

TMA Talking Points
September 17, 2007 CARB Workshop
on AB32 Implementation

- Medium and heavy trucks already almost exclusively use diesel engines which are the most efficient ICE.
- Fuel use is the second highest operating cost (driver pay is first) for motor carriers. There already are very strong market incentives to save fuel. TMA members compete fiercely on this point.
- We should not lose sight of the extensive amount of public sector and private industry effort that has been expended to develop 2007 emissions-compliant – and going forward 2010-compliant engines. New vehicle NOx and PM emissions have been reduced by more than 90% over the past decade with no meaningful loss of fuel efficiency. Significant gains in emissions reductions could be achieved today through programs that incentivize and encourage the purchase and use of new trucks – particularly if those vehicles replace much older models.
- We also note that California's vigorous efforts to reduce unnecessary idling – at both the operator/ in-use as well as equipment levels, are really just starting and should not be overlooked for the significant positive benefits they will achieve.
- TMA and its members have been actively working with the U.S. EPA to develop guidelines for SmartWay vehicles. The voluntary nature of this program has enabled us to quickly reach consensus on a list of components that enhance the fuel efficiency of line-haul tractor van-semitrailer combinations. Going forward, we are working with EPA to develop ways to better quantify the benefits of various fuel efficiency enhancing technologies and to eventually expand the numbers and vocation types of vehicles covered in this program. We strongly encourage California to support this voluntary approach and are willing to work with CARB in this regard.
- Looking at the list of other items that have been suggested for early adoption, TMA supports any actions that:
 - Increases electrification at truck stops as well as other loading and unloading facilities, thereby facilitating elimination of unnecessary idling
 - Encourages the acquisition and use of diesel hybrids. These type vehicles are particularly well suited for urban-type, public sector and municipal vocational applications such as refuse collection, roadway maintenance, and electric utility maintenance.
 - Fosters the use of biofuels that meet recognized quality assurance levels.
 - Creates incentives for purchase and use of fuel-efficient technologies such as idle reduction equipment, TPMS systems
 - Fosters public education and awareness of the importance of maintaining proper tire inflation pressures.

- Vehicle design changes alone cannot achieve the level of improvement that the Board seeks relative to medium and heavy duty commercial vehicles. We urge California to consider other approaches, besides vehicle regulations, including:

Creating incentives for “smart” logistics or operational approaches such as driver training, management of empty backhauls, routing or scheduling to avoid congestion.

Adoption of congestion mitigation construction and operational improvement programs

Better enforcement of existing speed limits.

Public sector supported research, development, and demonstration programs.

Controlled and responsible “liberalization” of vehicle weight and dimension limits to enable fewer trucks to safely transport equivalent cargo amounts while preserving highway infrastructure and improving safety.