25 September 2013

Mr. Craig Duehring

California Air Resources Board

1001 I Street

Sacramento, CA 95814

RE: Comments to the Amendments to the Alternative Fuel Vehicle Conversion Certification Procedures for On-Road Motor Vehicles and Engines.

Mr. Duehring,

Transfer Flow Incorporated appreciates that the California Air Resources Board has listened to the suggestions from industry and is willing to work with industry to increase the availability of Alternative Fuel Vehicles in California. Transfer Flow Inc. has and will continue to work with CARB to ensure that regulatory actions keep pace with technology while maintaining feasibility for businesses.

Transfer Flow Inc. supports CARB’s efforts to streamline the certification process for AFV’s in California however Transfer Flow Inc. disagrees with some of CARB staffs assertions. To continue to require durability testing on vehicles and components that are past their useful life is an overreach regulatory action. If a vehicle is past its expected useful life and is able to pass the State approved testing at a Bureau of Automotive Repair licensed state inspection facility then such a vehicle should be able to be converted without any further regulatory intervention. Similarly, the requirement that any credit generating converted vehicle must be inspected by a BAR Referee prior to releasing the vehicle to the consumer is not feasible.

While Transfer Flow Inc. agrees that technologies are continuously advancing, the justification for the use of a sunset provision to eliminate many of the proposed streamlining measures due to lower emissions standards taking effect in the 2018 Model Year is not true streamlining. Since lower emissions standards will be the new requirement in 2018, AFV’s will continue to have to meet the new lower standards for newer model year vehicles. Requiring more stringent certification measures in 2018 for AFV’s will not change the emissions standards that the converted vehicles have to meet, but rather will cause the same situation we currently find ourselves in where conversion manufacturers are unable to meet certification requirements in a timely cost effective manner.

Transfer Flow proposes the elimination of the sunset provision as a “safety net to contain potential emissions impacts”. Any such emissions impacts would be discovered by the safety net already in place through emissions inspection and testing at the biannual vehicle testing at BAR licensed state emissions testing facilities.

Furthermore Transfer Flow Inc. proposes the ability to use aggregate durability testing for certification. Data from multiple converted vehicles that have like systems installed with similar initial miles prior to conversion with different driving use, and therefore different accumulated mileage after conversion, would adequately prove the required durability testing.

Transfer Flow Inc. looks forward to the outcome of CARB’s consideration of the amendments to the certification requirement for AFV’s in California and appreciates the opportunity to comment on the proposed changes.

Sincerely,

Todd LaPant P.E.

Director of Engineering

Transfer Flow Incorporated

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