

## **Comment 1 for Mobile Source Certification and Compliance Fees Regulation (mobilesourcefees2021) - 45 Day.**

First Name: Simon  
Last Name: Wood  
Email Address: swood@lotuscars.com  
Affiliation: Lotus Cars Ltd., UK

Subject: Small Volume Manufacturers cert fees  
Comment:

CARBs proposal for fixed cert fees is not unreasonable. I would however urge that the level of fees be adjusted more in line with the volumes to be sold rather than a fixed fee. It is noted that a reduced fee is proposed for "carry over" and "Small Businesses". There are some, a very few, manufacturers or importers who may only be retailing some 100's of vehicles in California but whom do not meet the "Small Business" classification.

I should like to ask CARB to consider extending the reduced fees to include these low volume manufacturers. The volume limit could be set at the existing 4500pa low volume limit or a reduced number, say 2250pa, if that was felt more appropriate.

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-03-18 09:29:26

No Duplicates.

**Comment 2 for Mobile Source Certification and Compliance Fees Regulation  
(mobilesourcefees2021) - 45 Day.**

First Name: John

Last Name: McKnight

Email Address: jmcknight@nmma.org

Affiliation: National Marine Manufacturers Assoc.

Subject: NMMA Comment on CARB Certification Fee

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-mobilesourcefees2021-VDldOFE7WGVWOQVi.pdf'

Original File Name: mcknight.pdf

Date and Time Comment Was Submitted: 2021-03-24 08:41:32

No Duplicates.

**Comment 3 for Mobile Source Certification and Compliance Fees Regulation  
(mobilesourcefees2021) - 45 Day.**

First Name: Robert

Last Name: Alsip

Email Address: robert.alsip@suz.com

Affiliation:

Subject: Comments by Suzuki Motor USA, LLC

Comment:

Please see attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-mobilesourcefees2021-BWZUPVU5VGpWNQBu.pdf>'

Original File Name: Comments by Suzuki Motor USA, LLC.pdf

Date and Time Comment Was Submitted: 2021-04-13 09:12:56

No Duplicates.

**Comment 4 for Mobile Source Certification and Compliance Fees Regulation (mobilesourcefees2021) - 45 Day.**

First Name: Brandon

Last Name: Ciaccio

Email Address: brandonciaccio@gmail.com

Affiliation:

Subject: Let's focus on Carrying Capacity of an ecosystem

Comment:

Can you guys focus your efforts on the scientific ideas of Carrying Capacity" instead of charging people more who have been here for generations, promoting good stewardship of the environment, and who do not have a significant carbon footprint? Is that possible to have a conversation focused on those topics, versus trying to phase things out simply by charging more for them?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-04-14 14:16:28

No Duplicates.

**Comment 5 for Mobile Source Certification and Compliance Fees Regulation  
(mobilesourcefees2021) - 45 Day.**

First Name: MIKE

Last Name: LEV

Email Address: everythingmotorcycle@gmail.com

Affiliation:

Subject: CARB FEES, THERE YOU GO AGAIN

Comment:

You're not going to listen, so I'll make it short. Please stop with the insanity. CARB is destroying businesses in a time where the rest of California politics is already destroying us. Enough.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-04-14 15:00:42

No Duplicates.

**Comment 6 for Mobile Source Certification and Compliance Fees Regulation (mobilesourcefees2021) - 45 Day.**

First Name: Greg

Last Name: Knott

Email Address: gknott@opei.org

Affiliation: Outdoor Power Equipment Institute

Subject: CARB Cert & Compliance Fee Proposed Rule

Comment:

OPEI respectfully submits the attached comments in opposition of the proposed certification and compliance fees rule.

Due to ongoing Small Off-Road Engine (SORE) rulemaking activities, which will have a dramatic impact on the sector as early as model year 2024, including the number of EOs that will be issued and the sales volume of product covered by EOs, OPEI requests CARB to exempt SORE from the proposed certification and compliance rule at this time.

Additionally, the rulemaking package incorrectly estimates the volume of SORE product subject to certification and compliance, and as a result significantly underestimates the cost-impact to consumers.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-mobilesourcefees2021-UD8GcAZiUGoLUglq.pdf'

Original File Name: OPEI Comments to CARB Cert Fee Rulemaking 210419 FINAL.pdf

Date and Time Comment Was Submitted: 2021-04-19 07:55:08

No Duplicates.

**Comment 7 for Mobile Source Certification and Compliance Fees Regulation (mobilesourcefees2021) - 45 Day.**

First Name: Eric

Last Name: Barnes

Email Address: ebarnes@mic.org

Affiliation: Motorcycle Industry Council

Subject: MIC, ROHVA, and SVIA Comments on CARB's Proposed Certification and Compliance Fees

Comment:

Hello,

Please find attached comments from MIC, ROHVA, and SVIA regarding CARB's proposed certification and compliance fees for HMC, OHRV, and aftermarket parts.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-mobilesourcefees2021-VjtSPQBiVlpWIwN1.pdf'

Original File Name: MIC SVIA ROHVA Comments CARB Cert Fees 041921.pdf

Date and Time Comment Was Submitted: 2021-04-19 11:09:49

No Duplicates.

**Comment 8 for Mobile Source Certification and Compliance Fees Regulation  
(mobilesourcefees2021) - 45 Day.**

First Name: Rasto

Last Name: Brezny

Email Address: rbrezny@meca.org

Affiliation: Manufacturers of Emission Controls Assoc

Subject: MECA Comments on MS Cert and Compl Fees

Comment:

Comments attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-mobilesourcefees2021-UD0FZlw+UmBSCwdk.pdf'

Original File Name: MECA Comment MS Cert and Compl Fees 041921.pdf

Date and Time Comment Was Submitted: 2021-04-19 11:42:50

No Duplicates.

**Comment 9 for Mobile Source Certification and Compliance Fees Regulation (mobilesourcefees2021) - 45 Day.**

First Name: Josh

Last Name: Senator Newman

Email Address: [alina.evans@sen.ca.gov](mailto:alina.evans@sen.ca.gov)

Affiliation: State Senator, 29th District

Subject: Comment Regarding Proposed Mobile Source Certification and Compliance Fees  
Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-mobilesourcefees2021-AW8BYgZwAz1RNlA+.pdf>'

Original File Name: newman.pdf

Date and Time Comment Was Submitted: 2021-04-19 16:40:25

No Duplicates.

**Comment 10 for Mobile Source Certification and Compliance Fees Regulation (mobilesourcefees2021) - 45 Day.**

First Name: David  
Last Name: Goch  
Email Address: dgoch@wc-b.com  
Affiliation: SEMA

Subject: SEMA Comments on Proposed Fees  
Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-mobilesourcefees2021-VGZcagQ3BGYAKFV1.pdf'

Original File Name: 2021.04.19 SEMA Comments Re Fees-FINAL.pdf

Date and Time Comment Was Submitted: 2021-04-19 16:50:12

No Duplicates.

**Comment 11 for Mobile Source Certification and Compliance Fees Regulation (mobilesourcefees2021) - 45 Day.**

First Name: Viola

Last Name: Mader

Email Address: viola.mader@ktm.com

Affiliation:

Subject: KTM North America, Inc. comments to Proposed Certification Fees

Comment:

Please refer to the uploaded file and thank you for the opportunity to comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-mobilesourcefees2021-B2xcLlc7WVUCZwRr.pdf'

Original File Name: KTM comments to CARB Cert Fee proposal (VM 4-19-21).pdf

Date and Time Comment Was Submitted: 2021-04-19 22:17:01

No Duplicates.

**Comment 1 for Mobile Source Certification and Compliance Fees Regulation (mobilesourcefees2021). (At Hearing)**

First Name: Tia

Last Name: Sutton

Email Address: tsutton@emamail.org

Affiliation: Truck & Engine Manufacturers Association

Subject: EMA Statement on Agenda Item 21-3-2 Certification and Compliance Fees

Comment:

Attached is the statement of EMA for the April 22, 2021, Board Hearing, Item 21-3-2 (Proposed Mobile Source Certification and Compliance Fees).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-april2021opencomm-AWRSOVc3BwtQNQhn.pdf>

Original File Name: EMA Comments on CARB Proposed Certification Fee Regulation.pdf

Date and Time Comment Was Submitted: 2021-04-22 07:01:05

No Duplicates.

**Comment 1 for Mobile Source Certification and Compliance Fees Regulation  
(mobilesourcefees2021) - 15-1.**

First Name: Braden

Last Name: Liberg

Email Address: bliberg@edelbrock.com

Affiliation: Edelbrock Group

Subject: CARB Compliance Fee for SPMV and SPCNS

Comment:

Please see the attached

Comment to have a lower fee for a small volume engine manufacturer  
similar to the SPMV small volume vehicle manufacturer limits.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-  
mobilesourcefees2021-BWAHZVI2WGcBZQR2.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-mobilesourcefees2021-BWAHZVI2WGcBZQR2.pdf)

Original File Name: Edelbrock - CARB Fee SPMV Comments.pdf

Date and Time Comment Was Submitted: 2021-06-02 19:23:10

No Duplicates.

## **Comment 2 for Mobile Source Certification and Compliance Fees Regulation (mobilesourcefees2021) - 15-1.**

First Name: Daniel

Last Name: Ingber

Email Address: danieli@sema.org

Affiliation: SEMA

Subject: Resolution 21-9: Proposed Certification Fees

Comment:

Specialty Equipment Market Association (SEMA) comments respectfully requesting a reduction in the section 2904 proposed fees for certified engine packages for a Specially Constructed Vehicle and Specially Produced Motor Vehicle.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-mobilesourcefees2021-UCNcP1Q4AjAFXAdk.pdf>

Original File Name: SEMA Comments-CARB Certification Fees.pdf

Date and Time Comment Was Submitted: 2021-06-08 15:31:17

No Duplicates.

**Comment 3 for Mobile Source Certification and Compliance Fees Regulation  
(mobilesourcefees2021) - 15-1.**

First Name: Viola

Last Name: Mader

Email Address: Non-web submitted comment

Affiliation: KTM North America

Subject: KTM comments to modified language

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-mobilesourcefees2021-UTxcO1A1VGIEcAEv.pdf>

Original File Name: mader.pdf

Date and Time Comment Was Submitted: 2021-06-16 13:57:54

No Duplicates.