



Linda S. Adams
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Environmental Protection

Air Resources Board

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El Monte, California 91731 www.arb.ca.gov



Arnold Schwarzenegger
Governor

March 15, 2007

MANUFACTURERS ADVISORY CORRESPONDENCE (MAC) 2007-01

TO: ALL MANUFACTURERS OF

- PASSENGER CARS
- LIGHT-DUTY TRUCKS
- MEDIUM-DUTY VEHICLES AND ENGINES USED IN SUCH VEHICLES
- HEAVY-DUTY VEHICLES AND ENGINES USED IN SUCH VEHICLES
- ON-ROAD MOTORCYCLES
- OFF-ROAD RECREATIONAL VEHICLES
- OFF-ROAD SMALL SPARK-IGNITED ENGINES
- OFF-ROAD SMALL SPARK-IGNITED EQUIPMENT
- OFF-ROAD LARGE SPARK-IGNITED ENGINES
- OFF-ROAD SPARK IGNITED-MARINE ENGINES
- OFF-ROAD COMPRESSION-IGNITION ENGINES

ALL OTHER INTERESTED PARTIES

SUBJECT: Policy regarding the use of Electronic Signatures in the Air Resources Board's (ARB) Document Management System for Certification

The ARB is issuing this Manufacturers Advisory Correspondence (MAC) to provide guidance to manufacturers of on-road vehicles/engines and off-road engines/equipment on the handling of electronic signatures contained within documents submitted into ARB's Electronic Document Management System for Certification (DMS).

DISCUSSION:

The Mobile Source Operations Division has begun to use the DMS to handle certification documentation in order to reduce the use of paper, and the cost and resource burden of storing and mailing paper based documents on staff and manufacturers. As you may know, beginning January 2, 2007, certification related documents are being electronically submitted through the DMS, excluding on-road On-Board Diagnostics II (OBD II) documents. However, the protocol for acceptance of the signature of a manufacturer's authorized representative(s) on a document that has been scanned or captured through other electronic methods has not been addressed. This MAC is being issued to set forth the policy for manufacturers to use for submitting documents with electronic signatures and for ARB to consider as valid.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

POLICY:

Currently, manufacturers provide the letter of intent, compliance and cover letters, and other hardcopy signed letters with an original signature by the manufacturers' authorized representative. With the introduction of DMS, ARB policy is that manufacturers shall submit an authorization letter, before May 1, 2007, stating that all documents submitted with electronic signatures, either scanned or using digital ink, or any other electronic format approved by ARB, will be considered valid for certification. The authorization letter will be kept on file and a copy will be scanned and saved in the DMS. It is the manufacturer's responsibility to submit a new letter to notify ARB promptly when changes occur to the authorized signature document. The letter is to be drafted on a company letterhead and signed by the manufacturer's authorized company representative; for this purpose, third party consultants are NOT considered authorized contacts. All persons who will be authorized to sign documentation submitted to the DMS must have their names and sample signatures included. If any of the listed persons are part of a third party, such as a consultant or laboratory, the name of their organization should also be listed. The signed hardcopy should be mailed to ARB at the address listed in the attachments. Attachment A contains a sample letter that may be used.

When any change to the manufacturer's personnel authorized to sign certification documentation into the ARB's DMS occurs, a revised hardcopy letter must be submitted to the ARB. If the document is not updated with the most recent personnel, ARB may postpone certification until such time that the manufacturer has updated its list of authorized personnel. Attachment B contains a sample letter to be used for updating a manufacturer's list of authorized personnel.

Thank you for your attention to this matter. Questions regarding this policy should be directed to Ms. Jackie Lourenco, Chief, New Vehicle/Engine Programs Branch, at (626) 450-6152 or by email at jlourenc@arb.ca.gov. Questions regarding the Certification Document Management System should be directed to Ms. Ivonne Guzman-Cicero, Staff Air Pollution Specialist at (626) 575-6718 or by email at iguzmanc@arb.ca.gov.

Sincerely,

/s/

Annette Hebert, Chief
Mobile Source Operations Division

ATTACHMENT A

Annette Hebert, Chief
Mobile Source Operations Division
California Air Resources Board
9480 Telstar Ave., Suite 4
El Monte, CA 91731

Dear Ms. Hebert,

Company ABC hereby submits a list of people who are authorized to sign and submit electronic documentation into ARB's Document Management System (DMS) for Certification.

- John Doe (Place Signature Here)
- Jane Smith XYZ Consulting (Place Signature Here)

Electronic signatures from the persons listed above are to be considered valid and all documents submitted to the DMS containing said signatures will be considered valid documents.

If you have any questions regarding this letter, please contact me at (123) 555-1234.

Sincerely,

(Signature here)

Jon Do
Vice President
Company ABC

ATTACHMENT B

Annette Hebert, Chief
Mobile Source Operations Division
California Air Resources Board
9480 Telstar Ave., Suite 4
El Monte, CA 91731

Dear Ms. Hebert,

Company ABC hereby submits an update to the list of people who are authorized to sign and submit electronic documentation into ARB's Document Management System (DMS) for Certification.

Previous authorized personnel:

- John Doe
- Jane Smith XYZ Consulting

Current authorized personnel:

- John Smith (Place Signature Here)
- Jane Smith XYZ Consulting (Place Signature Here)

The above list represents the addition of John Smith as an authorized representative of Company ABC. Moreover, the above list represents the removal of John Doe as an authorized representative of Company ABC.

Electronic signatures from the current authorized persons listed above are to be considered valid and all documents submitted to the DMS containing said signatures will be considered valid documents.

If you have any questions regarding this letter, please contact me at (123) 555-1234.

Sincerely,

(Signature here)

Jon Do
Vice President
Company ABC