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**HONDA**

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Honda Ref: 280390

April 30, 2008

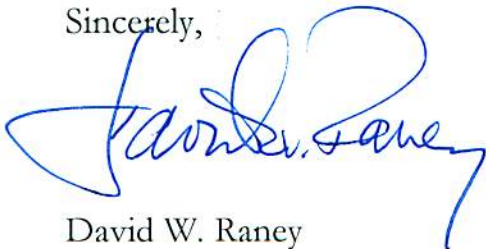
Clerk of the Board  
State of California Air Resources board  
1001 I Street  
Sacramento, California 95814

To Whom It May Concern:

American Honda Motor Company, Inc. submits the following comments on CARB's consideration of proposed amendments to the emission control and smog index label regulations. Specifically, these comments are in response to the latest 15-day notice issued by CARB on this subject with comments due on May 1, 2008.

Thank you for the opportunity to present these comments and for your consideration of them.

Sincerely,



David W. Raney  
Senior Manager  
Environmental and Energy Affairs

State of California  
Air Resources Board  
Title 13

**Comments Submitted for Consideration by:**

**American Honda Motor Company, Inc.  
1919 Torrance Boulevard  
Torrance, California 90501**

Comments On: Proposed Amendments to the Emission Control and Smog  
Index Labels Regulations

Comment Submittal Date: April 30, 2008

Electronically submitted to: <http://www.arb.ca.gov/lispub/comm/bclist.bhp>

Electronic copies directly submitted to the following CARB representatives:

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American Honda Motor Company, Inc. (hereafter, Honda), submits the following comments on the CARB staff proposal to amend the Emission Control and Smog Index Label regulations. These comments are specific to the Errata and Second Notice of Public Availability of Proposed Modified Text and Availability of Additional Documents and Information which has a comment deadline of May 1, 2008 and the Proposed Modifications in response to the Board hearing on June 21, 2007.

Honda is concerned that the most recent modifications to the label value and vehicle rating may, in some cases, not provide the most accurate information to a prospective customer of a new vehicle. This concern is based on the compliance parameter outlined in ARB Mail-out MSO #2007-03 which is the guideline for label value determination and satisfied with CO<sub>2</sub> data from the certification Emission Data Vehicle (EDV). This means that only one vehicle per emissions test group is represented, potentially a rating that is unrealistically greater or less for some vehicles in that specific test group.

In the certification process and establishment of EDVs and emission test groups, it is common for manufacturers to group multiple models together under one test group. The CO<sub>2</sub> values could potentially be quite different between these individual models. Also, EDV data alone may not show the relative advantage of a different transmission type. For example, if the EDV is an automatic transmission version, the potential benefits of other transmission variants may be hidden from the consumer.

**AB1493 includes a provision that allows manufacturers to demonstrate that vehicles with different efficiency ratings could use label values specific to them, if such demonstration was accepted by CARB. We ask that CARB considering extending this provision to these most recent amendments, allowing manufacturers the opportunity to make this demonstration as necessary with the benefit being more accurate representation of a specific vehicle's actual and more accurate expected performance.**

Finally, we strongly encourage CARB to reconsider application of a default value for Battery Electric Vehicles, Fuel Cell Vehicles, and Hydrogen Internal Combustion Engine Vehicles. We recognize the time required to thoroughly evaluate technology progress and update values for labeling of these vehicles and the need to do this properly. Nevertheless, a default value does not appropriately represent recent advances in vehicle efficiency. The 2004 data CARB used to calculate the Hydrogen FCEV default value has not been updated to reflect the rapid advance in fuel cell technology. Specifically, the default CO<sub>2</sub> equivalent combined value of 210 g/mile for the Hydrogen Fuel Cell Electric Vehicle does not reflect some of the second and third generation FCEV technology being introduced, which can demonstrate significantly higher Tank-To-Wheel fuel economy compared to earlier models.

The purpose of the greenhouse gas performance labeling is to inform public/customers, therein promoting fair comparisons among fuel and vehicle technology choices. We believe these changes to the final program will serve this purpose well. We also stand ready to work with CARB in the future to evaluate and develop and/or update the 2004 the performance values assigned to FCEVs. Including a provision for submission of support data for specific vehicles would provide the opportunity for assigning label values other than the default value in the future.

Thank you for considering these suggestions.