

**COMMENTS OF THE
MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION
ON U.S. ENVIRONMENTAL PROTECTION AGENCY'S PROPOSED
IMPROVEMENTS FOR HEAVY-DUTY ENGINE AND VEHICLE TEST
PROCEDURES, AND OTHER TECHNICAL AMENDMENTS
EPA-HQ-OAR-2019-0307**

June 26, 2020

The Manufacturers of Emission Controls Association (MECA) would like to provide supportive comments on the U.S. Environmental Protection Agency's (EPA) proposed rulemaking to improve heavy-duty engine and vehicle test procedures as well as other technical amendments. We support EPA's ongoing work to revise test procedures to most accurately characterize GHG emissions in the certification of engines and powertrains. MECA appreciates EPA's consideration of feedback from suppliers of electrified technologies that was provided during this regulatory development process.

MECA is an industry trade association of the world's leading manufacturers of clean mobility technology. Our members provide the technologies that enable all mobile sources 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 engines, vehicles and equipment to be the cleanest possible.

In addition to supporting the proposed revisions to test procedures and other technical amendments, MECA suggests that EPA consider that suppliers will need to conduct testing in accordance with EPA's revised requirements for hybrid and electrified powertrain systems. Therefore, it is important during implementation that the regulatory language does not hinder suppliers from conducting development testing due to lack of access to proprietary software and/or other constraints specifically referenced by the test procedures. Furthermore, we suggest that EPA remain flexible during the certification process when new technologies in the hybrid and electrified powertrain space are identified by suppliers and OEMs, especially if these may not be cost-effectively tested via the current proposed requirements. For example, technologies not envisaged by the current amendments may face hurdles when trying to conduct testing according to the required test procedures. In those instances, we request that EPA staff remain open to reviewing alternative test procedures with OEMs and suppliers for new and emerging technologies with limited initial sales.

In conclusion, MECA supports EPA's continued efforts to improve accuracy and reduce testing burden, increasing compliance flexibility, and streamlining regulations as they pertain to electrified powertrain certification requirements. MECA members are developing the electrified components in order to provide solutions for their customers to meet climate and fuel economy goals.

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