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California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

re: CARB Proposed Requirement for 2 EIN's for Off-Road Equipment

Gentlemen,

Please be advised that we are attorneys to the California Rental Association, a 501 (c)(6) organization representing in excess of 600 equipment rental dealers throughout the State of California. On behalf of our association (and its various individual members) we wish to comment upon the proposal to require off-road equipment to have two (2) EIN's posted on each vehicle. Suffice it say, asking owners to now install EIN's on both sides of a vehicle is an extra cost that is unfounded and certainly does not improve air quality! Even the portable equipment registration program only requires one placard on the outside of the equipment (cost of \$5 as part of the renewal, and CARB provides a placard!).

There are many rental fleets in the State of California that may have in excess of 500 to 1,000 machines. On average, each EIN label costs about \$5.00, excluding shipping, and not including administrative costs. For a fleet of 1,000 machines, the cost to go back and "re-label" the left side of the existing vehicles within the two (2) year proposal will be at least \$5,000.00 for just the labels alone (more if you include shipping). In addition to the cost of the label, there are administrative costs involved in ordering the stickers, distributing the stickers to each of the rental company's locations throughout California, and providing manpower to affix the stickers either in the field or when the vehicle is returned to the rental yard. Even using the low estimate of ½ hour per vehicle (again not just the time to affix the sticker), this will cost the rental company at least an additional \$15,000.00! Nobody wants to spend in excess of \$20,000.00 to accomplish this task, especially in the present economic times wherein the rental company's resources are limited, and especially when there is no benefit to emissions reduction!

In addition to adding this unnecessary cost, requiring the label on both sides of the equipment also needlessly increases the risk of enforcement wherein one label may be missing for one reason or another. This is amplified for a rental machine that may get more abuse from being used by multiple operators. Although it may be difficult from an enforcement standpoint to only have the sticker on one side, it cannot take that much time for the enforcement officer to walk around the vehicle to find

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the sticker! If portable equipment can get by with only one sticker, then certainly off-road equipment should be able to do the same! Please telephone me should you wish to discuss these matters. Thank you.

Very truly yours,

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LEC: mj

Cc: California Rental Association