



National
Marine
Manufacturers
Association

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Division Chief/MSOD (RBS)

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March 2, 2000

Mr. R.B. Summerfield, Chief, Mobile Source Operations Division
California Air Resources Board- Haagen-Smit Laboratory
P.O. Box 8001
9528 Telstar Avenue
El Monte, CA 91734-8001

Re: Marine Engine Star Label Placement

Dear Mr. Summerfield:

The National Marine Manufacturers Association (NMMA) represents all of the major manufacturers who will be certifying engines in model year 2001 under the ARB's new marine engine regulation. As you are aware, the regulation requires application of an environmental star label on PWC and the back of the outboard engine cover or cowling.

Several of NMMA's member companies have expressed concern regarding the agency's unnecessarily prescriptive interpretation regarding the acceptable label placement locations. These interpretations would have significant unanticipated negative effects on the aesthetics of the engine cover / PWC. The aesthetics are vital to the marketing appeal of the new technology engines that the regulation was intended to promote. Resolution of this issue is extremely urgent because the production season for model year 2001 is drawing near for most of the affected manufacturers. **The purpose of this letter is to request the ARB's flexibility in approving alternative placement options proposed by the manufacturers.**

Engine Cover or Cowling

A marine engine has both a lower and an upper cover. Either surface can meet the criteria that the label must be visible from 100 feet. Either the upper or the lower cover should be acceptable options under the regulation.

The upper cover is the primary location for decals and other styling features that distinguish the various manufacturers' engines. Placement of the large, fixed-design star label on the upper cover interferes with the styling features of the engine, regardless of whether there is physically available space based on the label dimensions. In addition, the upper cover does not offer a consistent location for the star label. The decals and other styling features on the upper cover vary between manufacturers and frequently vary between models and model years for a given manufacturer. Some manufacturers may even produce custom designs and decals for specific boat builders. For example, Mercury



Marine produces a custom decal set for the Tracker Boat engine cowl. This is a big part of marketing an engine to the boat builder.

The lower cover provides a readily visible surface that does not interfere to the same extent with the styling features of the product. The lower cover offers a more consistently available location for the star label and is less prone to replacement than the upper cover. Data from two large marine engine manufacturers indicate that the lower cover is 2 to 5 times less likely to be replaced under warranty than the upper cover. This is due to the higher potential for shipping and in-use damage of the upper cover, and the general sensitivity of the customer to minor cosmetic defects on the upper cover. This is significant because the regulation requires the label "must not be affixed to any location that is likely to be replaced over the engine's useful life". Furthermore, some NMMA members have been given a preliminary indication that the star labels cannot be replaced if the cover is damaged. The lower cover clearly represents an advantage in this regard.

Back Surface

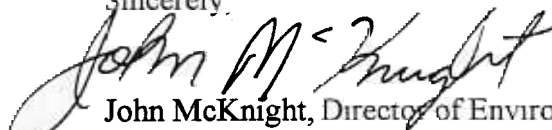
The regulation further requires that the star label be placed on the "back" of the engine cover or cowling. The term "back" is not defined in the regulation. The NMMA proposes that the back of the engine cover be generally defined to include any location within the back 2/3 of the engine cover perimeter. This will allow manufacturers the necessary flexibility to select a location for the star label that is consistent between models and between model years, and that does not unduly interfere with the engine styling.

Request for Interpretive Letter

The NMMA requests that the ARB issue an interpretive letter that identifies the lower engine cover or top of the lower unit as a suitable location for the environmental star label, with the understanding that the 100 ft visibility criteria must be met in any case. NMMA supports that in addition to the back of the engine the star label can also be placed on the upper port side of the back of the lower cover or lower unit. Use of this location will promote consistency, but also flexibility, that will benefit the users of the star label information, while also preserving the styling and appearance of our products. **This option will place the label on the car's driver side when towing and launching a trailer boat. This allows the launch ramp operator to view the label without having to walk behind the boat or in front of the car.**

Thank you for your response to this request. Timely resolution of this issue is critical since one or more manufacturers will begin their 2001 model year production within the next month. If you have any questions, please call me at 202/ 861-1180.

Sincerely,



John McKnight, Director of Environmental and Safety Compliance

CC: Mike Carter
Dean Hermano