*D. Affecting Whole Proposal*

The Agency evaluated four different options to translate the proposed level of emission control for US06, intermediate soak, and A/C into compliance procedures and appropriate emission standards. The first option would set stand-alone standards for each control area. Compliance procedures and standards would be established individually for aggressive and microtransient driving behavior, A/C, and intermediate soaks. The second option would combine the three non-FTP areas of control into a single standard. The third option would establish a composite standard based on results drawn from both the SFTP and the FTP. While the basic concept is similar to the second option, the approach is specifically structured to directly implement the proposed level of control for each area using bag weights and to preserve the existing FTP compliance margins. The fourth option considered by EPA would replace the current FTP with an entirely new FTP that reflects, as accurately as possible, actual driving behavior.

A full analysis of each option, how it was evaluated, and the feasibility of each approach is in the Support Document to the Proposed Regulations for Revisions to the Federal Test Procedure: Detailed Discussion and Analysis. Comment on the analysis is welcome. Comments are specifically solicited on the following issues which relate to all cycles in the SFTP or changes to the FTP.

- Use of a composite non-FTP emission standard was chosen as the central approach chosen instead of using individual stand-alone standards, a single combined stand-alone standard, a replacement FTP, or some other option not considered. Stand-alone standards or a single combined stand-alone standard were not chosen primarily because of the lack of data to determine appropriate compliance margins and the difficulty in determining a single emission level given the disparity in emission levels from vehicle to vehicle. Replacing the current FTP at this time was not chosen primarily because revising the existing FTP would potentially impact the stringency of more stringent emission standards currently being considered for different parts of the country, such as the California LEV and ULEV standards, efforts by the Northeast states to adopt California requirements, and voluntary 49-state emissions standards (''FEDLEV''). Additional information and data are requested on the use of any of these approaches. Comments concerning stand-alone standards, or the simple average of the composite standards, should include consideration of how to set appropriate standards for both intermediate and full useful life.[29] Durability procedures for new stand-alone standards should also be addressed.
- Because replacing the FTP would offer better assurances of in-use emission control and would simplify the test procedure, EPA believes it makes sense in the long term to consolidate all the test requirements into a revised FTP. However, to avoid jeopardizing work on more stringent emission standards and to avoid delaying implementation of today's proposal, EPA believes it is better to incorporate consolidation of the FTP with future consideration of tighter federal standards. Comments are solicited on when consolidation should occur.
- Under the non-FTP composite approach, the bag weights for each cycle are selected to mirror the proposed level of control determined using the in-use driving survey data. (A discussion of the proposed level of control for each pollutant and how it was determined can be found in the Final Technical Report on Aggressive Driving Behavior for the Revised Federal Test Procedure Notice of Proposed Rulemaking). Comments are requested on the method used to select each weighting factor or the weighting given to each bag when determining compliance with the composite non-FTP emission standards.
- Emission standards are proposed to be set at current Tier 1 FTP levels, with an adjustment made for $NO_X$, and are tied to future changes in the FTP standards. Comments on tying the non-FTP composite standards to FTP standards, the method used for determining the standards, the $No_X$ adjustment provided, or the need for other adjustments are requested.
- The Agency considered separating LDVs and LDTs but determined driving behavior was similar between these classes. Some adjustments are provided in the proposal for specific vehicle types, transmission types, and performance rating. Comments on the method used for determining these adjustments, the need for other adjustments, or other related issues are welcome.
- Very little emission data currently exists on emission impacts using fuels other than gasoline during the SFTP. Because of this, EPA considered exempting alternative- and/or diesel-fueled vehicles from the SFTP requirements, but decided such vehicles would be able to comply. Information and data related to applying today's proposal to alternative- and diesel-fueled vehicles are welcome.
- The Agency is asking for comments on whether or not it would be appropriate to establish a single $NMHC+NO_X$ standard for stand-alone A/C or soak/start requirements or for the proposed composite standards. Comments are also solicited on both the potential emission impacts and cost implications of this proposed alternative.
- Comments are requested on the benefits and feasibility of the proposed phase-in schedule from MY1998 to 2001. The Agency is particularly interested in data and comments on how potential concerns with higher catalyst temperatures should influence lead time, as well as how these concerns should be balanced with the objective to obtain the emission benefits under this rulemaking as quickly as possible. If it appears that wholesale elimination of commanded enrichment with short lead time could introduce unanticipated problems with catalyst deterioration, EPA may elect to spread the implementation of the requirements over a longer period in the final rule. Another option might be to set an intermediate standard level for the initial phase-in. Comments are solicited on the relative benefits and costs of an intermediate standard compared to a phase-in directly to the final standards.
- Today's proposal provides two blanket, automatic substitutions from the SFTP to the FTP to reduce testing costs and time for manufacturers. No substitution of FTP bags into the SFTP calculation is allowed. Flexibility in preconditioning is also provided in the proposal. If stand-alone standards are promulgated, EPA is considering an exemption from the intermediate soak requirements. Comments on any of these aspects or related matters are requested.
- Today's proposal will improve the accuracy of the dynamometer simulation of actual on-road operation during vehicle testing. In addition, the change in dynamometers to improve accuracy also allows modifying the equivalent test weight requirements to remove the cap. Comments are solicited on these changes.
- Comments are specifically solicited on the need for additional lead time to implement the new road load requirements in terms of the dynamometer changes. If data and additional information submitted

[29] Tier 1 standards were set for two points in the useful life of a vehicle—50,000 miles (intermediate) and 100,000 miles (full).