



June 4, 2021

Attention: Board Item hdomnibus2020

RE: Comments on the Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments: Subsection 1956.8(a)(2)(F)

Dear Docket Clerk:

New Flyer of America Inc. (New Flyer) and Motor Coach Industries, Inc. (MCI), as manufacturers of transit buses and motor coaches respectively (within the NFI Group Inc. group of companies), are submitting comment on the Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation.

Thanks are extended to CARB for reaching out to New Flyer previously for feedback on the transit diesel engine exemption process. This consideration is extremely important in the future operation of transit agencies and New Flyer's ability to support them.

In addition to the transit industry losing its only CARB-certified diesel engine option for 2024, it was recently learned that Cummins will not be providing CARB-certified model X12 and L9 diesel engines for 2024. These are the only diesel engines suitable for powering MCI motor coaches that are sold for public segment (commuter type intercity service, transportation of inmates) and private segment (employee shuttle, line haul service, and tour and charter service). There are no other engines available on the market that can directly replace the X12 in MCI coaches. Another engine option will be available, however, it is larger and will not fit without complete re-design and re-validation of the vehicle. Even if the re-design is completed, the engine is of higher horsepower; more power output than is actually required for MCI motor coaches. Lastly, and most significant to our customers, is that the cost of re-design and development, and upcharge for the larger engines themselves, would be passed along to them in a time when they will still be recovering from the decimation of their industry due to the COVID-19 pandemic.

The pandemic is also expected to prevent operators from venturing to alternative powertrains that MCI also offers, including CNG and battery-electric coaches, as the investment in the necessary infrastructure required to support these new powertrains will be prohibitive for them in the next couple years. As such, without a new diesel option, it is expected that operators will be incentivized to continue operating older, less efficient vehicles. This is even more likely given that motor coaches with the alternative powertrains provide less driving range and baggage capacity than the diesel equivalent, factors that are critical to operators.

With a situation similar to the one faced by the transit industry, and considering that the motor coach market in California is small (accounting for only 14% of MCI annual sales), MCI is requesting that the 2024 diesel engine exemption outlined under 1956.8(a)(2)(F) of the

amendments be extended to include motor coaches for both public and private operators. Prior to 2027, Cummins will determine their path forward for compliant emission packages within their entire engine product family – this is expected to include a diesel engine model suitable for the motor coach market for both CARB and EPA standards.

Thank you for your consideration. If you should have any questions, feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to be 'Kirk Burcar', written over a horizontal line.

Kirk Burcar
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