

Thank you for the opportunity to present our views at this proceeding.

As a brief introduction, AGC automotive supplies glass components and glazing systems to 1 out of every 3 vehicles produced globally, from 21 facilities in 14 countries around the world. AGC Automotive and our parent company AGC Group has supported CARB to create effective regulation and strongly believes that CARB's leadership is of critical importance to reducing GHG emissions.

We would like to summarize our position as follows:

For 2012 regulation, current available technologies can meet the required specifications for windshields, sidelite and backlites. Sunroof regulation needs further revision to balance weight and cost issues. However, we believe that we may be underestimating the resources required to fully and effectively implement these technologies, especially for reflective windshields. The numerous models that need to be developed for model years 2012 and 2013 could potentially overwhelm the supply base. To follow the automotive industry's product validation procedures and go from design, development, testing, tool-up, validation and mass production is a great task for each vehicle, let alone a monumental challenge for every vehicle in a short time period - both for OEMs and suppliers.

We strongly recommend an additional 1 year phase-in and suggest an additional 2 years phase-in timing is needed to ensure effective, lasting and widespread benefit of CARB regulation for GHG reduction.

Regarding the 2014 regulation, we are confident that triple metallic layer coating and film technology will satisfy CARB regulation. But as mentioned before we may be underestimating the time needed to prove the technology through testing and validation before significant resources are dedicated to implementing this technology in a mass scale. Please note that all windshields are not equal, each windshield is a unique part with its own characteristics that will require specific attentions and tailoring and therefore our concern as mentioned above. In particular, a number of poor performing windshields with low yields can consume a substantial portion of the industry's capacity. We need to be very careful to avoid a failure in the automotive industry.

We are recommending the 2014MY windshield regulation be revised to 2016MY with a gradual phase in period.

I want to thank you again for today's opportunity and hope take your views into consideration.