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Sent: Tuesday, October 4, 2022 12:35 PM
To: ARB Clerk of the Board
Subject: ACF

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Dear Clerk of the Board,

Royal Trucking appreciates the opportunity to provide public comment on the Proposed Advanced Clean Fleets Regulation (ACF).

We understand that fleets larger than 50 or that are able to produce \$50m revenue or service port/rail facilities are selected to lead the way in the cleaning the air. Why does the CARB continue to divide the industry into these groups? Clean air is necessary for all. It is unfair to pick on these segments of the industry. The Drayage regulation is finally reaching the end, the goal has been achieved for this regulation. Now is the time to finally reduce government oversight (Drayage vs Truck/Bus regulation) into these segregated groups. Make the rule but simply apply it to each and every group serving California. The Lawson lawsuit made it clear that small truckers and larger companies all have the same responsibility for replacing older equipment.

We received a quote to replace one of our day cab truck tractors to meet the ZEV rule. The estimate is \$480,000. This replacement vehicle is not available for at least 1 year, has a limited range of duty, costs \$350,000 MORE than a non-ZEV and weighs 4,000# more.

The cycle time to recharge the vehicle is 5+ hours. We do operate a day shift and night shift for our customers. We do not have time to recharge the ZEV between shifts, so are we required to double our fleet size to meet our customer's requirements? This simply makes it impossible for a fleet to compete with a company that does not need to meet the proposed rule.

One rule for all, keep it simple.

We urge you to amend the ACF regulation for more flexibility so that the regulation catches up with technology and not technology catching up with the regulation.

Thank you,
Jeff Becker
Royal Trucking

Sincerely,

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