



National Marine Manufacturers Association
 1819 L Street N.W., Suite 700
 Washington, D.C. 20036
 202-861-1180 Fax: 202-861-1181 www.nmma.org

APPROVED
 Reference No. NMC-2001-007

Air Resources Board
 Mobile Source Operations Division
 Off-Road Certification/Audit Section

By [Signature]
 Title A.R. Engineer Date 8/21/01

August 14, 2001

Mr. Kumar Muthukumar
 California Air Resources Board
 Certification Section
 9528 Telstar Ave.
 El Monte, California 91731

Dear Kumar:

On behalf of the National Marine Manufacturers Association, I would like to thank you for working with us to reach a solution to the issue of the placement and replacement of marine environmental Star labels on outboard engines and personal watercraft. It is our belief that the revised label placement and replacement requirements outlined in the July 26th letter to NMMA from R.B. Summerfield provides manufacturers with the necessary flexibility, while still preserving the goals and requirements of the CARB Star label program.

In reviewing the letter, there appears to be an oversight in the paragraph discussing the allowable exception from using marked replacement labels. It is our understanding that this policy will apply to both PWC and outboard marine engines, as the same considerations apply to both. However, on this issue the letter only references PWC. We request that the letter be revised to include the following statement:


The only exception to this rule would be that, prior to sale of a PWC or outboard marine engine to the ultimate purchaser, a manufacturer may replace a damaged label with an original equipment manufacturer label. The engine identification/serial numbers of PWC and outboard marine engines that have been issued replacement labels must be made available to the ARB Executive Officer upon request.

The inclusion of this revised paragraph will clarify our understanding of the intent of this letter.

Thank you again for your efforts to date, it has been a pleasure working with you to resolve these important issues. We would like to continue working with you on a revision to the regulation that would recognize the above issues and correct other items that have been a problem for industry and staff during the initial year of the regulation.

If you have any questions, please feel free to contact me at 202-721-1604 or e-mail jmcknight@nmma.org.

Sincerely,


 John McKnight, Director
 Environmental and Safety Compliance

Cc: **R.B. Summerfield, CARB**
Alan Lyons, CARB
Bob Cross, CARB

Executive Committee	Chairman, NMMA Jack Malone Yamaha Marine Group	Vice Chairman, NMMA William Barrington Sea Ray Boat Group	Secretary, NMMA J. Marty O'Donohue MARINCO	Treasurer, NMMA Kris Carroll Grady-White Boats	Immediate Past Chairman, NMMA Gayle McClure Dutton-Lainson Co.
	Chairman, NABM David Slikkers Tiara Yachts	Chairman, AMEM Tom Fileman Flagship Marine Engine Co.	Chairman, NAMPS Robert Selig, Jr. Davis Instruments	President, NMMA Thomas J. Dammrich	

Together, making boating the #1 choice in recreation