

Following are my comments and questions that I would like to pose to CARB as they consider legislation and regulations for locomotive users.

- Under the current proposal locomotives under 1000 HP are exempt. Is there anything in the legislation that prevents a current locomotive user who is using a locomotive above 1000 HP from repowering it with a 900 HP engine and avoiding all the regulations and spending account contributions? Can a locomotive user that has multiple locomotives that are over 1000 HP re-power their fleet with less than 1000 HP engines even if they have to add a couple of additional less than 1000 HP units to make up for lost total power?
- In CARB's presentation, little attention has been given to the option of converting current switch locomotives to zero emissions. There are many advantages to converting an existing locomotive including but not limited to: lower initial costs; faster into operation; lower and easier maintenance costs – a converted locomotive will utilize many of the locomotive's existing systems such as traction motors, trucks, brakes, etc., allowing the locomotive owner to continue to use existing parts and service networks for maintenance. Lower costs and faster (perhaps significantly) to operation, both in terms of construction time and potential reduced time to finance a lower cost locomotive, means that CARB's goals for emissions reductions will be met sooner.
- To CARB's question on costs used reflecting current prices:
 - In the Preliminary Cost Document, CARB shows cost estimates for a BE Switcher, of between 1500 and 3000 horsepower to be between \$2,750,000 and \$5,000,000. We believe these numbers could be reduced by 10% or more with a conversion of a user's existing switch locomotive to a zero emissions unit.

Thank you very much for the opportunity to respond.

Sincerely,

David Kerr