

**STATEMENT OF THE
MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION
ON THE AIR RESOURCES BOARD'S
PROPOSED EVALUATION PROCEDURES FOR AFTERMARKET CRITICAL
EMISSION CONTROL PARTS ON HIGHWAY MOTORCYCLES**

January 22, 2009

MECA is pleased to provide testimony in support of ARB's proposed exemption procedures for emissions critical aftermarket parts for highway motorcycles. We believe that the proposal presents a balanced, fair, and flexible approach that will ensure that in-use motorcycles, even if customized, deliver the same hydrocarbons (HC) and nitrogen oxide (NOx) emissions as intended from new original equipment manufacturer equipped (OEM) motorcycles.

MECA is a non-profit association of the world's leading manufacturers of emission control technology for motor vehicles. Our members have over 30 years of experience and a proven track record in developing and manufacturing emission control technology for a wide variety of on-road and off-road vehicles and equipment. This includes supplying reliable aftermarket replacement converters for passenger cars in California and across the country. A number of our members have extensive experience in the development, manufacture, and application of three-way catalyst technologies to enable new light-duty vehicles to meet existing LEV II and Tier 2 emission standards and new Class III highway motorcycles to meet California's Tier 2 standards that went into effect in 2008.

MECA and our members have a long history of cooperative interaction and a strong working relationship with ARB in developing replacement converter regulations. MECA has supported ARB's passenger car, aftermarket regulatory developments for over 20 years dating back to the original regulations for replacement converter certification in California in August of 1988. Our members worked closely with ARB staff prior to the 2007 Board decision to amend the aftermarket converter regulations to require the sale of OBD compliant aftermarket replacement converters in California and advance the level of emissions control technology to be fully compatible with diagnostic systems on in-use, OBD-II equipped vehicles. Throughout the entire history of ARB's aftermarket converter activities, MECA members have provided converter samples to ARB staff to facilitate their understanding of the performance and durability of aftermarket converter technologies.

Our members have invested and continue to invest significant resources in developing, optimizing and commercializing advanced emission control technologies to enable new and in-use motor vehicles to meet the most stringent standards for emissions. The technology to reduce emissions from Class III highway motorcycles is based on automotive-type, three-way catalyst closed-loop technology. This technology has been used on well over 300,000,000 automobiles with outstanding results. The tighter emission standards and durability requirements for new light-duty vehicles required by California's LEV II and the Federal Tier 2 regulations have led to significant advances in three-way catalyst performance and durability. To meet durability requirements for new catalysts that range from 120,000 to 150,000 miles, catalyst manufacturers

have developed technologies based on more thermally durable materials. Significant improvements in three-way catalyst system performance for aftermarket converters have been achieved by readily available catalyst design changes and optimizations that more closely approach the catalyst designs used in modern light-duty automobiles. These design changes include the use of high performance catalyst formulations with layered catalyst architectures and the latest oxygen storage promoters, larger catalyst volumes relative to the engine displacement, and the use of higher cell density metallic or ceramic substrates. These advances result in catalysts that can survive high temperature exposure and deliver the required performance over a longer useful life. These new materials and technologies have been applied to existing OBD II compliant aftermarket converters sold in California to meet the 5 year, 50,000 mile warranty requirement and can easily be incorporated into motorcycle aftermarket exhaust systems to deliver the 30,000 km durability requirement.

Three-way catalyst technology has been successfully applied to 87% of new, highway motorcycles sold in California since 2008. In most cases, the catalyst technology can be cost effectively incorporated directly into existing muffler designs. Because up to 85% of new motorcycle exhausts are modified before the end of their original warranty period expires, the proposed regulation is necessary to ensure that aftermarket emissions-related parts for motorcycles meet the same emissions and durability requirements as OEM parts in order to deliver the emission reductions intended from the in-use highway motorcycle fleet. Adoption of this proposal can potentially eliminate up to 6.8 tons per day of HC+ NO_x emissions from just the 2008 fleet of Class III motorcycles over their full useful life. The proposed regulation will ensure that highway motorcycles continue to have low emissions throughout their lifetime. We believe that the exemption guidelines outlined in this proposal are important to insure that aftermarket exhaust systems can be legally sold in California and achieve the highest standards of quality and performance so as not to increase emissions.

In closing, we commend the Air Resources Board for its continuing efforts to provide the people of California with healthy air quality and for demonstrating true leadership in continuing to develop innovative emissions regulations. Adoption of the current proposal will significantly reduce HC and NO_x emissions from existing Class III highway motorcycles operating in the State. We also wish to thank the ARB staff for its willingness to work closely with all interested parties throughout the development of this proposal. Our industry pledges its continued support and commitment to ensure that the technologies are available to ensure that highway motorcycles whose exhaust systems are modified do not increase emissions.

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