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**Subject: On-Board Diagnostic (OBD) Regulations – 13 CCR, §1968.2 (g)(2.2) and (g)(2.2.1)**

Air Resources Board Members,

I am writing on behalf of the Daimler AG which includes e.g. Mercedes-Benz, Mercedes-AMG, Mercedes Maybach and smart.

The Proposed Regulation Order Amend section 1968.2 from August 4th, 2015 includes intended changes of the Diagnostic Link Connector (DLC) in sections (g)(2.2) and (g)(2.2.1):

(...)

*(2.2) For **2019 and subsequent model year vehicles**, a standard data link connector conforming to the "Type A" specifications and in the location specified for "Type A" connectors in SAE J1962 version July 2012 (except as specified in section (g)(2.3)) shall be incorporated in each vehicle.*

*"(2.2.1) For **30 percent of 2019, 60 percent of 2020, and 100 percent of 2021 and subsequent model year vehicles**, the connector may not be covered in any way (e.g., may not be covered by a removable panel, dust cap, lid, flap, door).*

(...)

Whereas section (2.2.1) prohibits any covers of the DLC with a phase-in from MY2019 - MY2021, section (2.2) requires the DLC to comply with the most current version of the SAE J1962 from MY2019 without any phase-in.

Compared to the currently applicable SAE J1962 standard (from April 2002), the 2012 version of this standard defines following major changes:

- Stricter definition of the location of the DLC:
  - The whole DLC shall be located to the left of the brake pedal or clutch pedal

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- Much stricter definition of the orientation of the DLC according to a defined vehicle coordinate system (please refer to Figure 1 and Figure 2 of J1962):
  - The DLC shall face in a defined direction (longitudinal axis of the vehicle)
  - The orientation of the “D-shape” of the DLC is defined
- Increase of the defined “Technician Access Area” in front of the DLC (please refer to Figure 3 and Figure 4 of J1962):
  - Existing “access area” (25mm x 48mm x 120mm) was increased by Factor 6.7 (new “Technician Access Area”: 80mm x 100mm x 120mm)

Daimler AG supports CARBs efforts to update the requirements for the DLC in future vehicles that are currently in development (and therefore able to incorporate hardware changes). Due to existing automotive development cycles such complex hardware changes require a lead time of 3 years as a minimum.

Nonetheless, CARBs proposed requirement that the DLC shall comply with the most current SAE J1962 standard by MY2019 would cause a disproportionately high burden (cost, resources, loss of profitability, time) on phase-out models with low sales numbers because of necessary extensive hardware changes. The location of the connector in the vehicle exacerbates the situation due to complex interaction with several subsystems (e.g. hood lever, brake pedal, lights, and other electrical switches/systems).

Therefore, Daimler AG kindly requests an alignment of both DLC requirements set in (g)(2.2) and (g)(2.2.1):

Both changes should be required simultaneously with following phase-in:

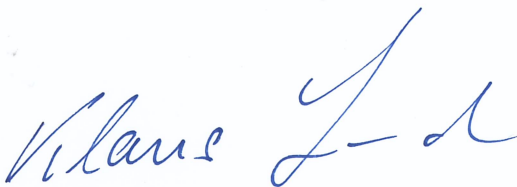
30 percent of 2019,

60 percent of 2020, and

100 percent of 2021 and subsequent model year vehicles

or the approved alternate phase-in according to § 1968.2 (c).

With Best Regards



Klaus Land



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