

John Trajnowski
06-8-4

STATEMENT OF FORD MOTOR COMPANY
ARB'S PROPOSED CHANGES TO ONBOARD DIAGNOSTIC
MONITORING AND ENFORCEMENT REQUIREMENTS

September 28, 2006

Good morning/afternoon. My name is John Trajnowski, and I am a Regulatory Liaison Engineer with Ford Motor Company's Vehicle Environmental Engineering Staff. I am here today to present Ford's position on the proposed changes to OBD II requirements.

I would like to start out by saying that this regulatory review has been a very long and complex process, and Ford appreciates the efforts set forth by the ARB staff in resolving many of our concerns with the proposed requirements. However, we have not resolved all issues. Overall, it should come as no surprise to any of you that the emission regulations in general, and OBD II requirements specifically, have become extremely complex and prescriptive. Our goal as we move forward has got to be the simplification of these requirements.

As a preliminary matter, Ford fully supports the comments submitted by the Alliance of Automobile Manufacturers and the Engine Manufacturers Association, and we participated in the development of those comments. Therefore, for the sake of time, I will confine my statement to two significant issues and not readdress all of the issues raised by EMA and the Alliance.

These two issues are:

1. The requirement to apply unique infrequent regeneration adjustment factors for the diesel oxidation catalyst (DOC) monitor malfunction threshold, and
2. The requirements to monitor the individual components of a cold start emissions reduction strategy *in addition* to monitoring the overall cold start strategy system performance.

The first issue involves ARB's proposal for the diesel oxidation catalyst monitor. The proposed changes would require us to develop an entirely new monitoring strategy on our medium duty diesel truck in 2008. This simply does not provide us with enough time to fully develop and validate an entirely new monitoring strategy, and implement it into production in just a little over a year's time. If we are forced to do so, we would have to significantly cut short our validation process and, in turn, run a much higher risk of false MILs in the field, which could result in the replacement of perfectly good catalysts at a very large expense with no air quality benefit. Therefore, we urge the board to delay this requirement until the 2010 model year so that we will have sufficient lead time to properly validate and implement a new monitoring strategy, and implement it in a time frame that is consistent with other changes that will be required for the OBD-II system.

The second issue involves the proposal to enhance the existing monitoring requirements for cold start emissions reduction strategies for both gasoline and diesel vehicles. These are strategies that we use to heat up the catalyst faster during a cold start, such as retarding the spark timing or increasing idle speed. Ford's current monitoring strategy determines the catalyst temperature during the warm-up to ensure that it reaches a minimum temperature by a sufficient time. So if we don't achieve the minimum temperature because of a malfunction, we will light the MIL. The ARB proposal would add requirements for us to also directly monitor all of the individual components that could affect catalyst warm-up (i.e., spark timing or engine idle speed), no matter how little we may try to modulate them during the start and with no consideration on how much or how little they may effect emissions. This could result in a false MIL if, for example, the vehicle was filled with bad fuel and the engine control strategy increased the spark timing during the cold start to keep the engine from stalling.

Therefore, Ford does not support the adoption of the new additional monitoring of individual components of the cold start strategy because it is repetitive and prone to

false results. At a minimum, the Board should direct ARB staff to revise the requirement to include a minimum emissions threshold for individual components similar to the comprehensive component monitoring criteria, such that the component would not require monitoring unless it can effect emissions by more than 15% of the standard on an FTP test.

In conclusion, Ford opposes the portions of the proposed regulation involving diesel oxidation catalyst monitor and cold start strategy component monitoring because these regulations would be redundant, have no perceivable benefit on vehicle emissions, and substantially increase the likelihood of false MILs, which are costly to manufacturers and the public and cause a lack of confidence by the public in the MIL. At this time I will be happy to answer any questions that you may have. Thank you.