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Dear Truck and Engine Manufacturers,

The members of the Clean Freight Coalition (CFC) comprise leaders of the commercial vehicle industry that have a long history of working together to support the needs of motor carriers, drivers, dealers and provide important services for fleets and bus passengers. All these stakeholders have worked tirelessly to support the movement of our nation's freight and passengers.

The recently enacted and pending regulations by the U.S. Environmental Protection Agency (EPA) and California Air Resources Board (CARB) have created uncertainty and disruption in the commercial vehicle industry, leading to internal combustion engine and truck scarcity. Federal and state zero emission vehicle (ZEV) mandates have already begun to impact coalition members' ability to purchase safer, cleaner equipment to support the movement of freight by truck and passengers by bus.

The Clean Truck Partnership (CTP) agreement entered between your companies and CARB has served as tacit approval of the regulatory timelines and requirements mandated by CARB. Moreover, the CTP is routinely referred to as a key proof point that industry is supportive of CARB's aggressive dash to zero emissions and by extension zero ICE vehicles. The cost of battery electric vehicles makes purchasing new equipment impossible for many fleets, and only a miniscule fraction of fleets have moved to battery electric vehicles. In addition, even in applications where the range and weight issues of battery electric commercial vehicles can be overcome, the infrastructure is entirely insufficient for meaningful adoption of these vehicles.

As the industry embarks on a new year and new Administration, industry collaboration is needed to reset and revise government standards that have been put in place. These standards include the Advanced Clean Trucks (ACT) rule, the Advanced Clean Fleets (ACF) rule, Greenhouse Gas Phase 3



(GHG 3) rule, and the CTP. Agreements that solely place the burden of compliance on zero-emissions sales misalign with our industry's goals of reducing emissions with equipment that is proven and cost-effective. California's one-size-fits-all regulations fail to account for the unique operational requirements of the commercial vehicle industry.

**To set achievable national emissions standards, truck manufacturers should abandon the CTP and are encouraged to work with industry partners to block harmful regulations that do not set us on a path to success.**

The members of the CFC are committed to working with the manufacturers on technology-neutral, uniform national standards to reducing emissions. Unachievable targets and timelines that fail to account for operational and economic realities have once again set our industry up for failure. With existing and emerging technologies, there are multiple paths forward to effectively reduce the life-cycle emissions footprint of commercial vehicles. Many fleets have already adopted these technologies.

History has proven that our industry can overcome obstacles of any nature when stakeholders are aligned; this obstacle is no different.

Sincerely,

A handwritten signature in cursive script that reads "Jim Mullen".

Jim Mullen  
Executive Director  
Clean Freight Coalition

cc: Members of the CFC  
Chris Spear, American Trucking Associations  
Jacqueline Gelb, American Truck Dealers  
Ryan Streblow, National Tank Truck Carriers  
Jim Ward, Truckload Carriers Association  
Lisa Mullings, National Association of Truck Stop Operators  
Debbie Sparks, National Motor Freight Traffic Association  
Fred Ferguson, American Bus Association  
Gary Petty, National Private Truck Council  
Dan Gage, The Transport Project