

**CALIFORNIA AIR RESOURCES BOARD**

**Heavy Duty Vehicle** ) **11 December 2008**  
**Greenhouse Gas Emission** ) **Agenda Item 08-11-4**  
**Reduction Measure** )

**STATEMENT OF  
DAIMLER TRUCKS NORTH AMERICA**

The California Air Resources Board (CARB) proposes to adopt a requirement under which all new model year 2011 and later sleeper-cab heavy-duty tractors pulling 53-foot or longer box-type trailers in California must be US EPA SmartWay certified. Daimler Trucks North America (DTNA) manufactures tractors eligible for SmartWay certification, and we strive daily to improve our customers' vehicles' fuel efficiency. Nonetheless, we object to CARB's regulation based on the following:

- 1- The EPA's SmartWay program is not based upon a scientific measure of tractors' aerodynamics or fuel saving capabilities. A clear, uniform set of test procedures and selection criteria is nonexistent.
- 2- Selection of vehicles eligible for SmartWay certification was based solely upon a guess as to which models provide superior aerodynamics within each manufacturer's product line. The selection process was not rigorous and left open the possibility that a SmartWay-eligible vehicle offered by one manufacturer may be less efficient than an ineligible vehicle from another manufacturer.
- 3- Manufacturers participating in the SmartWay program had an arbitrarily chosen number of vehicles deemed eligible for SmartWay certification. Some manufacturers had two vehicles; one manufacturer had four. The number did not depend on any scientific basis nor on the manufacturer's portion of the market nor any other measure.
- 4- Because of the SmartWay program's voluntary nature, manufacturers of some vehicle brands did not participate in the SmartWay programs and have no vehicles listed. These brands are not eligible for SmartWay certification.

As a voluntary program, there were small but solvable problems with this lack of rigor. The EPA and vehicle manufacturers, including DTNA, are working to solve these problems by creating a scientific basis for SmartWay eligibility. As a regulation, however, there is a big problem with the SmartWay program's lack of rigor. If a regulation prevents any tractor from pulling the most common type of trailer, that tractor will be hard to sell. In turn, if CARB prohibits all but SmartWay certified sleeper equipped tractors from pulling the most common type of trailers, CARB will create a major disincentive to sales of those tractors that are not SmartWay eligible. Yet CARB will do so based upon no rigorous scientific reason or based simply upon a manufacturer not having participated in the EPA's program. CARB will penalize tractor manufacturers and potentially harm business for California truck dealerships by virtue of a regulation with no rigorous scientific foundation.

SmartWay is a voluntary program and a work in progress. It is neither appropriate nor ready for a regulation. DTNA suggests that CARB only enacts a regulation if it stands up to scientific scrutiny and uniformly treats manufacturers and their vehicles based solely upon scientific measures. DTNA suggests that CARB work with the EPA to develop a rigorous procedure to compare the fuel efficiency (or greenhouse gas emissions) of heavy duty vehicles and determine SmartWay eligibility. DTNA recommends that, only after developing a rigorous procedure, should CARB regulate vehicles based upon SmartWay certification. DTNA suggests that CARB also work with the US Department of Transportation on its heavy-duty vehicle fuel efficiency (and greenhouse gas) measure, as mandated under the Energy Independence and Security Act of 2007. As an alternative, or perhaps as an interim measure, DTNA suggests that CARB require technologies, with rigorous specifications, that have been scientifically demonstrated to improve fuel efficiency. We suggest CARB start with the EPA's list of SmartWay add-on technologies: fuel tank side fairings, cab roof fairings, cab side extenders, aerodynamic mirrors, aerodynamic bumpers, idle reduction technologies, and low rolling resistance tires.