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MIC American V-Twin Committee Addresses The Urgent Need For An EPA Engine Certification Program

IRVINE, Calif., Jan. 11, 2006 - The Motorcycle Industry Council, Inc. recognizes the importance of the American V-Twin segment and its unique market position. In response to the growing needs of this segment, the MIC Board formed the MIC American V-Twin Committee in late 2004.

One hot issue that the MIC American V-Twin Committee identified early on, was the challenge that custom bike builders face in having to conduct the elaborate vehicle testing and certification required by the EPA emissions regulations. Currently, custom motorcycle builders and small volume manufacturers must certify the complete motorcycle even if they install an engine that is used in another motorcycle that has already been EPA certified. The high cost and complicated, time-consuming procedures for vehicle certification are a major burden or infeasible for many custom motorcycle builders and small volume manufacturers. To certify one engine family can cost in excess of \$10,000, not including the much higher cost and time that can be associated with the development of engine calibrations that comply with the emissions standards in the first place.

Since most custom bike builders or kit bike assemblers use engines that are also used in many other motorcycles, the Committee asked the question, "Why can't a custom builder install an engine that has already been EPA certified in another motorcycle, as long as reasonable criteria are met?" This would be a practical, economic solution that would benefit the engine manufacturers, the motorcycle builders, assemblers and hobbyists.

The Committee noted that the preamble in the new EPA regulations stated that they would consider such an engine certification program and EPA staff also announced their intention to develop such a program at the March 2005 EPA certification workshop.

MIC and Committee members first called EPA staff in April 2005 to ask them about their intention and expressed concern that it may take years to incorporate the option of an engine

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certification program into EPA regulations. It was suggested that a more expedient means for providing such a program may be a Manufacturer Guidance Letter, as similar provisions have been provided to manufacturers through such letters in the past.

The EPA asked MIC to put our thoughts together in a draft guidance letter for their consideration and MIC quickly responded. Under MIC's draft proposal, a small volume manufacturer or a producer, seller, or assembler of highway motorcycle kits is not required to apply for or receive certification to install an engine certified under this procedure, provided such person

- 1) installs an unmodified certified engine;
- 2) does not install the engine in a vehicle that exceeds the weight and gearing limits used to certify the engine;
- 3) uses or installs the evaporative emission system or parts specified by the engine manufacturer;
- 4) permanently affixes the required label in an approved location on the vehicle; and
- 5) assures that the owners manual is provided to the ultimate purchaser.

MIC is concerned about the misinformation within the industry surrounding this issue and the efforts to derail MIC's progress on what will be a beneficial option for the V-Twin industry. If such an engine certification is not developed by EPA, that leaves the V-Twin industry with no alternatives to the full-blown vehicle certification, and many small builders will simply not be able to comply with the EPA regulations for 2006.

MIC members and prospective members are invited to attend the MIC American V-Twin Committee forum on Monday, February 6, at 9:00 a.m. at the Cinergy Convention Center (Convention Center), Room 232, in Cincinnati to discuss this opportunity and other topics.

The MIC American V-Twin Committee is spearheaded by Chairman Fred Fox of Parts Unlimited/Drag Specialties and Vice Chairman, Ted Sands of Performance Machine, and its members include Lee Chapin (Mikuni American Corp.), Buzz Dyer (Cycle Shack, Inc.), Frank Esposito (Global Motorsport Group, Inc.), Wil Garland (American Ironhorse Motorcycle Company, Inc.), Gayle Greene (Paramount Custom Cycles), Dave Koshollek (DAKO Enterprises, LLS)), Nick Messer (Big Dog Motorcycles), Maurice Murray (Zoom Strategic Marketing), Grady Pfeiffer (GH Marketing), Jason Severstson (GE Consumer Finance), Tom Seymour (Saddlemen), Len Sims (NADA Appraisal Guides), and Brett Smith (S & S Cycle, Inc.).

The Motorcycle Industry Council (MIC) is a not-for-profit, national trade association representing manufacturers and distributors of motorcycles, scooters, motorcycle/ATV parts and accessories and members of allied trades, located in Irvine, California.