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October 23, 2007

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

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To Whom It May Concern:

The Association of International Automobile Manufacturers¹ (AIAM) is a trade association representing 14 international motor vehicle manufacturers. California is home to 16 AIAM member manufacturing and R&D facilities, as well as dozens of company support facilities. In total, these locations employ over 16, Californians at a payroll of \$1.4 billion and represent \$2.6 billion of AIAM members' \$35+ billion investment in the United States. California also has an annual AIAM company production capacity of 400,000 units. AIAM dealers in California employ an additional 60,000 people at an estimated annual payroll of \$3.3 billion. What's more, AIAM member company vehicles make up 54 percent of the over 1.7 million new cars and light trucks registered in California in 2006.²

We are writing in support of the proposed amendments to CARB regulations regarding new aftermarket and used catalytic converters offered for sale and use in California (section 2222, Title 13, CCR, Add-On Parts and Modified Parts).

As you know, AIAM member companies have a long tradition of providing clean, fuel-efficient transportation options for consumers in California and throughout the U.S. AIAM member companies pride themselves in being technology leaders and building durable products for their customers. Of course, vehicles are machines and must be maintained and serviced properly during the course of their useful lives to maintain their low emissions and fuel-efficient characteristics. AIAM member companies not only have strong dealer service facilities but also have forged alliances with the aftermarket service industry in California and indeed throughout the U.S. through the National Automotive Service Task Force to ensure that customers can get their vehicles easily and accurately serviced whenever needed and at whatever repair shop best fits their needs.

¹ AIAM member companies include American Honda Motor Co., American Suzuki Motor Corp., Aston Martin Lagonda of North America, Inc., Ferrari North America, Inc., Hyundai Motor America, Isuzu Motors America, Inc., Kia Motors America, Maserati North America, Inc., Mitsubishi Motors North America, Inc., Nissan North America, Inc. Peugeot Motors of America, Renault, SA, Subaru of America and Toyota Motor North America, Inc. AIAM also represents original equipment suppliers and other automotive-related trade associations.

² For more information, visit our website at www.aiam.org.

AIAM member companies also support the California Smog Check program as it endeavors to ensure that consumers properly maintain their vehicles to keep emissions low throughout their useful lives.

We believe the proposed amendments regarding new aftermarket and used catalytic converters sold in California are another important step toward ensuring proper maintenance of vehicles, maintaining low emissions from vehicles in-use, and protecting the interests of California consumers. We fully support your proposal to adopt:

- Performance standards to ensure that aftermarket catalytic converters are capable of achieving the applicable vehicle certification emissions standards for a period of five years or 50,000 miles;
- Requirements to ensure that aftermarket catalytic converters are compatible with catalytic converter detection monitoring in the on-board diagnostic systems;
- Requirements to ensure that aftermarket catalytic converters do not cause illumination of Malfunction Indicator Lights when the catalyst is functioning properly; and
- Extended warranty requirements for aftermarket catalytic converters of five years or 50,000 miles.

These proposed amendments will result in improved vehicle maintenance, a cleaner environment, and more satisfied consumers.

We will be unable to attend the public hearing scheduled for October 25, 2007 (agenda item # 07-10-7); however, we request that our comments be made part of the public record.

Sincerely,



Michael J. Stanton
President & CEO

cc: Honorable Mary Nichols
Tom Cackette
Michael McCarthy
Allen Lyons

