

October 14, 2010

**Via Electronic Submittal (<http://www.arb.ca.gov/lispub/comm/bclist.php>)**

Clerk of the Board  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Notice of Public Hearing to Consider Proposed Minor Amendments to the Periodic Smoke Inspection Program in Response to the Inclusion of Diesel Vehicles in Smog Check (Assembly Bill 1488, Mendoza 2007)**

Dear Sir or Madam:

The Engine Manufacturers Association is the national trade association representing the major manufacturers of heavy-duty engines used in vehicles subject to the above rule.

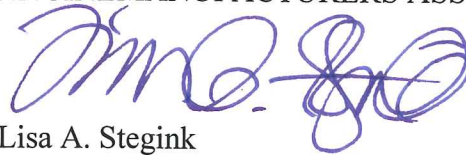
EMA has consistently supported the adoption of state inspection and maintenance programs as an important adjunct to manufacturers' efforts to design and build engines with reduced emissions and improved performance. However, overlapping smoke testing requirements place unnecessary costs and burdens on heavy-duty vehicle fleets and should be eliminated. EMA, therefore, supports ARB's proposed regulatory amendments to the PSIP program that would minimize duplicative inspection requirements.

Specifically, EMA supports the regulatory amendments allowing commercial truck fleets subject to both the PSIP and the Smog Check Program to submit evidence of passing a smog check test as proof of compliance with the PSIP in the years in which the Smog Check test is not required. Such amendments would reduce the unnecessary burdens associated with duplicate testing while still assuring that vehicles comply with applicable smoke opacity limits.

If you have any questions or need additional information, please do not hesitate to contact me.

Respectfully submitted,

ENGINEMANUFACTURERS ASSOCIATION



Lisa A. Stegink  
Legal Counsel