

**California Manufacturing and Technology Association  
CTIA-The Wireless Association  
Tech America**

Mary Nichols  
Chair  
California Air Resources Board  
1001 I St.  
Sacramento, CA 95812

Re: CARB Cool Car Standards and Implications on Wireless Transmission; Hearing date:  
June 25, 2009; Request for Continuance

Dear Chairperson Nichols;

The above mentioned organizations represent a broad array of manufacturers and providers of wireless devices and services used in automobiles. We understand the staff has proposed a rule which would require solar management standards for automotive window glazing that limits the transmission of solar energy into the vehicle and which reduce electromagnetic transmission. The proposed rule is scheduled for consideration for adoption by the Board on **Thursday, June 25, 2009**. We did not learn of the proposed rule until late last week and have been spending the interim period gathering information on the proposal and its potential impacts on the wireless devices and services provided by our member companies.

At this point there is some information we have seen that suggests that the proposed standard could lead to the degradation of signal quality for wireless devices. This degradation could result in dropped calls. The problem is we don't know, nor does the time frame proposed in the rule, provide us an adequate opportunity to assess impacts of Tier 1 or the presumably greater impacts of Tier 2 on consumers and public safety personnel or costs to our companies and customers related to those impacts. Certainly that will require additional analysis and testing to more fully understand. With over 25 million wireless customers in California, many using it as their only phone, even a small impact could have significant consequences. Similar issues arise for GPS and other wireless technology.

Given the lack of information and our inability to participate in the process to date we are respectfully requesting a reasonable continuance before adoption of the rule for our organizations and member companies to assess the impacts of the rule and offer comments before final adoption.

Thank you for your consideration. The names and contact information of the signators are below.

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