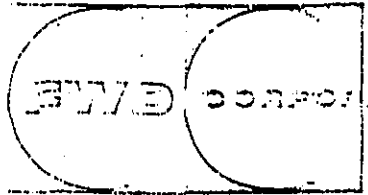


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April 2, 1981

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

Attn: ONAC 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 requirements 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.

81-02-45

Manufacturing custom vehicles magnifies the problem of the number and variety of configurations to be developed and certified. This causes us to expend 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 It is for this reason we feel the 80 dba noise standard regulation for heavy and medium trucks should be rescinded.

Very truly yours,
FWD CORPORATION
Leon W. Steenbock
Leon W. Steenbock
Project Engineer

bjs