



18-1-4
Steve Wulff

February 8, 2018

California Air Resources Board
1001 I Street
Sacramento, California 95814

Comments of SmartTruck Systems, LLC on the Proposed California Greenhouse Gas Emissions Standards for Medium- and Heavy-Duty Engines and Vehicles and Proposed Amendments to the Tractor-Trailer GHG Regulation.

Dear Chair Nichols and Members of the Board:

SmartTruck appreciates the opportunity to submit these comments in response to the Proposed California Greenhouse Gas Emissions standards for Medium- and Heavy-Duty Engines and Vehicles and Proposed Amendments to the Tractor-Trailer GHG Regulation. As an aerodynamic device manufacturer, SmartTruck has been working since 2011 to provide customers in the heavy-duty trucking industry with high quality aerodynamic drag-reduction technology in their efforts to reduce fuel consumption and to achieve compliance with California's Tractor-Trailer GHG Regulations. SmartTruck supports the efforts of the California Air Resources Board in creating a Phase 2 program that closely aligns with the Federal EPA Phase 2 Regulations as it existed on October 25, 2016.

In the effort to strengthen the above mentioned GHG Standards and Tractor-Trailer GHG Regulation, SmartTruck would like to see the incorporation of SAE Surface Vehicle Recommended Practice J2971: *Truck and Bus Aerodynamic Device and Concept Terminology* into the California Greenhouse Gas Emissions Standards for Medium- and Heavy-Duty Engines and Vehicles as well as the Tractor-Trailer GHG Regulation. As state and federal agencies expand their regulation of emissions coming from heavy duty vehicles through use of aerodynamic devices, we believe it would be beneficial to standardize the terminology we use to define, categorize, and regulate aerodynamic devices and concepts.

The proposed emissions standards and amendments that will constitute CARB Phase 2 have already incorporated by reference modified versions of SAE test protocols for verification purposes but have not referenced the SAE2971 terminology paper. We believe incorporating this standard into the rule would help clarify and identify the various aerodynamic devices on the market and to ease the compliance path for trailer OEMs as well enforcement of Tractor-Trailer GHG Regulation.

We appreciate the consideration of our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Wulff", is written over the typed name.

Steve Wulff
Senior Vice President, Product Development