

May 27, 2009

TTC-09063

BY ELECTRONIC SUBMITTAL

**Ms. Mary Nichols, Chair
Mr. James Goldstene, Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814**

Re: Comments on the PHEV Test Procedure Revision for OEM and Aftermarket Conversions

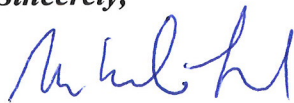
Dear Ms. Nichols, Mr. Goldstene and Board Members;

Toyota would like to thank you and your staff for working closely with stakeholders on the revisions to the PHEV test procedure for both OEMs and aftermarket conversion. PHEV testing has unique challenges due to PHEV's ability to use both grid electric energy and liquid fuels to power the vehicle. Toyota has worked with your staff directly and through our trade association to help to arrive at an OEM test procedure that we believe is technically correct and rigorous, assuring that vehicles certified to it meet the intent of the tailpipe regulations CARB has promulgated. We will continue to work with staff to address further issues as they arise in this newly developing technology. We intend to certify our limited demonstration 2010MY PHEV to this test procedure as a first step in our entrance into the PHEV market.

Separately, we note that OEMs expend tremendous resources to assure durability of emission systems and provide warranty for the products we produce. To ensure the environmental integrity of PHEV conversions we believe that similar requirements are appropriate and reasonable. Without such requirements, it is possible that lack of assured product durability may have a negative influence on the emerging market. While we reluctantly accept the agency's willingness to allow less stringent procedures for aftermarket conversions, we oppose relaxing the requirement further than currently proposed by ARB staff.

If you have any questions, please contact Michael Lord of my staff at 310-787-5644 or michael.lord@tema.toyota.com.

Sincerely,



Kevin D. Webber *For*
General Manager
Vehicle Regulation and Certification Engineering