



**TESTIMONY OF GLEN KEDZIE ON BEHALF OF THE AMERICAN TRUCKING
ASSOCIATIONS ON EPA’S REPEAL OF EMISSION REQUIREMENTS FOR GLIDER
VEHICLES, GLIDER ENGINES, AND GLIDER KITS RULE
(May 31, 2018)**

Good afternoon. My name is Glen Kedzie and I am Vice President, Energy & Environmental Counsel for the American Trucking Associations (ATA). Thank you for the opportunity to provide testimony on the scientific justification, or lack thereof, behind EPA’s proposed repeal of emission requirements for glider vehicles.

ATA is the trade association representing the interests of 34,000 companies in the U.S. Through our prior written comments and testimony, ATA has strongly opposed EPA changing course and repealing the glider provisions due to their excessive emissions and their undercutting the decades and billions of dollars of investments by fleets, manufacturers, and suppliers of clean vehicle technologies.

ATA has a long history of working with EPA in reducing emissions. Our message has remained consistent – new regulations must be justified; be economically and technologically achievable; must be based upon sound data and science; implementation should not create major market shifts or disruptions in equipment purchasing cycles; and be developed with an eye towards transparency.

Diesel engines have made incredible progress since the mid 1980’s in addressing NOx and PM. Today’s near-zero engine emissions reflect the major progress our industry has advanced over the last 30+ years. The same cannot be said for glider vehicles.

Putting the trucking industry’s emission reductions in perspective, over 36% of heavy-duty MY 2011 and newer diesel trucks in operation today are equipped with near-zero emission clean diesel technologies.¹ On the other hand, while glider vehicles comprise only 5% of heavy-duty tractors, their emissions will represent about one-third of all NOx and PM emissions from heavy-duty tractors in 2025 if EPA leaves them unchecked.

The science and data supporting the agency’s justification in regulating NOx and PM emissions from gliders rests on solid ground both under highway cruise conditions and transient operations. EPA’s November 20, 2017, glider emissions testing report, and CARB’s December 27, 2017, emissions analysis referenced as Attachment 3 in its comments to the proposed glider repeal rule docket further justify and thoroughly substantiate the differentiation in emissions between gliders and new vehicles. Furthermore, Section 14.2 of the August 2016 EPA/NHTSA *Response to Comments* document provides a plethora of support for the agency’s glider

¹ Industry research commissioned by the Diesel Technology Forum and conducted by IHS Markit.



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provisions. It also must not be left without saying that fatally flawed and elementary studies on glider emissions funded by select special interests have no place in setting laws to protect human health and the environment.

Of note, Environment and Climate Change Canada published their final Phase 2 regulation yesterday which included provisions to regulate glider vehicles. While ATA has not had time to review supporting documents to this rule, it would be advisable for the agency to peruse this regulation for further analysis and data on glider vehicles if warranted.

Finally, while economic cost considerations -- including employment losses -- are among the factors considered by the agency in setting standards, glider repeal stakeholders using questionable employment loss figures should substantiate and justify such numbers and EPA must account for associated employment gains in other trucking industry sectors.

In closing, ATA supports the current scientific conclusions justifying the regulation of glider vehicles to protect human health and the environment and stands ready to assist the agency in providing any additional information or data as necessary on this critical matter.

Thank you.