



June 18, 2009

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: AB32 Cool Car Glazing Proposed Regulation of May 8, 2009

Dear Board Members:

Guardian Automotive has closely followed and supported the development of this proposed regulation and appreciates the opportunity to participate and provide comment. Guardian has been a high volume supplier of infrared reflective (IRR) cool car glazing to OEM manufacturers in Europe in the form of fabricated windshields and backlites for over a decade. As a supplier of automotive glazing in North America and Europe, we are pleased to finally see actions in North America, specifically California, which will aid in the adoption of a technology proven to reduce emissions in a cost effective manner while simultaneously improving vehicle occupant comfort.

While the proposed regulation drives latest available versions of solar reflective technology and highest available benefit for windshields, we feel the need to caution that it does not drive adoption of best available technologies for other glazing positions. The same level of performance required in windshields is available and in use in a variety of vehicles in other glazing positions. We have seen and understand the comments of the auto manufacturers regarding the adoption of solar reflective laminated glass in apertures other than windshields. Perhaps implementing all openings at this performance level over a short period could pose some undue design burden, but as vehicles go through significant redesign stages there seems no practical reason not to adopt the available improvements thereafter. We would like to suggest that the ARB revisit the other apertures at a future date.

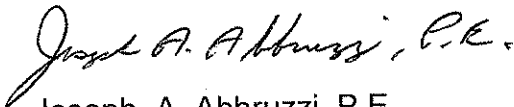
Some vehicles already employ side or door glass laminates and are positioned to readily take advantage of solar reflective solutions without re-engineering issues. In our experience, vehicles that have migrated to side laminates have actually experienced a reduction in weight as most of these vehicles adopted laminated glass of the same thickness as the monolithic glass it replaced. Given the weight benefit, as well as the

solar load reduction and other potential safety and security benefits of laminates, we would like to suggest the regulation include reasonably strong incentives for manufacturers to adopt solar reflective side laminates.

There will be an incremental cost for manufacturers to improve windshields from 50% to 40% Tts in 2014. Referring to section (b) (2) of the Compliance Options section of the proposed regulation, we believe that an alteration to allow a 5% increase in windshield Tts in trade for a Tts reduction to below 45% for the front door glass would provide adequate economic incentive to add the solar reflective benefit to those vehicles already using laminated door glass. As the adoption of laminated door glass is expected to rise, especially if the NHTSA adopts new regulations regarding side aperture ejection mitigation, it would be unfortunate to miss this opportunity to drive additional low cost and easily implemented emissions benefit.

To reiterate, Guardian is pleased to see and be part of the advancements made through this proposed regulation and hope the Board will find our comments useful.

Sincerely,



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