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Secretary for  
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# Air Resources Board

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**John D. Dunlap, III, Chairman**

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**Pete Wilson**  
Governor

MANUFACTURERS ADVISORY CORRESPONDENCE

MAC #98-04

July 27, 1998

TO: ALL PASSENGER CAR MANUFACTURERS  
ALL LIGHT-DUTY TRUCK MANUFACTURERS  
ALL MEDIUM-DUTY VEHICLE MANUFACTURERS  
ALL DIRECT IMPORTERS  
ALL OTHER INTERESTED PARTIES

SUBJECT: Submission of Certification Data Demonstrating  
Compliance With California's Inspection and  
Maintenance Program

This letter transmits the attached Manufacturers Advisory Correspondence (MAC) which informs vehicle manufacturers of the need to submit demonstrations of compliance with the Inspection and Maintenance (I/M) idle mode and Acceleration Simulation Mode (ASM) loaded mode emission standards, for all 2000 and subsequent model-year emission-data vehicles (EDVs) at the time of certification.

If you have any questions or comments, please contact Mr. Duc Nguyen, Manager, or Mr. Shewen Chen, Staff Engineer, Certification Section, at (626) 575-6661.

Sincerely,

R. B. Summerfield, Chief  
Mobile Source Operations Division

Attachment

State of California  
AIR RESOURCES BOARD

SUBJECT: Submission of Certification Data Demonstrating  
Compliance With California's Inspection and Maintenance  
Program

APPLICABILITY:

2000 and subsequent model-year passenger cars, light-duty trucks and medium-duty vehicles, except: diesel-fueled vehicles, vehicles with non-disengageable all-wheel-drive, and vehicles with full-time traction control. Diesel-fueled vehicles are currently exempted from California I/M testing. Vehicles with non-disengageable all-wheel-drive and vehicles with full-time traction control are currently exempted from ASM loaded-mode testing; for these vehicles, I/M idle speed testing is still required.

REFERENCES:

1. Title 13, California Code of Regulations (CCR) Section 1960.1, and the incorporated "California Exhaust Emission Standards and Test Procedures for 1988 and Subsequent Model Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles," as last amended July 24, 1996.
2. Manufacturers Advisory Correspondence No. 92-04.
3. "Mandatory Exhaust Emissions Inspection Standards and Test Procedures," Title 16, CCR, Section 3340.42.
4. Joint letter from American Automobile Manufacturers Association and Association of International Automobile Manufacturers, dated February 12, 1998.

[References to the above documents are indicated by brackets.]

## BACKGROUND AND DISCUSSION:

Title 13, California Code of Regulations (CCR) Section 1960.1 and the incorporated "California Exhaust Emission Standards and Test Procedures for 1988 and Subsequent Model Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles," as last amended July 24, 1996, [Reference 1], require vehicle manufacturers to tail-pipe test all 1993 and subsequent model-year emission-data vehicles (EDVs) to demonstrate compliance with the applicable California Inspection and Maintenance (I/M) emission standards specified in the "Mandatory Exhaust Emissions Inspection Standards and Test Procedures," Title 16, CCR Section 3340.42 [Reference 3]. Title 16, CCR Section 3340.42 contains two test procedures, a "loaded mode" test and an "idle mode" test.

The Air Resources Board's (ARB) policy regarding demonstrating compliance with the I/M emission standards is set forth in MAC No. 92-04 [Reference 2]. Because California air pollution control/air quality management districts (districts) were only utilizing the idle mode test in their I/M programs when MAC No. 92-04 was issued, manufacturers were only required to submit EDV idle mode test results prior to certification. This policy was subject to the condition that "when any district participating in the I/M program decides to require the loaded-mode test, all EDVs must undergo both the loaded-mode test and the idle test. In such an event, the ARB will inform manufacturers of this requirement." MAC No. 92-04 [Reference 2].

In accordance with Mac No. 92-04, the ARB is hereby notifying manufacturers in this MAC that the California Department of Consumer Affairs/Bureau of Automotive Repair (BAR) has required several district I/M programs to utilize the Acceleration Simulation Mode (ASM) loaded mode test as of June 8, 1998. The existing two-speed idle mode test will be retained for other areas of the state not subject to the ASM loaded mode I/M test.

The ARB recognizes that requiring manufacturers to immediately demonstrate compliance with both the ASM loaded mode and the idle mode I/M emission standards would impose excessive hardships, given the June 8, 1998 ASM test start date, and in light of vehicle manufacturers' requests for additional lead time to ensure the availability of test equipment and trained personnel needed to incorporate the ASM test into certification test procedures [Reference 4]. Therefore, the ARB will require vehicle manufacturers to submit demonstrations of EDV compliance with both the idle and the ASM loaded mode I/M emission standards beginning in the 2000 model-year (MY). In addition, to provide

manufacturers sufficient lead time for some early certified model-year 2000 engine families, the ARB will waive the EDV ASM loaded mode I/M test compliance demonstrations for 2000 model-year engine families if manufacturers submit the initial certification applications for those engine families to ARB and the applications are postmarked on or before June 30, 1999. In other words, initial certification applications for model-year 2000 engine families that are submitted and post-marked on or after July 1, 1999 must contain EDV demonstrations of compliance with the ASM loaded mode I/M emission standards. The implementation schedule in this MAC will provide vehicle manufacturers approximately one year to integrate the ASM loaded mode I/M test into their certification testing procedures.

MAC No. 92-04 is still applicable to requirements for EDV compliance with idle mode I/M testing. The provisions described in MAC No. 92-04 regarding: pre-conditioning, test fuel, test vehicles, test temperature, and carry-over/carry-across of test data are applicable to the ASM loaded mode test.

POLICIES:

1. Manufacturers must submit demonstrations that their EDVs comply with both the idle and the ASM loaded mode I/M emission standards in their certification applications for 2000 and subsequent MY passenger car, light-duty truck, and medium-duty vehicle engine families, with the following exceptions:
  - a. Demonstration of compliance with the ASM loaded mode emission standards is not required for an engine family if the initial certification application for that engine family is submitted and postmarked on or before June 30, 1999.
  - b. Diesel-fueled vehicles are currently not subject to the I/M program. Thus, no demonstrations of compliance with I/M emission standards are required for these vehicles.
  - c. Non-disengageable all-wheel-drive and full-time traction control vehicles are exempted from ASM test requirements, but continue to be subject to two-speed idle mode testing. Thus, these vehicles must demonstrate compliance with only the idle mode I/M emission standards prior to certification.

2. All requirements, including pre-conditioning, test fuel, test vehicles, test temperature, and data carry-over/carry-across, as described in MAC No. 92-04 are applicable to the ASM test.
3. MAC No. 92-04 is still applicable to the I/M idle test.