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**BAE SYSTEMS**

Submitted via email

February 19, 2019

Mary D. Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Comments on the Proposed Alternative Certification Requirements and Test Procedures for Heavy-Duty Electric and Fuel-Cell Vehicles and Powertrains (Zero-Emission Powertrain Certification Regulation)

Dear Chair Nichols and Members of the Air Resources Board:

On behalf of BAE Systems, I hereby submit comments in response to the Zero-Emission Powertrain Certification Regulation Staff Report released on December 31, 2018.

BAE Systems is committed to electrifying transportation in California and around the world. Our powertrains are used today in over 100 zero emission buses in the U.S. (including California) and in Europe, and we anticipate that number to increase to over 300 buses by the end of 2019. As a global company with over 20 years of experience developing and advancing electric powertrain technologies, we are also transferring these products and capabilities for use in other transport modes such as maritime and heavy-duty truck.

BAE Systems appreciates the efforts of the Air Resources Board (ARB) staff to propose a new, optional certification pathway for heavy-duty electric and fuel cell vehicles and their zero emission powertrains to meet the state's clean transportation and freight movement goals. As this optional pathway is contemplated to support mandatory regulatory measures both underway and forecast for on-road and off-road vehicles, we urge ARB to continue working closely with the industry to clarify the certification issues that may arise as OEMs, powertrain manufacturers and component suppliers work toward meeting certification requirements.

Thank you for your consideration of BAE Systems' comments on the Proposed Zero-Emission Powertrain Certification Regulation. We welcome the opportunity to answer questions on these comments and look forward to continue working with ARB to meet California's zero emission transportation goals.

Sincerely,



Stephen J. Trichka  
Vice President and General Manager, Power & Propulsion Solutions  
BAE Systems

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cc: R. Corey, ARB  
S. Cliff, ARB  
J. Kitowski, ARB  
D. Chen, ARB  
M. Diener, ARB  
E. Kersnar, ARB (for Mary Nichols and members of the Air Resources Board)