

From: contact@maxwellvehicles.com
To: [ARB Clerk of the Board](#)
Subject: Public Comment on ampts2020
Date: Monday, July 20, 2020 8:04:26 PM

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Please see my comments below;

First Name: Max
Last Name: Pfeiffer
Email: contact@maxwellvehicles.com
Email: contact@maxwellvehicles.com
Affiliation: Maxwell Vehicles
Subject: Zero-Emissions Aftermarket Exemption Procedures
Message:

To California's Air Resources Board,

Since early 2019, Maxwell Vehicles has been working with CARB's zero-emissions vehicle (ZEV) programs in an effort to bring our electric class-2B cargo van powertrains to market in California. We've worked with dozens of folks towards achieving an emissions compliance exemption under California Vehicle Code 27156. We've learned a lot, and CARB has done an excellent job of setting standards alongside aggressive timelines to reduce air pollution by implementing clean vehicle policies. To further this goal, I would like to make the following suggestions to the Board, for updating the Procedures for Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines.

CARB should prioritize clean-tech or zero-emissions system applications, to be consistent with the agency's mandates and emissions reduction timelines.

Please implement clear, consistent and publicly available standards for the non-emissions related criteria evaluated in determining the completeness or suitability of an application for an executive order. Lack thereof is burdensome to both companies seeking exemption, and CARB staff tasked with navigating these applications.

Separate exemption of aftermarket zero-emissions systems under CVC 27156 from the Certified ZEV standard. Electric vehicle conversions should be legal in California.

Maxwell has sought approval to sell zero-emissions powertrains retrofitted on used chassis in the interest of accelerating the adoption of clean transportation. This avenue reduces cost, making the new technology more accessible for pilots and development without the need for taxpayer subsidies. Class 2B accounts for the largest number of medium-duty commercial vehicles sold in California. Maxwell is the only company offering electric Class 2B vans. While we understand the need to prevent bad actors from skirting emissions regulations, we

need opportunities to exempt aftermarket zero-emission systems.

CARB is a tough ship to steer with much of the public impact happening behind the scenes. The collective efforts of CARB and companies like Maxwell are sowing the seeds for a cleaner future.

With thanks,
Max Pfeiffer
Founder & CEO
Maxwell Vehicles