

Ross Good
09-6-4



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State Relations
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Chair Nichols and members of the Board, my name is Ross Good and I am Sr. Manager of Government Relations for the Chrysler Group LLC.

I am asking for your careful consideration to alternative measures to the "Cool Glazing" rule before you today. As I have worked with my colleagues back at our headquarters in Auburn Hills MI on this issue over the past several months, I have asked them to keep one overarching thought in mind. That thought is "How can we help the ARB Board and Staff accomplish their goals?"

The goal in this case is the reduction in CO2 generated by lowering resting vehicle cabin temperatures thereby reducing the number of days throughout the year that we Californians need to utilize our air conditioners.

As they stand now, the Staff recommendations in the proposed rule focus on a single technological solution offered by a single manufacturer produced at a single plant in the U.S. There is hope that at least one other glass manufacturer will develop a material, a process for applying the material, a facility in which to apply the material in time to be of help. But that is a lot of "hoping," it is difficult to build a credible business plan on hopes.

So Chrysler Engineers took the question of how we can help to heart. Their recommended solution is to apply the more relaxed side and rear window standard to all of the side and front glazing materials. This, according to our estimate can be accomplished quickly, effectively and inexpensively with none of the technical difficulties associated with the proposed technology.

By quickly I mean Chrysler could launch the program company wide by the initial 2012 model year. By effectively I mean that we can accomplish upwards of 75% of the goal. By inexpensively I mean that we can do it at 10% of the cost. All the while without the nagging problems related to weakened signal strength from wireless communication devices.

There are other issues with the proposed rule as well. There is no exemption for plastic windows. This is important to Chrysler for these reasons.

First, the very popular Jeep Wrangler fitted with a soft convertible top uses flexible plastic side and rear windows which are not capable of meeting the side window standard. Outlawing the soft top would then require all Wranglers sent to California to be

fitted with a hard top. The hard top adds significant weight which will actually cause an increase in CO2 emissions by lowering fuel economy every mile the vehicle is driven not just the days the air conditioning is in use.

Second, the Global Electric Motorcar or Gem vehicle which Chrysler produces and I believe of which Chair Nichols is a proud owner, uses plastic side and rear windows. Switching to conventional glass would reduce the vehicle range while providing no A/C benefit. A/C is not even offered as an option on GEM vehicles!

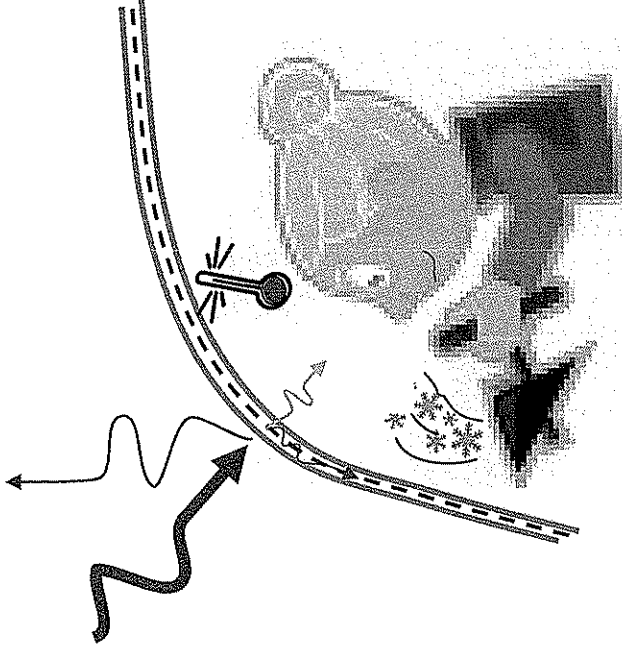
Third, it seems reasonable that an exemption for zero emission vehicles as a class might be a wise consideration. Certainly there are issues with where and how the electricity to power these vehicles and their A/C systems is generated, but at that point we would simply be picking at nits. Perhaps it would be better to address the nits after we've moved the boulders out of the way.

And finally, I know that you have heard and will testimony from a lot of people representing a lot of companies, environmentalists and ARB staff and everyone is pointing forward. But, when it is time to march, we are all headed off in a different direction. I think that this points out that the rule, as proposed today simply isn't ready. Let's take a little more time, align our goals and all move forward together.

Thank you for your time and consideration.

IR Reflecting

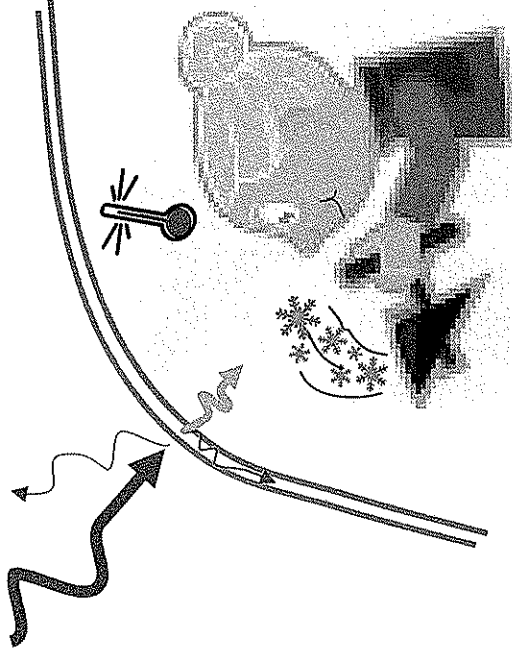
(ARB Proposal)



1.18 MMT CO2

Solar Absorbing

(Automaker Proposal)



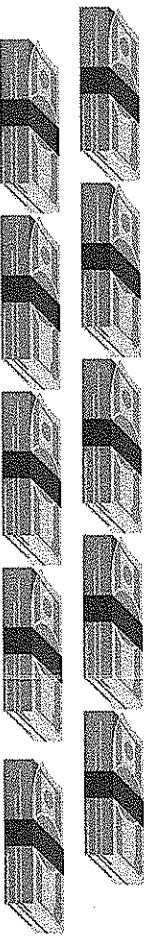
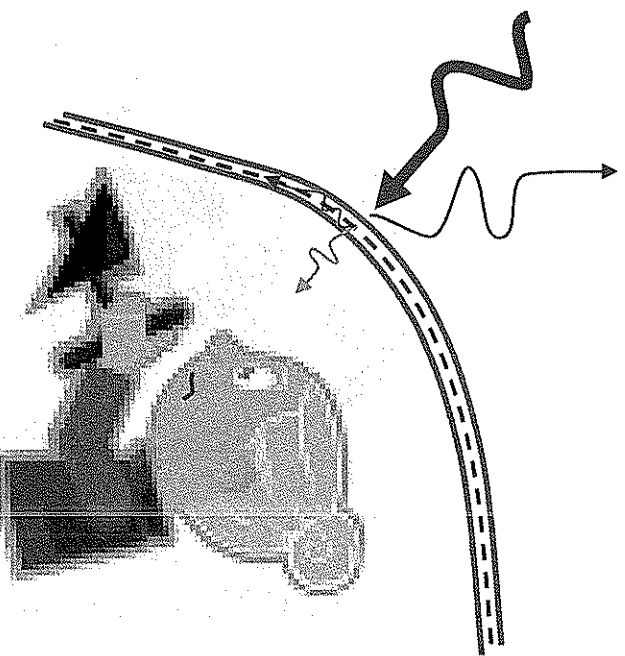
0.9 MMT CO2

Benefits stated are from the Staff ISOR report and are estimates based on full implementation in 2040 calendar year

+75% of CO2 REDUCTION BENEFIT

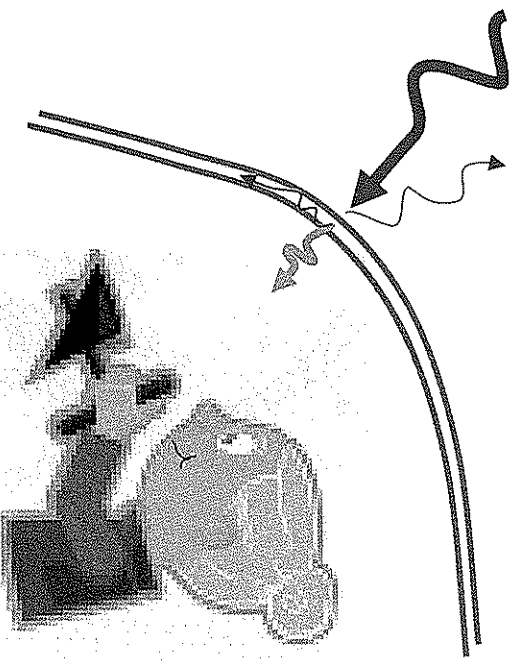
IR Reflecting

(ARB Proposal)



Solar Absorbing

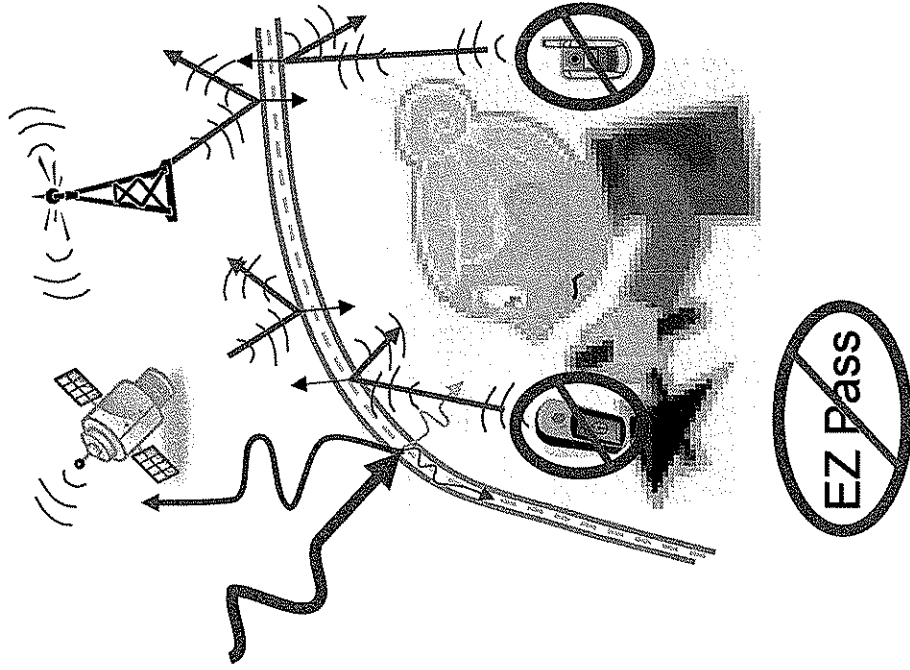
(Automaker Proposal)



10% of the COST

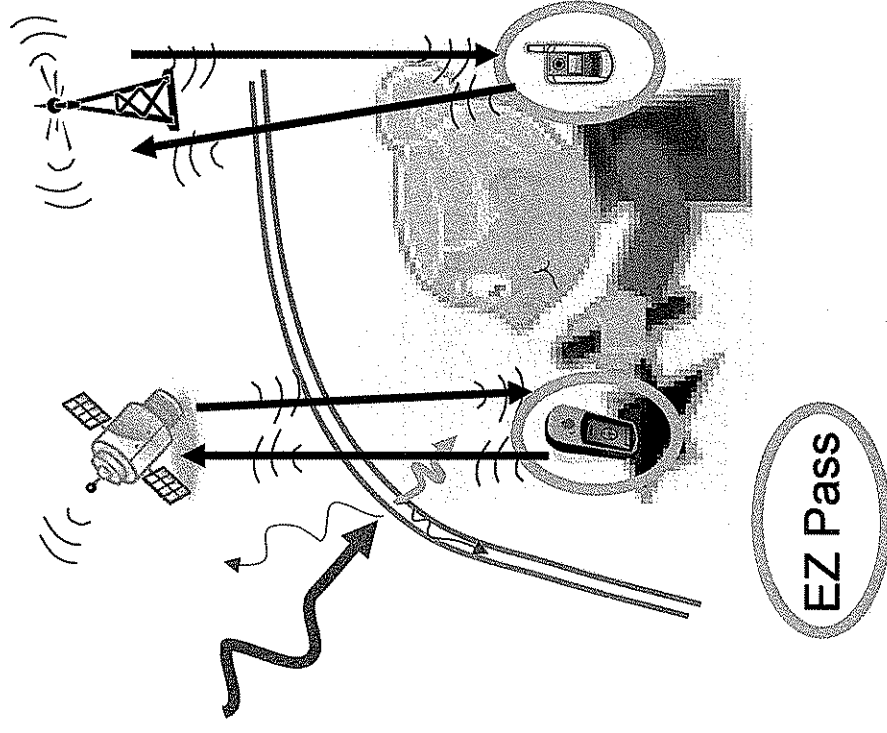
IR Reflecting

(ARB Proposal)



Solar Absorbing

(Automaker Proposal)



100% of CUSTOMER CONVENIENCE

Automakers Proposed Cool Cars Regulation (Cool Glazings)

	ARB Proposal (IR Reflecting)	Automaker Proposal (Solar Absorbing)
CO2 Benefits/year	1.18 MMT	0.9 MMT
Cost/vehicle	\$167	\$16
Cost Effectiveness (\$/ton of CO2)	\$287.85	\$36.16

- The regulation will create a product restriction for automakers – we won't be able to sell soft-top plastic windows such as found on Jeep® Wranglers or GEM® vehicle
- There is a only one known supplier and one potential supplier of IR reflecting technology by 2014 – Confirmed in Staff Report
- As an alternative to IR reflecting technology, we propose a 60% Tts across the entire vehicle nationwide.
 - ARB staff looked at this and is described in the Staff Report