

CALIFORNIA AIR RESOURCES BOARD

**Proposed Heavy-Duty Inspection and
Maintenance (HD I/M) Regulation**

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**Agenda Item: 21-13-3
Board Hearing: December 9, 2021**

**SUPPLEMENTAL COMMENTS OF THE
TRUCK AND ENGINE MANUFACTURERS ASSOCIATION**

December 9, 2021

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CARB requires data to be encrypted when stored for transmission, it should be defined in subsection E.4. Without discernible PII in the data, encryption is an overspecification.

We appreciate the opportunity to submit these additional comments, and we urge CARB to incorporate that and EMA's previous comments before issuing a Final Regulation Order. As previously noted, we welcome the opportunity to discuss all comments with CARB Staff.

Respectfully Submitted,
TRUCK AND ENGINE
MANUFACTURERS ASSOCIATION