

October 24, 2024

Clerks' Office
California Air Resources Board
1001 I Street,
Sacramento, California 95814

Re: Comments by Suzuki Motor Corporation for the Proposed Amendments to On-Road Motorcycle Emission Standards and Test Procedures and Adoption of New On-Board Diagnostics and Zero-Emission Motorcycle Requirements

Suzuki Motor USA, LLC, on behalf Suzuki Motor Corporation (collectively, "Suzuki"), respectfully submits the following comments related to CARB's amendments to the proposed regulations for new on-highway motorcycles marketed in California. Suzuki appreciates the outreach provided by CARB staff that has occurred over the development process of the proposed regulation as well as CARB staff's consideration of Suzuki's comments that were submitted at various times during regulation development.

Due to delays in finalizing the proposed regulations, CARB has proposed delaying implementation of the motorcycle regulation phase-in by one model year, to 2029. Suzuki supports this proposed amendment, as it will allow additional time to develop new motorcycle models compliant with the new stringent standards and help ensure that California dealers will be able to offer a more complete range of products for the 2029 and later model years.

Suzuki also supports CARB's overall initiative to reduce constituent and greenhouse gas emissions, which aligns with Suzuki's core principles towards carbon neutrality and environmental sustainability. However, Suzuki believes that CARB's current single focus towards pure zero-emission motorcycles overlooks the benefits that would come from a more holistic approach that considers other potential carbon-reduction technologies that would be suitable for on-road motorcycles, such as adoption of near-term solutions for increased engine efficiency that will provide a corresponding reduction in carbon fuel consumption, mid-term solutions such as development of low and zero-carbon liquid fuels that could function with the existing vehicle fleet, and longer-term solutions such as hydrogen internal-combustion engines that could provide high power density with near zero emissions. These technologies could work in concert with pure zero-emission motorcycles as vehicular carbon reduction solutions.

Under the currently proposed zero-emission mandate, companies will need to focus resources on development of new battery-powered powertrains, which is the only realistic technology that is capable of meeting the CARB mandate. This effort will require substantial investment and lead-time to develop a class of product which currently has low consumer acceptance and high price points, and which will be required to be introduced in large volumes into a California motorcycle sales market that is in the midst of a severe downturn due to generally poor economic conditions. It will also displace resources that could be deployed towards development of other low and zero-carbon solutions that could be attractive to motorcyclists and potentially achieve greater environmental benefit more quickly through popular adoption. Suzuki respectfully requests CARB reconsider their pure zero-emission mandate and instead, also allow other alternative carbon-reducing technologies that could be highly effective in moving California towards carbon neutrality.

Additionally, Suzuki has concern with four technical elements of the proposed regulation which could easily be resolved through minor amendments and without any negative impact to the environment.

These are as follows:

1. Proposed chassis dynamometer cooling blower placement for evaporative testing

In Attachment C-1, TP-934 Appendix A, 10.1(h), CARB has proposed to amend the variable speed cooling blower airflow measurement value to align with EU5 and EPA but appears to have inadvertently retained the original cooling blower placement distance of 0.3 ± 0.05 meters in Appendix A, 10.1(c). This specification does not align with the blower outlet position requirement in EU 134/2024, Annex II, 4.5.2.5.3 which specifies "*The blower outlet shall be perpendicular to the longitudinal axis of the vehicle, between 30 and 45 cm in front of its front wheel*".

Maintaining the current placement specification of 0.3 ± 0.05 meters in TP-934 creates a facility conflict for test environments that have non-portable dynamometer cooling blowers. These installations have been designed to the EPA and EU5 positioning tolerance of 0.3-0.45 meters and are not easily adapted the fixed value specified in TP-934.

Suzuki believes that there is no technical reason that the cooling fan blower placement position specified for TP-934 cannot be harmonized with EU5 and EPA requirements, and requests CARB to make this additional amendment.

2. Certification fuel

In Attachment A-1, §1958.2(c)(1)(A)(1) and Attachment B-1, Part: 1, D17, CARB has proposed to amend the certification fuel requirement to allow the use of CARB LEV III fuel in addition to CARB LEV IV certification fuel. Suzuki appreciates this consideration. However, there is still some ambiguity over the specific CARB certification fuel that would be used if confirmatory or enforcement testing were ordered. While the intent of the amendment seems clear, the absence of controlling language on this point could allow a misinterpretation in the future whereby a product certified using one version of California certification fuel could be required to be tested by CARB using the different California certification fuel.

Suzuki requests that CARB add a clarifying statement to the effect that should a manufacturer certify with either CARB LEV III or LEV IV fuel, any compliance testing performed by CARB would be conducted with the same California certification fuel that was used by the manufacturer for certification.

3. Reporting of in-use monitoring performance ratio (IUMPR)

In Attachment A-1, §1958.2(e)(2)(F), CARB has proposed to add a new subsection that describes a process whereby under certain circumstances a manufacturer could request a 6-month extension to the current proposed 12-month reporting period for submission of IUMPR data. Suzuki appreciates this consideration. However, the proposed amendment does not harmonize with the EU regulation that allows for 18 months for reporting. Having the certainty of a full 18 months to collect and submit required IUMPR data allows the necessary time to collect data for motorcycle samples with sufficient mileage to provide meaningful information on OBD performance. The 18-month term allowed under EU regulation provides assurance that sample collection need not commence at too early a stage. The CARB amendment will require a "best effort" to complete reporting within 12 months before an extension could be considered. This timeline will require manufacturers to commit resources sooner

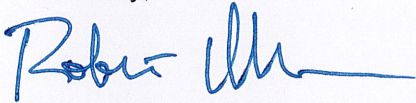
than is likely practicable considering typical on-road motorcycle usage without any associated environmental benefit compared to the 18-month reporting period allowed by EU regulation. Suzuki requests that CARB reconsider this matter and fully harmonize with EU 44/2014, Annex XII, Appendix 1, 4.1.7 and allow 18 months for IUMPR reporting without other qualifications.

4. Production motorcycle evaluation testing (PVE testing)

Suzuki believes the proposed requirement for up to 2 test motorcycles per model year for PVE testing is overly burdensome and will divert engineering resources that will be needed to develop new products compliant with the proposed regulations. As EU regulations require only a single PVE test vehicle per model year, Suzuki requests CARB reconsider this matter and harmonize with the EU requirement. This change will not impact emissions performance and will reduce unnecessary engineering burden.

Suzuki appreciates your consideration of these comments.

Sincerely,



Robert Alsip
Senior Department Manager
Government Relations