

October 22, 2018

Richard Corey  
Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812-2815

RE: Proposed Amendments to California Specifications for Fill Pipes and Openings of Motor Vehicle Fuel Tanks  
(CCR, Title 13, section 2235)

Dear Mr. Corey:

The Association of Global Automakers, Inc.<sup>1</sup> (“Global Automakers”) and our respective members appreciate the opportunity to comment on the Proposed Amendments to Vapor Recovery Nozzle and Vehicle Fill Pipe Regulations. We are supportive of the changes made by staff since the May 2018 workshop. However, we would like to use this opportunity to highlight three aspects of the proposed amendments that are critical considerations for staff when approving the amendments. These include: the design proposal, phase-in and provisions afforded to small volume manufacturers (SVM), and the spitback test update.

### **Design Proposal**

We agree with the staff report that acknowledges the significant lead-time and cost issues associated with the phase-in schedule proposed in alternative 1 at the May 23, 2018 Air Resources Board (ARB) workshop.<sup>2</sup>

The proposal provides additional flexibility for dimensional requirements and phase-in allowing manufacturers up to model year (MY) 2024 and later to implement the modification. And only requiring this change when a manufacturer is redesigning their vehicle’s fill pipe head.

### **Small Volume Manufacturer Provision**

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<sup>1</sup>The Association of Global Automakers represents the U.S. operations of international motor vehicle manufacturers, original equipment suppliers, and other automotive-related trade associations. Global Automakers works with industry leaders, legislators, regulators, and other stakeholders in the United States to create public policies that improve motor vehicle safety, encourage technological innovation and addresses environmental needs. Our goal is to foster an open and competitive automotive marketplace that encourages investment, job growth, and development of vehicles that can enhance Americans’ quality of life. Our members’ account for 40 percent of all U.S. production. International automakers account for 47 percent of all U.S. sales of passenger vehicles and light trucks. For more information, visit [www.globalautomakers.org](http://www.globalautomakers.org).

<sup>2</sup> Alternative 1 included “modifying the fill pipe head design, mating the new fill pipe head to the existing vehicle, modifying vehicle assembly line tooling to handle new fill pipe shape, and preforming crash, pre-mature shutoff, spitback, ORVR and evaporative emission testing.”

Additionally, we appreciate that SVM provisions have been added to the leak performance test, which will delay compliance with the performance test requirement until MY 2024. This time period will allow for SVMs to manage product cycles and meet the fuel filler pipe specifications on a timeline that takes into account the unique nature of small production volumes that also ensures the environmental benefits of these changes are realized.

#### **Spitback Test**

Initially, the May 2018 workshop raised concerns that potential changes to the spitback test validated by ARB would be made. Global Automakers is supportive of the final staff position that the spitback test in its current form will continue and appreciates the update to staff's position.

The spitback test has been working as intended, influencing the design of the new capless fuel pipes in vehicles. This test, in its current form, assures the safety of fill, the continued commitment to reducing vapor release and a methodology that allows for consistent testing.

#### **Conclusion**

Global Automakers is supportive of the modifications made to the staff report since the May 2018 workshop and appreciate the opportunity to provide comments. We are available to staff at any time in the event of any questions regarding these comments.

Sincerely,



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