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South Coast Air Quality Management District

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Office of the Executive Officer
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December 5, 2006

Clerk of the Board
Air Resources Board
1001 "I" Street, 23rd Floor
Sacramento, California 95814

Comments of South Coast Air Quality Management District regarding Proposed
Adoption of Amendments to California's Emission Warranty Information
Reporting and Recall Regulations and Emission Test Procedures

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to submit comments regarding the proposed adoption of Amendments to California's Emission Warranty Information Reporting and Recall Regulations and Emission Test Procedures. The proposed amendments would modify language associated with the level of proof necessary to trigger manufacturer actions to correct emission control component failures, clarify the types of corrective actions that CARB could impose on manufactures, and simplify emission defect reporting requirements.

AQMD staff strongly supports the proposed regulations. Robust emission defect and reporting requirements are essential elements of an effective vehicle emission control program with regard to providing CARB the ability to ensure that emission reductions demonstrated as part of the vehicle certification process actually occur in-use. It is logical to assume that the proper function of all emission control strategies and components used during vehicle certification by the manufacturer must be sustained during normal customer usage of the vehicles to ensure overall compliance with applicable emission standards. Therefore we agree with the premise of the proposed amendments that the number of emission component defects beyond a certain threshold level sufficiently justifies the implementation of corrective actions by vehicle manufactures to eliminate these defects.

The AQMD appreciates the opportunity to provide these comments. If you have any questions regarding this matter, please call me at (909) 396-2100.

Sincerely,

Barry R. Wallerstein, D.Env.
Executive Officer