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Docket #OPMO-0184  
ITEM # 40

MOTOR VEHICLE MANUFACTURERS ASSOCIATION  
of the United States, Inc.

300 NEW CENTER BUILDING • DETROIT, MICHIGAN 48202 • AREA 313-872-4911

ROGER B. SMITH, *Chairman*  
THOMAS H. HANNA, *President and Chief Executive Officer*

17-96-01  
II - A - 1003

July 18, 1985

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

Dear Sir:

The Motor Vehicle Manufacturers Association of the United States, Inc. (MVMA)\* is a major industry trade association whose members represent the major domestic motor vehicle manufacturers. We are responding to the notice of proposed rulemaking (NPRM) entitled, "Motor Carriers Engaged in Interstate Commerce; Noise Standards and Transportation Equipment Noise Emission Controls; Medium and Heavy Trucks," published in the June 19, 1985 Federal Register (50 FR 25516).

MVMA supports the Agency's NPRM which 1) defers the effective date of the 80 dB(A) noise level requirement for new medium and heavy trucks (40 CFR Part 205, Subpart B) from January 1, 1986 to January 1, 1988, and 2) amends the interstate motor carrier in-use standards (40 CFR Part 202, Subpart B) to more stringent noise levels.

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\*MVMA member companies are AM General Corporation, American Motors Corporation, Chrysler Corporation, Ford Motor Company, General Motors Corporation, Honda of America Mfg., Inc., International Harvester Company, M.A.N. Truck & Bus Corporation, PACCAR, Inc., Volkswagen of America, Inc., and Volvo North America Corporation.

File: Noise

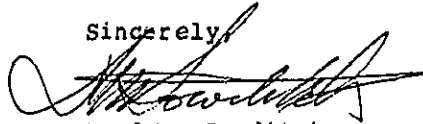
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Deferral of the standard would provide for additional time to permit the coordination of design, engineering and testing efforts necessary to comply with both the 80 dB(A) truck noise standard and the Agency's nitrogen oxide (NOx) and particulate emission standards for heavy-duty engines (promulgated on March 15, 1985). The deferral has economic merit as it would significantly reduce duplicative efforts. To maximize the recognized benefits obtainable from a two-year deferral of the 80 dB(A) noise standard, MVMA strongly urges prompt adoption of the NPRM.

If you or your staff have any questions regarding our comments, please feel free to contact me.

Sincerely,



Fred W. Bowditch  
Vice President  
Technical Affairs

cc: Kenneth E. Feith, EPA