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October 2, 2009

California Air Resources Board  
Sacramento, CA

**Re: Comments – Regulation to Reduce Green House Gas Emission from Heavy-Duty Vehicles**

Thank you for the opportunity to comment on the above regulation. All comments are in regards to "Attachment 1" recently received by U.S. mail.

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Suggest changing definition to:

"Rear Trailer Fairing" means a fairing the attaches to the rear of a trailer to reduce drag.

*Rationale:* There are known devices that reduce drag that do not meet the suggested definition. A performance approach will be more beneficial than a proscribed solution.

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Suggest not eliminating the word "bottom" and read:

".....extends down from the sides or bottom of the trailer....."

*Rationale:* There are applications, such as Intermodal transport, which require the skirt to be inset for lifting equipment. Intermodal use should not be discouraged by this rule.

Page A-18 95304 (b) (1) (D)

Suggest adding a criteria of acceptable damage such as:  
20% of the surface area.

*Rationale:* Damage does occur in the real world and a strict out of service criteria is impractical and expensive. We have done wind tunnel testing on our own products and deliberately damaged a skirt to understand the impact on performance. The result was surprising; the benefit decreased less than 3%. (From estimated fuel saving of 4.02% down to 3.91%) See picture below:



Please feel free to contact me for clarification, or a deeper understanding of our suggestions.

Sincerely,

Gary Gaussoin  
Chairman