

Docket # OPMO-0184
ITEM 36



FREIGHTLINER CORPORATION

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July 15, 1985

Assistant Administrator
Office of Air and Radiation (AR-443)
Docket No. OPMO-0184
U.S. Environmental Protection Agency
Washington, D.C. 20460

Subject: Proposed Amendments on 40 CFR Parts 202 and 205
Medium and Heavy Truck Noise Standards
50 Federal Register 25516 dated June 19, 1985

Dear Sir,

This submission is filed pursuant to the Notice of Proposed Rulemaking concerning noise emission standards for newly manufactured medium and heavy trucks (40 CFR Part 205, Subpart B), and for motor carriers engaged in interstate commerce (40 CFR Part 202, Subpart B).

Freightliner Corporation manufactures and distributes class 8 heavy duty trucks under the trade name of Freightliner Trucks. Through our subsidiary Mercedes-Benz Truck Company, Inc., we also manufacture and distribute class 6 and 7 heavy duty trucks under the trade name of Mercedes-Benz Trucks.

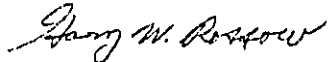
Freightliner Corporation fully agrees with and supports the agency's proposed rulemaking. Freightliner also concurs with the associated impact analysis on economics, health and welfare. That analysis shows that noise abatement improvements will continue with minimal adverse economic impact on industry and consumers. We believe the two-year deferral of the 80 db(a) standard from January 1, 1986 to January 1, 1988, to coincide with the EPA's Final Rule on heavy duty diesel engine Nox and particulate emissions for 1988 and later model year engines (50 Federal Register 10606, dated March 15, 1985) is a necessary and appropriate action. The Agency correctly recognizes that the feasibility of implementing the 80 db(A) noise standard technology in medium and heavy trucks is interdependent upon implementation of these new exhaust emission standards. Further, we

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believe that the Agency's action to tighten the noise emission standards for motor carriers engaged in interstate commerce in 1986 will assure continued environmental improvements in terms of reducing public exposure to excessive noise levels.

Sincerely,



Gary W. Rossow, Director
Government Technical Affairs

GWR/kb