



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY
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OFFICE OF
AIR AND RADIATION

September 14, 2021

John Bozzella
President and CEO
Alliance for Automotive Innovation
1050 K Street, NW Suite 650
Washington, DC 20001

Dear Mr. Bozzella:

Thank you for your letter of August 26, 2021 to Administrator Regan on behalf of the members of the Alliance for Automotive Innovation requesting that EPA clarify how it would expect to interpret the model year of vehicles produced during the 2021 model year (2021 MY) which due to the circumstances described in the letter may have currently unavailable semiconductors retrofitted during the first quarter of 2022. Administrator Regan has asked that I respond to your letter on his behalf.

Under the circumstances described in your letter including that the vehicles will otherwise complete production as normal during the 2021 MY, that the cause of the semiconductor shortage was beyond the manufacturers control due to the COVID pandemic and global supply chain issues, and that the retrofits will simply add back the missing parts prior to sale to consumers, it is EPA's view that such vehicles may legally be introduced into commerce under a certificate of conformity for the 2021 MY.

This determination by EPA is limited to the 2021 MY and the specific circumstances described in your letter and should not be considered broader guidance for similar issues in the future. We would anticipate that manufacturers will continue to be proactive in addressing these supply chain issues in their production planning going forward, and therefore, would not expect these kinds of issues to recur on a regular basis.

I hope this letter is helpful to you and your members.

Sincerely,

A handwritten signature in black ink, appearing to read "Byron Bunker". The signature is fluid and cursive, with a prominent initial "B" and a long, sweeping underline.

Byron Bunker, Director
Compliance Division
Office of Transportation and Air Quality