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November 29, 2021

California Air Resources Board
1001 I Street
Sacramento, California 95814

Re: CARB's Proposed Heavy-Duty Inspection and Maintenance Regulation

Dear California Air Resources Board Members:

Geotab Inc. (Geotab) respectfully submits these comments regarding the California Air Resources Board's (CARB) Proposed Heavy-Duty Inspection and Maintenance (HD I/M) Regulation. The HD I/M regulation would require periodic testing of HD vehicles operating in California to ensure their emissions control systems are functioning properly. Geotab's concern is that the required data points may not be readily available through the vehicle's connection interfaces.

Geotab's concern regards the accessibility of data as required by the HD I/M regulation. Today, emissions data and data utilized by telematic providers is readily available via the on-board diagnostic (OBD) port. However, over the last several years, some truck original equipment manufacturers (OEMs) have added and recommended for telematic providers to start utilizing a new port, commonly referred to as the RP1226 port. This port traditionally does not make emissions related data accessible. In short, fleets that utilize this port on current vehicles will not have access to the detailed emission data required by the HD I/M regulation. Furthermore, many OEMs have signaled to the market as a whole that non-emission related data will eventually be removed from the OBD port. Under this scenario telematic providers won't have a single plug to access both emissions and non-emission data. Simply, the introduction of the HD I/M regulation will have a dramatic impact on how telematics service providers enable fleets to manage for efficiency, maintenance and safety.

As an example, many fleets use telematics to better monitor emissions, thus a broader range of data needs to remain accessible for independent, objective analysis. The ability to identify faulty components impeding proper fuel efficiency for example has a measurable impact on emissions. This is only one example among thousands of how fleets utilize telematics to improve the efficiency of their fleet.

With the HD I/M regulation on the horizon, fleets need to consider how their current installations will impact compliance with this regulation. Should the fleets follow the OEM installation recommendations that will prevent them from complying with the HD I/M regulation in the future? Or, does the fleet disregard the OEMs advice and plug directly into the OBD port? What will happen when the OEM restricts access to non-emission related data at the OBD port? The time to consider these questions is now rather than years down the road.

In order to provide clarity at the fleet level, it is our recommendation for CARB to maintain a registry of vehicles and approved connectors that transmit the data required to comply with the HD I/M program. Absent a reliable catalog of approved connection points and a strong education campaign, Geotab is concerned there will be significant confusion in the market as fleets move to comply with the HD I/M regulation.

Thank you for the opportunity to comment on the proposed HD I/M regulation. If you have any questions, please do not hesitate to contact us.

Sincerely,
Scott Sutarik
Geotab Inc
Vice President, Commercial Vehicle Solutions



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[Geotab Inc.](#) is a proven leader in IoT and connected transportation. Geotab securely connects commercial vehicles to the internet, providing advanced web-based analytics to help businesses better manage their fleets and make data-driven decisions. Geotab's key industry differentiator is its open platform solution, which promotes a network of cooperation, enabling businesses to integrate data processed from Geotab connected vehicles into any system regardless of business size or operational needs.