

Comment from Miro Kefurt

1.) Replica Vehicle manufacturer may install battery electric power-train, rather than Internal Combustion Engine (ICE) that issue is not being addressed in any way in the regulations, and if interpreted as currently proposed, then Battery Electric Vehicle (BEV) would not really be "replica" of the original if the original vehicle had ICE. I believe that it should be specifically indicated in the regulations that "any" type of powertrain will be permitted, be it ICE, BEV or any version of advanced propulsion technology such as the many types of Hybrids that exist. BEV powertrains would especially make these vehicles attractive to environmentally minded individuals, and would also make the "emission certification" easier. The powertrains would not be limited to just very few, that engine manufacturers may offer under EPA and CARB rules for such vehicles, and therefore more vehicle "replica" models would be available to end consumers.

2.) As for having "foreign" company making either complete or incomplete or "kit" vehicles and then selling them to US distributor or "final stage" manufacturer, that in effect could mean that any number of such "final assembly" operations can exist under independent ownership, and thus thousands of such vehicles could be sold or imported annually even if they are otherwise identical - I believe that this is NOT the intent of the proposed regulations, so perhaps the "license" that NHTSA would award after "registration" should be limited to just the 325 vehicles proposed and any application for "identical" vehicles by another entity should then be denied.

3.) Case in point related to item #2 is also the possibility of number of foreign and or domestic manufacturers making the "identical" vehicle, and that the only distinction would also only be a different marketing name. Case in point is the MOKE vehicle, which for example is already made by more than 7 different companies in China, and already marketed as Low Speed Vehicle (LSV) by 4 different companies in USA, all of them independently fully intent to sell them as "replicas" as soon as possible. If multiple registrations to these legally independent companies is allowed, then at minimum 975 vehicles would be then permitted to be imported to USA, but if all of the Chinese companies will register independently then 2,275 vehicles would be permitted. While these MOKE vehicles are not 100% identical, they all resemble the MOKE which was last time produced in Portugal in 1995.

Thus again, I believe that there should be "cap" on vehicles that have "identical appearance".

Links to companies that already market the MOKE vehicle in USA as LSV, but fully intent to market them as "replicas" as soon as possible to do so:

American Custom Golf Cars, Inc. <<http://www.acgcars.us/Moke.html>>

MOKE America LLC <<https://mokeamerica.com/>>

Cruise Cars, Inc. <<https://www.cruisecarinc.com/emoke>>

Forman Automotive <<https://westcoastmoke.com/>>

List to companies that plan to market the MOKE as "replicas" as soon as possible to do so, and which currently DO NOT offer such vehicle as LSV:

MOKE USA <<https://mokeusa.com/>>

OKA AUTO USA division of MIROX Corporation

<http://www.okaauto.com/2020_OKA_NEV_ZEV.html>