



July 6, 2021

Attention: Board Item hdomnibus2020

RE: Comments on the 15-Day Notice for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments: Subsection 1956.8(a)(2)(F)

Dear Docket Clerk:

New Flyer of America Inc. (New Flyer) and Motor Coach Industries, Inc. (MCI), as manufacturers of transit buses and motor coaches respectively (within the NFI Group Inc. group of companies), are submitting comment on the 15-Day changes issued for the Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation.

Gratitude is expressed to CARB for providing an option for manufacturers to sell “legacy” engines in 2024 with the offsetting of NOx / PM deficits with zero emission credits.

However, an item of importance that was not contained within the 15 Day changes was consideration of motor coach operators specifically regarding the higher pricing engine manufacturers will charge for CARB-standard (vs. EPA-standard) engines beginning in model year 2022. The financial hardship faced by motor coach operators has been much greater than that experienced by other heavy duty sectors, such as freight hauling, during the COVID pandemic. Coach tours, team/club travel, and similar charters have nearly ceased, severely limiting operator revenue and funds available for purchasing newer, cleaner motor coaches. As such, it is expected that some businesses will continue running older, more emission-producing fleets unless an exemption can be made.

Due to these potential impacts, New Flyer / MCI requests that an exemption, similar to the one planned for transit bus engines, be offered for motor coach operators, at minimum, for model years 2022 and 2023. Although it is understood that the engine upcharge for 2022 CARB-standard transit bus engines will be higher than that for coach engines, the impact of COVID on coach operators compared to transit is arguably greater.

Thank you for your consideration. If you should have any questions, feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirk Burcar", with a long horizontal flourish extending to the right.

Kirk Burcar
Vice President, Engineering Services
New Flyer of America Inc.
6200 Glenn Carlson Drive
St. Cloud, MN 56301
P. 204-224-6608
E. Kirk_Burcar@newflyer.com