates.

Comment 5 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: Nikki
Last Name: Ayers
Email Address: Non-web submitted comment
Affiliation: Ayers Automotive Repairs

Subject: Comments on Proposed Amendments to CA Emission Warranty Info.Reporting & Recall Regs.
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/38-recall06-ws-4.pdf

Original File Name: recall06-ws-4.pdf

Date and Time Comment Was Submitted: 2006-12-12 13:30:50

No Duplicates.

Comment 6 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: Dean
Last Name: Saito
Email Address: Non-web submitted comment
Affiliation: SCAQMD

Subject: Comments on Proposed Amendments to CA Emission Warranty Info.Reporting & Recall Regs.
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/39-recall06-ws-5.pdf

Original File Name: recall06-ws-5.pdf

Date and Time Comment Was Submitted: 2006-12-12 13:31:49

No Duplicates.

Comment 7 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: Reginald
Last Name: Modlin
Email Address: Non-web submitted comment
Affiliation: DaimlerChrysler

Subject: Comments on Proposed Amendments to CA Emission Warranty Info.Reporting & Recall Regs.
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/40-recall06-ws-6.pdf

Original File Name: recall06-ws-6.pdf

Date and Time Comment Was Submitted: 2006-12-12 13:34:46

No Duplicates.

Comment 8 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: S. Kingsley
Last Name: Macomber
Email Address: kmacomber@sierraresearch.com
Affiliation: Sierra Research

Subject: Comments on Proposed Amendments to CA Emission Warranty Info.Reporting & Recall Regs.
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/41-recall06-ws-7.pdf

Original File Name: recall06-ws-7.pdf

Date and Time Comment Was Submitted: 2006-12-12 13:37:30

No Duplicates.

Comment 9 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: General
Last Name: Motors
Email Address: Non-web submitted comment
Affiliation:

Subject: Confidential Comment
Comment:

```
Please see attachment.
```

Attachment: www.arb.ca.gov/lists/recall06/42-recall06-ws-8.pdf

Original File Name: recall06-ws-8.pdf

Date and Time Comment Was Submitted: 2006-12-12 13:52:16

No Duplicates.

Comment 10 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: Jed
Last Name: Mandel
Email Address: Non-web submitted comment
Affiliation: EMA

Subject: Comments of the EMA
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/43-recall06-ws-1.pdf

Original File Name: recall06-ws-1.pdf

Date and Time Comment Was Submitted: 2006-12-12 15:52:26

No Duplicates.

Comment 11 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: Steven
Last Name: Douglas
Email Address: sdouglas@autoalliance.org
Affiliation: Alliance of Automobile Manufacturers

Subject: Comments of the Alliance of Automobile Manufacturers
Comment:

```
Please see the attached zip file.
```

Attachment: www.arb.ca.gov/lists/recall06/44-recall06-9.zip

Original File Name: recall06-9.zip

Date and Time Comment Was Submitted: 2006-12-13 14:19:20

No Duplicates.

Comment 12 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: Daniel
Last Name: Goycochea
Email Address: dgoycochea@sbcglobal.net
Affiliation: Independent/ Educator

Subject: Emission Warranty
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/46-recall06-26.pdf

Original File Name: recall06-26.pdf

Date and Time Comment Was Submitted: 2006-12-27 13:21:29

No Duplicates.

Comment 13 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: Roger
Last Name: Gault
Email Address: Non-web submitted comment
Affiliation: EMA

Subject: Oral Statement & Supplemental Comments of the EMA
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/67-recall06-ws-9.pdf

Original File Name: recall06-ws-9.pdf

Date and Time Comment Was Submitted: 2007-03-23 11:07:23

No Duplicates.

Comment 14 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: Philip
Last Name: Fournier
Email Address: Non-web submitted comment
Affiliation: ASC, Chapter 32

Subject: Amendments to CA Emission Warranty Info. Reporting & Recall Reg. & Emission Test Procedure
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/68-recall06-ws-10.pdf

Original File Name: recall06-ws-10.pdf

Date and Time Comment Was Submitted: 2007-03-23 11:12:40

No Duplicates.

Comment 15 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: Pamela
Last Name: Amette
Email Address: pamette@mic.org
Affiliation: Motorcycle Industry Council, Inc.

Subject: CARB Proposed Warranty Information Reporting & Recall Reg. Amendments
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/69-recall06-ws-11.pdf

Original File Name: recall06-ws-11.pdf

Date and Time Comment Was Submitted: 2007-03-23 11:15:25

No Duplicates.

Comment 16 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: Steven
Last Name: Douglas
Email Address: sdouglas@autoalliance.org
Affiliation: Alliance of Automobile Manufacturers

Subject: Comments of the Alliance of Automobile Manufacturers
Comment:

```
Please see the attached comments.
```

Attachment: www.arb.ca.gov/lists/recall06/70-alliance_comments.zip

Original File Name: Alliance Comments.zip

Date and Time Comment Was Submitted: 2007-03-23 11:18:30

No Duplicates.

Comment 17 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)

First Name: Allen
Last Name: Pennebaker
Email Address: Non-web submitted comment
Affiliation: ASCCA

Subject: Form Letter #1: No to New Regulations
Comment:

```
Please see the attached comment; about 130 form letters received at
the March 22, 2007 Board meeting.
```

Attachment: www.arb.ca.gov/lists/recall06/71-recall06-ws-14.pdf

Original File Name: recall06-ws-14.pdf

Date and Time Comment Was Submitted: 2007-03-23 13:03:57

No Duplicates.

Comment 1 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 15-1.

First Name: Aron
Last Name: Lowe
Email Address: Non-web submitted comment
Affiliation: Automotive Aftermarket Industry Assoc.

Subject: Amendments to CA Emission Warranty Info. Reporting & Recall Reg. & Emission Test Procedure
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/74-recall06-15day-1.zip

Original File Name: recall06-15day-1.zip

Date and Time Comment Was Submitted: 2007-07-06 10:35:31

No Duplicates.

Comment 2 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 15-1.

First Name: Pamela
Last Name: Amette
Email Address: pamette@mic.org
Affiliation: Motorcycle Industry Council, Inc.

Subject: Motorcycle Industry Council, Inc.
Comment:

```
Please see attached comment.
```

Attachment: www.arb.ca.gov/lists/recall06/75-carbwarrantyreportingrecall__micdraft_comments15daynotice062207_..pdf

Original File Name: CARBWarrantyReportingRecall_ MICDraft Comments15DayNotice062207_..pdf

Date and Time Comment Was Submitted: 2007-07-06 14:16:06

No Duplicates.