

June 19, 2019

AHCERT: 190395

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

Re: Honda Comments on CARB Proposed 15-Day Revisions to OBD II Regulation Section 1968.2

Dear California Air Resources Board Members:

Honda would like to provide comments to CARB's Proposed 15-Day Modification Regulation Order to OBD II Regulation:

1968.2(g)(8.1) and (g)(8.2)

Under section (g)(8), if a manufacture utilizes Over-the-Air (OTA) reprogramming that erases any data required to be store and made available pursuant to sections (g)(5) and (g)(6), CARB is proposing the manufacture to collect all lifetime data prior to erasure and submit a report to the Executive Officer.

CARB has explained section (g)(8) is not applicable if either OTA is not utilized, or if OTA utilized, all (g)(5) and (g)(6) data is retained during the reprogramming event.

The pathway of retaining (g)(5) and (g)(6) data during the reprogramming event is not an option. Section (g)(5.2.1)(B), requires the numerator, denominator, general denominator, and ignition cycle counter to be reset to zero, effectively erased, when a non-volatile memory reset occurs (e.g., reprogramming event). To meet existing (g)(5,2,1)(B), any manufacture using OTA reprogramming shall collect and report (g)(5) and (g)(6) data under (g)(8).

Manufactures want to utilize OTA reprogramming to provide better service to customers. OTA requires manufacture commitment to the costs related to development and data bandwidth. Any manufacture utilizing OTA reprogramming are subject to (g)(8) which inherently and unnecessarily increases the development and data bandwidth cost. This limits the motivation of using OTA reprogramming technology, and effectively reduces service to customers. ARB should not force increased costs to manufactures with OTA reprogramming.

Honda proposes 1968.2(g)(8) should be removed from the regulation update.

If you need further discussion, please do not hesitate to contact me.

Respectfully,

AMERICAN HONDA MOTOR CO., INC.

A handwritten signature in blue ink, appearing to read 'T-BUI' with a stylized flourish at the end.

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