



OSHKOSH TRUCK CORPORATION

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July 10, 1985

A-96-01 ITEX # 33
II-A-996 OPMO-0184

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

Assistant Administrator,

This letter is written to state the Oshkosh Truck Corporation is in support of the administrations proposed rule making on 40 CFR parts 202 and 205. Proposed changes to defer the effective date of the 80 db noise standard, for newly manufactured medium and heavy duty trucks in 40 CFR part 205, is of particular interest to our company being it comprises most of our vehicles which are in excess of 10,000 lb. GVWR. By the nature of our type heavy duty trucks, where large engines, large multiple gear cases, and other components must be used, along with the fact these components are somewhat uncovered, it becomes increasingly difficult to lower noise emissions from the truck. Even though component manufactures such as the engine and transmission manufacturers are developing products that are less noisy, they have not yet put them into production. In short, with the present technology and componentry, our industry has gone about as far as practical to lower the truck noise level. Additional noise lowering is increasingly difficult.

Again, we welcome the additional time proposed for effectivity of the 80 db requirement. This time will be well spent to develop, in a practical and cost effective manner, trucks that comply with a 80 db requirement.

At this date, should the rule change be resended, it would be near impossible to meet a January 1, 1986 effectivity for a 80 db noise level with our trucks.

Sincerely,

OSHKOSH TRUCK CORPORATION

Thomas A. Larson
Sr. Supervising Engineer

TAL:lh

File: noise

Rec'd. 8/5/85