

Statement of

**John Cabaniss, Director, Environment & Energy
Association of International Automobile Manufacturers**

On Proposed Amendments to the

**California Air Resources Board
Vehicle Onboard Diagnostics Regulations**

September 28, 2006

My name is John Cabaniss, director, environment & energy, of the Association of International Automobile Manufacturers (AIAM). AIAM is a trade association representing fourteen (14) automobile manufacturers which account for approximately 50% of the passenger cars and light trucks sold annually in California.¹

AIAM appreciates the opportunity to provide comments today on the proposed amendments to revise Title 13, California Code of Regulations (CCR) sections 1968.2 and 1968.5, related to motor vehicle onboard diagnostics (OBD) requirements. We would like to thank ARB staff for their willingness to meet with AIAM and our member companies on numerous occasions over the past eighteen (18) months to review and discuss our comments and concerns in this biennial review process. These collaborative efforts resulted in resolution of most of our concerns.

As the Board knows, the OBD regulations are very complicated and contain myriad specific requirements. In addition, from its inception the OBD regulations have been technology-forcing and they remain so today. This is primarily due to the continuing evolution of the use of electronics on vehicles for a variety of functions and the continuing evolution of electronic monitoring systems. The OBD thresholds and standards being proposed today are indeed technology-forcing. Industry is working diligently to develop the technology to meet the proposed requirements; however, challenges remain. This is especially true for diesels where OBD technology is in its infancy compared to gasoline OBD technology. It is essential that the dialogue between auto manufacturers and ARB staff continues. The biennial review process for OBD is an important aspect of this; however, it is also important for ARB and automakers to continue to have a routine dialogue in the interim to discuss progress. It is also important for ARB to have flexibility built into the regulations to adjust OBD requirements as may be deemed appropriate.

AIAM is neutral on the proposed regulations, i.e., we neither support nor oppose the proposed amendments. However, we agree with ARB that OBD systems are an important and necessary tool for ensuring that vehicles remain low emitting throughout

¹ AIAM member companies include Aston-Martin, Ferrari, Honda, Hyundai, Isuzu, Kia, Maserati, Mitsubishi, Nissan, Peugeot-Citroen, Renault, Subaru, Suzuki, and Toyota. AIAM also represents original equipment suppliers and other automotive related trade associations.

their useful lives. We do not object to further developing and implementing robust OBD systems; however, we believe it is critical that OBD requirements do not become obstacles for the development and deployment of advanced vehicle technologies needed to address overall environmental goals.

Finally, AIAM supports the comments being presented today by the Alliance of Automobile Manufacturers and the Engine Manufacturers Association.

Thank you.