



November 6, 2009

Air Resources Board
 1001, I Street Sacramento
 California 95814
 USA

Re: Comment on Proposed 15-day Modifications to Section 1971.1 California Code of Regulation

With regard to California Heavy-duty OBD regulation proposed for 15-day Modification, we Hino Motors, Ltd. would like to submit a comment on the standardization requirement section (h)(4.1) of CCR 1971.1. According to the proposed text, the phrase “that are monitored continuously” is erased from the (h)(4.1). We are afraid this change makes us difficult to understand what is required on the readiness status.

Specifically, there are some rationality checks of sensors which are performed only at engine start or at engine shut down to comply with section (g)(3). Does the proposed regulation intend to allow that the readiness status for those components under (g)(3) always indicates "complete" even if there are some monitors which are performed not continuously ?

If it is not the intention of the proposal, Hino requests the phrase "that are monitored continuously" should not be deleted, or the phrase "and (g)(3)" should be deleted so that the readiness status for the monitors subject to (g)(3) can indicate “complete” upon the respective diagnostic monitor(s) being fully executed and determining that the component or system is not malfunctioning.

15-day Proposed Text	Hino Comment
<p>(h)(4.1) Readiness Status: In accordance with SAE J1979/J1939-73 specifications, the OBD system shall indicate “complete” or “not complete” since the fault memory was last cleared for each of the installed monitored components and systems identified in sections (e)(1) through (f)(9), and (g)(3) except (e)(11) and (f)(4).</p> <p>The readiness status for Aall components or systems identified in (f)(1), (f)(2), or and (g)(3) that are monitored continuously shall always indicate “complete”.</p>	<p>Alternative 1 (h)(4.1) Readiness Status: In accordance with SAE J1979/J1939-73 specifications, the OBD system shall indicate “complete” or “not complete” since the fault memory was last cleared for each of the installed monitored components and systems identified in sections (e)(1) through (f)(9), and (g)(3) except (e)(11) and (f)(4).</p> <p>The readiness status for Aall components or systems identified in (f)(1), (f)(2), or and (g)(3) that are monitored continuously shall always indicate “complete”.</p>
	<p>Alternative 2 (h)(4.1) Readiness Status: In accordance with SAE J1979/J1939-73 specifications, the OBD system shall indicate “complete” or “not complete” since the fault memory was last cleared for each of the installed monitored components and systems identified in sections (e)(1) through (f)(9), and (g)(3) except (e)(11) and (f)(4).</p> <p>The readiness status for Aall components or systems identified in (f)(1), (f)(2), or and (g)(3) that are monitored continuously shall always indicate “complete”.</p>



We really appreciate for this opportunity of the public comment on ARB heavy-duty OBD revision. Please feel free to contact me if you have any question on this comment.

With best regards,

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