

## Alliance for Automotive Innovation

The Alliance for Automotive Innovation and our members provide the comments below on the ZEV-related regulations in CARB's Advanced Clean Cars II regulatory proposals<sup>1</sup>. CARB has taken a new approach to the ZEV regulations, by having the guiding regulation (13 CCR 1962.4) reference other supplemental regulations (e.g., §1962.8, ZEV Warranty). In general, we believe this approach improves the usability of the regulations. However, given the breadth and complexity of this regulation and the supplemental regulations, it is likely that additional changes will be required even beyond the 15-Day Notice process and this year's rulemaking.

We sincerely appreciate the time that the staff have taken to explain the program goals and specific mechanisms in workshops and meetings. The following comments contain specific changes to the regulations that streamline or improve the regulations.

1. [§1962.4, ZEV Regulations](#)

a. [\(d\)\(2\) Battery Durability Requirements](#)

This is covered in detail in Attachment A.

b. [\(e\)\(1\)\(A\)8, Full-Credit PHEV Minimum Certification Range](#)

This specifies the minimum all electric range as 73 miles. We believe this is a typo and should be 70 miles.

c. [\(e\)\(2\)\(A\)1.b. EJ Value Clean Mobility Program](#)

This paragraph provides up to 0.4 EJ Values for a PHEV placed in a Community-Based Clean Mobility program (CBCMP). However, this credit is only available if the PHEV has seating for 6 passengers. Some CBCMP may see value in limiting participation to vehicles that seat 6 passengers. However, we do not believe the ZEV regulations should dictate the requirements in the CBCMP. Thus, we recommend deleting this provision to provide the greatest flexibility.

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<sup>1</sup> "CARB's regulatory proposals" include the documents contained in the Public Hearing Notice and Related Material posted on April 12, 2022, at <https://ww2.arb.ca.gov/rulemaking/2022/advanced-clean-cars-ii>

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d. [\(e\)\(2\) Environmental Justice Values](#)

For completeness, the following recommendations are included here, but they mirror those in the cover letter.

1. New Section to Encourage Innovative Programs: We recommend adding a new section that would allow manufacturers to propose, and the Executive Officer to approve, innovative clean mobility programs designed to increase EVs in equity communities. For example, this provision could allow infrastructure investments in equity communities, which the current regulations do not appear to allow. Other ideas to improve access to and use of EVs in equity communities might include EVs in community car-share or ride-share programs. Or offering vehicle bundles (new or used) that include vehicle, insurance, and fuel. In addition to encouraging new and innovative programs in California, this would also allow the same in states that follow California under Section 177 of the Clean Air Act. We recognize that States' processes related to adoption of new regulatory language may preclude the ability of CARB to propose "open ended" language that would provide Executive Office authority, so we are open to further dialogue about processes that could otherwise provide fast-track approval of new ideas. Our goal is to ensure that new, creative ideas can be proposed and approved to further EV adoption.
2. Warranty Provision: We recommend the ACC II regulations provide an additional EJ values for EVs placed in the Qualifying Community-based Clean Mobility Programs that include an extended traction battery warranty for 10 years or 150,000 miles at 70 percent through 2030 model year and 75 percent for 2031 model year.
3. Allow Early Implementation: Allow implementation starting in 2023MY for off-lease provision since these vehicles will start coming off-lease in 2025 or 2026 calendar year. For all other EJ programs allow implementation beginning in 2024MY.
4. Extend Implementation: Extend all the EJ programs through 2031MY (Community Car share, Low MSRP, Off-lease, and the new section on Innovative Programs).
5. All EJ Proposals: Extend EJ value use through 2034MY. This will ensure the EJ programs can see maximum utilization through the end of implementation.
6. Low MSRP: To encourage manufacturers to bring more affordable EVs sooner and effectively kickstart the affordable EV market, we recommend providing additional EJ Values during the first few years of the program.

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Model Year	Vehicle Value
2024-26	0.3
2027	0.2
2028	0.1

e. [\(e\)\(3\)\(A\) Early compliance values, qualifying vehicles](#)

We want to clarify our understanding of this section. When a state adopts this regulation, 13 CCR 1962.4, early compliance values (ECVs) will be available in that state for the two model years prior to implementation of this regulation in that state. These ECVs would be generated for all ZEVs and PHEVs more than 7 percent if the state sold less than 7 percent ZEVs and PHEVs on average in the 2020-2022 model years calculated per 13 CCR 1962.4(e)(3)(A)2. For example, if a state that adopts these regulations next year (2024 model year), for implementation in 2027 model year, a manufacturer could earn ECVs for qualifying vehicles produced in 2025 and 2026 model year.

f. [\(f\)\(1\)\(A\) Including MDVs in ZEV Requirement Performance and \(g\)\(1\), fulfilling a ZEV Requirement Shortfall](#)

As noted in our cover letter, electrifying a medium-duty vehicle (MDV) provides substantially more environmental benefit than electrifying a smaller, cleaner, more efficient light-duty vehicle. Historically, manufacturers could use excess MDV ZEVs credits to meet LDV ZEV requirements. However, in the proposed ISOR ZEV regulations this is no longer allowed. We recommend including this allowance in both §1962.4(f)(1)(A), ZEV Requirement Performance, and in section (g)(1) fulfilling a ZEV Requirement Shortfall.

This provision is most valuable and will encourage the greatest volume of MDVs if it allows the transfer of MDV ZEV credits but does not require those ZEVs to also meet the LDV ZEV mandated percentage. Thus, the manufacturer would have to meet the MDV ZEV Mandate under Advanced Clean Trucks (ACT), and excess MDV ZEVs beyond those required to meet ACT could be transferred to the LDV ZEV program under §1962.4.

If MDVs are instead treated as if they are LDVs and thus generate a ZEV obligation, it eliminates most of the incentives to build excess MDV ZEVs. For example, in this scenario in 2030, each excess MDV ZEV transferred to the LDV would generate a 0.68 ZEV obligation leaving only 0.32 LDV ZEV credits. Of course, there would be no incentive

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to over-comply with the MDV ACT regulations in 2035 because the LDV ZEV regulation requires 100% ZEV, so there would be no benefit to transferring an MDV ZEV.

g. [\(f\)\(1\)\(E\) Including Converted ZEV and PHEV Values](#)

As currently written, converted ZEV and PHEV values can only be used to meet 15 percent of a manufacturer's requirement. Thus, in 2026 when the requirement is 35 percent, converted credits can be used to meet  $15\% * 35\% = 5.25\%$ , and the remaining 29.75% must be met with non-converted credits.

While we understand the desire to limit use of converted credits, an annual 15 percent cap is highly and unnecessarily restrictive. As an alternative, CARB should consider a cap that is computed as an average (or cumulative) over the period of 2026-2030, such that a manufacturer may use, for example, 10% one year and then 20% the next. Such a change would provide manufacturers with important compliance flexibility while not changing the total number of ZEVs that ultimately reach the market. We recommend this change in 13 CCR 1962.4(g)(1)(C).

A related concern is that the regulations only allow use of converted ZEV and PHEV values when a manufacturer has a shortfall. Consequently, many of these credits could expire without value.

We understand the intent behind these changes is to eliminate the large credit banks manufacturers have earned or purchased over the last decade. However, the credits in these banks represent one-to-one vehicle sales (after conversion). Automakers acted in good faith to either sell vehicles or purchase credits from vehicles sold in the state. They did so with the expectation that the credits could be used to meet the very steep increase in ZEV requirements being proposed.

Dramatic changes such as this send the wrong message to manufacturers and discourage use of programs that, at least at the time, CARB finds valuable. For example, should manufacturers be concerned that EJ values will fall out of favor and their use severely limited or even eliminated in the future? CARB should honor these past provisions in good faith, particularly as they caused manufacturer reliance and investments.

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We recommend allowing the use of converted ZEV and PHEV values regardless of whether a manufacturer has a shortfall by moving this provision to 13 CCR 1962.4(f), ZEV Requirement Performance section.

h. [\(h\)\(2\) Incur and carryforward deficit](#)

We recommend clarifying this language and perhaps including an example, such as “For example, the manufacturer must make up a deficit earned in 2026 model year no later than the 2029 model year.”

i. [\(i\)\(1\) ZEV Test Groups](#)

We recommend deleting “powertrain deterioration” from this section. We would also appreciate some examples of current models and how they should be grouped in a test group (e.g., Tesla Model 3, Chevrolet Bolt EUV vs Bolt EV). Our focus is to limit the number of test groups and the commensurate proliferation of testing and compliance costs. To reduce the cost of ZEVs and improve broad affordability, manufacturers will work with CARB and EPA to explore ways to streamline certification processes and costly lab testing activities for these vehicles. In theory, certifying a vehicle that does not and cannot emit pollution should require minimal effort.

j. [\(j\)\(2\) ZEV Reporting by VIN](#)

Reporting the VIN, model year, executive order number, make, model, test group, and state for every single ZEV and PHEV delivered for sale is overly burdensome and should be phased out as EV sales dramatically increase. By the 2028 model year, 50% of new vehicles will need to be ZEVs or PHEVs and this provision will require reporting all this information on millions of vehicles each year. Such requirements are unnecessary. Accordingly, we recommend eliminating this requirement after the 2028 model year or 2030 model year at the very latest. This will reduce the regulatory complexity and costs for vehicles that have zero emissions.

k. [\(m\)\(1\) Audit of records](#)

Along with (j)(2) VIN reporting requirements, this audit requirement can add substantial administrative burden for very little gain. Particularly when the requirements are combined by matching DMV VIN and OEM reported VIN and manufacturers are required

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to look for reports for just a few vehicles. We do not oppose audits or investigations where a significant discrepancy exists (more than 10 percent), but do not see the value in spending resources to track down a handful of ZEVs in a sea of millions.

(m) Enforcement of ZEV Requirements.

- (1) Audit of Records. A manufacturer must make records of vehicle sales into California available to the Executive Officer within 30 days of a request for audit to verify the accuracy of the reported information. Submitting incorrect information, or failing to submit required information, is a separate violation of this section for each incorrect or omitted statement for which violators shall be subject to penalty. The Executive Officer may only make this request for 2026-2028 model years and only when the manufacturer reported ZEV and PHEV sales volume in a model year exceeds the ZEV and PHEV registrations in California by equal to or more than 10-percent.

## 2. §1962.3 Electric Vehicle Charging Requirements

### a. (c)(3) Charging Cord requirements

The charging cord requirements will increase BEV and PHEV costs by \$100 to \$200 per vehicle and possibly more<sup>2</sup>. The compliance costs through 2035 will be \$1 to \$2 billion in California alone and another \$2.5 to \$5 billion in the other Section 177 states.

In addition to the staggering compliance costs, this requirement may discourage some customers from installing level 2 (L2) chargers. Manufacturers encourage installed L2 chargers because they typically offer faster and safer (compared to a charging cord laying on the ground) and may be set up to allow the customer to take advantage of time of day or demand response charging with the local utility, where the charging cord will not.

Charging cords with the appropriate connectors can be purchased online with next day delivery. Moreover, purchasing a charger allows the purchaser to enjoy the federal

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<sup>2</sup> For example, a random sample of convenience chargers on online show 20-foot L2 chargers with >24A start at over \$300. This cost would need to be reducing by the cost of the shorter L1 convenience charge cord installed on most vehicles.

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infrastructure tax credit, rather than simply paying more for the vehicle to cover the cost of the charger.

To the extent that charging cords are intended for 2<sup>nd</sup>, 3<sup>rd</sup>, and subsequent owners, it is possible or likely that by the time the vehicle reaches these owners, the charger would have been sold, lost, or stolen. Moreover, to the extent these cords remain with the vehicle until the end of life (EOL), it then simply adds to the e-waste stream. While some automakers may provide the charging cord, it should not be a requirement to do so.

If CARB decides to maintain this requirement, we recommend updating the requirement to allow a convenience cord to be “made available as an accessory” with each vehicle. This would allow the manufacturer to make it available at the dealer, include a voucher or something similar for a free charging cord. This would allow the vehicle to be tested without the cord, and ensure the customer wants the convenience cord. Tesla found very low usage of the portable charger and stopped including it with new Tesla vehicles.<sup>3</sup>

b. [\(c\)\(3\)\(B\)1. 24A requirement](#)

This paragraph should provide a 24A or sufficient power to charge a vehicle in 4 hours or less.

c. [\(c\)\(4\) DCFC requirement](#)

PHEVs should not be required to include a DCFC, since this would only add cost and is not likely to be needed. We recommend revising this paragraph accordingly.

3. [§1962.5 Data Standardization](#)

a. [\(a\) Applicability](#)

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<sup>3</sup> See, *Tesla, like Apple, will now make you buy a charger for your car separately*, Business Insider, April 18, 2022, retrieved from <https://www.businessinsider.com/tesla-home-charger-not-included-elon-musk-mobile-connector-2022-4> on May 9, 2022.

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The data standardization regulation should only apply to vehicles that receive ZEV or PHEV credit. Thus, we recommend the following change

“The requirements of this section shall apply to light-duty zero emission vehicles (ZEV) and plug-in hybrid electric vehicles (PHEV) certified to earn vehicle values in accordance with title 13, CCR, section 1962.4 for sale in California as follows:”

The added section underlined above should then be deleted from (a)(2) since it is not necessary.

b. (c)(4)(A)4d, Standardized Requirements SOH for Vehicles with battery reserve

This provision requires the SOH monitor to report the full range of battery capacity that the vehicle will ever allow and ignore the battery reserve. The need for a battery reserve is largely driven by CARB’s durability requirements. However, the SOH is used for battery warranty. Thus, manufacturers face competing requirements of adding battery reserve to meet the durability and then being penalized for that addition through the combination of SOH monitor in this regulation and the warranty in that regulation. We recommend revising this paragraph to read as follows:

reflects the maximum usable battery energy at the time of certification (e.g., a vehicle with a new battery but without the reserve capacity). as if the user was allowed to initially access the maximum the system is designed to ever allow (e.g., a vehicle with a new battery but with the reserve in the system artificially opened up to its maximum range of authority). Upon request by the Executive Officer, the manufacturer shall provide software or other means for CARB to conduct verification testing to ensure the accuracy of the SOH parameter to the measured usable battery energy.

c. (c)(3) Communications to a scan tool:

This section requires manufacturers to “use one of the following standardized protocols for communication to a scan tool of all required messages. **Only one protocol per vehicle shall be used to report all required messages.**” (emphasis added)



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Automakers understand that CARB does not wish for manufacturers to have multiple buses used to meet their standardization requirements. Within the protocol detection, a standardized message will be broadcast by the tool, asking if that bus supports “Regulated UDS” (0x01). Industry is interpreting that this requirement demands that only ONE bus, Ethernet OR CAN, is permitted to respond positively to this request. Regular/enhanced UDS diagnostic messages can and may be supported on both buses (if available) to support accessibility of diagnostic data to as many tools as possible (older CAN tools and modern Ethernet tools). During Auto Innovators meeting with CARB staff on 10 May 2022, CARB indicated that their expectation was in alignment with this interpretation of the language.

d. [\(c\)\(4\)\(D\)1.r. Battery Temperature History](#)

The J1979 team is working to provide standardized data to enable assessment on the temperature history of a ZEV energy storage system. Within CARB’s request for standardization, CARB specifically suggests in the standardization regulation that the temperature data is adjusted for energy throughput. To simplify the data across manufacturers, we recommend removing that constraint as shown here:

r. Average battery temperature during charging and propulsion system active. ~~weighted by battery energy throughput~~

e. [Typos](#)

We notice what appear to be typos as follows:

- (c)(6)(A) and (c)(6)(B): there appears to be an extra “(c)(4)” in the text.
- (e)(4)(D)1.: This should reference (e)(4) rather than “(e)(3).”

4. [§1962.6 Battery Label Regulation](#)

a. [\(b\)\(1\)\(B\) Nominal System voltage and cell voltage](#)

We recommend simply specifying “Nominal system voltage and cell voltage” and deleting the rest of this paragraph. SAE J2288 does not specify these values.

b. [\(b\)\(1\)\(C\) Individual Cell Count](#)

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This information is not needed quickly at the time of battery removal. Thus, instead of putting this on the battery label, we recommend allowing this information to be housed on the website required by subsection (c)

## 5. §1962.7 ZEV In-Use Testing

### a. Applicability

This regulation was originally developed for ZEVs only and did not include PHEVs. However, in the most recent version it applies to all PHEVs. PHEVs fall into three categories – non-credit generating PHEV, transitional partial credit PHEVs, full 1-credit PHEVs. Each of these categories should have different requirements throughout the regulations. However, for in-use PHEVs are already covered by existing in-use regulations, and to the extent that additional requirements should be included in in-use testing, those additional requirements should be placed in the existing in-use test procedures for those vehicles.

## 6. §1962.8 Battery warranty

### a. Definition of “Propulsion-Related part”

This is an important definition, but as written, it is overly broad. For example, a drive shaft, axle, or tires could be used to “propel the vehicle.” We recommend the changes shown below:

“~~Propulsion~~-related part” means any electronic system, component, or part that is used whose failure will directly impede the ability to refuel or recharge the vehicle, store fuel or energy for the vehicle (excluding the battery), propel the vehicle, or recover or recoup vehicle kinetic energy, including components used to control, manage, or thermally manage such propulsion-related parts. These parts include drive motor(s), inverter(s), converter(s), on-board charging system components, fuel cell stack components, refueling and fuel tank components, fuel cell air and fuel delivery components, regenerative braking system components, and the power electronics, electronic control units, and thermal management systems of such components and systems providing propulsion, thermal management, recharging and energy storage, conversion and related diagnosis within the vehicle. Advanced driver assistance systems (ADAS) and safety-related components and systems are not considered “propulsion-related parts” for the purpose of this regulation.

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b. Thresholds for ZWIR, ZFIR, ZIR, and Non-conformance

We understand the value in tracking warranty information even on a ZEV in the early years. However, the various trigger points for tracking warranty information and certainly declaring a non-conformance for a ZEV should much higher than the trigger points for an emissions nonconformance since the latter increases emissions and the former (ZEV) does not. We recommend the following triggers for warranty information and reporting on ZEVs:

Item	Basis	Emission Threshold	DRAFT CARB ZEV Threshold	INDUSTRY Proposal	Reason
<b>Non-Conformance</b>	Failure	4%/50	4%/50	<b>10%/125</b>	An emissions nonconformance <u>increases emissions</u> . A ZEV nonconformance does not. Consequently, it should have a higher threshold.
<b>EIR/ZIR</b>	Screened	4%/50	4%/50	<b>10%/125</b>	Align with non-conformance
<b>FIR/ZFIR</b>	Unscreened	4%/50	4%/50	<b>10%/125</b>	Align with non-conformance
<b>EWIR/ZWIR</b>	Unscreened	1%/25	1%/25	<b>4%/50</b>	Raises the threshold, reduces reporting burden, but still provides early indication of problems

7. §1969 Service Information requirements

Industry has been working with CARB to provide a standard (J1979-3) that allows access to diagnostic data over CAN or Ethernet. J1979-3 requires updates to J2534 to allow for usage of ethernet for communication. It is recommended that CARB update their references to J2534 to allow for programming over ethernet as well. Such a change will improve the efficiency of the repair community by allowing for much faster reprogramming for ZEV owners. SAE J2534-1 was updated on October 28, 2015.

8. Test Procedures for 2026 and Subsequent Model Year LDV ZEVs and PHEVsa. Definition of “SAE J1634”

We applaud CARB’s leadership in modernizing its battery electric vehicle testing procedures to the updated 2021 SAE J1634 (SAE International “Battery Electric Vehicle Energy Consumption and Range Test Procedure,” April 2021) incorporated by reference in these test procedures. These 2021 SAE J1634 test procedures are supported by regulatory agency and industry input and incorporate industry best practices to support

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battery durability, vehicle performance, and energy efficiency, with associated real-world benefits for consumers.

In addition, we recommend that CARB work with U.S. EPA to ensure U.S. EPA harmonizes its test procedures with those adopted by CARB to minimize laboratory test burden and ensure battery electric vehicles are consistently tested with one test procedure to simultaneously meet federal and state requirements.

b. [Definition of “SAE J1711”](#)

We expect that the next revision of the SAE J1711 to be approved within the coming months. This next J1711 revision will include import changes:

- Added CARB EAER (Equivalent All-Electric Range) definition
- Creates a new term “net energy change/fuel ratio” NECFR to describe the relative significance of the NEC compared to fuel consumption
- Added new “S-Factor” calculation. S-Factor corrects every Charge-Sustaining phase to Net Energy Change (NEC) equal to zero; always desirable
- CO2 calculations added alongside fuel economy calculations

If SAE J1711 is updated within the timeframe of the ACC II rulemaking, we recommend that CARB incorporate the latest version in a future 15-Day Notice change.

9. [PHEV Requirements](#)

a. [PHEV requirements:](#)

The ISOR documents are not particularly concise when referring to the three categories of PHEVs – (1) non-§1962.4 PHEVs (2026+), (2) §1962.4(e)(1)(B) Partial-Credit PHEVs (2026-28), and (3) §1962.4(e)(1)(A) Full-Credit PHEVs (2026+). Auto Innovators and our members request confirmation that the following general requirements apply to each:

(1) Non-§1962.4 PHEVs (2026+MY), i.e., Non-Credit Generating PHEVs:

- Must meet HPCS emissions (based upon certified emissions bin)
- New Battery Label
- Service Information

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## (2) §1962.4(e)(1)(B) Partial-Credit PHEVs (2026-28MY)

- Must meet HPCS emissions based upon certified emissions bin; Exempt if US06 AER  $\geq$  10mi
- New Battery Label
- Service Information
- **Battery Warranty for 8/100 with SOH  $\geq$  70%**
- **Certified to  $\leq$  SULEV30 / 15/150 emissions performance warranty**
- **Standardized data – SOH & Charging rate**
- **2 cycle Unadjusted AER  $\geq$  43mi**

## (3) §1962.4(e)(1)(A) Full-Credit PHEVs (2026+MY)

- **Exempt from HPCS – meets full PHEV US06 requirements**
- New Battery Label
- Service Info
- Battery Warranty for 8/100 with SOH  $\geq$  70%
- Certified to  $\leq$  SULEV30 / 15/150 emissions performance warranty
- Standardized data – SOH & Charging rate
- 2 cycle Unadjusted AER  $\geq$  70mi
- **US06 AER  $\geq$  40mi**
- **Charging requirements (convenience cord, on-board charger min specs)**

b. [PHEV Table of Regulations](#)

To further our understanding of the regulations, we created the following table listing the various ZEV regulations and their applicability to each PHEV category. We recommend, to the extent these are correct, CARB include changes to ensure clarity of the requirements to each PHEV category in each of these regulations.

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PHEV Requirements*	Section	PHEV Base Certification (No ZEV Credit)	Partial ZEV Credit (26-28MY Only)	Full ZEV Credit (26MY+)
Charging Standards	<u>1962.3</u>	No	No [1962.3 points to 1962.4 and not in 1962.4 (e)(1) B list]	Yes [1962.3(B).1 & 1962.4]
Min. Certified AER Range Value	<u>1962.4</u>	No	Yes ≥ 43mi	Yes ≥ 70mi
Min US06 AER Range Value	<u>1962.4</u>	No	No, if ≥ 10mi add 0.15 credit [1962.4 (e)(1)(B).2]	Yes ≥ 40mi
≤ SULEV30 Emissions Cert Level	<u>1962.4</u>	No	Yes	
Data Standardization	<u>1962.5</u>	No [1962.5 (a)(2) only applies to credit generating PHEVs. However, this should be clarified, by limiting to 1962.4 Cert PHEVs in (a) rather than (a)(2)]	Yes, SOH & charging rate (data stream and display) [1962.4 (e)(1)(A).4 & 1962.5(c)(4)(A).2 & (c)(6)]	
Battery Labeling	<u>1962.6</u>	Yes [1962.6(a)]		
ZEV In-Use: SOH reporting / accuracy & charge rate data	<u>1962.7</u>	No [1962.7 (a) applicability causes confusion. Needs clarity.] (LEV IV Emissions still applicable)	Yes? [1962.7(a)? Could not find a good reference. Needs clarity]	
80% Range 10/150	<u>1962.7</u>	No, only for ZEVs [1962.7 (a) applicability causes confusion & 1962.4(e)(1)(A)-(B) does not call out range durability 80% 10/150K] (LEV IV Emissions still applicable)		
ZEV Warranty- Battery Warranty	<u>1962.8</u>	No	Yes [1962.8(a) applicability]	
Extended Defects & Performance Warranty to 15/150	<u>1962.4</u>	No	Yes [1962.4(e)(1)(A).2 & B]	
Service Information	1969	Yes [1962.4(e)(1)(A).5 & B]		