



January 4, 2008

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

Electronic submission

Re: FERRARI COMMENTS ON CARB ENVIRONMENTAL PERFORMANCE LABEL

I am pleased to send you Ferrari's comments on the CARB Environmental Performance Label which replaces the current Smog Index Label, and gives new information regarding the potential global warming of the vehicles.

General Comments

Ferrari supports the CARB's intent to give consumers additional and more user-friendly information regarding the emissions and greenhouse gases certification levels of vehicles to help a more conscious choice, based on the environmental impact.

We deem that the proposed modification of the existing Smog Index Label (CARB regulation Title 13, CCR, Section 1965) with the new Environmental Performance Label is consistent with this purpose. We agree that it is important to add other relevant information, provided they are not redundant and harmonized to the greater extent with Federal laws.

Ferrari strongly supports harmonization between California and Federal emissions and fuel economy regulations to avoid additional burdens on vehicle manufacturers, especially for small-volume ones.

Specific Comments

We have the following specific comments on the new Environmental Performance Label, with reference to the modified text of the CARB regulation (<http://www.arb.ca.gov/regact/2007/labels07/labels07.htm>).

1. We think it is useful to take into consideration the greenhouse gases (GHG) along with the emission certification level to better identify the environmental impact of each vehicle, using suitable and easy to understand comparative scales. Nonetheless, the GHG emissions of vehicles are mainly due to the CO₂ emissions from exhaust, and therefore directly related to the vehicle fuel economy, a characteristic that is certified and displayed in the fuel economy label, recently modified by U.S. EPA for 2008 and later model years with the main purpose to give consumers more realistic values.
2. The addition of a global warming index, associated with the CO₂-equivalent emissions, is appropriate due to the increasing concerns about global warming, and also the greater awareness of most consumers, along with the increasing cost of fuels. But, instead of using a method of rating for GHG based on the CO₂-equivalent certification values (which means related to the proposed California law AB 1493), we strongly recommend to base the rating on the EPA fuel economy labeling rule, applicable from 2008 MY, as suggested by AIAM (see comment sent on June 19, 2007). In fact, the 5-cycle method to calculate fuel economy makes it possible to get values which better represent the real world usage. We deem it is preferable to consider such approach to evaluate the environmental performance because it accounts different driving conditions which directly affect fuel consumption and consequently CO₂ emissions. Furthermore, EPA did not get the waiver to CARB to implement the GHG rule, based on the principle that the global warming problem is really for all U.S.A. not only for California.



3. The modified format of the Smog Index makes it easier the correct understanding of the relative emissions of a specific vehicle, in comparison with the average value, inside a well defined range 1-10. We think such a scale is very common to classify a performance, being 1 the worst and 10 the best. It is easy to catch if a vehicle is better or worse than the average and make comparisons with other vehicles, for the two separate ratings contained in the label. It is also good to add in the new label the suggestion to visit the web site www.DriveClean.gov for people interested in getting more detailed information (another improvement over the old Smog Index Label).
4. For the same reason of clearness, we strongly support to use the 1-10 scale for the Global Warming Score in the new Environmental Performance Label. As discussed in point 2, the ratings could be associated to the EPA fuel economy (and CO2 exhaust) values for MY 2008+, through a conversion table.
5. The new format with the green background, different rating scales, and characters is helpful to enhance the conspicuousness of the label, and the reception of the information provided. The green color is the most suitable because internationally associated with environment protection.
6. We deem appropriate to allow, at manufacturer's option, to affix the Environmental Protection Label alone or to insert it in the present "Monroney Label", with smaller minimum dimensions in the second case. This solution is logical, taking into account that the "Monroney Label" contains a lot of information (inclusive of fuel economy) useful for customers to decide which vehicle to buy.
7. Regarding the mandatory date for the new label, Ferrari believes that it is necessary to match with the model year instead or (or in addition to) a specific date like October 1st, 2008. MY 2009 is reasonable, provided the final rule will be enacted soon to give vehicle manufacturers the minimum lead-time to plan all the activities necessary to respect new requirements. We agree with CARB to allow anticipated compliance, although it is possible to create some confusion for consumers, because certain vehicles could have the new label, others the old Smog Index label, during the transition period.

Should you have any questions on the above comments, please do not hesitate to ask me.

Sincerely,

A handwritten signature in black ink, appearing to read "Corrado Cingi".

Corrado Cingi
Vehicle Certification Manager
FERRARI S.p.A.

From: "Cingi, Corrado" <CCingi@ferrari.it>
Date: Mon, 07 Jan 2008 09:48:47 +0100
To: cotb@arb.ca.gov

Attention to Clerk of the Board
Air Resources Board

Dear Sir/Madam:

With reference to the new CARB Environmental Performance Label, I am sending our comments in the enclosed pdf document. I tried to send the document last Friday January 4 (and the following day) via the CARB web site. Unfortunately, it was not possible to connect from here just to the CARB web site. Although the 15-Day Public Comment Period terminated last Friday, I hope you can accept our comments. No problem for us if they are not posted in the public docket.

If you have any question, please do not hesitate to contact me.

Sincerely,

Corrado Cingi

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