

Vehicle Dealers' Frequently Asked Questions About the Pennsylvania Clean Vehicles Program

Q. What does "CARB certification" mean?

- A. A vehicle that has been approved by the California Air Resources Board (CARB) for use in the state of California has received CARB certification. An automaker must go through a California certification process, and receive approval from CARB in the form of a CARB Executive Order, before the automaker is legally permitted to offer that make and model in California. A CARB certified vehicle may also be certified for use in all 50 states (including California). A vehicle that is certified as a "federal" vehicle is not CARB certified.

Q. How can I tell if the new vehicles I order from my supplier have CARB certification?

- A. Inventory ordering differs depending on the source. Your supplier should be able to tell you how to order Pennsylvania compliant vehicles properly when you place orders for MY 2008 or later inventory. When the delivery is received, two mechanisms provide the ultimate assurance a vehicle is CARB certified.

The Manufacturer's Certificate of Origin (MCO) or Manufacturer's Statement of Origin (MSO). For a CARB certified vehicle, this document indicates that the vehicle is certified to or meets emissions standards for either all 50 states or the State of California. This notation is generally near the top of the MCO and may be in larger, sometimes specially colored print. Where no language exists regarding certification, the vehicle is not CARB certified. If the certification language indicates the vehicle is federally certified or certified to federal standards, the vehicle is not CARB certified.

The Vehicle Emissions Control Information (VECI) sticker mounted in the vehicle's engine compartment has language indicating the vehicle's emissions systems comply with California emissions requirements or requirements for all 50 states. If the languages indicates the vehicle is federally certified or certified to federal standards, the vehicle is not CARB certified.

Delivery invoices, window stickers, bills of lading, etc. may also contain appropriate information but the MCO/MSO and VECI sticker are required under federal law and must accompany each vehicle.

Q. My Pennsylvania dealership is close to the Pennsylvania border and I frequently get non-Pennsylvania resident customers. Must I sell them CARB certified vehicles?

- A. No. A Pennsylvania dealer may offer non-CARB certified vehicles to residents of other states only if:
- i. The customer purchasing the vehicle does not reside in a state that also requires CARB certified vehicles and,
 - ii. The non-CARB certified vehicle is marked with a clearly visible indication that the vehicle is not available for sale to Pennsylvania residents.

The Department anticipates that most new vehicle dealers will be unable to order non-CARB certified vehicles routinely, as many automakers do not allow their dealers to order

non-CARB certified vehicles if the dealership is in a state requiring the sale of CARB certified vehicles.

Q. Am I permitted to sell CARB certified vehicles to customers that may reside in a state that does not require the sale of CARB certified vehicles to its residents?

A. Yes.

Q. My dealership is located in a state adjacent to Pennsylvania that does not require CARB certified vehicles. May I acquire CARB certified vehicles from my supplier and sell them to Pennsylvania residents and/or residents of my state?

A. Yes. The U.S. Environmental Protection Agency (EPA) policy on cross-border sales allows states adjacent to states requiring CARB certified vehicles both to acquire and offer for sale CARB certified vehicles. Availability of CARB certified vehicles for acquisition in these situations is determined by the supplier. EPA's policy also does not prohibit the dealer from selling CARB certified vehicles to residents of the state in which the dealership is situated.

Q. As part of my non-Pennsylvania based dealership I possess a PennDOT Agent Number in order to issue Pennsylvania titles for my Pennsylvania customers. Does the CARB certification requirement apply to my titling activities for Pennsylvania customers?

A. Yes. See Pennsylvania [Title Issuing Agent FAQ](#) for information on titling procedures under the PCV program.

Q. What vehicles are exempt from the Program?

A. Section 126.413 of the Clean Vehicles Program rules list all [eligible exemptions](#) for qualifying or subject vehicles.

Q. How is a qualifying or subject vehicle exempted?

A. Approved title issuing agents have procedures for titling exempted vehicles. See Pennsylvania [Title Issuing Agent FAQ](#) for information on titling procedures under the PCV program.

Q. In addition to new automobile sales, my dealership provides long-term leases and daily vehicle rentals or leases. Do these vehicles require CARB certification?

A. Yes. Persons may daily rent or lease model year 2008 or newer non-CARB certified vehicles to the general public, but only if the vehicle is registered and principally operated outside of this Commonwealth. If your business subscribes to the International Registration Plan for apportionment of registration fees, the daily rented or leased vehicle is considered to be principally operated outside of this Commonwealth.

Vehicles offered for long-term, non-daily leases must be CARB certified unless the vehicle is engaged in interstate commerce and is registered and principally operated outside of this Commonwealth.

- Q. If I know that my dealership will be dealing in cars that will ultimately receive exemptions (such as emergency vehicles) can I possess non-CARB certified vehicles in my inventory?**
- A. Yes, provided that inventory is not offered for sale for any purpose other than that provided by the anticipated exemption. These vehicles should either be physically segregated from the inventory available to the general purchasing public or clearly marked as either not available for Pennsylvania residents or are intended for use only for a specific exempt purpose.
- Q. I don't sell new cars directly but buy late-model, low-mileage vehicles via a third-party such as an auction. Does this mean I can only buy those model year 2008 and newer vehicles only with CARB certification?**
- A. Any vehicle you acquire that is model year 2008 or newer and has less than 7500 miles on the odometer must be CARB certified or else it cannot be offered for sale, sold, leased, rented or delivered to a Pennsylvania motorist. If the model year 2008 or newer vehicle has 7500 miles or more on the odometer, it is not considered new and therefore does not require CARB certification. Any vehicle older than model year 2008 can be offered for sale, sold, leased, rented or delivered regardless of certification.
- Q. Is my dealership allowed to transfer non-CARB certified vehicles to another dealer?**
- A. Yes, but only if the non-CARB certified vehicle is intended for ultimate sale outside of Pennsylvania. A Pennsylvania dealer may transfer vehicles not subject to the PCV program (such as medium or heavy duty trucks, vehicles older model year 2008, or vehicles with 7,500 miles or more on the odometer) to other Pennsylvania dealers without qualification.
- Q. Will I be able to offer for sale diesel vehicles under the PCV program?**
- A. Yes. The PCV program does not prohibit diesel engines in cars, light-duty trucks and SUV's. Diesel vehicles weighing 8500 pounds or less must have CARB certification. The most popular diesel trucks generally weigh more than 8500 pounds and, therefore, do not require CARB certification. Automakers have indicated that more light-duty diesel vehicles that meet both California and federal standards will be available in model years 2008 and 2009.
- Q. Are all new Hybrid-Electric Vehicles California emissions compliant?**
- A. No. There are hybrid-electric vehicles that may not be CARB-certified. Hybrid-electric vehicles offered for sale in Pennsylvania must be CARB certified for use in California or all 50 states. Check with your supplier to ensure the hybrid-electric vehicles you order are compliant for sale in Pennsylvania.
- Q. Do CARB certified vehicles cost more?**

A. In the past, the prices of CARB-certified vehicles have been the same as those that are only "federally" certified.

Q. Are CARB certified vehicles exempt from Pennsylvania Emissions Inspection and Maintenance (I/M) requirements?

A. No. CARB certified vehicle are subject to the same inspection requirements as non-CARB certified vehicles when those vehicles are registered in one of the 25 Pennsylvania counties that require annual emissions inspection. A brand-new, current model year vehicle is eligible for an I/M exemption for the first year.