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August 25, 2020

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

Re: California Air Resources Board  
Proposed Heavy Duty Engine and Vehicle Omnibus Regulation and Associated Amendments  
Hearing Date: August 27, 2020

Dear Chairwoman Nichols,

These comments are submitted by Navistar, Inc. (Navistar) regarding the above-reference proposed rules. Navistar is a manufacturer of heavy duty vehicles and engines that has for decades produced engines and vehicles for the U.S. market, including California. Navistar further has held and currently holds California executive orders for heavy duty products and intends to do so in the future. The proposed rules would, therefore, directly impact Navistar.

Navistar is also a member of the Truck and Engine Manufacturer's Association (EMA). As a member, Navistar directly participated in the developments of the comments submitted by the EMA on August 13, 2020. Navistar adopts those comments in full. In addition, Navistar would like to emphasize that it strongly supports EMA's position that the proposed rule does not comply with the requirements of the Clean Air Act that a heavy duty emission rule provide a full four year lead time for new heavy duty regulations. Further, we do not believe the rule and supporting materials demonstrate the feasibility or cost-effectiveness of the proposed rule as more fully set out in the EMA comments.

We request that the Board fully consider the comments set out in this letter and in the EMA comments.

Sincerely,

Jacqueline Gelb