



March 18, 2026

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

Re: Supplier Industry Position on Implementation of the Heavy-Duty NOx Rule
(*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:

As leaders of the vehicle supplier associations representing over 900 member companies, including a broad cross-section of companies supporting the commercial vehicle sector, MEMA, The Vehicle Suppliers Association (MEMA), Manufacturers of Emission Controls Association (MECA) and Alliance for Vehicle Efficiency (AVE) appreciate the Administration's focus on strengthening domestic manufacturing and ensuring that emissions regulations are implemented in a way that supports American industry and technological leadership 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. Vehicle suppliers represent a critical component of the U.S.'s manufacturing base, investing billions of dollars in advanced technologies that improve vehicle performance and environmental outcomes. Our members have made substantial investments to design, develop, and commercialize the technologies necessary to meet the requirements of the final rule titled *Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards*.

The supplier industry has worked closely with vehicle manufacturers and regulators to prepare for implementation of the MY2027 heavy-duty NOx standards. Based on these investments and the progress made to date, suppliers remain committed to supporting implementation of the rule and believe that maintaining regulatory certainty is critical to ensuring continued investment, innovation, and deployment of advanced emission control technologies.

For this reason, we believe the proposals to significantly alter the rule's implementation structure at this stage, including the introduction of non-conformance penalties or substantial

expansions of credit flexibilities, would introduce unnecessary uncertainty into the market and undermine the significant investments that have already been made across the supply chain. Introducing mechanisms that allow the continued sale of engines that do not meet finalized standards risks distorting the competitive landscape and delaying the deployment of advanced emission control technologies that suppliers have already invested heavily to timely deliver. Suppliers made investments years earlier in the regulatory cycle. If the implementation structure changes now, it shifts the risk from fleets to the manufacturing sector that has already built the technology, essentially penalizing the vehicle suppliers who invested early.

While suppliers support the regulatory framework and emissions standards established in the final rule, we have consistently raised concerns regarding the extended emissions-related warranty and useful life provisions. These provisions introduce substantial long-term cost exposure and planning challenges for suppliers, particularly given the complexity of forecasting durability performance and warranty risk years in advance of full real-world deployment.

Suppliers respectfully request that EPA continue its engagement with industry stakeholders to evaluate these provisions and consider targeted refinements that address the practical implementation challenges they create, while preserving the overall regulatory structure and emissions objectives of the rule.

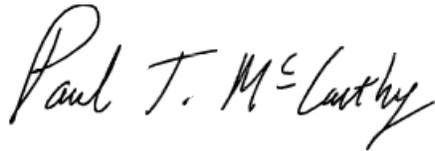
We believe that maintaining stability in the core regulatory framework, while thoughtfully addressing areas that create unintended burdens, will support continued investment in U.S. manufacturing, ensure technological progress, and enable a smooth transition to the next generation of heavy-duty emissions technologies.

MEMA, MECA, AVE and our collective 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.

Thank you for your continued leadership and consideration of the supplier industry's perspective.

Suppliers stand ready to partner collaboratively with EPA to support successful implementation of the heavy-duty NOx standards, address the uncertainty caused by the extended warranty provisions, and ensure that American manufacturers remain globally competitive while delivering meaningful environmental progress.

Sincerely,



Paul McCarthy
President and CEO, MEMA. The Vehicle Suppliers Association



Rasto Brezny
Executive Director, MECA, Supplying Clean Mobility



Lee Janger
Executive Director, Alliance for Vehicle Efficiency

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
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