



Lloyd's Register
LRQA

www.lrqausa.com
management-usa@lrqa.com
T +1 281-398-7370
T +1 888-877-8001
F +1 281-398-7337

LRQA
Lloyd's Register Quality Assurance, Inc.
1330 Enclave Parkway, Suite 200
Houston, TX 77077
United States

March 11, 2016

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Dear CARB staff,

LRQA is concerned with the proposed change in the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions which would move the verification deadline from September 1 to August 1. Much of the scheduling for our business outside of ARB work has been structured around the September 1 deadline. A change to August 1 would have a significant impact on the number of verification projects (both ARB and other voluntary programs) we would be able to perform in a given year with adverse effects on our bottom line.

Your analysis results stating verification bodies can more effectively use their time leading up to the verification deadline does not apply to LRQA's situation. With the balance of the schedules for various programs we work in, your suggestion that a more effective use of time with a shift to starting the verification cycle earlier would not alleviate the adverse effects on our business.

If there is an internal need for ARB schedule adjustments, we strongly encourage you to consider either a one or two week change rather than an entire month.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Derek Markolf'.

Derek Markolf
Americas Technical Manager Climate Change

Improving performance, reducing risk

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