

Manufacturers Advisory Correspondence (MAC) ECCD-2024-001

To: All Manufacturers Of

- Passenger Cars (PC)
- Light-Duty Trucks (LDT)
- Medium-Duty Vehicles And Engines Used In Such Vehicles (MDV/E)
- Engine Packages For Use In Light-Duty Specially Constructed Vehicles (SPCN)
- Engine Packages For Use In Light-Duty Specially-Produced Motor Vehicles (SPMV)
- Off-Road Large Spark-Ignition Engines (LSIE)
- Off-Highway Recreational Vehicles (OHRV)
- Alternative Fuel Retrofit (AFR) Systems For On-Road Vehicles And Engines (ONR Vehicle/Engine) Including PC, LDT, MDV/E, And Heavy-Duty Engines And Vehicles Equipped With These Engines (HDE/V)
- All Other Interested Parties

Date: May 17, 2024

Subject: Cost Limit for High-Priced Warranted Parts for New 2025 Model-Year (MY) Passenger Cars (PC), Light-Duty Trucks (LDT), Medium-Duty Vehicles and Engines Used in These Vehicles (MDV/E), Engine Packages for Use in Light-Duty Specially Constructed Vehicles (SPCN), Engine Packages for Use in Light-Duty Specially-Produced Motor Vehicles (SPMV), Off-Road Large Spark-Ignition Engines (LSIE), Off-Highway Recreational Vehicles (OHRV), and Alternative Fuel Retrofit (AFR) Systems Certified During Calendar Years (CY) 2024 and 2025 for Installation on In-Use MY 1994 and Subsequent On-Road Vehicles and Engines (ONR Vehicle/Engine) Including PC, LDT, MDV/E and Heavy-Duty Engines and Vehicles Equipped with These Engines (HDE/V)

Enclosed with this letter is a Manufacturers Advisory Correspondence (MAC) that identifies the cost limit for high-priced warranted parts for new MY 2025 PC, LDT, MDV/MDE, SPCN, SPMV, LSIE, and OHRV vehicles and engines, and for AFR systems certified during CY 2024 and CY 2025 for installation on in-use MY 1994 and subsequent ONR Vehicles/Engines. Also included is identification of the highest-cost metropolitan area of California for the purpose of calculating labor costs when determining the total replacement cost of a warranted part.

Tables 1, 2, and 3 at the end of this MAC are a summary of these cost limits for new MY 2025 PC, LDT, MDV/E, SPCN, SPMV, LSIE, and OHRV, and for AFR systems for in-use MY 1994 and subsequent PC, LDT, MDV/E, and HDV/E.

If you have any questions regarding LSIE warranty matters, please contact Mr. Zachary Lopez, Air Resources Engineer, Off-Road Spark-Ignited Engine Certification Section, at (951) 542-3496 or by e-mail at Zachary.Lopez@arb.ca.gov. For questions regarding warranty matters for new MDE (and MDV into which such MDE are installed), please contact Mr. Mel Capistrano, Air Resources Engineer, Compression-Ignition and Heavy-Duty Certification Section, at (951) 542-3096 or by e-mail at Mel.Capistrano@arb.ca.gov. For questions regarding warranty matters for MY 1994+ AFR systems for PC, LDT, MDV, HDE/V and MDE (and MDV into which such MDE are installed), please contact Dr. Michael Logue, Air Resources Engineer, Aftermarket Diesel and Off-Road Section, at (951) 542-3260 or by e-mail at Michael.Logue@arb.ca.gov. For questions regarding parts that upon failure must illuminate the MIL and be covered by the emissions warranty, please contact Mr. John Ellis, Manager, Gasoline On-Board Diagnostics Section, at (951) 542-3158 or by e-mail at John.Ellis@arb.ca.gov, or Mr. Frederico Garza, Manager, Diesel On-Board Diagnostics Section, at (951) 542-3177 or by e-mail at Frederico.Garza@arb.ca.gov. For all other matters in this MAC, please contact Mr. Steven Hada, Air Resources Engineer, On-Road Light-Duty Certification Section, at (951) 542-3190 or by e-mail at Steven.Hada@arb.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Robin U. Lang". The signature is written in black ink and is positioned above the typed name and title.

Robin U. Lang, Chief
Emission Certification and Compliance Division

State of California

California Air Resources Board (CARB)

Manufacturers Advisory Correspondence (MAC) ECCD-2024-

Subject: Cost Limit for High-Priced Warranted Parts for New 2025 Model-Year (MY) Passenger Cars (PC), Light-Duty Trucks (LDT), Medium-Duty Vehicles and Engines Used in These Vehicles (MDV/E), Engine Packages for Use in Light-Duty Specially Constructed Vehicles (SPCN), Engine Packages for Use in Light-Duty Specially-Produced Motor Vehicles (SPMV), Off-Road Large Spark-Ignition Engines (LSIE), Off-Highway Recreational Vehicles (OHRV), and Alternative Fuel Retrofit (AFR) Systems Certified During Calendar Years (CY) 2024 and 2025 for Installation on In-Use MY 1994 and Subsequent On-Road Vehicles and Engines (ONR Vehicle/Engine) Including PC, LDT, MDV/E and Heavy-Duty Engines and Vehicles Equipped with These Engines (HDE/V)

Applicability: - New MY 2025 PC, LDT, MDV/E, SPCN, SPMV, LSIE, and OHRV
- AFR Systems Certified During CY 2024 and CY 2025 for Installation on In-Use MY 1994 and Subsequent PC, LDT, MDV/E, and HDV/E

- References:
1. California Health and Safety Code Section 43205 [HSC § 43205]
 2. Emission Control System Warranty Regulations [Title 13, California Code of Regulations, Sections 2035 et seq. (13 CCR § 2035 et seq.)]
 3. Zero-Emission Vehicle Standards for 2018 through 2025 Model Year Passenger Cars, Light-Duty Trucks and Medium-Duty Vehicles [13 CCR § 1962.2(c)]
 4. Defects Warranty for 2001 and Later Off-Road Large Spark-Ignition Engines [13 CCR § 2435]
 5. Defects Warranty Requirements for Evaporative Emission Control Systems of 2018 and Later Model Year Off-Highway Recreational Vehicles [13 CCR § 2419.1 et seq.]
 6. "California Certification and Installation Procedures for Alternative Fuel Retrofit Systems for Motor Vehicles Certified for 1994 Through

Manufacturers Advisory Correspondence (MAC) ECCD-2024-

2003 Model Years and for 1994 Through 2003 Model Year Motor Vehicle Retrofit Systems Certified For Emission Reduction Credit”, as last amended August 8, 2014, (1994-2003 AFR System Certification and Installation Procedures) incorporated by reference in 13 CCR § 2030 and § 2031.

7. “California Certification and Installation Procedures for Alternative Fuel Retrofit Systems for 2004 and Subsequent Model Year On-Road Motor Vehicles and Engines”, adopted August 8, 2014, (2004+ AFR System Certification and Installation Procedures) incorporated by reference in 13 CCR § 2030 and § 2031.
8. “Defects Warranty Requirements for Certified Engine Packages for Use in Specially Constructed Vehicles” [13 CCR § 2214]
9. “Defects Warranty Requirements for Certified Engine Packages for Use in Specially-Produced Motor Vehicles” [13 CCR § 2209.6]
10. Manufacturers Advisory Correspondence 2017-03 available at this web link.

https://ww2.arb.ca.gov/sites/default/files/classic/msprog/nvepb/macs/_MACs/mac201703/mac201703.pdf

Policy:

1. Identification of the Highest-Cost Metropolitan Area of California for New MY 2025 PC, LDT, MDV/E, SPCN, SPMV, LSIE, and OHRV, and for AFR Systems Certified During CY 2024 And CY 2025 For Installation On MY 1994 And Subsequent ONR Vehicle/Engine.

According to HSC § 43205(b), 13 CCR § 2037(c), 13 CCR § 2214(c), 13 CCR § 2209.6(c), 13 CCR § 2435(b)(3), 13 CCR § 2419.1(c), the 1994-2003 AFR System Certification and Installation Procedures, and the 2004+ AFR System Certification and Installation Procedures, as applicable, the high-priced warranted parts list is based on a periodically revised cost limit as calculated for the highest-cost metropolitan area of California. For MY 2025, and CY 2024 and CY 2025 as applicable for AFR systems, the highest-cost metropolitan area of California is determined to be the San Jose-Sunnyvale-Santa Clara area.

The high-priced warranted parts lists should reflect actual part costs to owners at the dealership, including dealer markup. The labor cost, as part of a

Manufacturers Advisory Correspondence (MAC) ECCD-2024-

manufacturer's determination of the total replacement cost of a warranted part, is to be based on the manufacturer's labor rate in the identified highest-cost metropolitan area or, if the manufacturer has no dealerships in this area, a comparable alternative area in California.

2. a. Cost Limit for High-Priced Warranted Parts for New MY 2025 PC, LDT, MDV/E, SPCN, SPMV, and LSIE.

According to 13 CCR § 2037(c), § 2214(c), § 2209.6(c), and § 2435(b)(3), as applicable, the cost limit for high-priced warranted parts for MY 2025 PC, LDT, MDV/E, SPCN, SPMV, and LSIE is calculated using the annual average nationwide urban Consumer Price Index (CPI) for 2023, i.e., the calendar year two years prior to the model-year for which the cost limit is being calculated. This CPI is published by the U.S. Bureau of Labor Statistics. Rounded to the nearest ten dollars, the MY 2025 cost limit is \$770, as calculated below:

$$\begin{aligned}\text{MY 2025 Cost Limit} &= \$300 \times (\text{CY 2023 CPI}/\text{baseline CPI}_{1988}) \\ &= \$300 \times (304.7/118.3) \\ &= \$770\end{aligned}$$

- b. Cost Limit for High-Priced Warranted Parts for New MY 2025 OHRV Certified to the New Vehicle-Based Evaporative Emission Standards in 13 CCR § 2418.

According to 13 CCR § 2419.1(c), the cost limit for high-priced warranted parts for MY 2025 OHRV evaporative emission control systems is calculated using the annual average nationwide urban CPI for 2023, i.e., the calendar year two years prior to the model-year for which the cost limit is being calculated. This CPI is published by the U.S. Bureau of Labor Statistics. Rounded to the nearest ten dollars, the MY 2025 cost limit is \$250, as calculated below:

$$\begin{aligned}\text{MY 2025 Cost Limit} &= \$200 \times (\text{CY 2023 CPI}/\text{baseline CPI}_{2016}) \\ &= \$200 \times (304.7/240.0) \\ &= \$250\end{aligned}$$

- c. Cost Limit for High-Priced Warranted Parts for AFR Systems Certified During CY 2024 and CY 2025 for Installation on In-Use MY 2004 and Subsequent ONR Vehicle/Engine (2004+ AFR Systems).

According to the 2004+ AFR System Certification and Installation Procedures, the cost limits for high-priced warranted parts for 2004+ AFR systems certified during CY 2024 and CY 2025 are calculated using the annual average nationwide urban CPI for 2022 and 2023, respectively, i.e., the calendar year two years prior to the calendar year for which the cost limit is being calculated.

Manufacturers Advisory Correspondence (MAC) ECCD-2024-

This CPI is published by the U.S. Bureau of Labor Statistics. Rounded to the nearest ten dollars, the CY 2024 and CY 2025 cost limits are \$740 and \$770, respectively, as calculated below:

$$\begin{aligned}\text{CY 2024 Cost Limit} &= \$300 \times (\text{CY 2022 CPI}/\text{baseline CPI}_{1988}) \\ &= \$300 \times (292.7/118.3) \\ &= \$740\end{aligned}$$

$$\begin{aligned}\text{CY 2025 Cost Limit} &= \$300 \times (\text{CY 2023 CPI}/\text{baseline CPI}_{1988}) \\ &= \$300 \times (304.7/118.3) \\ &= \$770\end{aligned}$$

- d. Cost Limit for High-Priced Warranted Parts for AFR Systems Certified During CY 2024 and CY 2025 for Installation on In-Use MY 1994-2003 ONR Vehicle/Engine (1994-2003 AFR Systems).

According to the 1994-2003 AFR System Certification and Installation Procedures, the cost limits for high-priced warranted parts for 1994-2003 AFR systems certified during CY 2024 and CY 2025 are calculated using the annual average California CPI for 2022 and 2023, i.e., the calendar year two years prior to the certification's calendar year for which the cost limit is being calculated. This CPI is published by the California Department of Industrial Relations. Rounded to the nearest ten dollars, the CY 2024 and CY 2025 cost limits are \$790 and \$820, respectively, as calculated below:

$$\begin{aligned}\text{CY 2024 Cost Limit} &= \$300 \times (\text{CY 2022 CPI}/\text{baseline CPI}_{1988}) \\ &= \$300 \times (319.2/121.9) \\ &= \$790\end{aligned}$$

$$\begin{aligned}\text{CY 2025 Cost Limit} &= \$300 \times (\text{CY 2023 CPI}/\text{baseline CPI}_{1988}) \\ &= \$300 \times (331.8/121.9) \\ &= \$820\end{aligned}$$

3. Guidance on meeting the requirements for the items listed below may be found in MAC 2017-03, available at this web link.

https://ww2.arb.ca.gov/sites/default/files/classic/msprog/nvepb/mac/_MACs/mac201703/mac201703.pdf

Manufacturers Advisory Correspondence (MAC) ECCD-2024-

- The high-priced warranted parts must be documented in the manufacturer's certification application. For non-OHRV, parts up to \$100 below the cost limit must be listed. For OHRV, parts up to \$50 below the cost limit must be listed. Ref. MAC 2017-03, section 3.
- For high-priced parts consistently above the cost limit, cost documentation may be waived. Ref. MAC 2017-03, section 4.
- For a part that is integral to a larger assembly, the cost limit shall be determined based on the repair or replacement of the entire assembly. Ref. MAC 2017-03, section 5.
- A cost limit for MY 2026 and later vehicles and engines may be proposed by the manufacturer before a newer cost limit is determined by CARB. Ref. MAC 2017-03, section 6.
- The cost limit listed in this MAC under 2.a. is not applicable to transitional zero-emission vehicles, or range extended battery electric vehicles (BEVx). All emissions-related parts for these vehicles are warranted for their useful life. Ref. MAC 2017-03, section 7.
- The cost limit listed in this MAC under 2.a. is not applicable to vehicles that generate additional NMOG+NOx fleet average credits. All emissions-related parts for these vehicles are warranted for their useful life. Ref. MAC 2017-03, section 8.
- The cost limits for AFR systems are determined by the calendar year in which certification is granted. Ref. MAC 2017-03, section 9.
- A malfunctioning part that can affect regulated emissions and illuminates the malfunction indicator light (MIL) must be identified as emissions related, and is covered under warranty within the warranty period. Ref. MAC 17-03, section 10.

Manufacturers Advisory Correspondence (MAC) ECCD-2024-

**Table 1
Cost Limits For High-Priced Warranted Parts As Applicable For New
PC, LDT, MDV/E, SPCN, SPMV, and LSIE⁽³⁾**

Model Year ⁽¹⁾	Cost Limit		Model Year ⁽¹⁾	Cost Limit
1990	\$300		2010	\$550
1991	\$310		2011	\$540
1992	\$330		2012	\$550
1993	\$350		2013	\$570
1994	\$360		2014	\$580
1995	\$370		2015	\$590
1996	\$380		2016	\$600
1997	\$390		2017	\$600
1998	\$400		2018	\$610
1999	\$410		2019	\$620
2000	\$410		2020	\$640
2001	\$420		2021	\$650
2002	\$440		2022	\$660
2003	\$450		2023	\$690
2004	\$460		2024	\$740
2005	\$470		2025	\$770
2006	\$480			
2007	\$500			
2008	\$510			
2009	\$530			

Manufacturers Advisory Correspondence (MAC) ECCD-2024-

**Table 2
Cost Limits For High-Priced Warranted Parts For New OHRV**

Model Year ⁽¹⁾	Cost Limit
2018	\$200
2019	\$200
2020	\$210
2021	\$210
2022	\$220
2023	\$230
2024	\$240
2025	\$250

**Table 3
Cost Limits For High-Priced Warranted Parts For AFR Systems**

Calendar Year ⁽²⁾	Cost Limit For 2004+	Cost Limit For 1994-2003
2014	\$580	\$560
2015	\$590	\$570
2016	\$600	\$580
2017	\$600	\$580
2018	\$610	\$590
2019	\$620	\$600
2020	\$640	\$620
2021	\$650	\$690
2022	\$660	\$700
2023	\$690	\$730
2024	\$740	\$790
2025	\$770	\$820

(1) Model Year means the model year of the test group/engine family, irrespective of the date the Executive Order is signed.

(2) Calendar Year means the calendar year in which certification of the AFR system is granted, i.e., the date (during January 1 - December 31) the Executive Order is signed, irrespective of the model year of the base vehicle/engine.

(3) The high-priced warranted parts cost limit does not apply to new HDE/V.