



March 18, 2026

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: MEMA Position on Status of: *Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards*, Docket ID No. EPA–HQ–OAR–2019–0055

Dear Administrator Zeldin:

On behalf of MEMA, The Vehicle Suppliers Association (MEMA), representing over 900 member companies across the motor vehicle supplier industry, we welcome the Administration's focus and support for domestic manufacturing in the United States. As the largest sector of manufacturing jobs in the United States, encompassing more than 932,000 employees, vehicle suppliers are an intrinsic part of the industrial backbone of the United States.

MEMA is also the leading trade association in the U.S. for heavy-duty commercial vehicle suppliers, so the impact of the final rule titled *Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards (HD NOx Final Rule)* is especially impactful to our members. A recent MEMA national employment study found that U.S. employment in the medium- and heavy-duty commercial vehicle supplier sector has increased by 5.6% since 2019.¹ Suppliers have developed and commercialized technologies to meet the standards articulated in the *HD NOx Final Rule*. Further, commercial vehicle parts manufacturers have made significant investments to ensure readiness to fulfill the requirements. Any significant delay or changes to the implementation of the rule's requirements, including the provision of a non-conformance penalty option, would disrupt deployment and introduce unnecessary uncertainty. As previously stated by the supplier industry, the HD NOx standards as finalized provide an important pathway for technological deployment.

We appreciate EPA's willingness to engage with the supplier industry, incorporate stakeholder feedback, and ensure that the motor vehicle industry remains globally competitive. MEMA's continued position is as follows:

- MEMA members are ready to meet the standards and do not support significant changes to the final rule so close to implementation. This rule has provided a pathway and certainty for commercial vehicle suppliers. It is essential that this stability be maintained.

¹ MEMA, Employment Study, December 2024.

- The extended warranty and useful life provisions have caused uncertainty regarding cost and represent a significant and disproportionate burden on suppliers. MEMA has consistently raised concerns that these provisions create material long-term financial exposure, particularly given the complexity of forecasting durability performance and warranty risk years in advance of full real-world deployment. These are significant concerns for suppliers, a point which MEMA clearly conveyed in our May 2022 response to the proposed rule,² and in subsequent meetings with the Agency. MEMA respectfully asks EPA to amend the rule to preserve the current warranty and useful life provisions and framework.

Suppliers made these investments years earlier in the regulatory cycle based on the certainty provided by the finalized rule. Changes to the implementation structure at this stage would shift risk from fleets to the manufacturing sector that has already developed and deployed compliant technologies, effectively penalizing suppliers that invested early.

As EPA considers targeted changes to provide industry with flexibility, MEMA urges the Agency to focus such changes on the warranty and useful life provisions, which impose a regulatory burden on industry, and are the primary source of added costs and uncertainty. MEMA previously cautioned EPA that the warranty and useful life provisions were not realistic and would impose a heavy burden on the industry. For example, the final rule increases the emission-related warranty period for heavy-duty engines from five years and 100,000 miles to 10 years and 450,000 miles.³ Similarly, the useful life period for this service class will increase from 435,000 miles to 650,000 miles.⁴ These large-scale changes would harm the competitive posture of the U.S. commercial vehicle supplier sector. Absent such revisions, these provisions risk undermining supplier investment and long-term participation in advanced emissions technology deployment.

The associated costs of parts replacement are nearly always borne by suppliers and are embedded in supplier-customer contracts. These costs include the costs associated with the part, replacement parts, labor, expenses for disassembling the machinery, reassembly, and towing the vehicle. Because suppliers must estimate these expenses years in advance - often without access to real world durability data - the extended warranty and useful life provisions scheduled for implementation with MY 2027 have imposed additional pressures on suppliers and impeded proper business planning.

MEMA would welcome the opportunity to work with EPA to properly refine these specific provisions in the rule and to address the challenges that negatively impact the industry regarding cost, technology valuation, and potential accruals, while maintaining the necessary momentum to increase manufacturing jobs and investment in the United States. Accordingly, MEMA respectfully requests that EPA maintain the current warranty and useful life provisions and

² MEMA, The Vehicle Suppliers Association. Comments to the Environmental Protection Agency. Request for comment on Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards. Docket No. EPA-HQ-OAR-2019, 5 FRL-7165-03-OAR. May 2022.

³ Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards, 88 Fed. Reg. 4,307 (final rule) (January 24, 2023) (Table I-3- Current and Final Useful Life Periods for Heavy-Duty CI and SI Engines.).

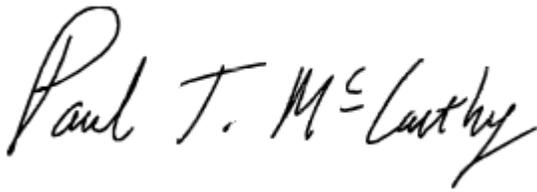
⁴ Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards, 88 Fed. Reg. 4,308 (final rule) (January 24, 2023) (Table I-4- Current and Final Emission-Related Warranty Periods for Heavy-Duty CI and SI Engines Criteria Pollutant Standards.).

framework while providing additional guidance to help suppliers plan for implementation.

Thank you for your consideration of MEMA's perspective. Suppliers stand ready to partner with EPA to address the uncertainty caused by the extended warranty and useful life provisions and ensure smooth implementation of the HD NOx standards.

We are eager to work with the Administration to improve opportunities for American workers and enable companies investing and operating in the United States to compete and lead on the global stage.

Sincerely,

A handwritten signature in black ink that reads "Paul T. McCarthy". The signature is written in a cursive, flowing style.

Paul McCarthy

President and CEO

MEMA. The Vehicle Suppliers Association

Cc: Aaron Szabo, Assistant Administrator, Office of Air and Radiation
Abbie Tardif, Principal Deputy Administrator, Office of Air and Radiation
Alexander Dominguez, Deputy Assistant Administrator, Mobile Sources, Office of Air and Radiation
William Charmley, Director, Assessment and Standards Division, Office of Transportation and Air Quality
James Sanchez, Assessment and Standards Division, Office of Transportation and Air Quality
Jessica Brakora, Assessment and Standards Division, Office of Transportation and Air Quality