



October 22, 2025

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

Re: Vehicle Supplier Position on "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 the vehicle supplier industry, MEMA, The Vehicle Suppliers Association, welcomes the Administration's focus on 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 appreciates EPA's willingness to engage with the supplier industry, incorporate stakeholder feedback, and ensure that the motor vehicle industry remains globally competitive.

MEMA would like to share the supplier industry's perspective on the final rule titled *Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards*.

- Suppliers 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.
- The extended warranty and useful life provisions have caused uncertainty regarding cost and are a significant concern for suppliers, a point which was clearly conveyed in MEMA's May 2022 response to the proposed rule, and in subsequent meetings with the Agency under the prior Administration.¹ MEMA asks EPA to amend the rule in order to allow for the preservation of the current warranty and useful life provisions.

Concerning the commercial vehicle sector, 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 2019.² Suppliers have developed and commercialized technologies to

¹ 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.

² MEMA Employment Study- December 2024.

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 in the implementation of the rule's requirements would disrupt deployment and introduce unnecessary uncertainty.

However, vehicle suppliers in the heavy-duty sector would welcome EPA's leadership in providing additional clarification and changes to the extended warranty and useful life provisions accompanying this rule. MEMA had cautioned EPA in its May 2022 formal comments to the docket 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 heavy-duty engines from five years and 100,000 miles to ten 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.

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 and its membership would welcome the opportunity to work with EPA to properly refine these specific provisions in the rule and to fix the problems that would negatively impact the industry with regard to 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 framework while providing additional guidance to help suppliers plan for implementation.

MEMA Background

Established in 1904, MEMA is the leading trade association in the U.S. for vehicle suppliers, parts manufacturers, and remanufacturers. MEMA's members design and manufacture the technology, components, and services that enable the production of new vehicles, as well as the essential maintenance and repair of the more than 295 million highway vehicles currently on U.S. roads.

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.).



The supplier industry is an essential part of the U.S. economy, directly employing more than 930,000 individuals. Overall, the supplier industry has added 61,000 jobs across the country since 2015. Additionally, suppliers indirectly support 4.8 million jobs in related sectors. Suppliers operate facilities in all 50 states and in more than 350 Congressional districts, with significant concentrations in the Midwest and Southeast. The sector's broad array of businesses and professional backgrounds reflects the dynamic, innovative nature of the industry. MEMA reiterates its support for the Administration's goal of strengthening domestic manufacturing and urges EPA to consider the specific impact of this rule on the vehicle parts manufacturing community and the thousands of American workers that constitute this critical sector of the economy.

Conclusion

Thank you for your consideration of the supplier industry's perspective. MEMA stands ready to work with EPA to address the uncertainty caused by the extended warranty and useful life provisions and ensure smooth implementation of the HD NOx standards. MEMA is eager to partner 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 "Bill Long". The signature is fluid and cursive, with the first and last names being clearly legible.

Bill Long
President and CEO
MEMA, The Vehicle Suppliers Association

Cc: Aaron Szabo, Assistant Administrator, Office of Air and Radiation
Abigale 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