Kubota

April 22, 1994

KUBOTA Corporation

64, ISHIZUKITA, SAKAI
OSAKA, JAPAN

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

STATE OF CALIFORNIA
AIR RESOURCES BOARD
RECEIVED 4/22/94
OF BOARD SECRETARY

15 day comment
XC: TAC
Legal
MSD

RE: **Comment on Proposed Emission Control Regulations for Off-Highway Recreational Vehicles and Engines (Mail-Out # 94-13)**

Dear Board Secretary:

KUBOTA Corporation (KUBOTA) is a multinational industrial company with headquarters in Osaka, Japan. The products manufactured in their plants are sold in over 130 countries. Kubota is currently divided into five product groups as follows:

- Farm and Industrial Equipment Group
- Pipe and Fluid Systems Engineering Group
- Industrial Casting Group
- Environmental Control Plant Group
- Building Materials and Housing Group

KUBOTA's Farm and Industrial Equipment Group operates in the Untied States through an American affiliate, Kubota Tractor Corporation, based in Torrance, California.

KUBOTA has been monitoring the development of the subject regulation and would like to comment on some specific aspects of it.

KUBOTA would like express concern with the definition of "Specialty Vehicles" as defined in the proposed regulation as follows:

> Article 3. Off-Highway Recreational Vehicles and Engines, 2411. Definitions, Page 5, (19) "Specialty Vehicles" means any vehicle powered by an internal combustion engine having not less than 3 wheels in contact with the ground, having an unladen weight generally less than 2,000 pounds, which is typically operated between 10 and 35 miles per hour. The recommended bed payload for specialty vehicles is usually up to 2,000 pounds. Specialty vehicles are mainly used off of highways and residential streets. Applications of such vehicles include, but are not limited to, carrying passengers, hauling light loads, grounds keeping and maintenance, resort or hotel areas, airports, etc.

It is difficult to ascertain what may be defined as a specialty vehicle, but staff has chosen to specifically include "grounds keeping and maintenance" and "airport" vehicles in the scope of the regulation. These types of vehicles are not recreational vehicles. They are industrial non-road vehicles which are used for work purposes and performing commercial services, not recreation, and more appropriately belong in the off-highway industrial equipment sub-category.

Post-It™ brand fax transmittal memo 7671	# of pages ▸ 2
To BOARD SECRETARY	From K. KOKRA
Co. ARB	Co. KTCED
Dept. EXEC. OFFICE	Phone # 708 884 0212
Fax # 916 323 0764	Fax # 708 884 6410

We do not object to regulation of these engines, however we believe that they properly belong in the off-highway industrial equipment sub-category that CARB intends to address with separate regulation in the near term.

KUBOTA recommends that staff revise the definition of "specialty vehicles" as applied in the regulation to make it clear that engines that are utilized in industrial equipment applications are not subject to differing regulations and procedures that are expected to be addressed by CARB in the near term.

In addition, KUBOTA has great concern with the proposed emission standard stringency in the two following areas:

Vehicle and Model Year	HC + NOx (g/Bhp-hr)	CO (g/Bhp-hr)	PM (g/Bhp-hr)
Specialty Vehicle Engines < 25 HP 1999 and Later	3.2	100	0.25
Go-Karts and Specialty Vehicle Engines ≥ 25 HP 1997 and Later	3.2	100	0.25

This proposed level of stringency parallels CARB ULGE Tier II for Class I and II engines. CARB has provided provisions within the CARB ULGE regulation (also reference CARB Mail-out #93-50), for industry and CARB to twice consider progress toward these levels of stringency prior to 1999.

KUBOTA strongly requests that CARB not preclude ULGE Tier II progress discussions as they relate to the above categories' stringency levels and effective dates one of which is proposed for as early as model year 1997.

The CARB Tier II progress discussions will include technical feasibility and cost effectiveness issues relating to 3.2 HC + NOx, 100 CO, and 0.25 PM stringency levels. Therefore, KUBOTA strongly recommends CARB to carefully review the emission levels proposed in Mail-Out # 94-13.

KUBOTA appreciates the opportunity to comment on the proposed regulation. Please contact me directly at 708) 884-0212 if you have further questions.

Sincerely,

Kevin R. Kokrda
Kubota Tractor Corporation
Manager
Emission Standards

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AIR RESOURCES BOARD
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BY BOARD SECRETARY

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MOTORCYCLE INDUSTRY COUNCIL, INC.

EXECUTIVE OFFICE

2 Jenner Street, Suite 150, Irvine, CA 92718-3812 • (714) 727-4211 • FAX (714) 727-4217

April 21, 1994

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

RE: CARB Mail-Out 94-13 "Notice of Availability of Modified Text" PUBLIC HEARING TO CONSIDER THE ADOPTION OF REGULATIONS REGARDING THE CALIFORNIA EXHAUST EMISSION STANDARDS AND TEST PROCEDURES FOR 1995 AND LATER OFF-HIGHWAY RECREATIONAL VEHICLES AND ENGINES

The Motorcycle Industry Council (MIC) is a nonprofit national trade association representing manufacturers and distributors of motorcycles, motorcycle parts and accessories, and members of allied trades.

MIC staff has reviewed the subject mail-out, and concurs with its content except for the following:

> On page 12 of Attachment 3, in §86-416(c)(1) the phrase "produced for sale in California..." has been stricken from the text, making it appear that CARB is asking for national sales reporting. A phone conversation with Board staff member Jackie Lourenco on April 19th has confirmed that this was not staff's intent.
>
> MIC suggests that for clarification purposes, the phrase "produced for sale in California" be put back into §86-416(c)(1).

Please contact me at the above phone number should you require further information regarding this comment.

Sincerely,

J.C. DeLaney
Director,
Technical Programs