



October 1, 2013

Mr. Dean Bloudoff
Air Resources Board
1001 "I" Street, P.O. Box 2815
Sacramento, California 95812

RE: PUBLIC COMMENT FOR THE APPROVED AMENDMENTS TO THE
ALTERNATIVE FUEL CONVERSION CERTIFICATION PROCEDURES FOR
NEW AND IN-USE VEHICLES AND ENGINES

Dear Mr. Bloudoff,

I want to thank you and the Air Resources Board staff for getting the new regulations to this point. I would like to make one comment in regards to the new approved regulations. It appears that they only apply to vehicles made in '2004' and afterwards. I suggest that this date be changed to '1998' and newer for the following reasons:

1. In 1996, the OBD-II specification was made mandatory for all cars sold in the United States.
2. Older vehicles produce a large percentage of the pollution in California and their conversion to CNG would be more valuable than the conversion of newer vehicles.
3. We have discussed with technicians and other knowledgeable people in other countries where they convert many older vehicles to CNG. They have all said that, if tuned correctly, older vehicles will not be adversely affected after they are converted. These experienced technicians also say that the engines run much cleaner after the conversion.
4. Many of the popular engines are still on the road. For example, the Chevy 350 was manufactured up until 2002. These engines can be much cleaner running on CNG.
5. Diesel engines can be driven for many years and operate well even with high mileage. Converting diesel engines to a mixture of natural gas and diesel will reduce particulate emissions and also give them better performance. The older diesel engines and our air quality will benefit greatly if we can get approvals for older engines.
6. Our conversion kits have been proven to work well on both new and older vehicles.

It is my suggestion that the regulations include vehicles from 1998 when the OBD-II was required. This has no adverse effects on the regulations or the goals for these new regulations.



Thank you for your time and consideration.

Best Regards,

A handwritten signature in black ink, appearing to read 'Gary Fanger', with a long horizontal stroke extending to the right.

Gary Fanger
Chief Operations Officer
Cenergy Solutions