

September 11, 2017

The Honorable Scott Pruitt
Administrator
Environmental Protection Agency
Office of the Administrator 1101A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Pruitt:

Volvo Group North America, Cummins Inc., and Navistar Inc. are among the major manufacturers in the heavy-duty vehicle and engine markets. We have long expressed our support for EPA and NHTSA to regulate fuel efficiency from heavy-duty vehicles. We are writing to communicate our concern about EPA's recent announcement of its intent to revisit provisions of the "Phase 2" greenhouse gas and fuel efficiency regulations finalized last year. Of particular concern are modifications to provisions related to glider kits and glider vehicles.

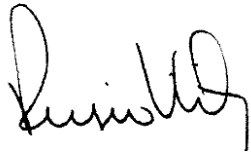
Glider kits are new chassis that lack a powertrain (engine, transmission, drive axles) and provide an option to owners for replacing damaged vehicles that still have usable powertrains. The reuse of powertrains in glider kits reportedly produces elevated PM and NOx emissions compared against current standards and currently certified OEM products. As such, glider kits should not be used for circumventing purchase of currently certified powertrains. The Phase 2 provisions as finalized maintain the glider kit option for the market while ensuring a level playing field for all manufacturers of trucks and engines.

Re-opening the Phase 2 rule may also lead to non-harmonized regulatory emissions and fuel efficiency requirements across the country, inflicting uncertainty and damage to our industry. The Volvo Group, Navistar and Cummins join with the Truck and Engine Manufacturers Association (EMA), the American Trucking Associations (ATA), the Truck Rental and Leasing Association (TRALA), and others voicing their concerns with re-opening the Phase 2 regulation. Each of our companies is seeking an opportunity to discuss this important issue with you in the very near future.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. Slagle", with a stylized, flowing script.

Dennis Slagle
Executive Vice President, Volvo Group,
and President, Mack Trucks

A handwritten signature in black ink, appearing to read 'Persio Lisboa'.

Persio Lisboa
Executive Vice President and Chief Operating Officer
Navistar, Inc.

A handwritten signature in black ink, appearing to read 'Jennifer Rumsey'.

Jennifer Rumsey
Vice President - Chief Technical Officer
Cummins, Inc.