**Off-Road Compression-Ignition Certification Checklist**

Revised: 11/5/2020

Certification of the following application types requires the indicated information, as applicable. Multiple sections may apply to an application. Further detail is contained in the California test procedures and the Federal and California regulations. Physical items must be mailed to the ECC Division Chief and electronic items submitted to the Document Management System (DMS) and E-Cert (when operational).

**BEFORE FIRST APPLICATION OR WHENEVER CHANGES OCCUR**

* Letter of Intent P
* Electronic Signatures Letter P
* Authorized Signatures Letter P
* Emissions Labels Samples P
* EPA Manufacturer Code
* CARB Manufacturer Code
* DMS Users Worksheet
* DMS Training

P = Physical submission

**BEFORE EACH APPLICATION**

* Certification Preview (optional)
* AECD Descriptions
* Durability Plan
* DF Carry-Across Worksheet

**EACH APPLICATION**

* Cover Letter and Carryover Cover Letter
* Statements of Compliance
* Waivers Requests
* FMPRO Application
* Engine Model Summary
* Durability Report
* Emissions Labels Schematics/Photos
* Tamper Resistance Declaration
* Sensors Description Worksheet
* Emissions Catalysts Description
* Emissions Warranty Statement
* Maintenance Schedule
* Delegated Assembly Documentation
* Projected Production
* Projected ABT Report
* CO2 Reporting
* Ammonia Slip Values
* NTE Deficiency Declaration
* DPF Regeneration Strategy Description
* SCR Inducement Strategy Description

**Frequently Asked Questions**

**Q:** Is an EPA Manufacturer Code required when submitting California-only applications?

**A:** Yes. The naming conventions used to identify engine and vehicle applications require a EPA Manufacturer Code, and therefore, all applications to CARB require it.

**Q:** Is an EPA Manufacturer Code equivalent to a CARB Manufacturer Code?

**A:** No. The format rules and the events which trigger issuing a manufacturer code differ between EPA and CARB. In particular, CARB will issue a new manufacturer code when the official name of the legal entity changes, even if in practice all is unchanged. While there are instances of EPA and CARB manufacturer code being identical, those examples are coincidences.

**Q:** Is a there a template for Letters of Intent?

**A:** No. The letter should be on manufacturer letterhead, in business format and addressed to the ECARS Division Chief, declare the company, model year, and category of products to be produced, and be signed by an authorized person directly employed by the manufacturer.

**Q:** Is a there a template for Electronic Signatures Letters?

**A:** Yes. The Manufacturer Advisory Correspondence MAC 2007-01 includes two attachments which are templates for these letters.

**Q:** Is a there a template for Authorized Consultants Letters?

**A:** No. The letter should be on manufacturer letterhead, in business format and addressed to the ECARS Division Chief, declare the company, the persons authorized to consult on behalf ot the manufacturer, and the model years and product categories that to which the authorization applies, and be signed by an authorized person directly employed by the manufacturer

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**Q:** How does CARB verify that Letters of Intent and other correspondence are legitimate?

**A:** CARB has a significant history of communication with numerous manufacturers and persons in industry and is able to recognize nearly all persons from whom correspondence is received. When new manufacturers or persons initiate contact, CARB does ask probing questions to be assured that the correspondence is authentic. In many cases, persons known to CARB introduce persons as-yet-unknown, thereby establishing the new individuals as legitimate.

**Q:** Is it possible to remove a person's access to the Document Management System?

**A:** Yes. In the cases of a reassignment, retirement, quitting, or for any other reason, a manufacturer may remove a person's access to the manufacturer directory of the Document Management System (DMS) by submitting an updated DMS Users Worksheet to the Primary Contact or DMS Contact which includes all persons who have or had access, with the person in question marked as deactivated. The data submitted by that person will remain unaffected and will be available to other still-active users with access to the manufacturer's directory.

**Q:** Is it possible to submit applications via email while completing the training for the Document Management System?

**A:** No. CARB requires that all official submissions be submitted to the Document Management System (DMS). While CARB does communicate via email to coordinate meetings, ask and answer questions, and obtain files quickly, anything submitted via email will not be considered official in regards to applications. CARB encourages new manufacturers to begin the registration process several months ahead of any intended production dates since it requires more time to complete all of paperwork and training than manufacturers generally expect.

**Q:** What changes trigger updates to items required before the first application?

**A:** Updates are required for the Electronic Signature Letter, Authorized Consultant Letter, and the DMS Users Worksheet after changes in authorized persons or the ARB Manufacturer Code, to the Emissions Labels Samples after changes in supplier, adhesive or ink formulation, or other label manufacturing processes, and to the ARB Manufacturer Code after changes to the legal company name. Any persons newly-granted access to DMS must undergo DMS training. The initial Letter of Intent need not be updated if Certification Previews and Cover Letters sufficiently accomplish the same goals.

**Q:** What is expected to be presented in a Certification Preview document?

**A:** The expectation is that an overview of the anticipated product lineup and certification schedule for the subsequent year or two will be presented. In addition, specific circumstances that affect applications and that may require accommodation or guidance should be previewed. Upcoming durability testing programs or carry-across of deterioration factors (DF's) should be summarized. However, these should be submitted in a separate Durability Plan document and reviewed with CARB in detail in a separate setting. Certification Preview documents may be presented during a eponymous Certification Preview meeting. While Certification Preview documents and meetings are optional, CARB strongly encourages manufacturers to include these in the certification schedule. Historical experience has shown that many questions have been answered and much possible confusion (wasted effort) have been avoided by including Certification Preview documents and meetings.

**Q:** Is a there a template for Auxiliary Emission Control Device (AECD) Description documents?

**A:** Yes. The Auxiliary Emission Control Device Declaration Template is the required template for describing AECD's.

**Q:** Is a there a template for Durability Plan documents?

**A:** No. The expectation is that the document will describe the test engine, break-in procedure, the service accumulation cycle and fuel(s), the test engine age, regenerations, maintenance, testing preparation and cycles, and testing fuels at each test point, the relative acceleration of the service accumulation cycle compared to in-use operation, the total durability program duration, justification the the test engine represents in-use operation, the affected engine families, and accumulation schedule. Other information as needed to justify the durability proposal should be included. CARB may request additional information be included.

**Q:** Is a there a template for the DF Carry-Across Worksheet?

**A:** Yes. The DF Carry-Across Worksheet is required for any application using deterioration factors not originating with the engine family described in the application. CARB uses the worksheet as a tool in evaluating carry-across of deterioration factors from one model year or engine family to another, but any final decision will be based on the overall engineering judgement of the CARB staff.