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## Updates for Mobile Source Certification and Compliance Fees Workshops

### Updates For February 20<sup>th</sup> and 21<sup>st</sup>, 2020 Workshops And Solicitation For Comments

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This notice is to provide stakeholders with updates to the material presented at the CARB Mobile Source Certification and Compliance Fee workshops held on February 20<sup>th</sup> and 21<sup>st</sup>. **The due date for comments is March 14<sup>th</sup>.**

[More Information](#)

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#### Webpage Update

The following items have been posted:

- Updates to slide 19 and an addition of a new slide (now slide 20) on the On-Road Mobile Source Certification and Compliance Fee Workshop held on February 21<sup>st</sup>, 2020.
  - Slide 19: On-Road motorcycles CARB costs per EO was added, and Light-Duty low cost values were corrected. Greenhouse Gas Phase 2 (GHG P2) and other categories are moved to a new slide.
  - Slide 20: The GHG P2 EO series and others were moved to this slide. Staff updated suggested low cost categories.
- Update of language on Slides 18 and 19 on the Off-Road Workshop held February 20<sup>th</sup>, 2020.

- Update to Slide 18 on the Aftermarket Part, Component and Retrofit Workshop held February 20<sup>th</sup>, 2020. The CARB cost for series D<sub>cat</sub>/D<sub>dpt</sub>/K category presented only included the D<sub>cat</sub> series costs. An updated cost for the combined series is now in place.

## Comments

**CARB requests comments on the following topics by March 14, 2020.** Business Information will be handled as confidential if requested, subject to limitation under the California Public Records Act ([FAQs About Accessing Public Records Maintained By CARB](#)).

### Fee Structural Components

CARB staff are focusing on the “Application Fee Concept” as the best fit for most EO series, with the caveats presented at the workshops. Please provide any suggested changes to the low cost categories and/or the limits on these categories. Please provide financial or business information supporting changes.

### Fee Costs Impacts on manufacturers

To develop fee costs, CARB requests information on financial impacts to manufacturers for fees. The current information presented are CARB’s costs for providing the certification and compliance activities. Please provide CARB with information on how these costs may affect your business and the cost of the product. Your feedback can include:

- Potential impacts of fees on the number of applications using CARB application costs as the upper bound for the new fee
- Potential impacts of fees on California production using CARB application costs as the upper bound for the new fee
- Potential impacts of fees on vehicle/equipment pricing using CARB application costs as the upper bound for the new fee. Will 100% of the fee be passed to the consumer or will your business absorb a portion of it?
- If the new certification fees are the same as the CARB application costs, how would they impact your business model?
- If the new certification fees are the same as the CARB application costs, would they create a financial hardship for your business? If so, please explain the nature of the hardship and the effect on your business.

- Are there any factors that are not currently being considered, but you believe should be considered when establishing new certification fees?

### Standardized Regulatory Business Information

CARB is conducting a formal economic review process called “Standardized Regulatory Impact Assessment” or SRIA and needs feedback on the following items.

- Are there any alternatives to the proposed new fee structure that can provide an equivalent recoupment of CARB’s application costs or a “reasonable” portion of CARB’s application costs? How would you define “reasonable?”
- Are you a small business that has never received an EO from CARB? Is the company a small business, as defined in California Government Code section 11346.3, subdivision (b)(4)(B)? Please provide your manufacturer name and address and number of employees.
- Please provide feedback on the sources of SRIA model inputs described in slide “California Production/Sales Trends by ... EO Category”.

If you would like to discuss CARB’s costs, share sensitive business economic or sales data, or coordinate a meeting to discuss alternatives, please contact [Kathleen Mead](#) at (916) 324-9550.

Please send all comments to [Kathleen Mead](#) by March 14, 2020. Also, please provide a copy to [Jackie Lourenco](#) and your series contact listed below.

<u>EO Series</u>	<u>Contact</u>
A (LD), M, U-M, U-N, U-G	<a href="#">Steven Hada</a>
A (HD), U-R	<a href="#">James Pang</a>
U-L, U-U, U-W	<a href="#">Byron Ng</a>
Q, G	<a href="#">Christopher Dilbeck</a>
RM	<a href="#">Scott Bacon</a>
B, C, D	<a href="#">Sidd Futaba</a>
AB and DE (stationary, locomotive, TRU)	<a href="#">David Quiros</a>
DE (on-road, off-road, APU)	<a href="#">Shawn Daley</a>

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