

15 September 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: Notice of Public Comment Period on Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation**

On behalf of TEMSA, I would like to formally request that the California Air Resources Board gather a public hearing regarding its proposed revisions to the Heavy Duty Engine and Vehicle Omnibus regulation, as outlined in the Board's notice dated August 1, 2023. This request comes from our concerns about the significant impact these amendments may have on both motorcoach manufacturers and operators, especially within the bus and motorcoach industry in California.

I'd like to point out that Temsa supports electric vehicle transition and CARB, and has produced an electric vehicle for market adoption. We as TEMSA support the path forward, but due to the well-known supply constraints, we believe that this implementation should be postponed to ensure the sector is not adversely affected.

Our primary concern arises from the limitations imposed by the regulations and subsequent agreements with the Engine Manufacturers Association (EMA) and engine manufacturers themselves. These restrictions severely restrict the number of permissible diesel engines for motorcoaches, causing substantial consequences for TEMSA and our numerous California-based customers.

Engine manufacturers have recently communicated their inability to develop engines that can meet the stringent CARB (California Air Resources Board) regulations until approximately 2027. Consequently, as a motorcoach manufacturer, we anticipate having very few, if any, engines available for building new motorcoaches during the MY2024 to MY2026 period for our California customers.

In light of these circumstances, we strongly believe that motorcoach manufacturers require an exemption allowing the sale of currently compliant diesel engines until new, lower-emission engines become commercially available in sufficient quantities. A public hearing is, therefore, crucial to ensuring that the Board, heavy-duty vehicle manufacturers and operators, such as those in the bus and motorcoach industry, as well as the general public, have a comprehensive understanding of the potential effects of the proposed amendments on end-users of heavy-duty engines. Moreover, it is essential to assess the potential impact of these amendments on the state's transportation network and emissions reduction goals.

Thank you for your consideration.

Sincerely,  
Ceyhun ERMAN  
R&D Manager



**TEMSA SKODA SABANCI ULAŞIM ARAÇLARI A.Ş.**

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