

TO: Engine Lubricants Committee

CC: Susan Feingold Carlson

FROM: Roger Gault

DATE: January 13, 2005

RE: PC-10 NCDT Request

The Engine Manufacturers Association (EMA) requests a change in the performance requirements for the PC-10 engine oil category currently under development.

Specifically, EMA requests that the CAT 1P test be added to the requirements for this category. As you are aware, the category currently includes the CAT C13 and CAT 1N tests. Although both of those tests remain important to the category in terms of measuring piston deposits, they do not adequately protect engines that utilize an articulated steel piston with minimum side clearance piston rings. Such pistons are prevalent in current heavy-duty engines and are expected to be used by one or more manufacturers in 2007. Therefore, to assure that PC-10 oils not only meet the chemical limits required for 2007 and later-year aftertreatment technologies, but also address/protect both current and future engine hardware technologies, we ask that all three tests be required for PC-10. Because the 1P is a previously developed engine test, which need not be included in either a precision or BOI matrix, it should not add to the cost or time required to complete the category.

EMA understands and shares the interest of its fellow stakeholders in eliminating redundant tests from the category. To that end, EMA member companies have reviewed the available data to determine whether the C13 or 1P test could replace the 1N test, which has been included in the category to measure the deposits on aluminum piston engines. To date, however, the data indicates that aluminum piston engines may not adequately be protected by either the C13 or 1P. Obviously, if any of the piston deposit tests are determined to be redundant during the matrix and technology demonstration phases of PC-10 development, EMA would be happy to withdraw its request for inclusion of that test in the category.

EMA appreciates the NCDT's consideration of this request and its continued cooperation on this very important project.

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