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Oshkosh Truck Corporation

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April 23, 1981

Director, Standards and Regulations Div.
ATT.: ONAC Docket 81-02 (Medium and Heavy Trucks)
ANR-490
U.S. Environmental Protection Agency
Washington, D.C. 20460

Dear Sir:

This letter is being submitted in response to the request for comments regarding regulations governing 80 versus 83db noise standards. The following information is provided in support of the position being established by Oshkosh Truck Corporation.

~~Being a small producer of speciality vehicles, Oshkosh Truck Corp. has experienced to date a situation which, in meeting the 83db requirement, has imposed complications above those subjected to larger manufacturers. This is due to the following:~~

1. Oshkosh does not produce vehicles for stock purposes. Vehicles are produced upon receipt of firm customer orders; resulting in delays in customer deliveries and a very abbreviated number of vehicles available for pre-production testing. ②
2. Vehicles purchased from Oshkosh tend to be highly specialized. With the wide range of diversified products built to customer specifications, pre-production testing opportunities are minimal and production verification testing is high. 3
3. Being a small scale manufacturer, Oshkosh relies heavily on its suppliers for information as well as for materials which meet the regulations. With a limited amount of manpower resources, Oshkosh frequently finds itself limited on what it can and cannot commit to a project. This can require Oshkosh to forego sales. 4
4. Oshkosh's volumn of vehicles of any given configuration is limited, thereby the cost impact of additional sound related items are more expensive than those of competition. 5

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Oshkosh encourages the continued use of the 83db regulation. It does not support the planned regulation of 80db. To substantiate its position, it offers the following reasoning. 6

The U.S. Trucking Industry, based on the condition of the economy is in a severely depressed state. Many of the product lines produced at Oshkosh rely on domestic sales volume coming from commercial applications. Most noticeably are products directly related to the use of mixers and snowplows. With construction and new housing starts at a near standstill, the sale of related chassis for this market place are far below normal. It is not anticipated that this industry will return to a healthy condition until the economy stabilizes or takes an upward trend. Even then, mixer sales have historically lagged that trend by several months while industry establishes its needs. For other vehicles such as snowplows, a depressed economy means lower tax revenues. This results in a shortage of funds available for the purchase of snow removal equipment, in almost all cases, purchasers of new equipment defer any buying, purchase smaller units, or repair and replace only on a demand basis.

Should the economy begin an upward trend, the truck marketplace will certainly follow. However, recovery of the market with the cost of new noise suppression hardware added will be a deterrent to a return to normal for truck manufacturers. At this time, costs that are associated with development, design, and pre-production testing are being curtailed. Adding these costs back will act as a depressant to overall recovery, forcing deferral of purchasing rates. 10

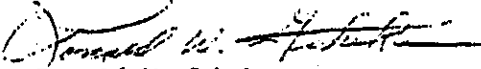
As of today, many of the elements needed to meet the planned 80db requirement are not yet known. A substantial number of hardware suppliers including manufacturers of engines, mufflers, and air cleaners are not fully aware of what is required to meet the standards. These suppliers have unknown hardware commodities and costs, most certainly the end vehicle producer is in the same position. Oshkosh is spending between \$400.00 and \$450.00 per unit to meet the current 83 db level. The additional dollar expenditure to meet the 80db requirement is going to be substantially greater. The development, design, and test costs are expected to be staggering! 13

The absolute value of the noise reduction program in reducing noise on our streets and other environments, beyond current levels, versus economic does not appear warranted. Trucks running at the current level 83db(A) are substantially quieter than they were several years ago, the contribution 14

~~of trucks to traffic noise versus an 83db(A) of 80db(A) limit should be assessed. We fully question the logic of reducing noise levels below 83db. With consideration being given to the environment and operating conditions that these vehicles operate in, it seems that the saturation point has already been reached. To continue to reduce noise levels while these vehicles must operate along side of cranes, bulldozers, etc., which have a substantially greater noise impact seems to be fruitless. In all reality, when is the ultimate reached?~~

Sincerely,

OSHKOSH TRUCK CORPORATION



Ronald W. Gehrke
Manager - Engineering Administration

RWG/mv