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May 27, 2009

Dear California Air Resources Board,

You have the opportunity today to help President Obama reach his goal of having a million plug-in hybrids on the road by 2015 by adjusting the strict testing requirements for retrofitting existing vehicles into plug-in hybrids.

Poulsen Hybrid, LLC has developed an affordable system for consumers who want to convert a conventional vehicle into a plug-in hybrid. Our system is completely independent of the original gasoline engine and takes less than 4 hours to install. We don't even have to open the hood to install the product.

Poulsen Hybrid applied for CARB exemption in early December, 2008 and has invested considerable effort into the process. CARB recently requested that we purchase over \$120,000 of vehicles and conduct extensive emissions testing for a passive product that does not modify anything under the vehicles hood. This has given us cause for pause as testing could potentially cost us hundreds of thousands of dollars just to obtain an "exempt" status.

As Charles Dickens once said "These are the best of times, these are the worst of times".

Detroit is experiencing the meltdown of a lifetime while innovative small companies have risen to the challenge of reducing our dependency on petroleum and have developed products to convert conventional and hybrid vehicles into plug-in hybrids.

The proposed CARB regulations will cause a significant financial hardship for innovative plug-in hybrid conversion companies and prevent the creation of hundreds of jobs in California. We have been approached by over 50 California entrepreneurs who are interested in selling our product as well as hundreds of consumers who want to convert their cars.

We are asking CARB to give our emerging industry some breathing room to comply with these new regulations by making the following changes:

- Consider capping the amount a small manufacturer has to spend on testing to \$25,000.
- Change the Tier 1 ceiling to 1,000 vehicles from the currently proposed 10 vehicles. Requiring extensive and expensive mandatory emissions testing after 10 units have been sold simply forces manufacturer's to perform a cost benefit analysis and pushes them away from the California market. Raising the Tier 1 cap to 1000 units will not harm air quality because the Tier 1 regulations require a company to show through detailed engineering analysis that its modifications to the vehicles will not increase air pollution.
- Give manufacturers a two year window to comply with the new regulations.

Please consider a compromise of the proposed regulations to balance the expensive testing with the potential of creating jobs and reaching the Obama goal of putting one million plug-in hybrids on the road. Also, California's AB32 requirements of 20% greenhouse emissions reductions by 2020, will be difficult to achieve when ground transportation contributes 40% of California's CO2 and new plug-in vehicles can only reduce that by at most 1% by 2020.

Sincerely yours,



Frank Kuchinski
VP Marketing
Poulsen Hybrid, LLC