April 2, 1981

Director, Standards & Regulation Division
U.S. Environmental Protection Agency
Washington, D.C. 20460

Attn: CNAC Docket 81-02 (Medium & Heavy Trucks) ANR-490

SUBJECT: '80 dba Level Noise Emission Standard
Requirement.

Gentlemen:

This comment is being made in response to the request made in
the Federal Register on March 19, 1981. As FWD Corporation is
a manufacturer of custom vehicles designed to meet the require-
ments of the customer, the 80 dba requirement is a burden on
the resources we have available. As the majority of the
vehicles we produce are all-wheel drive, the problem of noise
suppression is more difficult than for a manufacturer of rear-
wheel drive units. The front driving axle and transfer gear
case are additional noise sources not normally found in rear-
wheel drive units.

Manufacturing custom vehicles magnifies the problem of the
number and variety of configurations to be developed and certified.
This causes us to expand considerable development and testing
time to be able to provide vehicles to the segment of the public
whose needs are other than production type units.

In years 1978, 1979 and 1980, we verified 50, 36, 28 configurations
respectively and in the same years shipped 112, 139, 59 units
respectively. This indicates an average for three years of 2.72
units per configuration verified. As mentioned before, for a
small company, offering custom vehicles to fill a particular need
in the economy, it will be extremely burdensome to bring their
vehicles into compliance with the 80 dba level. It is for this
reason we feel the 80 dba noise standard regulation for heavy and
medium trucks should be restrained.

Very truly yours,

Leon W. Steenhoek
Project Engineer

FWD CORPORATION