

Dear Members of The Board;

For the last 450 days, Maxwell Vehicles has been trying to get an Aftermarket EO for our all-electric class 2B cargo van powertrain. The type of vans that deliver your Amazon packages. We are the only company offering a zero emissions product in this class and have the only product that sells without HVIP.

Throughout this process I've understood the folks at CARB to be intelligent people who follow their conviction to do no harm. But we applied for something unprecedented; an electric conversion that offers the opportunity to divert waste and utilize refurbished parts. I understand how used ERGs might be a problem, but an EV is zero-emissions, period.

CARB has demonstrated they support electric conversions for commercial vehicles, we have an HVIP category for it. So in an effort to clear a path for this technology through the aftermarket parts group, I propose that the procedures include clauses to the following effects;

Aftermarket modifications or add-on parts that completely eliminate a vehicle's fuel system, internal combustion engine, and all associated emissions systems in exchange for a zero-emissions powertrain shall be considered exempt from CVC27156. Applicants shall only need to furnish information limited to demonstrating that their system(s) remove all emissions producing components, and that no fuel-fired heaters may be installed.

This process should be fast-tracked in accordance with California Health Code's goals to reduce Air Pollution.

Zero emissions vehicle systems should be allowed running design changes provided that they inform the Air Resources Board of the scope of the changes, and demonstrate that they do not increase emissions.

I understand that there's a feeling oversight is needed on these technologies. But there are no emissions. It's that simple. It shouldn't take months--even years, to get through this process. Any oversight, certification, or non-emissions related regulation of these technologies should be done so through separate organizations, or processes outside of exemptions to CVC 27156. Pairing additional metrics to being granted an EO would be counter to GOV 11340.

I was drawn to California by its progressive environmental standards and my team and I have dedicated our lives to creating a cleaner future for Californians, and Americans at large. New technology needs flexibility. So let's make it easier to get ZEVs on the road. I sincerely hope that my motion is accepted and that we may continue working together toward CARB's goals for a cleaner future in California.

Thank you.
Max Pfeiffer