



Clerk of the Board
Air Resources Board
10011 I Street, 23rd Floor
Sacramento, CA 95814

Electronic submission

Subject: **FERRARI COMMENTS ON CARB PROPOSAL TO AMEND THE EVAPORATIVE AND EXHAUST EMISSIONS TEST PROCEDURES**

I am pleased to send you Ferrari's comments on the CARB proposal to amend the current motor vehicle evaporative and exhaust test procedures, as described in the following CARB site: <http://www.arb.ca.gov/regact/evap2006/evap2006.htm>.

General comments

Ferrari agrees with the principle to streamline the current California certification emissions tests procedures to reduce the burden on manufacturers both during certification of new vehicles, and for in-use verification tests. This fact is important for all manufacturers, but especially for small-volume manufacturers which have limited resources, and often rely on external facilities to carry out tests.

Moreover, we strongly support the harmonization of Federal and California rules, and therefore we really appreciate the present proposal, because it is an important step toward a better harmonization of the exhaust and evaporative tests procedures in U.S.A. This is essential to take advantage of the already streamlined EPA procedures, adopted via a direct final rule (effective February 6, 2006) for manufacturers which certify vehicles in all U.S.A. states. Otherwise, manufacturers shall continue to carry-out the 2-day diurnal evaporative test for CARB certification.

1. Optional waiver of the 2-day diurnal test for certification

Ferrari supports the CARB proposal to allow manufacturers the option to not to carry out the 2-day evaporative test for certification purpose for the reasons explained in the following.

The CAP 2000 rule has permitted to reduce the number of tests to be performed during certification. Nonetheless, the 2-day, and 3-day evaporative tests are still required and they are complicated and take approximately 2 weeks for each Emission Data Vehicle to be completed. Obviously, each 2-day evaporative test not performed means a real saving of time (approximately 4 days) and money.

We agree with CARB evaluation that the 3-day diurnal test plus the ORVR test permit to verify if canister purge is adequate.

June 21, 2006



Furthermore, vehicle manufacturers maintain the responsibility to demonstrate compliance with the applicable 2-day standard. Additionally, CARB could still perform 2-day diurnal tests for in-use compliance or require manufacturers to perform confirmatory 2-day diurnal tests for certification.

Manufacturers may use waiver based on good engineering judgement that the canister will be adequately purged during the FTP test, and the vehicle satisfy the 2-day evaporation standard. Additionally, they could define a correlation between the 2-day and 3-day test results, and make comparisons with already certified vehicles which adopt the same or similar evaporative and refuelling systems, using proven technologies, so that they are confident to comply with the supplemental evaporative test, although it is not run. The proposed optional waiver of the 2-day evaporative test reduces the burden during certification of a new vehicle, without affecting the stringency of the CARB regulations.

2. Alternative running loss test method

We agree with the principle of allowing manufacturers alternative methods to carry out running loss tests to increase options given to manufacturers. It is useful to have two or more alternative methods, which can produce similar results.

3. Canister preconditioning procedures

We agree with the proposal to allow alternative canister preconditioning procedures, because it could be useful for those vehicles with an evaporative control system layout which makes it more difficult to perform this portion of the evaporative tests. If the canister is inaccessible, or difficult to access, the present canister loading procedure can be quite burdensome and difficult to perform, especially on In-Use Verification Program vehicles.

4. In-use Verification Program evaporative test requirements

We believe it is appropriate to clarify which kind of tests shall be run for in-use evaporative verifications, related to the fuel types.

5. On-board Vapor Recovery Test procedures

The proposed change is intended to give more flexibility to carry out the ORVR tests. Ferrari supports such proposal. We think it is preferable to minimize the number of disconnections during the tests to limit the possibility to have void tests or at least to influence the tests results and repeatability.

6. Four-wheel drive dynamometer provisions

It is logical to add specific provisions to perform emission tests for 4-wheel or all-wheel drive vehicles to better reproduce on the dynamometer the real world driving conditions for such vehicles, and therefore the representativeness of these tests.



7. Vehicle labelling

Ferrari supports the proposal to simplify the current "tune-up" label. It is unnecessary to continue to include in this label data and information which are no longer useful for technicians, and vehicle owners (e.g.: tune-up specifications, and vacuum hose routing diagram). Deleting the vacuum hose routing diagram allows to simplify the label. Moreover, it is possible to adopt a unique form for all different models, changing only the data specific for each model. Finally, it is necessary to align the requirements between Federal and California requirements about vehicle emissions labelling. The proposed amendment could help manufacturers to save time and money.

Conclusion

The proposed amendments to the present California certification emissions tests procedures are beneficial for all manufacturers, reducing the time and cost of U.S.A. certification, increase the flexibility to perform some tests, without any drawbacks, or detriment to the stringency of current requirements. In light of the above, Ferrari strongly supports all the modifications proposed by CARB in these amendments.

Sincerely,

A handwritten signature in black ink that reads "Corrado Cingi". The signature is written in a cursive, flowing style.

=====<0>=====

Corrado Cingi
Vehicle Certification Manager
FERRARI S.p.A.
Via Abetone Inferiore 4 - 41053 Maranello MO ITALY
Phone: 01139 0536 949264 – Fax : 01139 0536 949594
E-mail: ccingi@ferrari.it