

Comment on EPA Proposed Glider Vehicles Rule, Docket ID EPA-HQ-OAR-2014-0827,  
submitted January 5, 2018

**Appendix A: Numerous Freight Truck Industry Leaders Have Publicly Opposed the Unfair Competition and Pollution that Would Be Allowed by a Glider Kit Loophole**

Name/Link	Summary of Position	p.n. in RtC
Volvo <sup>i</sup>	<p><b>Unfair Competition:</b> “The availability of these vehicles [gliders] is creating an unlevel playing field for manufacturers of new vehicles designed and certified to be compliant to all current emissions, fuel efficiency, and safety regulations.”</p> <p><b>Size of Market:</b> ““Gliders as a whole represent over 10,000 units annually”</p> <p><b>Gliders should be considered new vehicles:</b> Volvo includes an advertisement from a glider manufacturer that advertises gliders as new.</p> <p><b>Sub-300 cap:</b> “We further encourage EPA to reduce or, at a minimum maintain, the 300 unit production cap in the final action by the Agencies”</p>	1865-69
Clarke <sup>ii</sup>	<p><b>Used engines:</b> “This commenter recommends that used engines be eliminated as an option when assembling gliders. A rebuilt engine that has been brought back to the original MY EPA emission standard is always a cleaner option than a used engine installed in a Glider chassis.”</p> <p><b>Sub-300 cap:</b> “For example each small trucking company’s exemption could be the lesser of the average number of Gliders built annually over the past 3 years or 150 units/year.”</p> <p><b>Establishing base years:</b> “Instead of using production years 2010-2012 to establish peak levels use production years 2015-2016.”</p> <p><b>Gliders and vocational gliders each have 300 cap:</b> “The maximum cap with Gliders and Vocational Gliders would be 600/year.”</p>	1825-27
Cummins <sup>iii</sup>	<p><b>Limits on glider kits:</b> “Cummins supports limitations on the use of glider kits”</p> <p><b>Appropriate use of glider kits:</b> “[G]lider kits should not be used to circumvent the purchase of a currently certified engine and aftertreatment system”</p>	1830
GATR Truck Center <sup>iv</sup>	<p><b>Unfair competition:</b> “Dealers such as ours have been subject to a growing unfair competition from this rapidly expanding market of non-compliant vehicles.” “We strongly object to such an unfair disruption of market competition.”</p> <p><b>Support for regulation:</b> “GATR Truck Center strongly supports the Agencies' proposal to impose new requirements on companies</p>	1846

	assembling and offering for sale vehicles produced by installing used driveline components into new glider kits.”	
Navistar <sup>v</sup>	<p><b>Support for regulation:</b> “Navistar supports the portion of the NPRM that addresses gliders. Further, Navistar suggests that the allowance is too high, and that gliders should either be limited to 200 per year or eliminated completely.”</p> <p><b>Unfair competition:</b> “the prevalence of gliders, addressed in the NPRM, is one example how these pressures can lead to distortions in the market for vehicles.”</p>	1855
Nuss Truck & Equipment <sup>vi</sup>	<p><b>Support for regulation:</b> “strongly supports the Agencies' proposal to impose new requirements on companies assembling and offering for sale vehicles produced by installing used driveline components into new glider kits. NHTSA should also enforce the existing regulations that require manufacturers of glider-based vehicles to comply with all applicable safety standards.”</p> <p><b>Unfair competition:</b> “Dealers such as ours have been subject to a growing unfair competition from this rapidly expanding market of non-compliant vehicles.”</p> <p><b>Inappropriate use of gliders:</b> “The original intent of selling glider kits has moved from a rebuilding mechanism to now mainly evading diesel emissions EPA mandates”</p> <p><b>Health and Emission:</b> “The rapidly expanding glider-based vehicle market is seriously undermining the significant gains EPA, NHTSA, and the heavy-duty vehicle industry have made to reduce criteria and greenhouse gas emissions, reduce fuel consumption, and improve roadway safety”</p>	1857
PACCAR <sup>vii</sup>	<p><b>Support the 300 cap:</b> “If the implementation is set at January 1, 2018 as proposed in the NPRM, then EPA should allow all small businesses, as defined by federal regulations, to assemble a minimum of 50 gliders per year as exempt from the engine / vehicle model year requirements, regardless of the emission standard of the engine, and up to their maximum sales in 2013 or 2014, or 300.”</p>	1858
Truck Country of Wisconsin <sup>viii</sup>	<p><b>Emissions:</b> “We agree with EPA's assessment that most gliders manufactured today use remanufactured model year 2001 or older engines. Typically these engines have NOx and particulate matter (PM) emissions 20 to 40 times higher than today's clean diesel engines.</p> <p><b>Inappropriate use:</b> “Since 2010 when EPA's current NOx and PM standards for heavy duty engines took effect, glider sales have increased nearly 10-fold as compared to the 2004-2006 ~ time frame. We agree with EPA that this increase reflects an attempt to avoid using engines that comply with EPA's 2010 standards, and is an attempt to circumvent the Clean Air Act's purpose to protect human health and the environment.”</p>	p1864

Worldwide Equipment Enterprises, Inc. <sup>ix</sup>	<p><b>Support for regulations:</b> “Worldwide Equipment strongly supports the Agencies’ proposal to impose new requirements on companies assembling and offering for sale vehicles produced by installing used driveline components into new glider kits.”</p> <p><b>Unfair Competition:</b> “Dealers such as ours have been subject to a growing unfair competition from this rapidly expanding market of non-compliant vehicles”</p> <p><b>Unfair taxes for gliders:</b> “In addition to not having to follow the environmental regulations that legitimate dealers like Worldwide have to follow, the manufacturers of glider-based vehicles, in many cases, are not collecting the 12% federal excise tax (“FET”) that normally applies to new vehicle sales, giving customers even further financial incentive to purchase glider vehicles rather than fully compliant new vehicles.”</p> <p><b>Health and Emissions:</b> “the rapidly expanding glider-based vehicle market is seriously undermining the significant gains EPA, NHTSA, and the heavy-duty vehicle industry have made to reduce criteria and greenhouse gas emissions, reduce fuel consumption, and improve roadway safety”</p>	p1873
---	--	-------

<sup>i</sup> <https://www.regulations.gov/document?D=EPA-HQ-OAR-2014-0827-1966>.

<sup>ii</sup> <https://www.regulations.gov/document?D=EPA-HQ-OAR-2014-0827-1005>.

<sup>iii</sup> <https://www.regulations.gov/document?D=EPA-HQ-OAR-2014-0827-1298>.

<sup>iv</sup> <https://www.regulations.gov/document?D=EPA-HQ-OAR-2014-0827-1010>.

<sup>v</sup> <https://www.regulations.gov/document?D=EPA-HQ-OAR-2014-0827-1919>.

<sup>vi</sup> <https://www.regulations.gov/document?D=EPA-HQ-OAR-2014-0827-0922>.

<sup>vii</sup> <https://www.regulations.gov/document?D=EPA-HQ-OAR-2014-0827-1204>.

<sup>viii</sup> <https://www.regulations.gov/document?D=EPA-HQ-OAR-2014-0827-1468>.

<sup>ix</sup> <https://www.regulations.gov/document?D=EPA-HQ-OAR-2014-0827-0948>.