



**IVECO  
Trucks of  
North America  
Incorporated**

81-02-18

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Fiat • OM • Lancia • Unic • Magirus

Neil M. Goodwin  
Director of Engineering

n-96-02  
II-A-1052

April 23, 1981

Director  
Standards and Regulations Division  
ANR-490  
U.S. Environmental Protection Agency  
Washington, D. C. 20460

Attention: ONAC Docket 81-02 (Medium and Heavy Trucks)

Gentlemen:

IVECO Trucks of North America is an importer of medium and heavy duty vehicles manufactured in Europe, under the brand names, Magirus and IVECO (Industrial Vehicles Company). As the U.S. regulation representative for our parent company, IVECO, b.v., Amsterdam, Holland; we wish to enter comments in regard to Docket 81-02 as follows.

IVECO considers the previous EPA-ONAC action in regard to extending the effective date of the 80 decibel noise regulation from January 1, 1982 to January 1, 1983, as a highly desirable action; and EPA is to be congratulated for providing the industry with this temporary relief.

While we support the concept of rescinding the 80 decibel regulation in entirety, we wish to comment that we do so under the assumption that the present 83 decibel regulation would stay in effect. We emphasize this point in order to be certain that a Federal regulation for vehicles over 10,000# would stay in effect, and the issue would not be turned over to individual states. As an importer of vehicles, one of which is a version lower than 10,000# where states are not preempted, we are very aware that this area can best be described as a "hodge podge" of regulations, some of which do not even spell out the test procedure the manufacturer is to use to achieve the legislated noise level.

In effect, as difficult as it would be, we would prefer a single Federal preempting regulation even at 80 decibels (or 81, 82 decibels) to turning the issue over to the states.

As far as the matter of achieving the 80 decibel level itself is concerned we believe achieving this level is technically possible with very little production safety margin, but also at what we believe to be very high costs.

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**MAGIRUS TRUCKS**

Director, Standards and Regulations Division

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On our Magirus line of vehicles (above 25,000# GVW), we believe we will have to reduce our engine model offerings from 2 to 1. (Two naturally aspirated, to one turbocharged.) This will adversely affect our sales effort thru reduced vehicle model offerings. The additional cost of turbocharging our engines and providing noise shielding on the final vehicle we expect to be approximately \$750. per vehicle at the manufacturers cost level, which will impose a further drag on our sales effort.

On our smaller line of vehicles, IVECO "Z" Range (10,000 - 15,000# GVW), the following specifics are applicable:

- 1) Research and Development costs are on the order of 9 man-months per vehicle variation.
- 2) Production cost increase for 80 over 83 decibel level is approximately \$100 per vehicle considering noise paneling only.
- 3) Production safety factors for compliance testing will only be on the order of 1 decibel, whereas we believe 2-3 decibels are preferred to absolutely insure compliance.
- 4) The paneling we currently anticipate using for sound deadening is known to be susceptible to weathering agents and abrasions. As an importer with longer than normal pipeline between manufacture and end delivery to customer, we are concerned that the overall life of these components could become a problem area. In any event just normal usage could pose the same problems, and we are uncertain as to the final effect on increased maintenance, etc.
- 5) Use of noise deadening paneling on this vehicle is certain to increase engine compartment temperature. We expect there may be additional problems, such as hose heat cracking, as a result of higher compartment temperatures. This also causes concern as to adequate heat rejection capabilities for the engine itself.
- 6) The air cooled engine presently used in this vehicle is inherently noisy due to the engine air fan, however, this fan cannot be simply quieted as with a water cooled engine fan. If this step should prove necessary to achieve an adequate safety margin in production we currently estimate approximately \$400 increase in cost for this step only.
- 7) As an alternate to item 6 (above), light turbocharging of the engine may have to be considered. However, since this vehicle is basically cab over engine, this will be very difficult to accomplish and will probably cost more than item 6.

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Director, Standards and Regulations Division

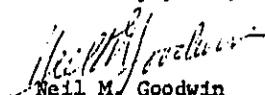
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In summary, we believe that quieting of our vehicles to the 80 decibel level, while technically feasible, will be extremely costly and will radically impede our marketing program. Remaining at the 83 decibel level will result in considerable cost avoidance and will insure much better overall performance regarding durability aspects of the vehicles at only marginal sacrifice in noise reduction. We therefore strongly suggest that EPA proceed with rescinding the 80 decibel requirement, however, with the stipulation that the present Federal preemption at the current 83 decibel level remain in effect.

Thank you for the opportunity to comment on this very important subject.

Sincerely yours,

  
Neil M. Goodwin  
Director of Engineering  
and Operations

NMG:smt

cc: R. Reardon  
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