



**Manufacturers of Emission Controls Association**

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March 15, 2004

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

Dear Margo:

The Manufacturers of Emission Controls Association (MECA) is writing to provide our comments on the recently released *Highway Diesel Progress Review Report 2*. MECA believes the report provides a very thorough and balanced analysis that accurately assesses the continuing, rapid progress in developing the technologies and strategies that will be used to meet the 2007 regulations.

As you aware, MECA is a non-profit association made up of the world's leading manufacturers of mobile source emission controls. MECA member companies have over 30 years of experience and a proven track record in developing and commercializing exhaust emission control technologies. A number of our members have extensive experience in the development, manufacture, and commercial application of emission control technologies for diesel engines. MECA members contributed technical information for the EPA report and MECA participated in the Clean Diesel Independent Review Panel in 2002.

Progress toward the 2007 requirements is extremely impressive and is exceeding the level of progress predicted at the time of the last EPA progress review. Recent successful advances made by MECA members is a direct result of their strong commitment which includes their ongoing investment of over \$1.8 billion for developing, optimizing, and commercializing advanced diesel engine emission control technologies. For example, in 2002 few predicted that as soon as early 2004, engine companies would have a viable filter management strategy in place, but that is exactly what has occurred. With filter technology, the focus now is principally on optimization and cost reduction. On the engine side, few predicted in 2002 that engine companies would be able to meet the 2007 interim NO<sub>x</sub> targets without advanced exhaust emission control. As pointed out in *Report 2*, most of the engine companies have indicated their 2007 strategies will be hitting the NO<sub>x</sub> targets with incremental changes in engine hardware and engine management systems.

The engine manufacturers, as well as our industry, are committed to provide products that address the needs of the ultimate customers, principally the trucking industry and to be responsive to the trucking industry's expressed concerns. For example, based upon the calls of the American Trucking Association last summer for 18 months or more of fleet testing prior to 2007 purchases, many of our members' customers accelerated their product development schedules by up to six months to ensure this could happen. Our members companies are partnering with the various engine manufacturers to deliver the vehicles for fleet testing on this schedule. Given the healthy competition in the market place and the great technical progress being made, we believe this schedule will be met.

MECA does not believe another independent technical review is needed between now and 2007. The progress in meeting the 2007 requirements is clearly on track and in many regards is ahead of schedule. Conducting an additional independent review at this time is unmerited and only serves to create needless uncertainty regarding the timely implementation of the 2007 regulations. Any uncertainty created could in turn discourage the expenditure of investments already planned to ensure that the rapid technological progress continues. We understand that EPA will continue to monitor progress in meeting the 2007 regulations and will be in regular consultation with all key stakeholders, including the engine and vehicle manufacturers, the emission control manufacturers, and the trucking industry. We believe this approach being taken by EPA is the most appropriate course of action.

In closing, we commend EPA for its comprehensive analysis of the ongoing technological progress in meeting the 2007 regulations. Our industry remains committed to do its part to ensure that the technologies need to help meet the 2007 standards will be available. If you or members of your staff have any questions, please contact me.

Sincerely,



Dale McKinnon  
Executive Director