



October 23, 2018

Mr. Tommy C. Fitzgerald
Fitzgerald Glider Kits
575 Technology Dr.
Sparta, TN 38583

Reference: Tennessee Tech University – Summary of Heavy Duty Truck Study and Evaluation of the Phase II Heavy Duty Truck Rule

Dear Mr. Fitzgerald:

In a letter to Congressman Diane Black on June 15, 2017, representatives of Tennessee Technological University (“Tennessee Tech”) shared the results of research that had been performed by the university related to the subject topic. On February 19, 2018, Tennessee Tech President Philip Oldham notified you, Congressman Black, and the EPA Administrator that the university was investigating the methodology and accuracy of the study, and President Oldham requested the recipients to withhold any use or reference to the study pending the conclusion of Tennessee Tech’s internal investigations.

The university has concluded its internal investigation and has found that certain conclusions reported in the June 2017 letter were not accurate. Specifically, the letter stated that, *“The results of the emissions test were compared with the 2010 EPA emissions standards for HDVs. Our research showed that optimized and remanufactured 2002-2007 engines and OEM ‘certified’ engines performed equally as well and in some instances out-performed the OEM engines.”* The university has determined that this statement is inaccurate in two respects. First, the field-testing procedures used by Tennessee Tech in this research effort were not sufficient to justify comparisons with EPA emissions standards. Second, following a review of the supporting data for these statements, Tennessee Tech has determined that the data does not support the statement that optimized and remanufactured engines performed equally as well as OEM “certified” engines.

The intent of the subject research was to conduct relative comparisons of emissions from OEM engines and engines remanufactured with the sponsoring company’s glider kits. These tests were intended only to establish a baseline comparison of the two groups of engines. The university’s review of the research has found that the research itself was methodologically sound, and that the methods, methodology, and measurements used were appropriate for the project based upon the project’s original intent.

It is the desire of every individual involved with Tennessee Tech that we maintain the highest degree of integrity in everything that we do, especially in scholarly endeavors that lead to informing public policy. We take our responsibility in this area very seriously, and we sincerely regret the inconvenience caused by the inaccuracies in the June 2017 letter.

Sincerely,

Trudy Harper
Vice Chairman of the Board of Trustees, Tennessee Technological University

cc: Congressman Diane Black
Administrator, Environmental Protection Agency



October 23, 2018

Administrator
Environmental Protection Agency
USEPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
MAIL CODE: 1101A
Washington, DC 20460

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Sincerely,

A handwritten signature in blue ink that reads "Trudy Harper". The signature is fluid and cursive.

Trudy Harper
Vice Chairman of the Board of Trustees, Tennessee Technological University

cc: Congressman Diane Black
Mr. Tommy C. Fitzgerald, Fitzgerald Glider Kits



October 23, 2018

The Honorable Diane Black
1131 Longworth HOB
Washington, DC 20515

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