E.O. 6-36 Lor. A.

PCA

Portland Cement Association

June 13, 2007

Catherine Witherspoon, Executive Director
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Re: Comments Submitted to the Air Resources Board (ARB) Concerning Implementation of California Global Warming Solutions Act (AB 32)

Dear Ms. Witherspoon:

I am writing on behalf of the Portland Cement Association (PCA) regarding the availability of comments and other documents the Air Resources Board has received related to implementation of AB 32. PCA is a trade association representing cement companies in the United States and Canada. PCA's U.S. membership consists of 45 companies operating 106 plants in 35 states and distribution centers in all 50 states servicing nearly every Congressional district. PCA members account for more than 95 percent of cement-making capacity in the United States and 100 percent in Canada. All of the portland cement manufacturers with production facilities in California are members of PCA.

With the exception of materials or correspondence deemed confidential by the submitter, PCA believes that comments and other perspectives forwarded to the attention of ARB related to AB 32 implementation should be made available to the public. PCA is has provided comments to ARB on the industry's views on greenhouse gas reporting and would not object to those comments being made publicly available. PCA is aware that the California Energy Commission is posting on its website all comments submitted to the Market Advisory Committee. We believe that ARB should take similar steps.

We further believe that the implementation process will benefit from enhanced disclosure of this information and could facilitate greater dialogue among interested parties, leading to more informed comments and superior information for the ARB to consider. This could also minimize the ARB's administrative burden, as the ARB will not have to respond to multiple public records requests. Moreover, additional disclosure may decrease repetitive comments and allow for the identification of information voids or inaccuracies.

I may be reached at (202) 408-9494 or aohare@cement.org to address any questions you may have regarding PCA's thoughts on this matter. Thank you for your attention.

Sincerely,

Andrew T. O'Hare

Andrew T. O'Hare
Vice President, Regulatory Affairs

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JUN 18 2007
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EXECUTIVE OFFICE

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