



Mercedes-Benz

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Research & Development
North America, Inc.

STATEMENT
BEFORE THE: California Air Resources Board
Advanced Clean Cars II
June 9, 2022
James Fahy, Senior Regulatory Affairs Specialist

Good Morning/Afternoon,

My name is James Fahy and I am employed by Mercedes-Benz Research & Development North America. Mercedes-Benz filed detailed comments regarding the ACC2 regulation, but today I'll focus on the proposed PEMS In-Use Standards for MDVs.

CARB aims to improve transparency and ensure emissions controls across engine operations on-road. To that end, please know that our Mercedes-Benz Medium Duty vehicles, such as Sprinter vans, are already tested at 63 to 75 percent of their GCWR during certification, depending on the test group. We additionally provide off-cycle dyno tests at these GCWR ratios with repeat cycles, varied temperature, and at high altitude. Mercedes-Benz has been and will continue to provide CARB with PEMS data, which we believe satisfies CARB's stated intent.

CARB staff indicated during workshops that the Mercedes Sprinter van is not the target of the PEMS requirement - and that the rule is primarily focused on pick-up trucks with high tow capacities and long periods of towing. While we appreciate this verbal representation, as written, the proposed regulation *would* impact this vehicle.

Mercedes Sprinter vans are primarily used for last mile delivery applications, *not* for towing. Last mile delivery vehicles prioritize maneuverability and frequently reverse, rendering them incompatible with towing. Additionally, the maximum tow capability of the Sprinter van is capped, and depending on its hardware configuration, the total weight it can tow is limited.

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As another common application, 20% of Mercedes Sprinter vans are up-fitted to be used as recreational vehicles. Such vehicles are typically only used on weekends and vacations. An up-fitted Sprinter is much smaller and self-contained, differentiating it from a typical “Class A” RV that can ordinarily be found towing an additional passenger vehicle.

Mercedes-Benz therefore requests revisions to the tow capacity thresholds to accurately reflect vehicles intended to be impacted by this new requirement. As proposed, CARB might inadvertently work against its own goal to have newer, more efficient vehicles introduced onto Californian roads. As manufacturers modernize and electrify delivery vehicles, increasing cost and limited availability of new vehicles remain major concerns for end purchasers. The PEMS NOx emission standard proposed is 4 to 6 times more stringent than SULEV175 for MY2027, posing significant development challenges. The PEMS requirement will likely increase the price of last-mile delivery vehicles, as manufacturers face an increased test burden and technological challenges.

Since the Mercedes Sprinter is not CARB’s primary target, we ask that CARB update the GCWR threshold from 14-16,000lb. This modest increase in the threshold would still ensure consistency in emission control during towing, without adding unnecessary costs for vehicles not intended to be included, like last-mile delivery vehicles with low towing capacities.

Alternatively, CARB could include a ratio requirement of vehicle weight with and without towing capabilities to better define the applicability criteria, which would continue to target vehicles with large towing capacities, like MDV pickup trucks.

This concludes my remarks. Mercedes-Benz looks forward to continuing to work with CARB as it develops this rule. Thank you again for your leadership and the opportunity to testify today.