



**Cynthia Williams**  
Global Director  
Sustainability, Homologation and Compliance

**World Headquarters**  
One American Road  
Dearborn, MI 48126-2701  
USA

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Chair Randolph and Members of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Ford Motor Company appreciates the opportunity to comment on the Advanced Clean Cars II (ACC II) Rule as it nears finalization. This rulemaking addresses policy issues of great significance to California, and to our Nation.

At Ford, we consider pollution and climate change as human rights issues, and strategic priorities. We are committed to the continuation of Henry Ford's original vision of providing affordable transportation to everyone. We will as a matter of company policy continue to advocate for justice, partnering and collaborating with cities, communities, and customers to incorporate equitable mobility into our products and services.

Ford Motor Company is rapidly transforming, investing more than \$50 billion by 2026 to put new electrified vehicle models on the road globally. We are proud of our history of partnership and leadership with California, including our voluntary commitment to the California Framework Agreement, a 50-state GHG solution with stringency far beyond the Trump Administration's preferred SAFE Vehicles Rule. In 2021, Ford submitted comments to EPA's Reconsideration of the Withdrawal of a Waiver for California's Light-duty Vehicle ZEV and GHG (SAFE I) supporting the restoration of California's authority, and we have subsequently led our industry in support of California's Waiver authority in court challenges. We appreciate the opportunity to provide input on the Advanced Clean Cars II regulation to drive successful adoption of EVs in California.

Since we provided full comments on the ACC II prior to the June board hearing, we will restrict our comments on the 15-day-notice changes to one area.

### **Advanced Clean Cars II Battery Durability**

In our comments filed May 31, 2022, Ford recommended that CARB defer enforcement of the Battery Durability requirement. Ford intended this recommendation to allow CARB to build data on the long-term performance of current-technology EV batteries and gain experience regarding the intended objectives, while also allowing industry to make potentially required changes, before initiating enforcement - which

includes the risk of recall of vehicle components having unprecedented cost. In the 15-Day Notice, CARB Staff elected to soften the requirement while retaining enforcement from the start of ACC II in 2026 MY. In parallel, the 15-day notice proposal tightens the enforcement testing protocol.

We greatly appreciate the work done by CARB Staff on the topline durability requirement. Industry is climbing a steep learning curve on the behavior of EV batteries, and this adjustment provides valuable headroom that will minimize the amount of battery reserve capacity required.

Ford has remaining concerns about the enforcement testing protocol, and we recommend several changes to align the procedure with existing In-Use testing procedures while significantly streamlining the requirements.

We recommend adjustments to the proposed in-use testing pass/fail criteria to align with existing in-use testing procedures. For context, under 40 C.F.R. § 86.1846-01(b)(1), the current in-use exceedance range for ICE emissions is 30% on the pass/fail measurement, represented as a limit of 1.30 times the applicable in-use standard. We recommend a similar structure for battery durability, as follows:


- A 50% pass/fail threshold
- and
- An exceedance range of approximately 10% on the pass/fail measurement, evaluated on the average of the tested group

Ford also appreciates the adjustment of Battery State of Health Parameter Accuracy from 5% to 8%. We remain concerned that the delta between the measurement precision available in the lab and in-vehicle customer reported values may exceed 8%. We are confident that our understanding will mature as field usage data accumulates, and we look forward to reviewing and aligning on an appropriate accuracy threshold.

We request that CARB staff consider the consequences of these proposed adjustments to intended overall emissions reductions, and the benefit of avoiding increased vehicle costs for customers. Ford believes these considerations warrant a more measured approach to enforcement testing. In addition to these recommended changes, we look forward to working with CARB and SAE to set standards for the testing procedures, and for the selection/exclusion process applying to test vehicles.

Thank you for the opportunity to comment. If you have any questions about the substantive comments, please contact Steve Henderson ([shenders@ford.com](mailto:shenders@ford.com)) or Evan Belser ([ebelser1@ford.com](mailto:ebelser1@ford.com)).

Sincerely,



Cynthia Williams  
Global Director, Sustainability, Homologation and Compliance  
Ford Motor Company