October 20, 2023

The Honorable Steven S. Cliff, Ph.D.

Executive Officer

California Air Resources Board

1001 I Street

Sacramento, CA 95814

ATTENTION: Clerk’s Office

**RE: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation**

Dear Dr. Cliff:

I am writing on behalf of ABC Companies, the largest independent distributor of motorcoaches in North America, with locations spanning across the United States and Canada, including four locations in California. Our company, alongside our 133 California employees is actively spearheading efforts to introduce zero-emission motorcoaches to the market, providing essential support for the thousands of riders our customers transport daily.

Over the past two years, we have made significant strides, transitioning from zero to over 30% of our new vehicle deliveries comprising battery electric buses. While this progress is noteworthy, electric buses cannot entirely replace our clean diesel motorcoaches for the majority of operators due to three primary challenges: prohibitive costs (double that of diesel counterparts), limited range, and the absence of reliable public charging infrastructure suitable for vehicles of this size.

ABC Companies has taken a proactive step by privately funding the largest motorcoach charging facility in North America, situated in Newark, California. Both our company and our customers are deeply committed to and actively progressing towards achieving zero emissions. However, 70% of our customer base still relies on clean diesel vehicles.

The impact of COVID-19 on travel has further exacerbated our challenges. We are anticipating a deficit of new coach replacement cycles, which is projected to exceed 450 vehicles by the end of this year. To put this into perspective, the entire state of California's annual purchases from all suppliers averaged 253 units.

This situation brings us to the pressing issue of compliance with the current Omnibus regulation. With only one engine supplier, the 15 engines allocated to us represent a mere 14% of what we require for our California-based operators. Without an amendment to the legacy engine availability regulation, we risk putting our California motorcoach operators in jeopardy.

Failure to amend this regulation will force our customers, who require late-model buses, to seek operators from states not governed by the California Air Resources Board (CARB). Even worse, they may be compelled to turn away travelers, who might then resort to personal vehicles, thereby increasing emissions and directly contradicting the spirit of the regulation.

ABC Companies respectfully requests that the CARB Executive Officer exercise their authority to amend the Heavy-Duty Engine and Vehicle Omnibus regulation. We seek an exemption for private motorcoach operators, allowing them unrestricted use of currently available clean diesel engines until new 2027 CARB-compliant engines become commercially available for new motorcoach production.

We appreciate your attention to this matter and your understanding of the critical implications it holds for our industry, the environment, and the communities we serve.

Sincerely,

**R. Thom Peebles  
Vice President, Marketing**

**ABC Companies**