



To Whom It May Concern:

Bergstrom, Inc. manufactures a battery-powered no-idle system which reduces emissions due to engine idling. In accordance to the H.R. 6, Energy Policy Act of 2005, when utilizing idling reduction technology, such as our system, states are allowed to adopt a 400-pound vehicle exemption on heavy-duty vehicles (see below).

**H.R., Energy Policy Act of 2005 (which became Public Law #109-58)  
SEC. 756: Reduction of Engine Idling**

Vehicle Weight Exemption – Section 127(a) of title 23, United States Code, is amended: (1) by designating the first through eleventh sentences as paragraphs (1) through (11), respectively: and (2) by adding at the end of the following:

Heavy-duty Vehicles:

- (A) In General – Subject to subparagraphs (8) and (C), in order to promote reductions of fuel use and emissions because of engine idling, the maximum gross weight limit and the axle weight limit for any heavy-duty vehicle equipped with an idle reduction technology shall be increased by a quantity necessary to compensate for the additional weight of the idle reduction system.
- (B) Maximum Weight Increase – The weight increase under subparagraph (A) shall not be greater than 400 pounds.
- (C) Proof – On request by a regulatory agency or law enforcement agency, the vehicle operator shall provide proof (through demonstration or certification) that:
  - (i) The idle reduction technology is fully functional at all times; and
  - (ii) The 400-pound gross weight increase is not used for any purpose other than the use of idle reduction technology described in subparagraph (A).

In 2012, the [Moving Ahead for Progress in the 21<sup>st</sup> Century \(MAP-21\)](#) became law which increased the weight exemption to 550 lbs. (Refer to Sec. 1510 in the bill). Despite the weight exemption increase, not all states have adopted the laws to the new weight standards. We have attached a [map](#) from the Office of Energy Efficiency & Renewable Energy showing which states have adopted exemptions since 2014. (Please note: There are a few states that have no weight exemption tolerances such as California.) We recommend checking online often to ensure you comply with each state as laws can change at any time.

The Bergstrom battery-powered no-idle system used in this truck weighs approximately 460 lbs. The system combines a lightweight, fully functional air-conditioning system and a compact air-heating system both designed to work independent of the truck's main engine. When used effectively, the system virtually eliminates overnight truck idling. The California Air Resources Board has approved our system with **ARB approval # 08-643-004**.

