

**STATEMENT OF THE
MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION
ON THE
PROPOSED CHINA TECHNICAL SPECIFICATIONS OF REMOTE EMISSION
SUPERVISION SYSTEM FOR HEAVY-DUTY VEHICLES**

May 28, 2020

The Manufacturers of Emission Controls Association (MECA) enthusiastically supports MEEs leadership in proposing technical specifications for remote emission supervision systems on heavy-duty vehicles. We believe this is an important step in ensuring that emission control systems are operating properly in real time and emission standards are being met in the real world and not just during certification or compliance testing in the laboratory.

MECA is an industry trade association of the world's leading manufacturers of clean mobility technology. Our members have nearly 50 years of experience and a proven track record in developing and commercializing emission control, efficiency and electric technology for a wide variety of on-road and off-road vehicles and equipment in all world markets. Our members provide the technologies that enable heavy-duty on-road vehicles to meet the most stringent NOx and PM emission standards as well as electrification and all-electric technologies that reduce emissions of all pollutants, criteria and climate, and allow vehicles to be the cleanest possible. This includes exhaust and engine sensors, OBD controllers, telematics and other components of an on-board monitoring system. Our industry has played an important role in the environmental success story associated with light- and heavy-duty vehicles in the United States and has continually supported efforts to develop innovative, technology-advancing, regulatory programs to deal with air quality and climate challenges.

We believe that on-board monitoring and real time reporting will become a critical component to ensuring real world emission compliance of vehicles. We continue to believe that certification should include both laboratory testing and on-the-road confirmatory testing and on-board monitoring to serve as a compliance tool and not replace certification testing in the lab but to complement dynamometer testing. MECA members are continuing to develop more accurate sensors with increased durability for reliable data reporting. Manufacturers continue to improve the telematics capabilities that are already being used on new trucks for reporting maintenance related information to fleet managers to keep trucks on the road longer. New sensors will be developed in the future to ensure that vehicles aren't tampered and emission controls not defeated. We support MEE's consideration of anti-tampering security for the OBM system including security and encryption protection within the OBM system. This is a critical element in an effective OBM control architecture.

MECA believes that sensor and telematics technology is amenable to retrofitting on in-use vehicles to address compliance among a greater portion of the fleet to accelerate implementation of the technology. Retrofitting these devices on to existing vehicles will not interfere with the normal operation of the engine and is an efficient way to perform real time inspection and maintenance of trucks to ensure repairs are done quickly to minimize the emissions.

In conclusion, MECA commends MEE's leadership in demonstrating how remote emissions monitoring can be a reality by taking the first steps to set specifications for the technology that will reduce emissions of criteria and climate pollutants in the real world. The heavy-duty transportation sector is responsible for a major portion of China's emissions inventory, and these emissions are forecast to continue increasing, reflecting the anticipated impact of factors such as economic growth, increased movement of freight by trucks, ships, and rail, and continued growth in personal travel. There are significant opportunities to continue to reduce pollution from medium- and heavy-duty engines and vehicles through the application of innovative technologies such as sensors and telematics.

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