



Public Policy Center

May 27, 2009  
SM-3080

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

The purpose of this letter is to transmit General Motors (GM) comments on the ARB's proposed aftermarket conversion certification requirements for plug-in hybrid electric vehicles (PHEVs). This item is being considered by the Board at its May 28, 2009 public hearing.

GM supports strong aftermarket conversion certification requirements for PHEVs. GM, as an original equipment manufacturer (OEM), must comply with a comprehensive set of requirements that it must meet to ensure compliance with exhaust emission standards, evaporative emission standards, and on-board diagnostic system requirements over the full useful life of the vehicle. In addition, OEMs are faced with extended emission warranty requirements of 15 years/150,000 miles (or 10 years for energy storage devices such as batteries) for products certified as partial zero emission vehicles (PZEVs). OEMs must also meet strict Federal Motor Vehicle Safety Standards (FMVSS).

The proposal being considered by the Board offers significantly less stringent requirements to aftermarket converters, particularly in Tiers 1 and 2, and considerable flexibility compared to the proposal from the January Board hearing. A further relaxation of the requirements would be unwarranted and would lead to a further increase in the potential for increased emissions and conversion systems that do not operate properly (including the OBD system) and are not durable. This could have the unintended consequence of "poisoning" PHEV technology in the eyes of consumers, a consequence that GM does not want to see happen.

PHEVs and extended range electric vehicles (EREVs) such as the Chevy Volt are exciting and emerging technologies that can help to address environmental and energy issues. GM is committed to the Volt and continues to be on track to introduce the Volt in late 2010 calendar year. It is very important that consumers have a positive initial experience with these advanced electric drive technologies so that we can grow the market for them going forward.

Sincerely,

Alan R. Weverstad  
Executive Director  
Environment, Energy, and Safety Policy