



Automobile Club of Southern California

1225 EIGHTH STREET, SUITE 375 • SACRAMENTO, CALIFORNIA 95814

August 11, 1993

GOVERNMENT AFFAIRS

Pat Hutchens, Board Secretary
California Air Resources Board
P. O. Box 2815
Sacramento, CA 95812

15-day comment
XC: TAC
Legal
MSD

STATE OF CALIFORNIA
AIR RESOURCES BOARD
RECEIVED 8/12/93
BY BOARD SECRETARY

Dear Ms. Hutchens:

Re: Title 13 CCR Amendments to Regulations Regarding
On-Board Diagnostic System Requirements for 1994
and Later Passenger Cars, Light-Duty Trucks, and
Medium-Duty Vehicles and Engines (OBDII) (Mail-out
#93-40)

Thank you for the opportunity to comment on these amendments.

We have a significant concern regarding the relaxation of such a critical regulation. We believe that the on-board diagnostic system (OBDII), which links the vehicle certification process, assembly line testing, and in-use maintenance, is one of the most important CARB requirements.

We believe the implementation of OBDII is critical to successful and continuing progress in reducing vehicle role as cause of air pollution.

Many aspects of future vehicle emissions control are dependent on OBDII. Significant among these are:

- manufacturer compliance to standards - for both new and in-use vehicles
- mechanic assistance in diagnosis and repair of emission control problems
- motorist assurance of an improved repair process and savings of both costs and inconvenience.

Additionally, OBDII will provide a significant improvement in accuracy and efficiency when it replaces the test portion of the Smog Check program.

We strongly urge you to not relax the requirements beyond the upcoming model year.

Sincerely,

Michael Appleby
Michael R. Appleby
Manager
Automotive Engineering

MRA:mib

bcc: Alice Bisno, Michael Appleby