

On behalf of Kia Motors Corporation, following is the response to the CARB letter dated January 8<sup>th</sup> requesting a response to the ZEV disclosure questionnaire:

CARB Questions	Kia Response
<p><b>1)</b> For model years through 2006, ARB staff is requesting permission to share PZEV, AT PZEV, and ZEV information from the following columns of the individual automaker credit statements:</p> <ul style="list-style-type: none"> <li>- model year</li> <li>- model</li> <li>- number of vehicles</li> </ul> <p>Will you, as an automaker, concur with an ARB staff request to publicly disclose this information? If you cannot, please discuss your reasoning.</p>	<p><b>Kia understands that CARB released this information to the ZEV Coalition early in 2007.</b></p>
<p><b>2)</b> Under Section 1962(g)(4) of the ZEV Regulation (Title 13, California Code of Regulations (CCR)), some automakers received credits for the production of advanced demonstration vehicles.</p> <p>Will you, as an automaker, concur with an ARB staff request to publicly disclose this information? If you cannot, please discuss your reasoning.</p>	<p><b>Kia agrees to release this information. Should CARB modify or intend to modify the content of the disclosure as described under questions 1-3 of this questionnaire or if any legal or other agreement is made impacting disclosure of ZEV information, Kia reserves the right to revisit our agreement to release future data.</b></p>
<p><b>3)</b> ARB staff is considering a requirement that all future production credit data (for vehicles produced on or after January 1, 2009) be made available to the public. Would you support or oppose a proposal to require release of:</p> <ul style="list-style-type: none"> <li>- Information on actual production credits earned?</li> <li>- Information on your credit balance?</li> </ul>	<p><b>Kia agrees to release this information. Should CARB modify or intend to modify the content of the disclosure as described under questions 1-3 of this questionnaire or if any legal or other agreement is made impacting disclosure of ZEV information, Kia reserves the right to revisit our agreement to release future data.</b></p>
<p><b>4)</b> Under Section 1962(g)(2)(C) of the ZEV Regulation (Title 13, CCR), automakers are required to elect to comply via the primary or alternative requirements.</p> <p>Will you, as an automaker, concur with an ARB staff request to publicly disclose the compliance path elected for the 2009 through 2011 model years? If you cannot, please discuss your reasoning.</p>	<p><b>Kia agrees to release this information. Should CARB modify or intend to modify the content of the disclosure as described under questions 1-3 of this questionnaire or if any legal or other agreement is made impacting disclosure of ZEV information, Kia reserves the right to revisit our agreement to release future data.</b></p>

<p>5) Under Sections 1962(f)(2) of the ZEV Regulation (Title 13, CCR), ZEV and PZEV credits are earned in units of grams per mile non-methane organic gas (g/mi NMOG). To simplify the ZEV credit bank, staff would like to propose calculating credits based on the number of vehicles produced and the ZEV credit per vehicle rather than converting with the NMOG fleet average. Additionally, this would entail converting existing bank balances to credits using a 1/0.035 multiplier. This multiplier represents the asymptote of the NMOG fleet average curve (Section 1961(a), Title 13, CCR).</p> <p>Would you support or oppose such a proposal?</p>	<p><b>Kia has identified potential problems with this approach but needs additional time for review.</b></p>
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Please contact me or Julia Rege ([jrege@hatci.com](mailto:jrege@hatci.com)) should you have any questions.

Regards,

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