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Docket # OPMO-0184

ITEM # 39

MACK TRUCKS, INC.

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July 18, 1985

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II-A-1002

Assistant Administrator
Office of Air and Radiation (AR-443)
Docket No. OPMO-0184,
U.S. Environmental Protection Agency,
Washington, D. C. 20460

Gentlemen:

Subject: Docket No. OPMO-0184
Notice of Proposed Rulemaking
40 CFR Parts 202 & 205
Motor Carriers Engaged in Interstate Commerce;
Noise Standards and Transportation Equipment
Noise Emission Controls; Medium and Heavy Trucks

Mack Trucks, Inc., a manufacturer and importer of heavy duty trucks of 25,000 pounds GVWR and greater, submits the following comments for inclusion in Docket No. OPMO-0184. These comments pertain to the Notice of Proposed Rulemaking as published in the Federal Register of June 19, 1985.

In substantiation of, and in concurrence with, previously submitted petitions, Mack Trucks, Inc., resolutely supports the proposed deferral of the Medium and Heavy Truck 80dB(A) noise standard from January 1, 1986 to January 1, 1988.

Mack's initial investigation into methods of compliance with the recently promulgated NOx and particulate emissions standards for 1988 and later, confirms that a significant redesign of Mack engines and vehicle exhaust systems will be required in order to meet the new gaseous emission standards. Mack, therefore can verify the Agency's position that definite cost savings will be possible if the development, design, engineering and testing for both regulations (noise and gaseous emissions) are combined or closely coordinated.

Also, under the heading of potential cost savings of deferral, the Agency addresses the additional "pass-through" costs attendant to the 80 dB(A) truck that would have to be born by the ultimate purchaser. Mack wishes to point out that, in our opinion, if the regulation is not deferred, such costs would be higher in 1986 than in 1988. If compliance is required



File: noise

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Subject: Docket No. OPMO-018
Notice of Proposed Rulemaking
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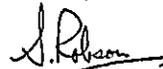
in 1986, manufacturers will have to add noise related components to existing engines and vehicles. This in turn will cause such costs to include, not only the price of added or changed components, but also increased costs of operation due to (a) decreased fuel consumption as a result of increased vehicle weight and changed engine operating characteristics and (b) increased maintenance costs due to the additional time required to perform routine maintenance on the noise related items. Although, similar costs will be applicable in 1988, they should be somewhat reduced due to the design requirements of noise and gaseous emissions being considered jointly. The deferral will allow manufacturers to better address the problem of meeting regulatory requirements while bearing in mind the consumers requests for trucks that are lighter in weight, more fuel efficient and require less maintenance.

In support of the deferral, Mack wishes to add that there appears to be a current trend in the marketplace by certain consumers towards vehicles with quieter operating characteristics, not only from an interior noise prospective, but also exterior noise. Some of the larger fleets are investigating and considering the long term impact of quieter vehicles, not only on the driver's health, but also on their corporate image as presented to the general public and the community at large. If this trend continues and increases, the marketplace will itself force manufacturers to develop the technology that will eventually attain comparable goals with those of the Agency.

In summation, Mack Trucks, Inc., unequivocally supports the deferral of the 80dB(A) Medium and Heavy Truck Noise Standard from January 1, 1986 to January 1, 1988. If further information or clarification of our comments is desired, please do not hesitate to call.

Very truly yours,

MACK TRUCKS, INC.



S. Robson
Sr. Project Engineer -
Vehicle Regulations

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