



INTERNATIONAL TRUCK AND ENGINE CORPORATION

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TRUCK GROUP

June 20, 2006

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

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

Dear Dr. Sawyer,

ARB's Service Information Rule (SIR) should provide flexibility for engines to comply with light-duty provisions or heavy-duty provisions as best suits the business needs of the engine manufacturer producing the engine and the vehicle manufacturer installing it.

- Light-heavy duty and medium-heavy duty diesel or diesel-derived engines should be permitted to comply with "medium duty" provisions.
- "Medium duty" engines, derived from light-heavy duty and medium-heavy duty diesel engines should be permitted to comply with heavy-duty provisions. [1]

In this way, manufacturers would be able to comply with the regulations by providing a single website that is organized under a single set of rules. Manufacturers will realize cost savings by not artificially segmenting their sites between light-duty and heavy-duty elements. This should also help manufacturers avoid errors of omission.

Vehicle and engine manufacturers should have the flexibility to choose how best to provide the required service information support for 'de facto' private-label engine sales. Service literature for "private-label" engines may be better marketed on the vehicle manufacturers' SIR sites, where the service information for the vehicle manufacturers' own engines is marketed under current light-duty rules, even when the gross vehicle weight exceeds 14,000. This will maintain existing practices in the market. [2]

International Truck and Engine Corporation appreciates ARB staff's discussion of these issues prior to the hearing. International concurs with staff discussion that some arrangements would be subject to the Executive Officer's approval.

International is a leading manufacturer of heavy-duty trucks and engines. International® Engines are used in International® Trucks and in trucks built by or for others. International Truck and Engine Corporation is a member of the Engine Manufacturers' Association and the Truck Manufacturers' Association and supports their statements.

Sincerely Yours,

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Manager, Vehicle Requirements
International Truck and Engine Corporation

\\s\ Eric T. Swenson

Notes:

[1] Medium-duty engines derived from light-heavy and medium-heavy duty engines are desirable features for commercial vehicles below 14,000 lbs GVW, because they offer durability benefits to vehicle owners. Some commercial vehicles above 14,000 lbs GVW, with low overall duty cycles, benefit from lower-cost light-heavy engines, derived from "medium-duty" engines.

[2] Some engine supply agreements between engine and vehicle manufacturers are 'de facto' private label sales, because the engine's accessories, engine control system, and wiring interconnection to the vehicle are all highly tailored to the vehicle manufacturer's cab and chassis. Tailoring can implement the vehicle manufacturer's specifications for terminology, scan-tool diagnostic protocol, wire color, and circuit marking. Also, engine control systems have been implemented on different electronic hardware from the engine manufacturer's standard offering for the same displacement engine. Some engines have even been painted to the color desired by the vehicle manufacturer. Examples of these 'de-facto' private label engines include the Cummins, Inc. I-6 engine sold in the Dodge Ram and the International® Powerstroke™ engine sold in Ford F-series.