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October 22, 2024

Clerk of the Board,
California Air Resources Board
1001 I Street
Sacramento, CA 95814
via <https://www.arb.ca.gov/lispub/comm/bclist.php>

Re: Public Comments on the Proposed Advanced Clean Trucks Regulations and the Zero Emissions Powertrain Certification Test Procedure (13 CCR 1963)

Dear Members of the California Air Resources Board,

Oshkosh Corporation designs and builds specialty vehicles and machinery, including military vehicles, concrete mixer, refuse, wrecker, and utility truck bodies, refuse vehicle, airport products, and access construction equipment through our iconic brands Oshkosh Defense, JLG, Pierce, McNeilus, IMT, Oshkosh AeroTech and Jerr Dan. One of our most recent products is a medium duty (MDV) battery electric delivery vehicle (BEV) built by Oshkosh Defense. We have a long and successful history of developing fully electric and hybrid vehicles across a wide variety of industries, inventing new technologies that reduce energy consumption and emissions, lower total cost of ownership and increase performance.

On behalf of Oshkosh Corporation, I am writing to provide feedback on the proposed Advanced Clean Trucks (ACT) Regulations and the associated Zero Emissions Powertrain Certification Test Procedure, as outlined in 13 CCR 1963. Oshkosh Corporation has extensive experience in the design and production of specialized vehicles for government and commercial use.

We appreciate CARB's efforts to accelerate the deployment of zero-emission vehicles (ZEVs); however, we have a significant concern regarding certain certification requirements that have been incorporated by reference in the final regulatory language shared on October 7, 2024. Specifically, the draft final rule references the inclusion of DC fast charging systems for vehicle certification. This requirement, as written, mandates costly and unnecessary change requirements to the new Oshkosh BEV delivery vehicle introduced this year.

Oshkosh is under federal contract and began delivering a large federal fleet of BEV delivery vehicles in late 2024 (as 2025MY vehicles). These electric vehicles have been designed to meet the specific federal government charging requirements. The vehicle is designed to federal specifications to return at the end of each workday to an overnight charging facility that is dedicated to the fleet. Adding a DC fast charge system is a costly feature with no appreciable benefit to the federal fleet owner.



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In light of these facts, Oshkosh respectfully opposes finalization of the ACT regulations as currently written. As written, the regulatory language in Section 1963 will create a new requirement for this delivery vehicle without adequate lead time for implementation. We urge CARB to modify the certification requirements in 13 CCR 1962.4(i)(2)(7) to make the inclusion of DC fast charging systems optional for federal fleets. This adjustment would allow OEMs to design vehicles that meet the specific needs of federal fleet operators without imposing unnecessary burdens or costs, while still advancing the goals of CARB's zero-emission vehicle program.

We believe this proposed change strikes a proper balance between promoting ZEV deployment and recognizing the unique operational and financial considerations of large federal fleets.

We remain committed to supporting the state's emissions reduction goals, and we hope CARB will take these concerns into account when finalizing the regulations.

Thank you for your attention to this matter. We would be happy to provide additional clarification or participate in further discussions if needed.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "David Smith", written over a faint, illegible background.

David Smith
Director, Emissions Compliance and Certification
Oshkosh Corporation