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ORAL STATEMENT
INTERNATIONAL TRUCK AND ENGINE CORPORATION

ARB HEARING OF PROPOSED CHANGES TO ONBOARD DIAGNOSTIC
MONITORING AND REPORTING REQUIREMENTS

September 28, 2006

Good morning and thank you.

My name is Tim Gundrum and I am responsible for OBD Certification and Compliance for International Truck and Engine Corporation.

First of all, I would like to say that International supports the comments of the Engine Manufacturers' Association.

But I wish to speak to you today specifically about the proposed requirement to establish a unique infrequent-regeneration adjustment factor for the NMHC catalyst monitor beginning in the 2008 model year. This means developing and demonstrating thresholds that incorporate the effect of NMHC catalyst deterioration on infrequent regenerations.

While there are several reasons why we believe this provision should not be included in the rule, I wish to concentrate on one – namely, that it is unnecessary, since it would provide little incremental benefit over containment measures that manufacturers already have in their control strategies.

There are many reasons why manufacturers place boundaries on the control of infrequent regeneration: fuel economy, performance, reliability, and durability. These affect the engine manufacturer's bottom line through customer dissatisfaction and warranty costs.

During the regeneration of the PM filter, the NMHC catalyst (also known as a DOC) is used to raise the exhaust temperature by burning fuel introduced into the exhaust.

If the DOC is deteriorated, then not as much heat will be generated, making the process less efficient. Yes, some of the hydrocarbons will pass through the DOC unburned, increasing emissions, but there will be the parallel effect of reducing fuel economy because the regeneration of the PM filter is less effective.

Therefore, limitations are placed on the regeneration process. These may include determining whether the amount of heat at the outlet of the DOC is comparable to what is expected, placing a time limit on the length of regeneration attempts, and monitoring regeneration for minimum effectiveness. Regenerations are aborted or avoided and errors are flagged when it becomes obvious that there is a problem. Thus the emission impact of a DOC malfunction will be limited.

The regeneration of a PM filter is a very complex process. Entry conditions are carefully selected to ensure that regeneration is effective. The heat-up of the fragile catalysts and filters is carefully controlled so that thermal stress does not fracture the components. The regeneration phase is carefully monitored to prevent overheating that would result in catastrophic damage to the DOC or PM filter.

Contrary to other impressions you may received, engine manufacturers do not indiscriminately increase fuel levels in order to achieve regeneration when a DOC is deteriorated. Upper boundaries are placed on these levels, and they are based on extensive laboratory and field test data.

In summary, we feel that the containment measures that manufacturers already have in their control strategies ensure that the concerns of ARB will not be realized.

We believe that there will be little or no benefit of going through the exercise of determining special infrequent regeneration adjustment factors for the case of a deteriorated DOC. This would be a monumental task.

We urge the Board to at least delay this requirement until 2010 so that in the interim we can work together to determine the most effective way to eliminate ARB's concerns.