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**Title: Greenhouse Gas Phase 2 Regulatory Compliance Implementation**

**Applies To: Cummins® and International® Engines Built After January 1, 2021**

## CHANGE LOG

Please refer to the change log text box below for recent changes to this article:

01/26/2026 - Updated Certificates and branding. Removed multiple VIN request  
09/30/2025 - Updated Change Request Form and added link to form instructions.  
06/18/2024 - Clarified info under "Process". Added clarification for Neutral at Coast and Neutral at Idle/Stop  
03/28/2023 - Updated new form and work instructions  
02/15/2023 - Update new form to REV 9  
03/30/2022 - Updated change request documents

## DESCRIPTION

This document provides guidance for assessing the feasibility of implementing a customer-requested change to an engine or vehicle parameter/feature. Customer requested changes will be approved in accordance with the requirements specified in 40 CFR Part 1037 to ensure continued compliance with greenhouse gas (GHG) regulations.

### Scope

These instructions apply to all Class 2B to Class 8 vehicles and engines for which GHG phase II requirements are applicable. These requirements became applicable starting with model year 2021 and are applicable to all later model years including new vehicles and engines.

### Background

U.S. EPA 40 CFR Part 1037 – CONTROL OF EMISSIONS FROM NEW HEAVY-DUTY MOTOR VEHICLES defines Phase 2 GHG regulations. To comply with these regulations, the engine must meet specific standards based on the emissions of Carbon Dioxide, Methane, and Oxides of Nitrogen (NOx). In addition, a profile of the GHG emissions for each vehicle sold under Phase 2 is calculated using the specific engine performance characteristics along with the specific vehicle characteristics, some of which are identified on the Vehicle Emissions Control Information (VECI) label on the vehicle. (Refer to the VECI label for a list of emissions reduction components. For further information, please review the vehicle operator's manual.)

Vehicles manufactured by International Motors, LLC. have been built to comply with all applicable vehicle emissions standards. Modifications to the vehicle that will cause noncompliance are prohibited by regulations. Additionally, records of actual vehicle configurations and their GHG profile are kept, and they must be updated as changes are made in order to maintain their accuracy.

Changes can affect the GHG emission profile or the classification of a vehicle. The profile of the GHG emissions for each vehicle is calculated from specific engine and vehicle characteristics using the Greenhouse Gas Emissions Model (GEM). Classification of the vehicle affects how it is treated by GEM and determines the GHG emission standard against which the GEM result is compared.

Therefore, International Motors, LLC. must be informed and approve of any relevant desired changes. Unapproved changes may violate anti-tampering provisions of the Clean Air Act.

### Deadline

Requests for changes that may affect GHG compliance or reporting must be submitted no later than September 1 of the year following the vehicle's compliance year. This timeline ensures adequate processing and alignment with federal reporting requirements.

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## **SPECIAL TOOL(s) / SOFTWARE**

N/A

[Tools Resource Center](#)

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## **SERVICE PARTS INFORMATION**

N/A

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## **Process**

The steps taken depend upon the feature and/or parameter for which a change is desired, and they are detailed in the table below.

The change request form is available in the "Other Resources" section of this document.

"Reporting Period" means until September 1 of the year following the compliance year of the vehicle (e.g. September 1, 2024 for vehicles of compliance year 2023).

See the Glossary for further description of certain Features/Parameters.

<b>NO CHANGE IS ALLOWED</b>		
<b>Feature/Parameter</b>	<b>Notes:</b>	
Tire Pressure Monitoring Systems (TPMS) or Automatic Inflation Systems	Units that are built with TPMS (Tire Pressure Monitoring Systems) are not eligible to have that feature removed from the system as it is an integral part of the overall safety systems associated with that particular truck. International Motors, LLC. will not authorize removal of this system.	
Load based speed control	This is not a GHG-affecting item but may affect vehicle compliance in other ways.	
<b>APPROVAL REQUIRED</b>		
<b>Feature/Parameter</b>	<b>Notes:</b>	<b>Steps to be Completed By Technician</b>
Automatic engine shutdown	Tractors: Approval required only when <i>within the reporting period</i> .  Changes include enable/disable and timer values.	<b>WHERE APPROVAL IS REQUIRED:</b>  1. Identify which parameter needs to be changed  2. Complete the change request form  3. Start a case file with the programming group requesting the parameter change  4. Attach the completed change request form to the case file
APU removal	Tractors	
Predictive Cruise	Tractors: Approval required  Vocational: Not applicable	
Neutral at Coast	See special instructions for Eaton transmissions below.	

Neutral at Idle (Neutral at Stop)	See special instructions for Allison transmissions below. (This feature cannot be disabled in trucks using VISTA (6.6L) engines.)
Tire changes or additions	Includes tires associated with newly installed axles.
Axle or axle lubricant	
Transmission Type	
GVWR/GCWR	Certain changes in GVWR or GCWR impact GHG compliance. The (separate) GVWR/GCWR change process will determine if there is an impact, and if so, this GHG change request process must be followed.

### APPROVED WITHOUT REQUEST

Feature/Parameter	Notes:	Steps to be Completed By Technician
Automatic engine shutdown	<b>Tractors:</b> <i>After the reporting period ends</i> , approved without request. <b>Vocational:</b> Approved without request at any time	For <i>tractors</i> , approval request must be submitted if still within the reporting period (as indicated in the section above).
Low idle speed adjustment	Approved without request if within predefined acceptable adjustment range. <b>Otherwise, not allowed.</b>	
Global vehicle speed limit		
Pedal, cruise speed settings, and droop	These do not affect GHG.	

### SPECIAL SITUATIONS, INSTRUCTIONS

Feature/Parameter	Notes:	Steps to be Completed By Technician
Horsepower (HP) Rating Change	<b>Either case below</b> requires that a change request form be submitted.  Case 1. Vehicles originally sold with "12WGK" feature code:  Change may be made at any time in vehicle's life.  Case 2. Vehicles <b>NOT</b> originally sold with "12WGK" feature code:  If approved, change may be made <i>only during reporting period</i> .	<b>1.</b> Determine via lineset whether or not the unit has the following feature code installed: "12WGK engine re-rate capable."  <b>2.</b> If yes, or otherwise within reporting period, proceed with completing the change request form located in the other resources section of this document, and start a case file with the programming group.  <b>3.</b> If approved, the engine manufacturer responsible will schedule the programming and provide the updated engine label.

		Re-rate HP and torque change will be dependent on chassis components as well.  Additional charge for re-rate may be applicable at time of re-rate.
	Cummins Engines: A letter of approval will be issued to Cummins as part of the final approval package, along with the approved change request form.	Provide letter of approval to Cummins as they will require this before changing ECM parameters.
Neutral at Coast Parameter – Eaton	International Motors, LLC. will provide assistance for engine parameter changes.  Eaton will log in remotely to change TCM parameters. (Dealer must have ServiceRanger installed.)	Provide approved change request form to Eaton as they will require this before changing TCM parameters.
Neutral at Idle (Neutral at Stop) Parameter - Allison	Special letter for Allison will be provided as part of approval, in addition to the approved change request form.	Provide special approval letter to Allison as they will require this before changing TCM parameters.
Aerodynamic feature changes	Special approval required. Changes include modification, replacement, or removal of components such as fairings, air deflectors, and skirts; or the addition of externally mounted devices or features.	Contact International Motors, LLC.
Weight changes	GHG credit is taken for certain weight savings – usually because a lighter material is used. Features that may be affected include wheel rim or hub, bumper, steps, fifth wheel, transmission case, and clutch housing. Approval may be required for replacing these items.	Contact International Motors, LLC.

**NOTE:**

Other parameters that affect the overall GEM score such as axle ratios, and tire rpms may still be dealer programmable, but a completed change request form is still required to complete the process.

**U.S. EPA 40 CFR Part 1037 – CONTROL OF EMISSIONS FROM NEW HEAVY-DUTY MOTOR VEHICLES**

Vehicles manufactured by International Motors, LLC. have been built to comply with all applicable vehicle emissions standards. Modifications to the vehicle which will cause noncompliance are prohibited by regulations. Refer to the Vehicle Emissions Control Information (VECI) label on the vehicle for a list of Emissions reduction components. For further information, please review the vehicle operator’s manual.

To comply with the Phase 2 GHG regulations, the engine must meet specific standards based on the emissions of Carbon Dioxide, Methane, and Oxides of Nitrogen (NOx). In addition, a profile of the GHG emissions for each vehicle sold under Phase 2 is calculated using the specific engine performance characteristics along with the vehicle characteristics, some of which are identified on the VECI label.

**Glossary**

The following table provides further description of certain features and parameters.

<b>Feature/Parameter</b>	<b>Notes:</b>
Automatic engine shutdown (AES)	System that shuts down the engine if the vehicle is parked and there is no activity for a certain amount of time. This may also be known as "Extended Idle Reduction," though this term covers other technology besides AES.
Global vehicle speed limit	Maximum limit of vehicle speed allowed by engine controls.

Predictive Cruise	A system that anticipates changes in terrain (e.g. using GPS) to control operator demand in order to ultimately optimize GHG and fuel economy during cruise control operation.
Neutral Coast	Controls that automatically shift the transmission into neutral when there is no load demand from the engine, and the vehicle is still in motion – such as when it is coasting.
Neutral at Idle (Neutral at Stop)	Controls that automatically shift the transmission into neutral when the engine is idling and the vehicle is not in motion, and activation must NOT require parking brake application.
Auto Neutral	This is a control feature, similar to Neutral at Idle, but requires parking brake activation. (This does not qualify as a GHG feature.)
Stop/Start	This is a control feature that stops the engine at zero vehicle speed and restarts it upon detected desire to move (as indicated by lifting the brake or pressing the accelerator pedal). Not currently offered.

## **REPAIR STEP(s)**

N/A

## **WARRANTY INFORMATION**

N/A

### **Warranty Claim Coding:**

Refer to the [Warranty Coding Manual](#) for Group and Noun Codes.

### **Standard Repair Time(s):**

Refer to the [SRT Manual](#) for Repair Times

## **OTHER RESOURCES**

Link	Description
<a href="#">Master Service Information Site</a>	Service Portal
<a href="#">G-6527</a>	Engine Re-Rating Process for Cummins and International Engines Built After 1/1/2021
<a href="#">G-3443</a>	New 2022 California Emission Control Warranty Requirements
<a href="#">Change Request Form - PDF</a>	Download form and fill it out. See <a href="#">Change Request Form Instructions</a> for information about how to properly fill out the form. Submit filled-out form with new case attachment - select the programming group when starting the case file.

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