

**Comment 1 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Julie

Last Name: Becker

Email Address: [jbecker@autoalliance.org](mailto:jbecker@autoalliance.org)

Affiliation: Alliance of Automobile Manufacturers

Subject: Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedure

Comment:

Please see the attached letter to Catherine Witherspoon from the Alliance of Automobile Manufacturers.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/2-recall06-1.pdf>'

Original File Name: recall06-1.pdf

Date and Time Comment Was Submitted: 2006-11-02 15:17:47

No Duplicates.

**Comment 2 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Julie

Last Name: Becker

Email Address: [jbecker@autoalliance.org](mailto:jbecker@autoalliance.org)

Affiliation: Alliance of Automobile Manufacturers

Subject: Failure to Respond to the Alliance October 3, 2006 Letter Concerning ISOR

Deficiencies

Comment:

Please see the attached letter from the Alliance of Automobile Manufacturers.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/4-recall06-2.pdf>'

Original File Name: recall06-2.pdf

Date and Time Comment Was Submitted: 2006-11-28 10:55:59

No Duplicates.

**Comment 3 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: john

Last Name: duerr

Email Address: john.duerr@detroitdiesel.com

Affiliation:

Subject: Emission Warranty Information Reporting

Comment:

Comments in Attachment

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/5-ddccomments.pdf>'

Original File Name: DDCcomments.pdf

Date and Time Comment Was Submitted: 2006-11-29 13:05:52

No Duplicates.

## **Comment 4 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: David

Last Name: Munoz

Email Address: [david@munozauto.com](mailto:david@munozauto.com)

Affiliation:

Subject: Expansion of Vehicle Warranty Status

Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

1. The proof required to demonstrate violations of ARB's emission standards or test procedures;
2. The corrective actions available to ARB to address the violations;
3. The way emissions warranty information is reported to ARB.

As part of the "Corrective Action", ARB staff state, "Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component."

However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states "The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period."

Any expansion of the vehicle warranty status will negatively impact my business and other independent repairers in the State of California. I believe this is a major change in the vehicle warranty and a major rulemaking initiative. I implore the ARB to conduct a thorough economic analysis of this proposal's impact on the California independent repair industry. This proposal will have a negative impact on small businesses, the economy of our state and should be rejected.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-12-01 13:57:39

No Duplicates.

**Comment 5 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 6 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Bob

Last Name: Renteria

Email Address: brenteria@americanauto-body.com

Affiliation:

Subject: Oppose Expansion of Vehicle Warranty Status

Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;

The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB.

As part of the "Corrective Action", ARB staff state, "Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component."

However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states "The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period."

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Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-12-01 14:12:58

No Duplicates.

## **Comment 7 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Bob

Last Name: Little

Email Address: bl75cc@sbcglobal.net

Affiliation:

Subject: emission waranty

Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;

The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB.

As part of the "Corrective Action", ARB staff state, "Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component."

However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states "The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period."

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Thank you,

Bob Little

CEO Ed Little Auto Service, Inc

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-12-01 15:30:59

No Duplicates.

## **Comment 8 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Brad

Last Name: Kyle

Email Address: brad\_kyle@hotmail.com

Affiliation:

Subject: Recall 06

Comment:

To whom it may concern,

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;

The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB.

As part of the "Corrective Action", ARB staff state, "Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component."

However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states "The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period."

Any expansion of the vehicle warranty status will negatively impact my business and other independent repairers in the State of California. I believe this is a major change in the vehicle warranty and a major rulemaking initiative. I implore the ARB to conduct a thorough economic analysis of this proposal's impact on the California independent repair industry. This proposal will have a negative impact on small businesses, the economy of our state and should be rejected.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-12-01 20:59:14

No Duplicates.

## **Comment 9 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Matthew

Last Name: Corson

Email Address: matt515t@sbcglobal.net

Affiliation:

Subject: Oppose Expansion of Vehicle Warranty Status

Comment:

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To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;

The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB.

As part of the "Corrective Action", ARB staff state, "Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component."

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Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-12-02 11:54:55

No Duplicates.

## **Comment 10 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Nick

Last Name: Modesti

Email Address: nmodemir@covad.net

Affiliation:

Subject: Please oppose amendment to California emission warranty

Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;

The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB.

As part of the "Corrective Action", ARB staff state, "Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component."

However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states "The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period."

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Thank you,  
Nick A. Modesti  
Manager

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-12-04 10:08:50

No Duplicates.

**Comment 11 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Aaron  
Last Name: Lowe  
Email Address: aaron.lowe@aftermarket.org  
Affiliation: Automotive Aftermarket Industry Assoc.

Subject: EWIR Comments

Comment:

Please see attached document in regards to EWIR.

I have submitted this document once before on December 1, 2006.  
Please disregard previous document and use this document as  
official comments.

Thank you.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/14-carb\\_extended\\_warranty\\_testimony\\_12-1-06.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/14-carb_extended_warranty_testimony_12-1-06.doc)'

Original File Name: CARB Extended Warranty Testimony 12-1-06.doc

Date and Time Comment Was Submitted: 2006-12-04 13:06:22

No Duplicates.

## **Comment 12 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Chuck

Last Name: Spiteri

Email Address: Spiteri@carsupport.com

Affiliation:

Subject: Oppose Expansion of Vehicle Warranty Status

Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;

The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB.

As part of the "Corrective Action", ARB staff state, "Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component."

However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states "The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period."

Any expansion of the vehicle warranty status will negatively impact my business and other independent repairers in the State of California. I believe this is a major change in the vehicle warranty and a major rulemaking initiative. I implore the ARB to conduct a thorough economic analysis of this proposal's impact on the California independent repair industry. This proposal will have a negative impact on small businesses, the economy of our state and should be rejected.

Thank you for your consideration,  
Chuck Spiteri  
Spiteri's Auto Service

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-12-04 15:35:25

No Duplicates.

**Comment 13 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Pamela

Last Name: Amette

Email Address: [pamette@mic.org](mailto:pamette@mic.org)

Affiliation: Motorcycle Industry Council

Subject: Motorcycle Industry Council Comments

Comment:

Attached are comments of the Motorcycle Industry Council regarding the Proposed Amendments to CARB Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures (Hearing Date: December 7, 2006).

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/17-mic\\_comments\\_re\\_warrptgrecall\\_120406.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/17-mic_comments_re_warrptgrecall_120406.pdf)'

Original File Name: MIC\_Comments Re WarrRptgRecall\_120406.pdf

Date and Time Comment Was Submitted: 2006-12-04 16:02:38

No Duplicates.

**Comment 14 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Leonard

Last Name: Kata

Email Address: leonardkata@vw.com

Affiliation: Volkswagen of America, Inc.

Subject: Comments on Amendments to Warranty Reporting, Recall, and Emission Test Procedures

Comment:

Volkswagen Comments in Response to Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/18-recall06-14.pdf>'

Original File Name: recall06-14.pdf

Date and Time Comment Was Submitted: 2006-12-05 10:53:32

No Duplicates.

## **Comment 15 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Mike  
Last Name: Howe  
Email Address: mike@mikehowesautomotive.com  
Affiliation: Automotive Shop Owner

Subject: Proposed Regulations

Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006, Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;  
The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB. As part of the "Corrective Action", ARB staff state, "Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the emission warranty for that specific component." However, in the staff evaluation of the Potential Impacts on Other Businesses, the report states "The proposed amendments should have minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period."

Any expansion of the vehicle warranty status will negatively impact my business and other independent repairers in the State of California. I believe this is a major change in the vehicle warranty and a major rulemaking initiative. I implore the ARB to conduct a thorough economic analysis of this proposal's impact on the California independent repair industry. This proposal will have a negative impact on small businesses, the economy of our state and should be rejected.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-12-05 16:45:30

No Duplicates.

## **Comment 16 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Scott

Last Name: Brown

Email Address: scott@connieanddicks.com

Affiliation: Independent Automotive Service Provider

Subject: Concerns regarding the proposed extended warranties

Comment:

I am first concerned about your conclusion that this proposal would have little to no economic impact on small businesses in California. Where is the public record on this study?

Second, extending the warranty threatens the very livelihood of an entire industry (the automotive aftermarket repair industry) with no data to show that extending the warranty will improve air quality in any substantial way. According to the CARB "Motor Vehicle Service Information Rule" it states the following:

"to ensure that independent service facilities and aftermarket parts companies have access to information and tools necessary to diagnose and repair emissions-related malfunctions and produce emissions-related replacement parts for California Vehicles"

If the fleet is under warranty for 15 years / 150k mi then how and why would we want to continue to tool up for these vehicles when it is likely that we will never see them?

In fact is is my experience that customers who do not have long warranties are more likely to maintain their vehicles better than those with the warranty, over the life of the car, which is far more likely to prevent excessive emissions. Preventing failure by proper maintenance (better maintenance than the manufacturer prescribes) is more appealing based upon the inconvenience alone.

In closing I ask that you look at this from my perspective. We are an important piece to this puzzle.

Regards,

Scott Brown  
Connie & Dick's Service Center Inc.  
150 Olive Street  
Claremont, CA 91711

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-12-06 08:55:24

No Duplicates.

## **Comment 17 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Craig

Last Name: Wells

Email Address: craigwells@inlandsmog.com

Affiliation:

Subject: recall06

Comment:

To Whom It May Concern:

As an independent automotive repair shop owner in the State of California, I am contacting you in regard to the December 7, 2006,

Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission

Test Procedures. I am concerned with several aspects of the proposed rule changes.

Of the existing regulations that need to be improved upon, your staff identified three specific aspects:

The proof required to demonstrate violations of ARB's emission standards or test procedures;

The corrective actions available to ARB to address the violations;

The way emissions warranty information is reported to ARB. As part of the "Corrective Action", ARB staff state, "Depending on the type of the defective emission-control component and whether or not OBD is able to detect the problem, corrective action would be either the recall of all affected vehicles or the extension of the

emission warranty for that specific component."

However, in the staff evaluation of the Potential Impacts on Other

Businesses, the report states "The proposed amendments should have

minimal impact on the independent service and repair industry and aftermarket parts manufacturers since the proposal deals with relatively new vehicles and engines that are still within their certified useful life period."

Any expansion of the vehicle warranty status will negatively impact my business and other independent repairers in the State of

California. I believe this is a major change in the vehicle warranty and a major rulemaking initiative. I implore the ARB to conduct a thorough economic analysis of this proposal's impact on the California independent repair industry. This proposal will have a negative impact on small businesses, the economy of our

state and should be rejected.

Thank You,  
Craig Wells  
Owner  
Inland Smog and Repair

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-12-06 09:16:15

No Duplicates.

**Comment 18 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: robert

Last Name: redding

Email Address: b.redding@att.net

Affiliation: automotive service association

Subject: Comments

Comment:

Please see attached Comments for 12-7-06 hearing.

Robert L. Redding, Jr.

Washington, D.C. Representative

ASA

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/22-asa\\_carb\\_statement\\_\\_kahler\\_\\_12-7-06.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/22-asa_carb_statement__kahler__12-7-06.doc)'

Original File Name: ASA CARB Statement (Kahler) 12-7-06.doc

Date and Time Comment Was Submitted: 2006-12-06 09:37:19

No Duplicates.

**Comment 19 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Gordon

Last Name: Gerber

Email Address: Gerber\_Gordon\_R@Cat.com

Affiliation: Caterpillar Inc

Subject: Caterpillar Comments to Agenda Item \$06-11-5

Comment:

Please see the attached comments from Caterpillar on this Agenda item.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/23-12-06-06\\_caterpillar\\_submittal\\_arb\\_defect\\_reporting.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/23-12-06-06_caterpillar_submittal_arb_defect_reporting.pdf)'

Original File Name: 12-06-06 Caterpillar Submittal, ARB Defect Reporting.pdf

Date and Time Comment Was Submitted: 2006-12-06 10:01:19

No Duplicates.

**Comment 20 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Lygeri

Last Name: Kokkinakos

Email Address: lygeri.kokkinakos@na.mitsubishi-motors.com

Affiliation: Mitsubishi Motors

Subject: Submittal of Comments to Board

Comment:

Submittal of Comments to the Board Attached.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/24-mmccomments\\_to\\_board.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/24-mmccomments_to_board.pdf)'

Original File Name: MMC Comments to Board.pdf

Date and Time Comment Was Submitted: 2006-12-06 10:27:59

No Duplicates.

## **Comment 21 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Brent

Last Name: Black

Email Address: bwblackp@gmail.com

Affiliation: iATN

Subject: Recall006: Impact of warranty extensions on California small businesses, and consumers.

Comment:

Dear California Air Resource Board Members, and all other concerned parties.

I am writing to express serious concerns about the impact of the proposed mandated warranty extension, and all previously-mandated emissions warranty extensions, on the future of the independent automotive aftermarket, and of the well-being of the automotive technicians working on these vehicles. In addition, these warranty extensions will have a significant effect on the solvency of the car manufacturers, and ultimately on the prices that automobiles can be offered to the consumer.

The continued trend of mandatory extensions of emissions warranties in California will result in driving the cost of new cars up, while restricting the consumer to using only new car dealers for warranty service. This will cause a massive loss in routine maintenance and other service repair revenue to the shops that would ordinarily receive the business, and effectively prevent them from doing emissions repair for the covered vehicles. The subsequent lack of service options will cause a backlog in service, further exacerbating the problem. Unfortunately, by the time anyone realizes what has happened, the industry as we know it today could be gone.

Consumers who have convenient access to quality auto service are much more likely to maintain their vehicles and in turn keep their vehicle emissions low, even between smog checks. A solid infrastructure of both dealers and independent repair shops is good for the country from both an economic and an environmental standpoint, and is a critical part of maintaining clean air, in addition to a solid economy. Your actions threaten the very existence of this industry and directly clash with your stated goals in your Information Availability rules.

The threat is so significant that over 60% of iATN (a network of nearly 50,000 automotive professionals) members polled (see attached) consider the advent of the 15/150 warranty to be a threat to the very future of the Automotive Aftermarket. These members are the very people affected by previous emissions warranty extensions and they should certainly know.

Your actions, both now and previously, seem to imply a belief that the vehicle will be better maintained by the consumer if it is

under warranty through the car manufacturer. You must have some statistical data or research to back this assumption, but I have not seen it presented. This is especially critical, considering the potential effect on the thousands of small businesses, repair shops, technicians, and consumers, who will all be negatively impacted by these changes if you are wrong.

Is there a new study on the impact on California small businesses, and the California consumer as a result of the proposed mandated warranty extensions? The previous study results, while arguable, no longer apply due to the increase in the number of potentially covered vehicles.

What about the impact of these vehicles going out of warranty in an environment where an entire industry had no incentive (demand) to tool up on the vehicle since they were warranted for 150k? How will the emissions be impacted when that fleet hits the aftermarket?

Expecting the consumer to keep their vehicle properly maintained and repaired seems reasonable. Placing their responsibility on the car manufacturer and their dealer repair facilities exclusively, will effectively destroy the existing aftermarket infrastructure. Currently, the independent automotive repair shops are instrumental in helping to maintain a very large portion of our country's mobile fleet, and assist in supporting a large segment of our economy. The destruction of this industry can't be good for California.

Continually extending the length of mandated automotive warranties will ultimately cause vehicle prices to go up considerably. If the OE is forced to warranty vehicles for 15 years, the cost of this must be passed on to the consumer. The impact on the car companies, the consumer, and the automotive aftermarket could be catastrophic. Does CARB expect that these companies, some of whom are already on the verge of bankruptcy, are going to redesign the way they build vehicles in order to prepare for this unknown expense anytime in the near future? Can you imagine the cost in 1991 dollars if GM were forced to cover emissions failures on a 1991 Buick 15 years after it was sold, and the eventual, and extreme cost to the consumers who purchase new cars in the future? This expense must be passed on to the consumer. This older fleet is currently maintained primarily by the aftermarket industry which you aim to take out of the picture.

These repairs are currently done at a relatively reasonable cost. The aftermarket industry is supported by the large number of consumers who choose this option for their vehicle maintenance. What will the world look like when that industry is not available for the older fleet?

What the consumer probably does not realize is that these mandated warranties will add considerable cost to the vehicles they purchase in the future. And, to make things worse, some consumers purchase an extended warranty never knowing they were forced to pay for the cost of a built-in mandatory warranty for many of the same things covered by the optional warranty they paid for.

A large percentage of new car buyers will not keep a car for 15 years or 150k miles. These consumers are forced to pay for warranty repairs for the next owner, even if they know they will not be keeping the car. What about the impact on the fixed income

community, many of whom will not need a 15 year warranty, and surely should not be forced to buy one?

What about consumer choice on this issue? Why not give them the option to pay for their own warranty (one where they can go to any shop they please) if they wish, or simply pay for the repairs, if they prefer not to purchase this government mandated insurance?

There is no question that we need a program that requires vehicle owners to responsibly and properly maintain and repair their vehicles. The additional cost of this warranty punishes those very people who do just that. Properly maintained vehicles are less likely to need longer warranties in the first place.

Perhaps I am missing something, a study, or some kind of proof that the CARB has that validates this action. An action that has the potential to damage or even destroy an industry, and in turn negatively impact a very large segment of our economy, demands serious substantiation. If this data exists I have been unable to locate it.

This industry has stepped up to help clean the air on many occasions. I am sure that most would love nothing more than to continue to participate in partnering with the CARB in keeping the air clean, and in keeping the economy growing. We cannot do this if we are no longer in business. It would be a sad day in American history to see the Independent Automotive Repair business regulated out of existence, in the false hope that somehow this would be good for the environment, the economy, or the citizens of California. Most Californians very much enjoy their cars, and their freedom to have them serviced and maintained where they wish.

I would like to end this letter with a very important quote:

"ensure that independent service facilities and aftermarket parts companies have access to information and tools necessary to diagnose and repair emissions-related malfunctions and produce emissions-related replacement parts for California Vehicles"

This quote is directly from YOUR Motor Vehicle Service Information rule.

How can the CARB recognize the critical needs of the automotive aftermarket in regard to access to emissions service information, and the importance of the aftermarket segment having the information and parts to diagnose and repair these systems, and then on the other hand effectively exclude that very same market segment from even working on the very same systems covered in the rule?

Forcing consumers to take their emissions repair work to OEM repair facilities exclusively, in addition to all the other concerns above, negates the benefits of your very own Vehicle Service Information rule by effectively locking out the aftermarket from the majority of repairs covered by that rule.

Submitted respectfully for your consideration.

Thank you.

Brent Black  
President and Founder

International Automotive Technicians' Network  
Brea, California

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/25-warranty-poll.pdf>'

Original File Name: warranty-poll.pdf

Date and Time Comment Was Submitted: 2006-12-06 10:35:18

No Duplicates.

**Comment 22 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Dean

Last Name: Saito

Email Address: [dsaito@aqmd.gov](mailto:dsaito@aqmd.gov)

Affiliation: South Coast AQMD

Subject: Agenda Item 6-11-5 Comment Letter

Comment:

Dec. 07, 2006 Agenda No. 06-11-5: Public Hearing to Consider Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures.

To follow via Federal Express.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/26-120606\\_commenty\\_letter\\_warranty\\_info.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/26-120606_commenty_letter_warranty_info.pdf)'

Original File Name: 120606 Commenty Letter Warranty Info.pdf

Date and Time Comment Was Submitted: 2006-12-06 10:59:00

No Duplicates.

**Comment 23 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Sara

Last Name: Rudy

Email Address: [srudy@ford.com](mailto:srudy@ford.com)

Affiliation: Ford Motor Company

Subject: Emission Warranty InformationReporting and Recall Regulations and Emission Test Procedures

Comment:

Please find attached Ford Motor Company comments in response to Notice of Public hearing to consider amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures, dated October 10, 2006.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/27-ford\\_warranty\\_defect\\_comments\\_2006\\_12\\_06.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/27-ford_warranty_defect_comments_2006_12_06.pdf)'

Original File Name: Ford Warranty Defect comments 2006\_12\_06.pdf

Date and Time Comment Was Submitted: 2006-12-06 11:02:29

No Duplicates.

**Comment 24 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Diane

Last Name: Bailey

Email Address: [dbailey@nrdc.org](mailto:dbailey@nrdc.org)

Affiliation: Natural Resources Defense Council

Subject: SUPPORT—Proposed Amendments to Emission Warranty

Comment:

Please see attachment for comments from the Natural Resources Defense Council, Union of Concerned Scientists, Environmental Defense, Sierra Club, American Lung Association of California, Coalition for Clean Air.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/28-emission\\_warranty\\_info.\\_reporting\\_and\\_recall\\_regulations\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/28-emission_warranty_info._reporting_and_recall_regulations_.pdf)'

Original File Name: Emission Warranty Info. Reporting and Recall Regulations .pdf

Date and Time Comment Was Submitted: 2006-12-06 11:12:40

No Duplicates.

## **Comment 25 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Kevin

Last Name: McCartney

Email Address: crashh@prodigy.net

Affiliation:

Subject: Warranty vs Repair Assistance

Comment:

The state bases most of it's justification for a "super warranty" on it's failures to win judgements against the Original Equipment Manufacturers (OEM). This seems to indicate that the OEMs will win similar judgements concerning warranty coverage of catalytic converters, EGR systems and other emission control systems.

A much more effective alternative exists. The state has very effective low income repair assistance program (LIRAP) that successfully reduces emissions in a very efficient and cost effective manor without any potential for legal challenges to eliminate positive results. The state also has a very popular program that allows consumers to voluntarily pay a fee at the time of new car purchases to avoid future smog inspection expenses. Clearly, consumers are willing to pay the state to reduce their future emission related expenses.

A state-controlled program that allows consumers to choose ANY state approved repair shop best handles high mileage emission repairs. The state then has control over what gets repaired without legal challenges. Licensed technicians under strict oversight and direct approval of state employees perform the repairs. Any super warranty option will be subject to legal challenges that the state has a well-established history of loosing. And, any repairs that actually are performed under a super warranty program would be legally performed by technicians that do NOT posses the state required smog license.

Consumers will NOT be well served by a super warranty that causes them to be redirected to a dealership who charges them diagnostic fees only to confirm that the needed repair is not covered under the super warranty. A state run system similar to the very successful LIRAP program would allow consumers to have emission-related repairs performed with great efficiency and competence by their choice of state approved service providers.

Phosphorous poisoning is a leading cause of catalyst failure. Phosphorous poisoning is believed to be responsible for over 90% of catalyst failures under existing warranty and even higher percentage of higher mileage catalyst failures. Sulfur, sulfated ash and zinc also damage catalysts. But, this is ignored by consumers and California BAR has refused to convey this information to technicians (other states have informed technicians through newsletters, etc). The vast majority of consumers, technicians and service managers (including dealerships) are ignorant of the many compounds in readily available automotive

products that will and do degrade catalytic converters.

The catalytic converters that degraded due to phosphorous or other common contamination would not be covered under the existing super warranty proposal. Likewise, EGR failures and deposit related failures would often NOT be covered under this super warranty because such failures are often prevented by the use of OEM approved fuels. California clean air would be far better served by outlawing substandard fuels lubricants and lubricant products that are linked to the majority of emission system failures.

A Super warranty would NOT cover most catalyst and EGR system failures because most such failures are caused by the use of OEM prohibited products. Catalytic converters in properly functioning cars eliminate about 99% of harmful exhaust emissions. A typical 1000 PPM NOx is reduced to 10 PPM by normal catalyst reduction. A super warranty that excludes that is useless if the OEM can argue that the catalyst failure was caused by the use of prohibited compounds (Phosphorous, sulfur, sulfated ash, zinc, chlorine, etc - all commonly used by consumers, shops and dealerships)

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-12-06 11:50:28

No Duplicates.

**Comment 26 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Pamela

Last Name: Amette

Email Address: Non-web submitted comment

Affiliation: Motorcycle Industry Council

Subject: ARB Staff's Process for Continuation of the Dec. 7, 2006 Hearing Re: Recall

Regulations

Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/47-recall06-27.pdf>'

Original File Name: recall06-27.pdf

Date and Time Comment Was Submitted: 2007-01-16 11:45:18

No Duplicates.

**Comment 27 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Steven  
Last Name: Douglas  
Email Address: [sdouglas@autoalliance.org](mailto:sdouglas@autoalliance.org)  
Affiliation: Alliance of Automobile Manufacturers

Subject: Defect & Warranty Reporting

Comment:

The attached documents have not been added to the record.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/48-122206\\_malik\\_attachment\\_3.zip](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/48-122206_malik_attachment_3.zip)'

Original File Name: 122206 Malik Attachment 3.zip

Date and Time Comment Was Submitted: 2007-02-01 12:12:09

No Duplicates.

**Comment 28 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Barry

Last Name: Wallerstein

Email Address: Non-web submitted comment

Affiliation: SCAQMD

Subject: Comments of SCAQMD Regarding Proposed Adoption of Amendments to CA's Emission Warranty...

Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/50-recall06-28.pdf>'

Original File Name: recall06-28.pdf

Date and Time Comment Was Submitted: 2007-03-20 08:46:35

No Duplicates.

## **Comment 29 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Paul

Last Name: Frech

Email Address: pfrech@aol.com

Affiliation:

Subject: 15 year 150,000 warranty

Comment:

C & F Auto  
2090 Placentia Avenue  
Costa Mesa, CA 92627  
949-646-6910

March 19, 2007  
California Air Resources Board  
c/o Clerk of the Board  
1001 I Street  
Sacramento, Ca 95814

Re: Notice of public hearing to consider amendments to California's emission warranty information reporting and recall regulations and emission test procedures.

Dear Members of the California Air Resources Board:

For more than forty years I have owned and operated a mom and pop, neighborhood auto service and repair shop. I precede the Bureau of Automotive Repair and the Smog Check Program, and do remember the dirty air. The 15 year 150,000 mile warranty proposal is an example of "the road to clean air is paved with the best intentions." Let me explain.

In the sixties, seventies and the eighties I serviced and repaired only two brands of cars, Volkswagen and Audi. Volkswagen sales slid in the late seventies, but the good news was that Audi sales were expanding at the same time. As luck would have it a news program call Sixty Minutes aired a program the purported to show Audi's having unintended acceleration. You know that Audi was completely cleared of any wrong doing, but the damage was done.

Audi fought back by bring on new models and renaming all their cars, but the one thing that they did that brought my business to its knees was to offer a 10 year 100,000 mile power train warranty. Normally we expect to see new cars remain with the dealer for the first three years, but when Audi went to ten years, we lost the next seven years of service and repairs. Talks with our then current customers to ask why we were not getting their business were answered with, "Audi has given us a ten year warranty and they say if we miss a service or the factory parts

are not used that we will forfeit the warranty." We tried to explain that any qualified person could keep the warranty in effect, but to no avail. Many asked if we were willing to go to court with them to fight Audi on these matters. A business decision had to be made.

We abandoned all hopes of getting Audi service and repair work and looked to other German makes that we were compatible with. With a major invest in tools, training, parts, and information and we took on BMW, Porsche, and Mercedes. We lost money for a few years, but not sight of our dream.

The 15 year 150,000 warranty will kill the entire aftermarket. Unlike my predicament with Audi, there are no other cars to work on and we will never survive for fifteen years with out any work.

Paul Frech

Owner, C & F Auto

President, Automotive Trade Organizations of California

Past president and current Newsletter Editor, Automotive Service Councils of California Orange coast Chapter

Executive Board Member, California Automotive Business Coalition

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-03-20 10:03:55

No Duplicates.

**Comment 30 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Aaron

Last Name: Lowe

Email Address: aaron.lowe@aftermarket.org

Affiliation: AAIA

Subject: Aftermarket Comments

Comment:

Please see enclosed joint comments from the independent vehicle aftermarket.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/53-carb\\_testimony-extended\\_warranty-march\\_20\\_2007.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/53-carb_testimony-extended_warranty-march_20_2007.doc)'

Original File Name: CARB Testimony-Extended Warranty-March 20 2007.doc

Date and Time Comment Was Submitted: 2007-03-20 11:51:18

No Duplicates.

**Comment 31 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Pamela

Last Name: Amette

Email Address: [pamette@mic.org](mailto:pamette@mic.org)

Affiliation: Motorcycle Industry Council

Subject: MIC Comments 3/22/07 - CARB Warranty Recall and Reporting Amendments

Comment:

The attached zip file includes:

1. MIC 3/22/07 Comments to CARB Proposed Emission Warranty & Recall Amendments
2. 6 documents previously submitted to the Board and staff.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/54-mic\\_comments\\_re\\_warrptgrecall\\_attachmentb.zip](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/54-mic_comments_re_warrptgrecall_attachmentb.zip)'

Original File Name: MIC Comments Re WarrRptgRecall\_AttachmentB.zip

Date and Time Comment Was Submitted: 2007-03-20 12:06:57

No Duplicates.

**Comment 32 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Sara

Last Name: Rudy

Email Address: [srudy@ford.com](mailto:srudy@ford.com)

Affiliation: Ford Motor Company

Subject: Emission Warranty InformationReporting and Recall Regulations and Emission Test Procedures

Comment:

Please find attached Ford Motor Company comments in response to Notice of Public Hearing to consider amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/55-ford\\_warranty\\_defect\\_comments\\_2007\\_03\\_20.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/55-ford_warranty_defect_comments_2007_03_20.pdf)'

Original File Name: Ford Warranty Defect comments 2007\_03\_20.pdf

Date and Time Comment Was Submitted: 2007-03-20 14:09:42

No Duplicates.

## **Comment 33 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Michael  
Last Name: Mahneke  
Email Address: Mike@Mahneke.com  
Affiliation: I. A. P. A.

Subject: amendments to California's emission warranty information reporting and recall regulations

Comment:

There is no evidence extending the warranty will provide any real benefit to the consumer. You will give the new car dealers an unfair advantage over the independent repair segment of the industry, should you decide to pass the proposed regulation. I and most of the independent repair facilities invest many thousands of dollars each year to remain current with the changing technology, so we have a true vested interest in repairing and servicing today's automobiles.

The price of the new vehicles will rise just due to the cost of the litigation alone. It is unheard of to require a manufacturer to warranty any product beyond its useful life. Most automobile owners do not keep a vehicle for 15 years, yet they will be paying the price of the warranty for the second and third owners in the initial purchase.

Please really think about what this pending legislation will do not only to the new car manufacturers but the consumers and the aftermarket industry. Please VOTE NO on the proposed amendments to extending the emission warranty regulations.

Thank you,

Mike Mahneke  
Mahneke Motors  
Goleta, CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-03-20 15:59:58

No Duplicates.

**Comment 34 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Nikki  
Last Name: Ayers  
Email Address: nikki@ayersrepairs.com  
Affiliation: Independent Automotive Professionals Ass

Subject: CA Emission Warranty Information Reporting & Recall  
Comment:

See attached file.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/57-carb\\_hearing\\_letter.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/57-carb_hearing_letter.doc)'

Original File Name: CARB Hearing Letter.doc

Date and Time Comment Was Submitted: 2007-03-20 21:02:51

No Duplicates.

**Comment 35 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Timothy

Last Name: Kitt

Email Address: tk@swedemasters.com

Affiliation: IAPA

Subject: 15/150 Bad for business

Comment:

To whom it may concern,

As a small automotive repair business owner I am very concerned with the possibility of the "15/150" legislation and the effect it will have on my business and on other small businesses like mine.

I urge you to consider the consequences that such legislation may lead to, such as driving repair business into the dealerships and away from the aftermarket.

I thank you for your consideration.

Sincerely,

Tim Kitt

President, Swedemasters inc. Santa Barbara CA.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-03-20 21:31:16

No Duplicates.

**Comment 36 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Gordon

Last Name: Gerber

Email Address: Gerber\_Gordon\_R@Cat.com

Affiliation: Caterpillar Inc

Subject: Written Comments of Caterpillar Inc

Comment:

Caterpillar comments to the "Amendments to California's Emissions Warranty Information and Recall Regulations" included in the attachment provided.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/59-03-21-07\\_caterpillar\\_submittal\\_arb\\_defect\\_reporting.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/59-03-21-07_caterpillar_submittal_arb_defect_reporting.pdf)'

Original File Name: 03-21-07 Caterpillar Submittal, ARB Defect Reporting.pdf

Date and Time Comment Was Submitted: 2007-03-21 08:21:56

No Duplicates.

## **Comment 37 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Michael  
Last Name: Self  
Email Address: johnself@west.net  
Affiliation: private citizen

Subject: do not extend warrantee emissions

Comment:

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

Re: Notice of public hearing to consider amendments to California's emission warranty information reporting and recall regulations and emission test procedures

Dear Members of the California Air Resources Board:

The Independent Automotive Professionals Association (IAPA) opposed the above referenced proposed rulemaking that would change the way CARB staff addresses emissions parts in California. The IAPA members are dedicated independent automotive repair shop owners and aftermarket parts distributors both wholesale and retail.

This pending rule will ruin our businesses and livelihoods. The CARB staff through a commissioned study completed by the RAND Corporation stated that if the pending regulation is implemented it will have a significant impact on the automotive aftermarket by 2010 and will cost our business segment millions of dollars in revenue. It will have a negative impact on our economic survival in California and will impact other departments' revenue such as the Employment Development Department, Franchise Tax Board, State Board of Equalization and Bureau of Automotive Repair. Several of our members have attended the hearing in Bakersfield and the workshops held by the department and we are really dismayed that the CARB staff has totally dismissed our concerns in this matter.

Your Board has heard from many members of the industry that there is no evidence extending the warranty will provide any real benefit to the consumer. And you will give the new car dealers an unfair advantage over the independent repair segment of the industry, should you decide to pass the proposed regulation. Most of the independent repair facilities invest thousands of dollars each year to remain current with the changing technology, so we have a true vested interest in repairing and servicing today's automobiles.

Also, your Board must be fully aware CARB does not have the authority to extend the warranty beyond the current 3 year/50,000 mile warranty which is the current statute in California. Even if

you do pass this pending regulation, this whole process will end up in the courts and the only segment of the California population that will get hurt is the consumer. The price of the vehicles will rise just due to the cost of the litigation alone. It is unheard of to require a manufacturer to warranty any product beyond its useful life. Most automobile owners do not keep a vehicle for 15 years, yet they will be paying the price of the warranty for the second and third owners in the initial purchase.

Please really think about what this pending legislation will do not only to the new car manufacturers but the consumers and the aftermarket industry. Please VOTE NO on the proposed amendments to extending the emission warranty regulations.

Sincerely,

Michael Self

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-03-21 08:37:43

No Duplicates.

**Comment 38 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Diane

Last Name: Bailey

Email Address: dbailey@nrdc.org

Affiliation:

Subject: Support Recall/Warranty Item

Comment:

Please find our comments attached.

Thanks.

-diane

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/61-emissions\\_waranty\\_and\\_recall\\_arb\\_letter\\_\\_3\\_.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/61-emissions_waranty_and_recall_arb_letter__3_.doc)'

Original File Name: Emissions waranty and recall ARB letter (3).doc

Date and Time Comment Was Submitted: 2007-03-21 10:22:05

No Duplicates.

**Comment 39 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Craig

Last Name: Johnson

Email Address: cjauto@verizon.net

Affiliation:

Subject: 15 year warranty

Comment:

Please consider to NOT have the manufacturers extend their emmission warranty to 15 years, or 150,000 miles. Everytime I take my vehicle in for a recall, I get sold things My vehicle does not need. They bring me a laundry list of things my car needs.

I then take my car to my independent garage, and they show me the items do NOT need replacing, and they even show me in my owners manual that the items are not replaced yet.

Thank you for considering my request.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-03-21 10:22:08

No Duplicates.

**Comment 40 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: K. Martin

Last Name: Keller

Email Address: Non-web submitted comment

Affiliation: CalABC

Subject: Notice of public hearing to consider amendments to CA's emission warranty info.

reporting

Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/63-recall06-38.pdf>'

Original File Name: recall06-38.pdf

Date and Time Comment Was Submitted: 2007-03-21 10:23:30

No Duplicates.

**Comment 41 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Steven  
Last Name: Douglas  
Email Address: [sdouglas@autoalliance.org](mailto:sdouglas@autoalliance.org)  
Affiliation: Alliance of Automobile Manufacturers

Subject: Alliance Comments on Defect & Warranty Reporting  
Comment:

Attached are the Alliance comments and attachments A, B, and C.  
Legal comments will be provided separately.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/64-alliance\\_comments.zip](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/64-alliance_comments.zip)'

Original File Name: Alliance Comments.zip

Date and Time Comment Was Submitted: 2007-03-21 10:56:40

No Duplicates.

**Comment 42 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: John  
Last Name: Cabaniss  
Email Address: jcabaniss@aiam.org  
Affiliation: Assoc of International Automobile Mfrs

Subject: AIAM Comments on EWIR Proposal

Comment:

Attached are the comments of AIAM on the subject of proposed amendments to California's emission warranty information reporting and recall regulations and test procedures, to be considered at the March 22 hearing of the Board.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/65-aiam\\_ewir\\_comments\\_3.22.2007.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/65-aiam_ewir_comments_3.22.2007.pdf)'

Original File Name: AIAM EWIR Comments 3.22.2007.pdf

Date and Time Comment Was Submitted: 2007-03-21 11:11:46

No Duplicates.

**Comment 43 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 45 Day.**

First Name: Karl

Last Name: Simon

Email Address: Non-web submitted comment

Affiliation: U. S. EPA

Subject: Comments by the U.S. EPA regarding proposed amendments to CA's emission warranty

Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/66-recall06-43.pdf>'

Original File Name: recall06-43.pdf

Date and Time Comment Was Submitted: 2007-03-21 14:27:15

No Duplicates.

**Comment 1 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: Daniel

Last Name: Goycochea

Email Address: [dgoycochea@sbcglobal.net](mailto:dgoycochea@sbcglobal.net)

Affiliation: Independent/ Educator

Subject: Emissions Warranty

Comment:

I ask that you consider the impact of expanding the emissions warranty. In an already sluggish industry that is trying to rebound, we can not afford to lose more business. It is a fact that consumers also choose to do business with there local independent repair facilities. This industry needs the work that is available to us. Losing this battle would be detrimental to the independent repair industry. As a political machine the independent repair industry can be a very strong ally to those that support our concerns. I thank you for your time and consideration.

Sincerely Daniel Goycochea

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2006-12-07 09:08:29

No Duplicates.

**Comment 2 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 3 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: John

Last Name: Cabaniss

Email Address: JCabaniss@AIAM.org

Affiliation: AIAM

Subject: Comments on Proposed Amendments to CA Emission Warranty Info.Reporting & Recall Regs.

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/36-recall06-ws-2.pdf>

Original File Name: recall06-ws-2.pdf

Date and Time Comment Was Submitted: 2006-12-12 13:23:46

No Duplicates.

**Comment 4 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: Denny

Last Name: Kahler

Email Address: Non-web submitted comment

Affiliation: Automotive Service Association

Subject: Comments on Proposed Amendments to CA Emission Warranty Info. Reporting & Recall Regs.

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/37-recall06-ws-3.pdf>

Original File Name: recall06-ws-3.pdf

Date and Time Comment Was Submitted: 2006-12-12 13:27:50

No Duplicates.

**Comment 5 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: Nikki

Last Name: Ayers

Email Address: Non-web submitted comment

Affiliation: Ayers Automotive Repairs

Subject: Comments on Proposed Amendments to CA Emission Warranty Info. Reporting & Recall Regs.

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/38-recall06-ws-4.pdf>

Original File Name: recall06-ws-4.pdf

Date and Time Comment Was Submitted: 2006-12-12 13:30:50

No Duplicates.

**Comment 6 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: Dean

Last Name: Saito

Email Address: Non-web submitted comment

Affiliation: SCAQMD

Subject: Comments on Proposed Amendments to CA Emission Warranty Info. Reporting & Recall Regs.

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/39-recall06-ws-5.pdf>

Original File Name: recall06-ws-5.pdf

Date and Time Comment Was Submitted: 2006-12-12 13:31:49

No Duplicates.

**Comment 7 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: Reginald

Last Name: Modlin

Email Address: Non-web submitted comment

Affiliation: DaimlerChrysler

Subject: Comments on Proposed Amendments to CA Emission Warranty Info.Reporting & Recall Regs.

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/40-recall06-ws-6.pdf>

Original File Name: recall06-ws-6.pdf

Date and Time Comment Was Submitted: 2006-12-12 13:34:46

No Duplicates.

**Comment 8 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: S. Kingsley  
Last Name: Macomber  
Email Address: [kmacomber@sierraresearch.com](mailto:kmacomber@sierraresearch.com)  
Affiliation: Sierra Research

Subject: Comments on Proposed Amendments to CA Emission Warranty Info. Reporting & Recall Regs.

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/41-recall06-ws-7.pdf>

Original File Name: recall06-ws-7.pdf

Date and Time Comment Was Submitted: 2006-12-12 13:37:30

No Duplicates.

**Comment 9 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: General

Last Name: Motors

Email Address: Non-web submitted comment

Affiliation:

Subject: Confidential Comment

Comment:

Please see attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/42-recall06-ws-8.pdf>

Original File Name: recall06-ws-8.pdf

Date and Time Comment Was Submitted: 2006-12-12 13:52:16

No Duplicates.

**Comment 10 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: Jed

Last Name: Mandel

Email Address: Non-web submitted comment

Affiliation: EMA

Subject: Comments of the EMA

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/43-recall06-ws-1.pdf>

Original File Name: recall06-ws-1.pdf

Date and Time Comment Was Submitted: 2006-12-12 15:52:26

No Duplicates.

**Comment 11 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: Steven

Last Name: Douglas

Email Address: [sdouglas@autoalliance.org](mailto:sdouglas@autoalliance.org)

Affiliation: Alliance of Automobile Manufacturers

Subject: Comments of the Alliance of Automobile Manufacturers

Comment:

Please see the attached zip file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/44-recall06-9.zip>

Original File Name: recall06-9.zip

Date and Time Comment Was Submitted: 2006-12-13 14:19:20

No Duplicates.

**Comment 12 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: Daniel

Last Name: Goycochea

Email Address: [dgoycochea@sbcglobal.net](mailto:dgoycochea@sbcglobal.net)

Affiliation: Independent/ Educator

Subject: Emission Warranty

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/46-recall06-26.pdf>

Original File Name: recall06-26.pdf

Date and Time Comment Was Submitted: 2006-12-27 13:21:29

No Duplicates.

**Comment 13 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: Roger

Last Name: Gault

Email Address: Non-web submitted comment

Affiliation: EMA

Subject: Oral Statement & Supplemental Comments of the EMA

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/67-recall06-ws-9.pdf>

Original File Name: recall06-ws-9.pdf

Date and Time Comment Was Submitted: 2007-03-23 11:07:23

No Duplicates.

**Comment 14 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: Philip

Last Name: Fournier

Email Address: Non-web submitted comment

Affiliation: ASC, Chapter 32

Subject: Amendments to CA Emission Warranty Info. Reporting & Recall Reg. & Emission Test Procedure

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/68-recall06-ws-10.pdf>

Original File Name: recall06-ws-10.pdf

Date and Time Comment Was Submitted: 2007-03-23 11:12:40

No Duplicates.

**Comment 15 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: Pamela

Last Name: Amette

Email Address: [pamette@mic.org](mailto:pamette@mic.org)

Affiliation: Motorcycle Industry Council, Inc.

Subject: CARB Proposed Warranty Information Reporting & Recall Reg. Amendments

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/69-recall06-ws-11.pdf>

Original File Name: recall06-ws-11.pdf

Date and Time Comment Was Submitted: 2007-03-23 11:15:25

No Duplicates.

**Comment 16 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: Steven  
Last Name: Douglas  
Email Address: [sdouglas@autoalliance.org](mailto:sdouglas@autoalliance.org)  
Affiliation: Alliance of Automobile Manufacturers

Subject: Comments of the Alliance of Automobile Manufacturers  
Comment:

Please see the attached comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/70-alliance\\_comments.zip](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/70-alliance_comments.zip)

Original File Name: Alliance Comments.zip

Date and Time Comment Was Submitted: 2007-03-23 11:18:30

No Duplicates.

**Comment 17 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06). (At Hearing)**

First Name: Allen

Last Name: Pennebaker

Email Address: Non-web submitted comment

Affiliation: ASCCA

Subject: Form Letter #1: No to New Regulations

Comment:

Please see the attached comment; about 130 form letters received at the March 22, 2007 Board meeting.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/71-recall06-ws-14.pdf>

Original File Name: recall06-ws-14.pdf

Date and Time Comment Was Submitted: 2007-03-23 13:03:57

No Duplicates.

**Comment 1 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 15-1.**

First Name: Aron

Last Name: Lowe

Email Address: Non-web submitted comment

Affiliation: Automotive Aftermarket Industry Assoc.

Subject: Amendments to CA Emission Warranty Info. Reporting & Recall Reg. & Emission Test Procedure

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/74-recall06-15day-1.zip>

Original File Name: recall06-15day-1.zip

Date and Time Comment Was Submitted: 2007-07-06 10:35:31

No Duplicates.

**Comment 2 for Emission Warranty Info. Reporting and Recall Regulations and Emission Test Procedures (recall06) - 15-1.**

First Name: Pamela

Last Name: Amette

Email Address: [pamette@mic.org](mailto:pamette@mic.org)

Affiliation: Motorcycle Industry Council, Inc.

Subject: Motorcycle Industry Council, Inc.

Comment:

Please see attached comment.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/75-carbwarrantyreportingrecall\\_\\_micdraft\\_comments15daynotice062207\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/recall06/75-carbwarrantyreportingrecall__micdraft_comments15daynotice062207_.pdf)

Original File Name: CARBWarrantyReportingRecall\_ MICDraft  
Comments15DayNotice062207\_.pdf

Date and Time Comment Was Submitted: 2007-07-06 14:16:06

No Duplicates.