



South Coast Air Quality Management District

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Office of the Executive Officer

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March 19, 2007

Clerk of the Board
Air Resources Board
1001 "I" Street
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 robust emission defect and reporting regulations, and in that vein, these requirements should impose requirements that facilitate and improve upon the durability of current emission control system components. Emission reduction benefits from stringent certification standards are only realized with the highest possible standards relative to vehicle and engine emission control system durability. The imposition and enforcement of strict emission defect, recall, and reporting regulations are critical to ensuring that in-use emissions remain in check relative to certification standards.

Emission warranty reporting and recall regulations should allow ARB the flexibility to impose recalls based on information generated from all warranty claims and any other information source that would lead to the conclusion, based on the engineering judgment of technical staff, that a significant number of emission control system component failures are occurring in the in-use vehicle fleet for a particular engine or vehicle model. Obviously, the hand-built engines and vehicles used by manufacturers for certification approval, for the specific purpose of obtaining permission to sell their vehicles and engines in California, are in 110% working order. This reality leads to the conclusion that the proper operation of emission control system components is extremely critical for compliance with in-use emission standards, and therefore, ARB should have full flexibility to trigger an emissions-related engine or vehicle recall where significant numbers of emission control system component failures are deemed to be occurring in the in-use vehicle fleet. We understand that the automobile industry has suggested relaxing the criteria for recall requirements and our specific recommendation is that any provision in the proposal that could hinder ARB staff's ability to impose recalls based on all available emission component defect

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information should be deleted from any proposed modifications. We believe that robust emission defect and reporting requirements are essential elements of an effective vehicle emission control program, and the proposed modifications to the warranty information reporting and recall regulations should be formulated to ensure maximum compliance with in-use vehicle and engine emission standards.

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,

A handwritten signature in black ink, appearing to read "Barry Wallerstein", with a long horizontal flourish extending to the right.

Barry R. Wallerstein, D.Env.
Executive Officer

CSL:HH:DKS:DRC