



January 25, 2012

Mary D. Nichols, Chairman  
California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Re: Jaguar and Land Rover Comments Related to the 2012 Proposed Amendments to the California Zero Emissions Vehicle Program Regulations

Dear Chairman Nichols,

Attached are the Jaguar Land Rover North America, LLC's (JLRNA) comments in response to the December 7, 2011 "California Environmental Protection Agency Air Resources Board Staff Report: Initial Statement of Reasons Advanced Clean Cars 2012 Proposed Amendments to the California Zero Emission Vehicle Program Regulations".

JLRNA thanks the California Environmental Protection Agency Air Resources Board for the opportunity to comment and contribute to the process and looks forward to further discussions.

Sincerely,

Anna-Lisa Corrales  
General Counsel and Secretary

January 25, 2012

**Jaguar Land Rover North America, LLC's (JLRNA) Comments in response to the December 7, 2011 " California Environmental Protection Agency Air Resources Board Staff Report: Initial Statement of Reasons Advanced Clean Cars 2012 Proposed Amendments to the California Zero Emission Vehicle Program Regulations."**

Jaguar Land Rover welcome and support the initiatives published in the Initial Statement of Reasons for the 2012 Proposed Amendments to the California Zero Emissions Vehicle Program Regulation, and particularly welcome the provisions made for Intermediate Volume Manufacturers.

We would like to request reconsideration of, and further discussion regarding, the proposed lead times for transition between Intermediate Volume Manufacturer and Large Vehicle Manufacturer definition.

Jaguar Land Rover consider the lead time provisions for redefinition of an IVM to LVM to be insufficient to initiate and launch the necessary new vehicle programs to meet the LVM category requirements:-

***[Section 2.2.1 Amend Manufacturer Size Definitions - ISOR Page 27 "A manufacturer with three consecutive averages over a size threshold will be subject to the stepped-up requirement the first model year following the last year of the third consecutive threshold. Below is an example of how this would work:***

**Manufacturer A Sales Averages**

<u>2017-2019</u>	<u>2018-2020</u>	<u>2019-2021</u>	<u>2020-2022</u>
19,000	21,000	25,000	28,000

***Manufacturer A, formerly an IVM would be subject to LVM requirements in model year 2023"]***

Jaguar Land Rover request consideration of a revision of the wording and concept as follows:-

"A manufacturer with three consecutive averages over a size threshold will be subject to the stepped-up requirement the FOURTH model year following the last year of the third consecutive threshold. Below is an example of how this would work:

**Manufacturer A Sales Averages**

<u>2017-2019</u>	<u>2018-2020</u>	<u>2019-2021</u>	<u>2020-2022</u>
19,000	21,000	25,000	28,000

Manufacturer A, formerly an IVM would be subject to LVM requirements in model year 2026".

This proposed lead time (maintaining current overall IVM-LVM transition lead times) WOULD give sufficient lead time to initiate and launch the necessary new vehicle programs to meet the LVM category requirements.

While the example stated in the ISOR suggests full transition outside of the scope of the regulation, the proposal does allow for earlier full transition within the scope of the regulation (i.e. 2025MY or earlier). Jaguar Land Rover thank the California Environmental Protection Agency Air Resources Board for the opportunity to comment and contribute to the process and look forward to further discussion on this proposal.