December 1, 2008

Comments to California Air Resources Board on the proposed, Statewide Truck and Bus Regulation regarding Proposed Idling Regulations under Title 13 CCR Sections 2485(d)(2)(M) and 1956.8(a)(6)(B)

Navistar, Inc appreciates the opportunity to provide comments to the Proposed Regulation Order. Further, Navistar supports and promotes efforts toward clean air and a safe environment. As originally written, the provisions and requirements of the Heavy Duty Diesel Idling Requirements and Automatic Engine Shutdown System (AESS) overlooked an important vehicle type, armored cars, for exemption to the rule.

Some manufacturers of vehicles that are produced and ultimately used for build-up into armored cars would have no practical way to apply the infrastructure required to discriminate a chassis that was required to comply with the idle shutdown rule versus one that did not need to comply. As such, manufacturers and dealers would have incurred a costly burden of programming all engines to engage the idle shutdown, and then “de-selecting” those settings once the truck was delivered to a location other than the State of California.

For the aforementioned reason, plus for reasons of security of armored car cargo, driver and operator safety, and the need to not hamper the drive-off capability of an armored car we are pleased that staff recognized the requirement and suggestions of the affected industries and have taken measures to include armored cars in the category of exempt vehicles. Navistar endorses the changes as stipulated in § 2485(d)(2)(M) and 1956.8(a)(6)(B).

Respectfully submitted by Thomas Kramer, Navistar, Inc, Engine Group Emissions Certification and Compliance