

February 17, 2006

Dr. Robert F. Sawyer Chairman California Air Resources Board 1001 "I" Street P.O. Box 2815 Sacramento, CA 95812

Dear Dr. Sawyer,

We are aware that your Board will meet on Thursday, February 23rd to consider the 2005-2006 Lower-Emission School Bus Guidelines and Funding Allocation. Regarding the retrofit portion of the program, we are supportive of the language contained in the guidelines. We believe this language is fair and balanced in requiring the highest performance and safest emission control technology be given preference over other less performing technologies. This type of "BACT" approach is a fundamental tenant that has been and continues to be a central theme in many of the ARB's emission reduction programs.

Our company has a Verified Level 3 device that addresses the needs and meets the guidelines of this program. We are currently working with ARB staff to expand the verification to address the very oldest and highest PM emitting bases in the State. We expect the verification extension to be completed within the first half of this year.

Our products are sold and supported throughout the State by the Cummins distribution network. We are confident in our distribution partner's ability to reach out to school districts and their bus operations across the state, and that we will be able to generate substantial interest and participation in the program above and beyond the current funding level of \$12.5M.

We are pleased that the ARB had developed a program that is consistent with the intent and language of the legislation and we are supportive of your efforts to administrate this program.

Sincerely.

Bradley L. Edgar, Ph.D.

Executive Vice-President and CTO