



October 20, 2008

Ms. Mary D. Nichols, Chairman  
California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, California 95812

Dear Chairman Nichols:

**Subject: Comments on the 2<sup>nd</sup> 15-Day Notice of Proposed Modifications to the ZEV Regulations**

Chrysler LLC appreciates the efforts of the ARB Staff to modify the travel provision proportionality language in an attempt to provide manufacturers some amount of lead-time to adjust to this regulation change.

Chrysler LLC fully supports the comments submitted as the Large Volume Manufacturers (LVMs) to maintain clarity of the intent of travel provision proportionality. We understand the intent of the travel provision proportionality to be that if a manufacturer generates sufficient credits in California to meet its gold requirement, the manufacturer should be considered to have sufficient credits in the Section 177 state to cover the gold requirement, without an excess or shortage of credits.

However, since the sales ratio will vary between California and a Section 177 state over time, using options such as carry-forward/carry-back for credits can lead to scenarios where the gold requirement may be met in California, but not necessarily in a Section 177 state.

Chrysler LLC requests ARB to confirm the intent of the travel provision proportionality calculation in order to avoid the possibility of any unintended consequences of the proportionality concept.

If you have any questions regarding these comments, please contact Chris Bostwick at (248) 512-0478 or [cb41@chrysler.com](mailto:cb41@chrysler.com).

Sincerely,

A handwritten signature in black ink that reads "Chris Bostwick".

Reginald Modlin *FOR*  
Director  
Environmental Affairs  
Chrysler LLC