



October 9, 2024

Truck and Engine Manufacturers Association
Jed R. Mandel
President
333 West Wacker Drive
Chicago, IL 60606

To: Jed R. Mandel,

In 2021, Oregon's Environmental Quality Commission adopted the regulations for new medium and heavy-duty vehicles. These rules included the Advanced Clean Truck rule, which requires medium- and heavy-duty vehicle manufacturers to sell zero-emission vehicles as a certain percentage of new vehicle sales, beginning with the 2025 model year. The Heavy-Duty Low NOx Omnibus rule requires lower oxides of nitrogen (NOx) and fine particulate matter (PM2.5) emissions for new conventionally fueled (e.g., diesel, natural gas) heavy-duty vehicle engines. These rules go into effect with the 2025 engine model year¹. These rules are critical in helping Oregon achieve its greenhouse gas emission reduction goals and reducing air pollutant emissions from largest sectors in Oregon's anthropogenic inventory.

Recently, DEQ has engaged in a number of conversations with dealers over pending implementation of the rules and heard concerns regarding availability of new engines and trucks and purchasing requirements imposed by manufacturers on the dealers.

We are particularly interested in understanding how truck manufacturers are approaching compliance with the Advanced Clean Truck (ACT) and Heavy-Duty Low NOx Omnibus (Omnibus) Rules. Given the significant impact these regulations will have on Oregon's environment and the truck industry, we are seeking clarification on how each manufacturer is preparing to comply with the new requirements. Specifically, we would like to inquire about the following:

1. Compliance Strategy:

How do you plan to meet the targets and timelines set by the ACT rules? Could you provide a breakdown of the steps you are taking to ensure compliance with the mandate for zero-emission vehicles? What are your plans for product availability to provide zero emission vehicles for different sectors or compliant Omnibus engines?

¹ DEQ recently announced plans to initiate a rulemaking to pause implementation of the Omnibus rules to the 2026 engine model year.

2. **Communication with Dealers:**

What specific information or guidance are you providing to your dealer networks regarding the implementation of the ACT and Omnibus rules?
Are there plans for dealer training, marketing, or technical support to ensure that dealerships are well-equipped to handle the transition to cleaner technologies?

3. **Collaboration with Other Manufacturers:**

Have you engaged in any formal or informal discussions with other truck manufacturers about your approach to complying with the ACT or Omnibus rules? If so, could you provide details of these discussions and how they might impact competition within the industry? Based on our conversations with dealers, the manufacturers appear to have very similar market strategies.

4. **Transparency and Consumer Impact:**

How do you plan to communicate the changes to your customers, particularly regarding any price adjustments or new features in zero-emission vehicles? How are you marketing and making it easier for customers to buy a ZEV?

We would greatly appreciate your response to these questions at your earliest convenience. Your insights will help us better understand manufacturers' role in shaping the future of clean transportation and ensuring a fair, competitive market.

Thank you for your time and attention to this matter. We look forward to your response.

Sincerely,



Ali Mirzakhali

Air Quality Division Administrator

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Oregon Department of Environmental Quality