

January 24, 2013

James Goldstene  
Executive Officer  
Air Resources Board of the State of California  
1001 "I" Street  
Sacramento, CA 95814

**RE: Technical Status & Revisions to Malfunction & Diagnostic System Requirements for Heavy-Duty Engines (HDOBD) & Passenger Cars, Light-Duty Trucks, & Medium Duty Vehicles & Engines (OBD II)**

Dear Mr. Goldstene:

GILLIG LLC is a California Manufacturer of Transit Buses.

We ask the ARB to consider delaying the implementation of the 2014 single party certification requirement and OBD compliance for HD Hybrid Transit Buses to coincide with the EPA implementation in 2016/2017. The 2014 implementation of this requirement means GILLIG will be unable to provide fuel efficient Hybrid Transit Buses to California transit properties in 2014.

GILLIG purchases engines from Cummins and hybrid powertrain systems from Allison and BAE. Our hybrid suppliers are working diligently on OBD functionality compliance for their systems but it is uncertain if their level of progress will be acceptable to CARB in 2014. Additionally, we are unable to obtain a commitment from any of our suppliers to carry the single party certification for the combined HD Engine/Hybrid Powertrain System combination.

If we continue down this path, California transit properties will be forced to purchase less efficient larger displacement diesel engine conventional transmission powertrains instead of hybrid powertrains. Transit hybrid powertrains are capable of fuel economy improvements on the order of 25% over a conventional powertrain configuration. The economic impact of the higher fuel consumption will be felt for the 12 year life of the bus, the environmental impact will be longer.

January 24, 2013

Page 2

The ARB states in the attachment to the notice for public comment on this document that ***"The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption."*** At GILLIG we do our part by offering the most fuel efficient hybrid powered transit buses in the industry. We implore you to allow us to continue to do this in California by delaying the single party certification requirement for HD Hybrid Transit Buses until 2016/2017.

We appreciate your consideration in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Joseph Policarpio / krl".

Joseph Policarpio  
Vice President

JP:krl

cc: D. Maunus  
G. Vismara