

- MVMA supports "an exemption process for essential uses without substitutes".
- EPA should propose exemption procedure.
- Exemptions for aftermarket required.
- MVMA requests that EPA allow at least two full years between promulgation and the effective date of any regulatory action.
- Individual member companies will provide additional comments on this matter of timing.

Truck and Equipment Manufacturers

Wagner

- Phase-down proposed in Option 3 10 year period represents too great a highway safety risk.
- Brake strip friction material must be exempted from Option 3, and 5 year options 1 and 2.
- Recommend EPA establish mechanism for exemption procedure.
- Request (1) an exemption on drum brake strip lining, and (2) extension of 5-year ban option for disc brake pads used on older vehicles.

Navistar

- 3-1/2 to 4 years lead time to develop and incorporate new material into any product.
- One-year not enough lead time for brake linings.
- Exemption required for replacement parts.
- Navistar supports Alternative 1 (5 years) if certain modifications are made:

<u>Year</u>	<u>Percent</u>
6	30
7	24
8	18
9	12
10	6
11	0