



Hyundai America Technical Center, Inc.
6800 Geddes Road, Superior Township, MI 48198
Phone: (734) 337-2500 Fax: (734) 337-3168
www.hatci.com

VIA EMAIL (goffman.joseph@epa.gov)

June 2, 2023

Mr. Joseph Goffman
United States Environmental Protection Agency
Office of Transportation and Air Quality, Assessment and Standards Division
2000 Traverwood Dr.
Ann Arbor, Michigan 48105

**Re: Request for Extension of Public Comment Period, EPA-HQ-OAR-2022-0829,
“Multi-Pollutant Emissions Standards for Model Year 2027 and Later Light-Duty and
Medium-Duty Vehicles”**

Hyundai America Technical Center, Inc. (“HATCI”) is the design, technology and engineering division for Hyundai Motor Company and Kia Corporation, collectively Hyundai Motor Group (“HMG”) for North America. HATCI supports new light-duty vehicle development for HMG’s North American operations and global programs with engineering facilities and staff at locations in the United States including in Alabama, California, Georgia and Michigan.

For the reasons provided below, HATCI respectfully requests that the United States Environmental Protection Agency (“EPA”) extend the public comment period by at least thirty (30) days for the proposed EPA rule, “Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles,” EPA-HQ-OAR-2022-0829 (“Proposed Rule”). As EPA explained in its Program Announcement for the Proposed Rule, “the proposed standards would significantly reduce passenger car, light truck, and medium-duty vehicle emissions” of both criteria pollutants and greenhouse gas. EPA Administrator Michael Regan calls the Proposed Rule “the most ambitious pollution standards ever for cars and trucks.” The Proposed Rule was issued in the Federal Register on May 5, 2023 and EPA held several days of virtual public hearings from May 9-11, 2023 where the agency heard from dozens of public and private individuals and entities.

The Proposed Rule will significantly affect HATCI for years and likely decades to come in its research and development of light-duty vehicles in the United States. HATCI is currently in the process of evaluating the voluminous Proposed Rule preamble, regulatory text and extensive supporting documentation, which as of the date of this letter includes over 432 separate supporting and related materials with tens of thousands of cumulatively pages. In addition to the volume of supporting material, EPA undoubtedly recognizes that the Proposed Rule itself contains extensive categories, sub-categories and complex engineering and other technical



Hyundai America Technical Center, Inc.
6800 Geddes Road, Superior Township, MI 48198
Phone: (734) 337-2500 Fax: (734) 337-3168
www.hatci.com

details that HATCI must evaluate, process and discuss with a wide range of stakeholders in the United States and abroad before it may prepare formal comments to submit to EPA.

Based on the volume, complexity and short- and long-term business, economic and societal implications of the Proposed Rule, HATCI requires additional time to reasonably and sufficiently address these once-in-a-generation proposed regulatory changes.

HATCI is a member of the Alliance for Automotive Innovation ("AAI") and supports AAI's May 25, 2023 request for at least a one (1) month extension to the public comment period for the Proposed Rule.

We look forward to sharing thorough and thoughtful written comments with EPA on the Proposed Rule, and again respectfully requests the public comment period be extended until at least August 7, 2023. If you have any questions about this request, please contact me at [phone].

Sincerely,

A handwritten signature in black ink, appearing to read "R. Willard", written over a horizontal line.

Richard Willard

Director, Regulation & Certification Dept.

Hyundai-Kia America Technical Center, Inc.

Cc: Michael Safoutin, EPA (Safoutin.Mike@epa.gov)

Robin Moran, EPA (Moran.Robin@epa.gov)

Micahel Olechiw, EPA (Olechiw.Michael@epa.gov)