



VIA WEB SUBMISSION

August 30, 2023

The Honorable Steven S. Cliff, Ph.D.
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814
ATTENTION: Clerk's Office

RE: PUBLIC HEARING REQUEST: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Dear Dr. Cliff:

On behalf of the NFI Group Inc., pursuant to Section 11346.8 of the California Government Code, I write to request the California Air Resources Board (CARB or Board) hold a public hearing on its proposed amendments to the Heavy-Duty Engine and Vehicle Omnibus (Omnibus) regulation, per the Board's notice posted on August 1, 2023. We would seek the hearing prior to the close of the comment period or, alternatively, seek to have the comment period extended beyond September 18 to accommodate a public hearing.

The NFI Group is the parent company of Motor Coach Industries (MCI), New Flyer, ARBOC and Alexander Dennis, all in the business of manufacturing, selling, and servicing both over-the-road motor coaches and transit buses, with many operating in both private companies and transit agencies throughout the state. We also have sales and service locations in the state.

MCI is proud to offer both diesel and battery electric coaches to our customers as well as providing support such as infrastructure planning to enable the transition to zero-emissions. Unfortunately, the impact of the regulation and subsequent agreement with EMA and engine manufacturers severely limits the number of allowable diesel engines for motor coaches, thus we, as well as our many California based customers will be significantly impacted.

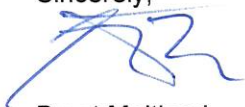
The Board's action appears to be predicated solely on heavy-duty truck engine manufacturer product plans and we believe it important for the Board to provide for the exchange of additional information from vehicle manufacturer and the end users of these engines, in a public forum.

Further, a public hearing is warranted to ensure the Board and heavy-duty vehicle manufacturers and operators, such as the bus and motorcoach industry, along with the public, fully understand the impact of the proposed amendments on the end users of heavy-duty engines, and in turn the impact on the state's transportation network and emissions goals.

For these reasons, we request the Board schedule a public hearing before moving forward with the proposed amendments to the Omnibus regulation. I can be reached at 630-235-9696 or Brent.Maitland@MCIcoach.com, for any questions concerning this request.

Thank you for your consideration. If you should have any questions, please feel free to contact me.

Sincerely,



Brent Maitland
VP Private Sector, MCI & New Flyer
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Des Plaines, IL 60018