

To: ALL MANUFACTURERS OF Mail-Out #ECCD 2020-02

- PASSENGER CARS
- LIGHT-DUTY TRUCKS
- MEDIUM-DUTY VEHICLES AND ENGINES USED IN SUCH VEHICLES
- HEAVY-DUTY VEHICLES AND ENGINES USED IN SUCH VEHICLES
- ON-ROAD MOTORCYCLES
- OFF-HIGHWAY RECREATIONAL VEHICLES
- OFF-ROAD SMALL SPARK-IGNITION ENGINES
- OFF-ROAD SMALL SPARK-IGNITION EQUIPMENT
- OFF-ROAD LARGE SPARK-IGNITION ENGINES
- OFF-ROAD LARGE SPARK-IGNITION EQUIPMENT
- OFF-ROAD SPARK-IGNITION MARINE ENGINES
- OFF-ROAD SPARK-IGNITION MARINE WATERCRAFT
- OFF-ROAD COMPRESSION-IGNITION ENGINES
- AFTERMARKET PARTS
- DIESEL EMISSION CONTROL STRATEGIES

ALL OTHER INTERESTED PARTIES

Date: May 7, 2020

Subject: POTENTIAL DELAYS IN MANUFACTURER SUBMISSION OF REQUIRED DATA AND REPORTS

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Dear Manufacturer:

The California Air Resources Board (CARB) is aware that recent stay-at-home orders, production shut downs, and laboratory closures may be having an impact on manufacturers' ability to generate and submit compliance information required by California regulations for new vehicle/engine certification, on-board diagnostics, in-use programs, warranty reporting, and aftermarket parts. While all applicable reporting requirements continue to remain in effect, the purpose of this correspondence is to advise manufacturers of steps to take should manufacturers fail to timely complete or submit any CARB-required data submissions or reports. CARB will use the submission to inform its exercise of enforcement discretion on a case-by-case basis based on the facts.

For any required data or reports that cannot be submitted by the applicable deadline due to circumstances outside of the manufacturers' control, such as stay-at-home orders, manufacturers should submit the portion of the report or data set that can be prepared by the applicable deadline and/or submit a placeholder document that explains, in detail, the manufacturer's inability to report the remaining compliance information to the appropriate CARB information system (e.g., Document

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Management System) by the deadline. Manufacturers should additionally designate a representative and provide supporting documentation, including any information about the reason for the delay, such as the circumstances. Manufacturers may also contact their appropriate CARB representative for questions, or to further explain extenuating circumstances or other relevant details related to their compliance information submittals. This letter does not waive any regulatory requirements, and manufacturers should plan to complete all required testing and reporting as soon as circumstances allow.

Questions may also be directed to the following:

- New vehicle/engine certification: Ms. Jackie Lourenco, Chief, New Vehicle/Engine Programs Branch, at (626) 450-6152 or [Jackie.Lourenco@arb.ca.gov](mailto:Jackie.Lourenco@arb.ca.gov)
- In-use and warranty programs: Ms. Sharon Lemieux, Chief, In-Use Vehicles Programs Branch, at (626) 575-7067 or [Sharon.Lemieux@arb.ca.gov](mailto:Sharon.Lemieux@arb.ca.gov)
- On-board diagnostics: Mr. Michael Regenfuss, Chief, On Board Diagnostic Branch, at (626) 575-7004 or [Michael.Regenfuss@arb.ca.gov](mailto:Michael.Regenfuss@arb.ca.gov)
- Aftermarket Parts: Ms. Kim Pryor, Chief, Aftermarket Parts Certification and Audit Branch at (626) 575-6640 or [Kim.Pryor@arb.ca.gov](mailto:Kim.Pryor@arb.ca.gov)

Sincerely,



Allen Lyons, Chief

Emission Certification and Compliance Division

cc: See next page

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cc: Todd Sax, Chief  
Enforcement Division

Jackie Lourenco, Chief  
New Vehicle Engine/Programs Branch

Mike Regenfuss, Chief  
On Board Diagnostic Branch

Sharon Lemieux, Chief  
In-Use Vehicles Programs Branch

Kim Pryor, Chief  
Aftermarket Parts Certification and Audit Branch

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