

November 13, 2018

AHCERT: 180723

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, California 95814

Re: CARB Proposed Amendments to OBD II Regulation Section 1968.2

Dear California Air Resources Board Members:

Honda would like to provide comments to CARB's Proposed Regulation Order for OBD II Regulation:

1968.2(c) Definitions

CARB is proposing to indicate "engine stop-start system" would be considered active off-cycle credit technology and would be required to be tracked with the 2022 model year to correct an unintended mistake.

Honda recommends to change the 2022 model year implementation to a 3 year phase-in of 30/60/100 percent beginning 2022 model year. Majority of the 2020 model year vehicles development have been completed and manufactures need sufficient development time with a phase in implementation starting 2022 model year. Moreover, a similar phase in schedule was applied in the 2016 rulemaking for off-cycle technology tracking. The proposed regulation should be modified as below:

For 2004 through 2021 model year vehicles, engine idle stop-start systems are not required to be tracked under section (g)(6). For 30 percent of 2022, 60 percent of 2023, and 100 percent of 2024 and subsequent model year vehicles, engine idle stop-start systems are required to be tracked under section (g)(6).

1968.2(g)(8.1) and (g)(8.2)

CARB is proposing requirement of OTA vehicle tracking data record reporting. CARB's rationale stems from the concerns of vehicles using the OTA creating a potential of minimal vehicle activity tracking data. Honda has multiple concerns related to this proposed regulation.

Firstly, there is already existing regulations defined in 1968.2(j)(3) which requires the manufacturers sampling method, number of samples, timeline and reporting format to be approved by the Executive Officer. The current regulation is sufficient to handle the potential of minimal vehicle activity tracking data. The regulation proposal for OTA is unnecessarily redundant and ultimately requires more reporting that does not add value to emissions.

Secondly, the potential of minimal vehicle activity tracking data due to OTA has yet to be realized objectively and may not be equal for all manufactures OTA implementation. This creates an unnecessary burden for manufactures that do not have this potential near or long term issue. If there are any issue of

not achieving the number of sampling requirements, manufactures have other means of collecting additional data.

Finally, the proposed (g)(8.1) and (g)(8.2) will inherently and unnecessarily increases architecture development cost and the data bandwidth cost. This limits the motivation of using OTA reprogramming technology. ARB should not force increased costs to manufactures with OTA reprogramming.

Honda proposes 1968.2(g)(8.1) and (g)(8.2) should be removed from the regulation update.

If you need further discussion, please do not hesitate to contact me.

Respectfully,

AMERICAN HONDA MOTOR CO., INC.

A handwritten signature in blue ink, appearing to read 'T-BUI', with a stylized flourish at the end.

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