The Vehicle Suppliers Association

Comments of

MEMA, The Vehicle Suppliers Association

to the

Environmental Protection Agency

on the

Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

September 22, 2025

Docket ID No. EPA-HQ-OAR-2025-0194

I. Introduction

MEMA, The Vehicle Suppliers Association, established in 1904, is the leading trade association in the United States for vehicle suppliers, parts manufacturers, and remanufacturers, with over 900 members. Pursuant to the Environmental Protection Agency (EPA) Notice of Proposed Rulemaking and request for comment,[1] MEMA hereby encourages EPA to consider retaining greenhouse gas emissions standards to keep the U.S. supplier base globally competitive and to ensure that suppliers' past and future investments continue to benefit the market, the workforce, and the U.S. economy.[2]

The mobility sector depends on the resilience and strength of suppliers, and our sector is an intrinsic and essential part of the U.S. economy. Vehicle suppliers directly employ more than 932,000 Americans, a number that has grown since the implementation of the United States-Mexico-Canada Agreement (USMCA). In addition, MEMA members support more than 4.8 million jobs in related industries. Suppliers operate facilities in all 50 states and across more than 350 Congressional districts, with significant concentrations in the Midwest and Southeast. The vehicle supplier sector shares the Administration's stated objectives of strengthening and growing the U.S. manufacturing base and ensuring and expanding economic opportunities for communities across the U.S.

MEMA's members design and manufacture the technologies, components and services that enable the production of new vehicles, as well as provide the essential

[1] Reconsideration of the 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards, 90 Fed. Reg. 36,297 (proposed rule) (Aug 1, 2025) ("The EPA seeks comment on the nature and extent of any reliance interests that may have arisen from our assertion of regulatory authority over GHG emissions from new motor vehicles and engines and is committed to assessing any such interests, determining whether they are significant, and weighing such interests against competing rationales, as required by law.").

[2] *See Id*.

maintenance and repair of the more than 295 million highway vehicles[3] that are currently on the road in the U.S.

MEMA submits the following comments in response to the EPA's August 1, 2025, Federal Register notice.[4]

2. Suppliers Play a Critical Role in Developing and Innovating Products

Motor vehicle parts suppliers provide 77 percent of a new vehicle's value[5] and play an essential role in creating, mobilizing, and adapting global supply chains that support the mobility sector. Suppliers create complex technologies and highly integrated systems that make vehicles more efficient, including emissions control technologies, alternative powertrain systems, and advanced driver assistance programs.

Since 2019, the motor vehicle supplier industry added 14,000 jobs, driven in part by new North American Industry Classification System (NAICS) classifications linked to electrification and connectivity.[6] Many of these roles come from consumer and industrial firms moving into the e-mobility and connectivity markets.

Suppliers are at the forefront of technological development, anticipating the needs of original equipment manufacturers (OEMs), and investing in technology solutions to meet emissions standards. To support this work, suppliers have committed significant resources in U.S.-based research and development (R&D), enabling technologies to be designed, prototyped, tested and validated domestically before being deployed in vehicles. These efforts are yielding measurable results: since 2019, hybrid and battery electric (BEV) vehicle production share has increased 23%,[7] while production of new transmission types has grown by 50 percent.[8]

Suppliers are some of the earliest movers to advance technologies that improve vehicle safety, fuel efficiency, and emissions reduction. As industry leaders, MEMA members continue to drive investment in new technologies and manufacturing facilities. A clear and consistent approach to regulation provides the certainty needed to sustain these investments and to plan for the future of innovative mobility solutions.

3. Summary of Comments

MEMA is eager to work with EPA on solutions that provide consumers with choice, balance the complexities of the mobility supply chain, and maintain the U.S. vehicle supplier

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[3] S&P Global Mobility Vehicles in Operation as of January 1, 2024. This figure includes passenger cars, light trucks as well as medium and heavy duty trucks.

[4] Reconsideration of the 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards, 90 Fed. Reg. 36,288 (proposed rule) (Aug 1, 2025).

[5] Automotive Aftermarket Industry Analysis–2023, AAPEX Show (2023).

[6] MEMA Employment Study, concluded 2024.

[7] *See Id.*

[8] *See Id.*

sector's global leadership. MEMA urges EPA to consider retaining greenhouse gas (GHG) emissions standards at a level that promotes technological feasibility and global competitiveness, while supporting U.S. companies and strengthening domestic job creation. Suppliers have already invested in and remain committed to technologies across the motor vehicle supply chain that reduce GHG emissions.

- **MEMA supports regulation that provides economic stability for suppliers**. The vehicle development cycle is lengthy and requires prolonged product investment and planning timelines. Manufacturers rely on regulatory stability to make long-term development decisions and to foster innovation.
- **MEMA supports regulatory stability for suppliers.** Consistency in standards is critical to keeping the U.S. motor vehicle industry competitive and maintaining the U.S.'s leadership in technology deployment. Clear and reliable standards ensure consideration of the full range of technology offerings, balance stakeholder interests, and allow consumers to make informed purchase decisions that best meet their needs.

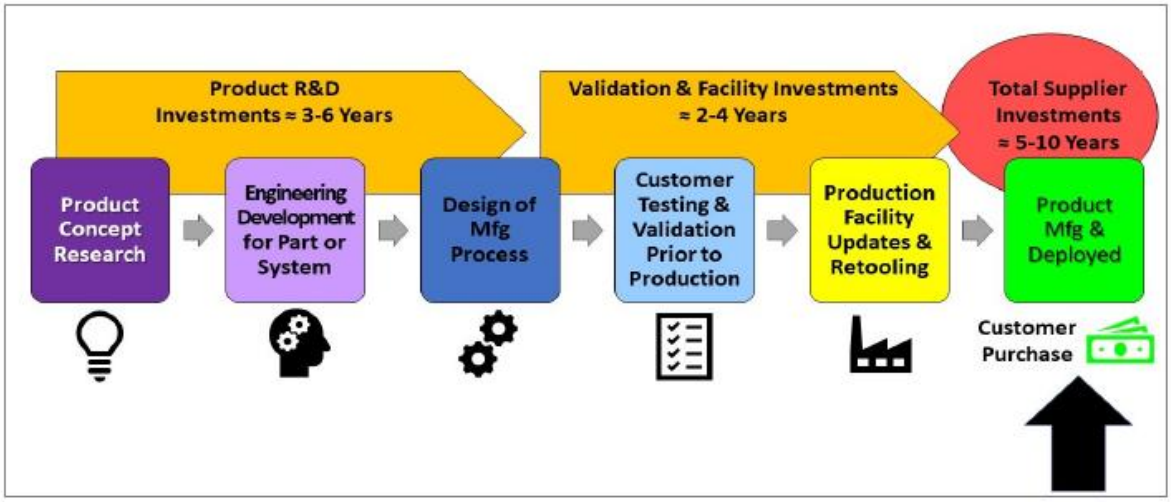
4. A Regulatory Environment that Promotes Economic Stability Can Encourage Investment and Innovation

It is essential that suppliers have regulatory stability as a durable framework for capital investments and workforce planning decisions. The motor vehicle supplier industry stands at a critical junction, having invested significant R&D to develop and deploy technologies that reduce greenhouse gas emissions. MEMA encourages EPA to consider the mobility industry's substantial reliance interests in the continuation of GHG emissions standards and to safeguard the progress already achieved through these investments.

A. The Vehicle Supply Chain Requires Lengthy Investment Timelines

MEMA respectfully requests that EPA consider the lengthy product planning and investment timelines required by vehicle suppliers in order to ensure the safe deployment of new technologies. These timelines include extended periods for safe development and validation to confirm that performance requirements are met. Advanced vehicle supply chains also depend on access to a diverse range of materials, subcomponents, and technologies, which are essential to maintaining world-class safety expertise and global competitiveness. A clear and consistent understanding of requirements and regulatory guidelines provides suppliers with the stability and visibility needed to plan effectively and meet these requirements.

Graphic 1: Motor Vehicle Parts Suppliers Product Planning and Investments Timeframe



The above graphic illustrates the timeline for average supplier product planning and investment. Suppliers typically invest 5-10 years in the development, manufacturing, and deployment of products and have been working to develop technologies that improve efficiency and increase safety. During this period, suppliers shoulder the majority of costs and investment risks and do not realize a return on investment until products are ultimately shipped to their OEM customers.

A drastic change in policy could significantly disrupt these ongoing supplier development cycles. Eliminating standards that have guided and justified these investments may lead to significant sunk investments for the sector and undermine continued innovation.

B. Suppliers Have Made Significant Investments in Technologies that Improve Efficiency

Suppliers have invested heavily in technologies that reduce GHG emissions. This includes investments in a variety of powertrains, including battery electric, hydrogen, and hybrid options. Suppliers have also invested in technologies that improve vehicle efficiency, such as engine system enhancements, automatic tire inflation, light-weighting, low-rolling resistance, and more.

The supplier community, both independently and in collaboration with OEMs, continues to engineer innovative technologies that achieve real-world emissions and fuel consumption reductions, often beyond those measured with standard test procedures. The off-cycle credit program and A/C efficiency credit program have supported industry investment in forward-looking technologies that deliver measurable, demonstrable and verifiable benefits to fuel economy and emissions performance. These programs provide a cost-effective mechanism for achieving fuel economy and emissions targets while incentivizing the development of advanced vehicle technologies. These programs have been essential to ensure that supplier investments remain viable and are not rendered stranded or lost as sunk costs.

As a result of the potential removal of GHG emissions standards, suppliers face difficult strategic decisions to mitigate the risk of stranded investments. For example, some MEMA member companies are preparing to defer tooling and capital expenditure until there is greater clarity regarding OEM demand, including the technologies OEMs will require, both domestically and globally. In the interim, suppliers are limiting employment opportunities, slowing or idling production, and operating facilities at reduced capacity due to market uncertainty created by continuously shifting emissions requirements and tariff pressures.

MEMA members have reported that U.S. motor vehicle parts jobs could be significantly impacted if GHG standards are fully rolled back, as the U.S. risks being limited to legacy technology production. For example, advanced powertrain technology engineering jobs could be completed outside of the U.S., where there is a regulatory demand for those innovations.

Suppliers already report hearing from customers who are planning significant reductions in e-mobility orders based in part on anticipated regulatory changes, even after production lines have already been installed at supplier facilities. For many companies, this risk is more severe than suspended future investments – the capital spending is already complete, and the proposed regulatory changes could impose severe and sustained losses.

The proposed full rollback of GHG standards has already delayed critical investment decisions and caused customers and suppliers at all tiers to delay or reverse orders. It has also created stranded capital investment, suspended hiring, and prompted investment freezes. These outcomes diminish the attractiveness of the U.S. market for further investment and weaken the ability of U.S. suppliers to compete effectively in the global marketplace.

C. Elimination of the Standards Could Undermine U.S. Leadership in Global Innovation

Suppliers operate in a global landscape and compete in foreign markets with existing emissions standards. Recent reports from the International Trade Commission[9] cite increased investment in U.S. automotive manufacturing, with the U.S. as the primary recipient in the USMCA region. Continued U.S. investment and development of advanced technology innovations depend on regulatory stability and forward-looking standards.

The U.S. has a longstanding record as a global technology leader and is uniquely positioned to drive advances in fuel efficiency and emissions-reducing technologies. Eliminating GHG standards could undermine U.S. leadership in technology development and reduce global market share. Many domestic manufacturers have based their investment strategies on existing GHG regulations. If those regulations change significantly, companies may need to delay or reconsider R&D and capital investments.

To supplement these comments, MEMA conducted a preliminary survey of members engaged in the Emissions Working Group to assess the expected impact of removing GHG

[9] United States International Trade Commission. USMCA Automotive Rules of Origin: Economic Impact and Operation, 2025 Report. (August 2025).

standards on competitiveness.[10] Among U.S.-produced products, 72.2% of respondents indicated that the proposal could make them less competitive than their foreign counterparts.[11]

Survey responses also show that 70.6% of respondents anticipate reductions in R&D spending if the GHG standards are eliminated. In addition, suppliers expect U.S. investment to decline over the next 12 months, with 64.7% of respondents projected a reduction in domestic investment. In contrast, more than half of respondents expected no changes to foreign investment plans.

The survey results further indicate that removing GHG standards could make U.S.-manufactured goods less competitive globally and potentially diminish the attractiveness of the U.S. as a place to conduct business. It is possible that as powertrain investments are relocated, the same outcome could occur for other innovative technologies, such as advanced safety systems, as companies may prefer to centralize core R&D functions abroad rather than dispersing them across multiple regions. This shift could ultimately result in an overall loss of U.S. talent and capital investment in the automotive sector. MEMA therefore urges EPA to consider retaining GHG emissions standards, and to pursue a feasible, technology-neutral standard that provides suppliers with market stability and ensures the U.S. remains at the forefront of technology innovation.

5. Consistent Regulatory Leadership Supports Investment and Innovation

A national GHG regulatory emissions program with unified targets and timelines gives suppliers the predictability necessary for long-term business planning. Such stability drives domestic investment in emissions-reducing technologies and the jobs that accompany them. A unified approach also provides industry stakeholders and OEMs with economies of scale, lower compliance costs, and more consistent market access. Further, the heavy-duty industry faces challenges in achieving economies of scale due to its smaller production volumes. The aggregate market at the OEM level helps drive these changes. Ultimately, these benefits extend to consumers through broader access to advanced technologies and lower vehicle costs.

Many technologies that suppliers deploy today were developed under a national emissions regulatory program. Fragmented standards across the vehicle markets could create challenges for suppliers, making it harder to sustain investment and innovation in the U.S. Ultimately, differing state standards increase the costs of compliance and likely reduce consumer choice. The existence of a national program helps maintain a stable market for the

[10] This was a preliminary survey of MEMA's Emissions Working Group, comprised of 44 member companies. The survey was conducted between August 22, 2025, and September 5, 2025. The survey received 19 completed responses. 72.6% of respondents were light vehicle original equipment manufacturers, and 23.8% of respondents were commercial vehicle original equipment manufacturers. Of the respondents, 78.9% were tier one manufacturers. The survey asked respondents 15 questions, asking them to indicate the impact of the proposal on their businesses. The responses generated were a mix of narrative responses and ranked choice.

[11] MEMA Emissions Working Group Survey, September 2025.

ongoing deployment of advanced technologies and prevents the potential of a patchwork of conflicting regulatory frameworks across the U.S. Historically, attempts by certain states and private parties to challenge EPA's regulatory preemption authority have underscored the risks of a fractured system.[12]

Globally, other regions will continue to adopt vehicle emission reductions requirements in their respective markets. If the U.S. does not pursue comparable policies, new emissions-reducing technologies may be developed and produced closer to the relevant markets elsewhere. As a result, the U.S. could assume the role of market-adopter, relinquishing its role as a significant market leader of advanced emission reduction technologies.

The existence of a national emissions program aligned with global trends may also support U.S. suppliers' competitiveness by facilitating the global sale of vehicles built to consistent standards, reducing duplicative compliance costs, strengthening opportunities for international market access, and helping ensure motor vehicle products remain attractive for export. Accordingly, a national standard not only secures domestic innovation but also positions the U.S. as a leader in the global automotive supply chain.

A. MEMA Supports Feasible, Technology Neutral Standards

Suppliers play a critical role in developing and deploying advanced technologies that improve vehicle efficiency. Strong, forward-looking standards drive greater investment in research, development, and deployment of advanced technology in the U.S. Standards that encourage the implementation of advanced technologies in vehicles ensure stability, enabling suppliers to continue investing in job growth and technological innovation.

MEMA has long supported standards that are technology neutral and technically feasible, and that provide manufacturers with sufficient lead time. MEMA's most recent national employment study, concluded at the end of 2024, found that 74% of employment was powertrain-agnostic, demonstrating the wide range of technologies developed by suppliers. Including all technologies that reduce emissions will increase manufacturing capacity, enhance vocational performance, and strengthen consumer acceptance.

MEMA urges EPA to collaborate closely with stakeholders to ensure that regulations reflect the best available industry data. Incorporating input from all appropriate sources ensures that regulations are adopted to and aligned with market and technology realities and meet the needs of U.S. consumers. MEMA and its members support an inclusive process for government and industry stakeholder meetings that guarantee the most up-to-date information informs the regulatory process.

Suppliers have already developed a wide range of technologies ready for deployment to reduce GHG emissions. These technologies are representative of the commitment that suppliers have made to developing and deploying advanced technologies in the U.S. The

[12] Massachusetts v. EPA, 549 U.S. 497 (2007). American Electric Power Co. v. Connecticut, 564 U.S. 410 (2011).

proposed rollback of the standards could dramatically impact the investments that suppliers have made into these technologies. Some technologies that suppliers have developed include:

- *Hybrid technologies:* The U.S. has a competitive advantage over other countries in terms of hybrid vehicle technology. Hybrids have been available in the U.S. market for years and consistently meet consumer mobility needs. For example, hybrids allow drivers to switch between ICE and electric driving modes. These technologies also perform well in the commercial vehicle sector and are available for deployment in appropriate use cases. Hybrid technologies capitalize on both company and infrastructure investments. Overall, hybrids play an important role as a flexible driving option for consumers.
- *Hydrogen Internal Combustion Engines (H2ICE):* MEMA members have advanced next-generation ICE technologies, including hydrogen internal combustion engines (H2ICE). This is promising technology that is technically feasible for both light and heavy-duty applications. The manufacturing technology and workforce skills needed for H2ICE may be adapted from currently available ICE manufacturing footprints.
- *Battery Electric Investments*: MEMA members manufacture EV batteries and other powertrain related components. Suppliers have made significant investments t6o make possible the continued electrification of the vehicle fleet. The proposed removal of GHG standards could make it difficult for suppliers and their customers to reduce the costs associated with these technologies, due to reduced production volumes. This could reduce the competitiveness of U.S. prices for these technologies, especially compared to global competitors.
- *Lightweighting and aerodynamic advancements:* Suppliers continue to invest in materials and process technologies to achieve higher strength and more durable products at a lower weight. Lightweighting is an important part of the overall strategy for improving vehicle emissions performance. The use of lighter weight materials (high strength steel, aluminum, plastics, polymer composites, carbon fiber, magnesium, etc.) and designs- otherwise known as mass reduction or lightweighting- continues to be a cost-effective strategy to increase trucking efficiency and reduce emissions. Lightweighting also includes the unsprang mass of suspension and brake components as well as, but not limited to, wheels which are suited for all powertrain options and eligible for credit under previous emissions programs.
- *Tire and Braking advancements:* New technologies such as automatic tire inflation, load-based tire inflation and low-rolling resistance increase vehicle efficiency and improve emissions outcomes.
- *Software efficiency technologies:* Suppliers also offer software efficiency features that control shifts and propulsion for vocational heavy-duty cycles.

EPA should recognize the widespread impact of supplier-led technologies and the importance of balancing regulatory goals with market realities. In evaluating future standards, EPA must reinforce the strength of the U.S. motor vehicle industry, sustain U.S.

technological leadership, expand consumer choice, and reduce the total cost of vehicle ownership.

6. Consistent Regulatory Leadership Supports Investment and Innovation

MEMA appreciates the opportunity to provide feedback on this critical rulemaking. MEMA and the supplier industry share the Administration's objective to enhance domestic manufacturing, strengthen U.S. leadership in advanced emissions-reducing technologies, and support long-term economic growth. The supplier industry plays a central role in driving innovation, creating jobs, and delivering investment, and MEMA is proud of its members' substantial footprint within the U.S. manufacturing sector.

The motor vehicle supplier industry is at a critical juncture, with substantial investments and R&D into advanced emissions-reducing technologies to meet both GHG and criteria pollutant standards. Preliminary survey results from MEMA members demonstrate the risks posed by eliminating national GHG standards, including reduced competitiveness for U.S. suppliers, significant cuts in R&D investment, and decreased domestic manufacturing activity.

Suppliers emphasize the need for a stable, feasible, technology-neutral regulatory framework that prevents market fragmentation, ensures long term business planning, and encourages further innovation. The industry has significant reliance interests in the continuation of national GHG standards. The supplier industry requires the stability of a national program to sustain U.S. leadership in technology development and to promote further investments that strengthen the U.S. supplier manufacturing sector. Alignment with international standards, where appropriate and feasible, could also enhance global competitiveness and open new market opportunities for U.S. suppliers.

MEMA member companies have also provided specific technical feedback in the Appendix to ensure that EPA's regulations remain clear, feasible, and effective. Addressing certification and compliance challenges will reduce unnecessary costs, preserve customer choice, and support the deployment of advanced technologies.

MEMA respectfully suggests that EPA consider implementing national GHG standards at a feasible level that ensures regulatory stability, sustains domestic investment, and maintains the global competitiveness of U.S. suppliers.

MEMA welcomes the opportunity to continue working with EPA as this proceeding moves forward. For any questions concerning these comments, please contact Jennifer Lewis, Vice President of Regulatory Affairs at jlewis@mema.org or Emily Sobel, Senior Manager of Regulatory Policy at esobel@mema.org.

Appendix- Technical Feedback

For over two decades, federal certification of heavy duty hybrid systems has relied on engine dynamometers due to the high cost and low availability of chassis dynamometers capable of certifying vehicles of this size. EPA should ensure that regulatory language clearly defines the scope of components included in certified configuration. This clarity is critical to differentiate certification types at the vehicle or dynamometer level to meet the standards.

Powertrain testing provides another pathway for manufacturers to certify to a lower family emissions limit (FEL) and earn emissions credits. However, if the engine is capable of criteria pollutant emissions control without hybrid components, the engine manufacturer should only be required to warrant the components needed to control their criteria emissions control components. Forcing manufacturers to include hybrid components into heavy duty powertrain certification could increase development costs as well as per-vehicle costs for vehicle types such as the hybrid bus. This unnecessary burden could ultimately reduce the availability of diesel hybrid bus options for transit agencies beginning in Model Year (MY) 2027 and undermine the cost-effectiveness of hybrid technologies.

MEMA urges EPA to clearly define the certification and in-use compliance responsibility for ICE and RESS components and systems at the vehicle (1037) and component levels (1036). Precise assignments are critical to avoid ambiguity or overlapping language that create uncertainty and add complexity. Greater clarity will reduce compliance costs and preserve the availability of heavy-duty vehicles. For specific recommendations,

For HD applications that certify emissions control technology at the Tier 1 component level on engine or powertrain dynamometer, 1036 certification best aligns with manufacturer responsibility. However, limited provisions in 1037 enable late-stage application-specific integration for specialized commercial vehicle applications. Some in-use compliance provisions should be retained at the vehicle level – 1037 recommendations below reflect this approach.

For HD applications that certify emissions control technology at the vehicle chassis level or bodybuilder level, 1037 certification best aligns manufacturer in-use responsibility. Light duty vehicles typically certify at chassis level due to better availability of chassis dynamometers for vehicles of this size. Alternatively, heavy duty manufacturers certify to much lower volumes.

The diagnostic requirements of 40 CFR 1036.110, and the references to the EPA 2023 adoption of California Code of Regulations (CCR) 1971.1 in 40 CFR 1036.810 are unclear. EPA should provide clarifying language on its position that HD hybrids that are not a component of engine criteria emissions certification.

1036.101 Overview of Exhaust Emissions Standards

The EPA redline only proposed a revision to 40 CFR 1036.101(a), to remove GHG references to engine certification but did not propose any changes to 40 CFR 1036.101(b). EPA should add language to 1036.101(b) that clarifies the intended incorporation by reference in 1036.810 for CARB 1971.1 to match EPA's position that diagnostics for hybrid components are only required if hybrid components are optionally certified with the engine through powertrain testing. Proposed language could be added to the end of 40 1036.101(b) echoing language EPA previously included in the EPA GHG Phase 2 preamble to clarify OBD and emissions control boundaries for manufacturer accountability and preserve hybrid bus options that end users want to have available through federal certification:

> ***40 CFR 1036.101(b)*** *"You may optionally demonstrate compliance with the emission standards of this part by testing hybrid powertrains, rather than testing the engine alone. Except as specified, provisions of this part that reference engines apply equally to hybrid powertrains. Diagnostic requirements apply for engine systems or components; as such, we generally apply those diagnostic requirements to hybrid powertrain systems and components only if the engine manufacturer includes those features or parameters as part of the certified configuration for their engines."*

Section 1036. 301 Selective Enforcement Audit: Since the proposed redline removes the language referencing fuel maps from engines and powertrains that are part of the GEM model for vehicle GHG certification, a better wording to clarify the intent towards criteria pollutant emissions control certified systems would be ***"SEA apply for certified engine and powertrain configurations"*** without these added words the SEA is overly broad and could be interpreted to expand the scope of enforcement for criteria pollutants beyond the certified configuration with some inflationary risk in vehicle costs.

Section 1036.801: The definitions provided in the redline should reinforce the scope of criteria pollutant emissions control systems and components in heavy duty, low volume application-specific technology.

- MEMA appreciates the broad definition of "**hybrid"** because it reflects a technology neutral approach. However, additional verbiage is needed to specify the scope and obligations for certification of hybrid systems for criteria emissions control.
- Hybrid powertrain certification should be retained as an option to certify emissions control or earn NOx credits. However, if emissions control is established only on engine and aftertreatment components on an engine dynamometer, then hybrid components should do not need to be included in the system that controls the vehicle and engine performance within the FEL. ***"The provisions in this part that apply to hybrid powertrains apply equally for hybrid engines, ~~except as specified~~ if it is certified as part of the criteria pollutants control system."***

- 40 CFR 1037.105(h) should be retained to ensure EPA can maintain a reasonable level of flexibility in their approach to hybrid certification for low volume applications that nurture innovation at the end use level, tailored to specific heavy duty vehicle applications that have high performance needs to maintain infrastructure and public services. This flexibility could be useful for criteria pollutant certification requirements.

Section 1037.205: Sections of the redline copy include language concerning vehicle application for certification, including requirements for vehicle RESS components that are needed to charge the system, store energy, and transmit power to move the vehicle. The proposed wording could create some overlap and uncertainty in certification scope and emissions control warranty between vehicle and Tier 1 component manufacturers since RESS components are also included in 40 CFR 1036.

Section 1037.540: The language regarding special procedures for testing vehicles with hybrid power takeoff should be retained. This technology fits some used to build and maintain infrastructure and reduce emissions during stationary use.

Section 1037.610: Language regarding vehicles with off cycle technology should be partially retained so that A to B testing can be completed on vehicles for criteria emissions reductions technology applied at the vehicle level.

Section 1037.621: The language regarding delegated assembly should be retained for hybrid components for power take off that can reduce criteria emissions pollutants with components that are applied at a vehicle level.

Neutral-Idle Redline/ Technical Comment

Section 1036.415: Some of the proposed language regarding "adjustable" and "not adjustable" neutral idle could lead to confusion about allowable overrides for idle reduction technologies that were previously required to be "tamper resistant." **Some elements of the current language in 1037.660 should be retained** to clarify idle reduction timers, allowable override conditions, and the definition of idle reduction system "tamper-resistance" as preventing vehicle owners, dealers, or other service outlets from adjusting the threshold inactivity period. "Adjustable" and "non-adjustable" language in 1036.415 is insufficiently clear.

Response to EPA request for comments to avoid impact on EPA Criteria Pollutant program

The HD Low NOx/PM standards are critical to keeping domestic manufacturers at the forefront of innovation for emissions control technology. It is critical that these existing standards are maintained for regulatory stability to ensure that domestic suppliers remain competitive.

The EPA HD Low NOx standards, test and certification procedures are important for harmonized criteria emissions standards across all markets that adopt U.S. vehicle standards. The certification and test procedures for conventional and hybrid vehicles should verify the emissions control systems are sufficiently robust for real-world applications. This will

encourage R&D for application-specific needs, providing cost-efficient compliance options that best fit the end-users mission, infrastructure, environment, and productivity.

- Section 1037.401: Language regarding the general provisions should be retained to allow in-use testing at the vehicle level, which is needed for enforceability of criteria pollutant standards in the field.
- Section 1037.655: Language concerning post useful vehicle modifications should be retained to avoid higher criteria emissions on older vehicles.