

**Honda Comments on the
2012 LEV & GHG Revisions – 15 Day Notice**

Thank you for the opportunity to comment on the Revisions posted as **“Enclosure A”**

1. PM and the Mid-Term Review. At the January 27th Board Hearing, the Board directed staff to review PM technology advancements for earlier implementation. Honda notes that measuring PM at the 1.0 mg/mile is not yet technically, nor practically feasible. CARB staff should take this into consideration when reviewing the PM schedule.
2. Fuel Specifications. Honda shared with staff its advances in researching the affects of fuel specifications on actual PM. Honda proposed using its PM Index methodology to a) create PM Index specifications for certification fuels and b) create PM Index specifications for market fuels. The certification fuel specifications will standardize the testing of engines across all OEMs, and the market fuel specifications have the potential to reduce PM emissions in the in-use fleet, both older light duty vehicles on the road, as well as new light duty vehicles. If the PM Index strategy is too difficult for ARB to implement, a similar result can be achieved by holding aromatics of C>9 to not less than 2 vol %, in which case the gasoline quality for PM measurements will stabilize. We recommend that ARB add this specification to certification gasoline for LEV III light-duty vehicles.
3. Hybrid Test Procedures. In the hybrid test procedures, ARB requires that the battery state of charge (SOC) at the end of the test be within 1% of the battery’s SOC at the beginning of the test. EPA recently adopted SAE J1711 and SAE J1634 which allows the variance between the starting and ending SOC to be within 5% of each other, and allows for an energy adjustment based on the SOC difference. Honda believes that the intent of ARB is to harmonize as much as possible the regulations between EPA and ARB. Additionally, Honda believes that the SAE procedures are a) more flexible, b) more realistic, and c) will reduce design and testing burdens that are unnecessarily the result of ARB’s current practice. We respectfully request that ARB consider this issue when harmonizing their regulations with EPA.
4. Labeling guidelines in the Appendix D 2015 Test procedures. ARB newly changed the required abbreviations of “wide range/linear/air-fuel ratio heated oxygen sensor” to “WR-HO2S.” Today, this technology is in wide use and commonly abbreviated on today’s label as “AFS.” Honda recommends that ARB continue using “AFS.”

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