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CERTIFIED MAIL

MACK TRUCKS, IN
One of The Signal Companie

June 1, 1981

Mr. Kenneth E. Feith
Standards and Regulations Division
Office of Air, Noise and Radiation
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Dear Mr. Feith:

Request for Information Concerning
the 80 dB(A) Noise Emission Standard
for Medium and Heavy Duty Trucks

This letter responds to your letter of May 5, 1981, to Mr. A. W. Pelletier, Chairman of the Board and Chief Executive Officer, Mack Trucks, Inc.

In our November 7, 1981 petition for reconsideration of the 80 dB(A) Standard, we addressed both the estimated costs of compliance and the improved and/or additional components that would be necessary for compliance with the upcoming Standard. We are unable to supply you with the "per vehicle costs due to quieting by model and engine configuration" as you requested. We have not developed such costs as of this date. However, we believe that our previous estimate of as much as a $400 to $500 per vehicle increase to our customers is still applicable.

We would like to make an addition to the list of improvements required to further quiet Mack chassis. The new list is as follows:

1. More efficient mufflers, which certainly will be larger and/or heavier.

2. Additional underhood/undercab sound absorbing material.

3. Side shields to effectively eliminate the engine from "the line of sight", when viewed from the side of the chassis.

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4. Oil pan covers on Mack engines, which power approximately 91% of our vehicles.

Each Mack vehicle will require some combination of the above noted items.

Our sound level development work utilizes octave band analysis in treating the entire vehicle as a noise source. For this reason, we have no data on "the acoustical source levels of the various component elements before and after quieting". Our sound level reduction technique calls for increased treatment of easily (less costly) quieted components instead of addressing components which are more difficult (costly) to quiet.

We hope that this data will aid the Agency in its review of the Standard's original supporting analysis.

Very truly yours,

MACK TRUCKS, INC.

Thomas F. Brown

Thomas F. Brown
Executive Engineer-
Vehicle Regulations

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