



**TRUCK  
MANUFACTURERS  
ASSOCIATION®**

1225 New York Avenue, NW – Suite 300  
Washington, DC 20005-6165  
Phone: 202/638-7825 • Fax: 202/737-3742

Dr. Robert F. Sawyer, Chairman  
State of California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

June 20, 2006

**Reference: Agenda Item 06-6-3, California Motor Vehicle Service Information; Title 13 CCR 1969**

Dear Dr. Sawyer,

The Truck Manufacturers Association (TMA), whose members include all of the major North American manufacturers of medium and heavy-duty trucks (greater than 8845 kilograms (19,500 pounds) gross vehicle weight rating), hereby submits comments to the Board for its consideration on this subject. TMA member companies include: **Ford Motor Company, Freightliner LLC, General Motors Corporation, International Truck and Engine Corporation, Isuzu Commercial Truck of America, Inc., Kenworth Truck Company, Mack Trucks, Inc., Peterbilt Motors Company, Sterling Truck Corporation, Volvo Trucks North America, Inc., and Western Star Trucks.**

Commercial vehicles are capital goods used by their owners to deliver business and public-safety services. The ability to quickly and effectively complete repairs is critically important to owners to ensure minimum downtime and lost revenue because the vehicle cannot perform its mission. Vehicle manufacturers agree that current and comprehensive service information must be available to vehicle owners. Effective service information also benefits manufacturers. It minimizes warranty costs by facilitating cost-effective repairs.

The ARB's Service Information Rule (SIR) for heavy-duty vehicles appears to be based on the premise that existing service information marketing and delivery efforts by heavy-duty manufacturers are not serving the needs of commercial vehicle owners and that, in the future, manufacturers will withhold OBD information from vehicle owner's mechanics in order to direct service only to authorized service channels. On the contrary, vehicle and engine manufacturers have for decades been marketing service information to their mutual customers - vehicle owners and their repair facilities.

Manufacturers willingly offer product-specific training to mechanics employed by vehicle owners<sup>1</sup>. The American Trucking Association's Technology and Management Council (ATA/TMC) provides advice to vehicle owners and repair facilities on preventative maintenance and repair practices, in their recommended practices manual. Increasingly, these marketing efforts use the Internet's e-commerce foundations to speed the delivery of service and repair information and to manage publication costs. These efforts are supported by 24-hour nationwide parts delivery service for most makes and models. The addition of regulated on-board

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<sup>1</sup> Some vehicle owners use this training to enable them to complete their own warranted repairs, eliminating the expense of bringing the vehicle to an off-site repair facility.

diagnostics will not change long-standing heavy-duty industry practices for serving customers with effective service information.

Accordingly, TMA believes that, at a minimum, ARB should agree to a future review on heavy-duty SIR subscription sales, for the purpose of assessing the benefits to covered persons versus the cost to provide those benefits. An initial assessment of light-duty subscription sales suggests that heavy-duty SIR sites will not meet typical business investment guidelines for cost effective use of business capital. The order of magnitude difference in sales volumes of heavy-duty vehicles compared to light-duty vehicles, plus the very large numbers of vehicle/engine combinations that are offered, greatly increases the per vehicle/engine cost of providing this information for heavy vehicles. These are permanent, fixed costs for manufacturers.

Finally, TMA supports the Engine Manufacturers' Association's (EMA) comments and remarks on this subject and adds the following additional observations:

- Flexible website subscription schedules will allow engine manufacturers to optimize offerings to heavy-duty vehicle owners and qualified heavy-duty repair facilities.
- The principal 'covered person' needs to be the vehicle's owner and qualified repair facilities. Mechanic training and certification by Automotive Service Excellence (ASE) recognizes specialties for heavy-duty vehicles and diesel engines. Some post-secondary vocational schools offer programs in heavy-duty diesel engine repair. Heavy-duty service training literature legitimately assumes these specialty qualifications, and further assumes mechanics routinely obtain commercial driver's licenses, in order to conduct road tests of repairs.
- Commercial vehicles are not consumer products. They are marketed based on a 'relationship' business model where establishing and maintaining the vehicle owner's trust earns repeat sales. Effective engine and vehicle service have been keys to maintaining the vehicle owner's trust in the past and will remain so in the future, as underserved customers will seek competitors for future commercial vehicle purchases.

We appreciate the opportunity to provide the Board these views.

Sincerely Yours,

A handwritten signature in black ink, appearing to read 'Robert M. Clarke', written in a cursive style.

Robert M. Clarke  
President