



February 28, 2025

California Air Resources Board

RE: Used Truck Voucher Pilot Concept Request for Information

Please see below for Master's Transportation responses.

1. Which specific entities or industry experts should be involved in the design of the Used Truck Voucher Pilot Concept?
 - a. Answer: Dealers with agreements in place to sell and upfit used units as well as suppliers of equipment for the upfits and those with the ability to repower a vehicle from fossil fuel to electric.
2. Would a voucher process through an HVIP approved dealer work for this pilot concept?
 - a. Answer: It is our understanding that HVIP is a voucher process for new vehicles and dealers who sell new vehicles. This may not be a good dealer representation of used truck dealerships.
3. Should the Used Truck Voucher Pilot Concept have a fleet size and revenue cap?
 - a. If so, please provide input.
 - i. Answer: No
4. What should the incentive level be?
 - a. Should incentives vary based on mileage, vehicle body type, and/or battery capacity?
 - i. Answer: Yes – it should vary based on body type and size and could vary based on GVWR.
5. What type of certification should a used vehicle have to ensure quality?
 - a. Original Equipment Manufacturer Certified?
 - i. Answer: No
 - b. Battery state of health?
 - i. Answer: New or greater than 90% of capacity remaining.
 - c. Others?
 - i. Answer: Certification should be performed by a facility certified by the manufacturer of installed components.
6. Should eligible vehicles be capped at a specific mileage or age?
 - a. Answer: 5 years with no mileage limits. Equipment with over 85,000 miles should require suspension components to be refurbished such as bushings, springs, bearings, shocks, struts, etc.
7. What sort of recordkeeping or reporting requirements would be appropriate for fleets awarded a voucher?
8. Is there value in funding/requiring extended warranties? What would be an effective strategy?
 - a. Answer: Yes. Currently retail, certified used vehicle warranties create an extension of the original warranty. This helps to control cost of ownership for a used vehicle. The dealer should offer an additional manufacturer or dealer warranty similar to warranties of new vehicles. Most car manufacturers offer a 3yr/36,000 mile bumper to bumper warranty so a 2 yr/24,000 mile warranty would not be unreasonable.

9. Would there be reasons why you would avoid purchasing a used zero-emission vehicle? If so, please elaborate.
 - a. Answer: Yes. Question 8 helps to clarify warranties which will alleviate purchasing concerns when purchasing a zero-emissions vehicle. Due to the cost and systems of zero emission vehicles, it's important the purchaser does not incur additional expenses due to repairs in the early years of ownership.
10. Are there additional strategies, comments, or feedback that you would like CARB staff to consider as they explore the design of a Used Truck Voucher Pilot Concept?
 - a. Answer: There's an ability to repower vehicles which has a larger impact as it removes an ICE vehicle and replaces it with zero emission vehicle. Vouchers that assist with payment of moving from ICE to zero emission with the same vehicle introduces a strategy to accomplish CARB at a much reduced timeframe and smaller financial burden.