

From: [ARB Clerk of the Board](#)
To: [Bechtold, Bradley@ARB](#); [Hopkins, Chris@ARB](#)
Subject: FW: Supplemental Ford Comments to hdomnibus2020 (Proposed Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments)
Date: Thursday, August 27, 2020 10:48:21 AM

FYI

From: McAlinden, Ken (K.J.) <kmcalind@ford.com>
Sent: Thursday, August 27, 2020 10:48 AM
To: ARB Clerk of the Board <cotb@arb.ca.gov>
Subject: Supplemental Ford Comments to hdomnibus2020 (Proposed Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments)

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Attn: Clerk of the Board

[Apologies. Tried to submit these comments during the 27-August Board Hearing through the web site in lieu of oral testimony, but kept getting an error message.]

Docket: hdomnibus2020

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Affiliation: Ford Motor Company

Subject: Supplemental Ford Comments on HD Omnibus Proposed Rule

Message:

Ford submitted prior written comments on a number of the averaging, banking, and trading provisions in the proposed Omnibus Rule with the goal of improving a manufacturer's ability to align their product plans with the proposed regulation, incentivizing early introduction of low NOx technologies, and even making enforcement of the standards more straightforward. We encourage CARB staff to review and consider those suggestions.

One additional suggestion Ford would like to make is related to the optional 50-state-directed engine emission standards. As proposed, the program would not allow a manufacturer to certify any engines to standards or FELs higher than the optional 50-state standards (e.g. 0.10 g/hp-hr NOx). Ford requests that CARB consider removing this

restriction and replacing it with a new requirement prohibiting a manufacturer participating in the optional 50 state program from carrying a negative credit balance in any averaging set for the model years in which they are certifying to the optional 50 state standards. This revision will ensure fleet emissions performance as good or better than described in the Statement of Reasons while providing flexibility for manufacturers with varied engine offerings and product development cadences.

Thank you for the opportunity to share these comments as well as for your time and consideration.