

From: [Mead, Kathleen@ARB](mailto:Mead_Kathleen@ARB)
To: [Sakazaki, Ryan@ARB](mailto:Sakazaki_Ryan@ARB)
Subject: FW: CARB Certification Fee proposal / 15-day notice (KTM comments to modified language)
Date: Wednesday, June 16, 2021 10:33:14 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
Sensitivity: Confidential

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From: Mader Viola <viola.mader@ktm.com>
Sent: Monday, June 7, 2021 12:17 PM
To: Mead, Kathleen@ARB <kathleen.mead@arb.ca.gov>
Cc: Lourenco, Jackie@ARB <Jackie.Lourenco@arb.ca.gov>
Subject: RE: CARB Certification Fee proposal / 15-day notice (KTM comments to modified language)
Sensitivity: Confidential

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Dear Ms. Mead,

Please see below for your information and thank you in advance for your consideration.

Kind regards,

Viola Mader

“We thank CARB for proposing to double the total number of allowable low volume EFs per MY under certain circumstances, however this does not change the situation for us specifically due to the 2,500 total unit sales restriction.

We propose to make the additional 3 low volume EFs available without the maximum 2,500 total units restriction and to offer an optional tiered structure, where up to 200 or up to 300 units maximum EF sales are assessed at a multiplier of the original discounted rate, for example 15 and 20% of the base fee respectively [101 – 200 units: \$1,308 and 201 – 300 units: \$1,744] which would greatly alleviate the burden on manufacturers that have multiple EFs with unit volumes between 101 and 300 each.

Additionally we would like to point out that under the current proposal, we would be subject to a potential year over year rate increase by 500% for a carry-over application or by 1000% for a MY25 partial carry-over application, simply by exceeding the maximum allowable number of units per EF. This scenario does not appear to be reasonable or in any way related to the actual cost of processing the application.”

VIOLA MADER
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