



March 5, 2004

Ms. Margo Oge
Director
Office of Transportation and Air Quality
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Margo:

EMA and its members have read EPA's recently released *Highway Diesel Progress Review Report 2*. I would like to offer you some comments regarding the Report's conclusions on engine manufacturer readiness for 2007.

Consistent with their public statements, the major engine manufacturers have finalized their designs for 2007 engines, or they are on target to do so shortly. As such, manufacturers' efforts are now fully focused on delivery of products that not only meet the 2007 standards, but that also meet their customers' expectations. Manufacturers are committed to having a reasonable number of prototype engines for truck customer on-road testing in 2005. And, manufacturers are on track to complete emission certification in 2006 and produce complying engines for the 2007 model year.


As you know, EMA members participated with the trucking and fuel industries in the 2002 Clean Diesel Independent Review Panel's assessment of progress towards meeting the 2007 emission standards. Engine manufacturers identified the tremendous resources committed to meeting the 2007 emission standards, and the considerable technical challenges that remained. They also reported the rapid progress being made, and agreed with the Panel that it was too early to suggest that compliance wasn't possible. Today, engine manufacturers have more confidence and certainty in their ability to comply with the 2007 standards than they had two years ago during the Panel process.

Finally, as we have said on a number of occasions, our success in meeting 2007 emission standards is dependent on several factors not under our control. For example, as EMA has stated a number of times, without <15 ppm sulfur diesel fuel being available as required in the rule, the 2007 program will not be a success. Similarly, the imposition of a new on-board diagnostics program for 2007 implementation, or a new manufacturer run in-use test program, which is not consistent with our discussions with EPA and the California Air Resources Board, would unacceptably broaden the scope of compliance complexity and could change our views about 2007 compliance.

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If you have any questions, please feel free to contact me.

Very truly yours,



Jed R. Mandel

cc: Alan C. Lloyd, PhD
Chairman, CARB