

INTER-OFFICE MEMORANDUM

FROM: K. Drexl

DATE: Oct. 17, 1995

TO: All Participants
Compliance

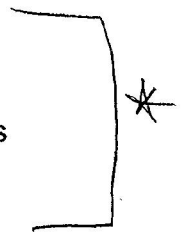
SUBJECT: EPA Final Rule

cc: M. Juron
J. Afrath
Hurley
F. Hermann
M. Kunz

Meeting Participants:
K. Drexl B. French W.
H. Polz P. Voelcker
W. Kurtz A. Nickel

A (second) meeting was held on this subject to discuss/establish the MBNA tasks in order to meet the compliance requirements of the EPA's Final Rule.

To re-iterate in simplified terms, the EPA Final Rule requires vehicle manufacturers to make available to the independent aftermarket or anyone who requests it, all information to make use of the On Board Diagnostic (OBD) system. The EPA's intent is to make the OEM provide emission-related diagnostic, training and repair information and tools available to anyone outside the dealer body



The following items were resolved:

1. It is recommended that all technical literature be made available because of the inter-related nature of the MB literature. Separating the emission-related information from the remainder is not practical.

2. CAC (W. Hurley via P. Voelcker) stated that all outside requests for technical literature should be directed to CAC.

3. The recommendation therefore was that the CAC should also handle the other tasks/aspects of this program.

- establish/maintain the index and report to NTIS Fed World.

- handle fulfillment requirements via established distribution points (ASO, Bell & Howell, MBNA Chicago PDC)

4. The CAC must be prepared to accommodate all inquiries/orders as of December 7, 1995.

5. It was noted that the Parts literature and the Technical Training literature do not yet comply to SAE J1930.

Klaus Drexl
Service Engineering
Schoebel

bcc: W. Blaylock T. Klobe
H. Hascher F.

P. Devlin P.

Stricker

MBNA must inform DBAG concerning the HHT and StarDiagnosis issue. The primary issue is that the >old= Hand Held Tester (HHT) and the >new= StarDiagnosis (SD) are two different and distinct devices and must be treated as two completely separate entities.

1.0 The Hand Held Tester was conceived, developed, manufactured and deployed to MBNA dealers before the EPA issued its Final Rule in August 1995. This rule concerns OEMs making emission related repair procedures, information and tools available to third parties; e.g. aftermarket equipment manufacturers, independent repair shops, etc.

- 1.1 DBAG could not (and would not) supply HHTs for third party customers therefore MBNA Service Engineering devised the strategy, with the concurrence of the Product Compliance department, to supply emission related repairs information embedded in the HHT, to US equipment manufacturers for inclusion in their commercially available scan tool.
- 1.2 MBNA Service Engineering canvassed US companies looking for candidate(s) able to take on the project, essentially requesting they (independently) engineer the MB information into their scan tool. MBNA selected Balco, Inc., San Jose, CA. (now known as Snap-on Diagnostics) as the most suitable to undertake such a task. VSE/PD was so informed and (reluctantly) agreed. Additionally, Assenmacher Specialty Tools; Boulder, CO. and Edge Diagnostics, Sunnyvale, CA. requested limited support from MBNA, requesting only the use of the HHT, for their development work.
- 1.3 Further, MBNA was aware that Balco, Inc. was a member of the Equipment & Tool Institute (ETI), an organization of equipment suppliers who share OEM data and information. This would assure a broader exposure for the MB emission related information which MBNA provided.
- 1.4 This activity continues today supported by Service Engineering and VSE/PD with:
 - o Snap-on Diagnostic: scan tool MT 2500 w/MB specific module; ETA 4th Qtr >98.
 - o Assenmacher Specialty Tool: scan tool M 4001 D; available now.
 - o Edge Diagnostics Systems: scan tool PAC (using Balco data); no ETA.
- 1.5 Service Engineering is uncertain that the abovementioned scan tools will have the capability of the HHT. These tools were considered interim measures, initiated by MBNA, to support the overall compliance effort. Because DBAG (and therefore MBNA) could not physically supply HHTs, the effort with the outside equipment manufacturers was accepted/tolerated, by third parties (few complaints to EPA and CARB). Note - the equipment manufacturers demonstrate support for MBNA to EPA and CARB.
- 1.6 The application for the HHT has been limited by DBAG. HHT will not be applicable to new vehicles beginning with the W220.

2.0 The StarDiagnosis system was developed and manufactured **after** the EPA issued its Final Rule. The capability of SD incorporates the existing HHT function but then goes beyond to incorporate diagnosis for the new vehicles starting with W220.

- 2.1 DBAG has been working on the new StarDiagnosis system since late 1994. Technical function responsibility is with VSE/PD (Dr. Weisser). Responsibility for sales, distribution, deployment logistics and support is with VSE/I (Dr. Neher).
- 2.2 Two separate benchmarking groups from VSE, came the USA in early 1995 to look at our market and solicit technical inputs by MBNA. This was supported by Service Engineering and Product Management-Service.
- 2.3 Compliance responsibility with EPA Final Rule requirements at MBNA was taken over 10/95 by the Customer Information department (now New Media & Technology department) within CAC. They work directly with VSE/I.] *
- 2.4 StarDiagnosis, a VSE/I literature product, therefore was also taken over.
- 2.5 As of 05/98, this responsibility within MBNA has now been shifted to the Technical Information department.

The DBAG opinion that the on-going effort with external equipment suppliers concerning the HHT, will also satisfy the EPA and CARB with respect to the new SD, is not correct. HHT and SD are two physically different systems, with distinctly different applications. The facts currently are:

- o The HHT (or its function) is still not available to third parties.
- o DBAG is blocking the availability of the new SD to third parties.

RECOMMENDATION:

MBNA must strongly advise and encourage DBAG to make this SD available to third parties. This is the only solution which is available in our market **now**.

IMPLICATION FOR NON-COMPLIANCE:

There is a genuine risk that US vehicle certification could be halted.

Armin Nickel
Service Engineering
July 02, 1998