



Application for Certification Common

Initial Part 1

MY2027

Durability Group: VCEXDPDNNC01

Evaporative Families: Not Applicable

Test Groups Covered: VCEXD06.78VV, VCEXD06.78WV

Four Stroke, Diesel Cycle, Diesel Fueled, Direct Injection, 6.7L, Inline-6

Vehicle Class Covered: Class 2b HDV (8,501 - 10,000 lbs GVWR), Class 3 HDV (10,001 - 14,000 lbs GVWR)

Applicable Standards:

FEDERAL Tier 3 BIN 200, CARB LEV III ULEV 200

FEDERAL Tier 3 BIN 200, CARB LEV III SULEV 200

Vehicles Covered:

Class 2b HDV (8,501 - 10,000 lbs GVWR) - RAM 2500 Pickup 2WD/4WD

Class 3 HDV (10,001 - 14,000 lbs GVWR) - RAM 2500 Pickup 2WD/4WD

& RAM 3500 Pickup 2WD/4WD

Vehicles Run:

Vehicle ID R5D2-54403

Vehicle ID R5D2-54419

Request Response Date:

6/1/2026

Contact:

Daniel Brinkman at 812-341-0752



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Section 1 - Correspondence and Communication

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For questions pertaining to the application for this Test Group contact:

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Section 5 - Test Group Description

Durability Group:	VCXDPDNNC01
Test Group Name:	VCXD06.78VV, VCXD06.78WV
Engine displacements covered:	6.7 Liter
Arrangement and number of cylinders:	I-6
Vehicle classes covered:	Class 2b HDV (8,501 - 10,000 lbs GVWR), Class 3 HDV (10,001 - 14,000 lbs GVWR)
Emission standards class:	Tier 3 BIN 200, Tier 3 BIN 200
Sales Area:	Federal 50 State

Section 6 - Emissions Demonstration Vehicle(s) Description

Please refer to Section 6 in the test group applications.

Section 7 - Certification Test Results

Please reference to CSI in Section 17.03 of the test group applications OR CARB E-CERT submissions.



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Section 8 - Emissions Compliance Statements & Waivers

Section 8.01 - General Compliance

Cummins Inc. makes the following statements to the best of its knowledge and belief concerning the emissions control system used on the vehicles covered by the certificate for MY2027 as required by 40 §CFR 86.1810-01 (a)(1)(2), and Advisory Circular 76.

1. Cummins Inc. states that any element of design, system, or emission control device installed on the vehicles covered by the certificate for MY2027, for the purpose of complying with standards prescribed under Section 202 of the Clean Air Act, will not, to the best of Cummins' information and belief, cause or contribute to an unreasonable risk to public health or welfare except as specifically permitted by the standards prescribed under Section 202 of the Clean Air Act. Cummins Inc. further states that any element of design, system, or emission control device installed on the vehicles covered by the certificate for MY2027, for the purpose of complying with standards prescribed under Section 202 of the Clean Air Act, will not, to the best of Cummins' information and belief, cause or contribute to an unreasonable risk to public safety.
2. The emissions control systems will not result in any unsafe condition endangering the motor vehicle, or its occupants, or persons or property in close proximity to the vehicle if it is properly maintained and operated, except that parking or operation of the vehicle where combustible materials, such as dry grass or leaves, can come into contact with the hot exhaust system may cause these materials to ignite under some wind and weather conditions. A warning against parking or operation over combustible materials is contained in the owner's manual. Under malfunction conditions, such as engine misfiring due to operator abuse (thereby allowing excess fuel/air mixture to enter the catalyist), misuse, tampering, or failure to perform essential maintenance, system overheat conditions may arise. It is believed that owners would be adequately warned by the malfunction (engine miss) and the "check engine" light that maintenance will be required.
3. The motor vehicles were tested in accordance with good engineering practice to ascertain that such test vehicles will meet with requirements for the useful life of the vehicle in those situations where Cummins Inc. had a reasonable basis for suspecting either an unsafe condition or the emission of noxious or toxic matter. Any data derived from such testing is available to the Administrator upon request pursuant to 40 §CFR 86.1843-01 (g).
4. The vehicles will not exceed by more than 6% the Lean Best Torque (LBT) air-fuel ratio without prior EPA and ARB approval.



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Cummins Inc. further states to the best of its knowledge and belief the test vehicles, with respect to which data are submitted, were tested in accordance with the applicable test procedures, meet the requirements of such tests, and, on the basis of such tests, conform to the requirements of the regulations.

California Statement

In addition, Cummins Inc. states to the best of its knowledge and belief concerning the emissions control system used on the vehicles covered by the certificate for MY2027, such vehicles conform to the rules and regulations of the State of California, Title 13 of the California Code of Regulation and CARB Manufacturer Advisory Correspondences.

Section 8.02 - Emissions Compliance

Below is a list clearly identifying the standards applicable to this MY2027 test group for which emission testing was not performed. All Cummins vehicles will conform with the emission standards for which emission data is not being provided, as allowed under 40 CFR §86.1829-15 (d)(4) or §86.1810-01.

Formaldehyde - HCHO

Section 8.03 - Altitude Compliance

The EPA procedure for compliance with High-Altitude Emission Ref. 40 CFR §86.1829-01 (b)(1)(ii)(B) and CARB regulations permit Cummins to establish compliance with the high altitude emission standards based on its evaluation of appropriate high altitude emissions tests. Cummins will use data generated by these tests to demonstrate its compliance. Cummins states that, on the basis of tests mentioned above, it is in compliance with the high altitude emissions requirements for the represented test groups.

Cummins states that none of the vehicles covered by this test group for MY2027 in the United States require altitude performance adjustments. All vehicles use a powertrain control module to monitor and adjust the operation of the engine to perform satisfactorily at all altitudes.

Data supporting exhaust compliance are on file and are available upon request.



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Section 8.04 - Defeat Device

Cummins Inc. states that any element of design, system, or emission control device installed on or incorporated on vehicles covered by the certificate for MY2027, for the purpose of complying with standards prescribed under Section 202 of the Clean Air Act, are not equipped with auxiliary emission control devices that can be classified as a defeat device as defined in 40 CFR §86.1803.01.

To that end, Cummins provides the following confirmation as requested by CARB for MY2027 test groups:

1. Do the test and production vehicles have defeat devices?
 - No.
2. Have all AECDs been declared and described in the application?
 - Yes.
3. Do the test and production vehicles have alternate maps?
 - The MY2027 AECD disclosure documents submitted to ARB contains the information for Cummins' "alternate maps" along with justification and emissions impact. These strategies are used as described in the AECD document and approved by ARB.
4. Is the transmission part of any AECD, for example, by receiving outputs from the ECU or providing inputs to the ECU, in any emission control strategy, for example, engine and/or catalyst warm-up. If yes, please describe, including purpose, entry/exit conditions, actuations, and justifications.
 - There is no transmission AECDs.
5. Does the transmission behave and perform the same as, or differently than, while on road versus on a dynamometer? Please explain any differences.
 - The transmission behaves same on road and on dynamometer.



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Section 8.05 - Production Vehicles for Testing

Cummins Inc. agrees that the Air Resources Board may have the need to conduct vehicle test programs in order to ensure that vehicles offered for sale in California by a vehicle manufacturer comply with the vehicle emissions related regulations of the State of California. Therefore, Cummins Inc. agrees to supply a reasonable number of vehicles to the Air Resources Board, so that the Board may conduct reasonable vehicle emissions test programs, from time to time. The vehicles supplied will be representative of production units offered for sale to the public.

Section 8.06 - Production Statement

The production vehicles shall be in all material respects the same design as those for which approval was granted.

Section 8.07 - Label Statement

The under hood emissions control label material and the adhesive used to secure the label to the vehicle meet the standards contained in applicable Cummins Inc. and FCA US LLC material standards and performance standards. The applicable material standards and performance standards meet the requirements contained in the California Motor Vehicle Emission Control Label Specifications.

Section 8.08 - Drivability Statement

Cummins Inc. states that those vehicles for which a certificate is requested have drivability and performance levels which satisfy drivability and performance requirements for vehicles sold in the United States.

Section 8.09 - California I & M Statement

Cummins Inc. states that on the basis of development testing, test groups for which certification is requested are in compliance with the California Inspection and Maintenance (I & M) test requirements applicable to such vehicles.



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Section 9 - OBD Description

Cummins Inc. considers this information proprietary and confidential. The description contains engineering detail that would allow competitors to gain insight into Cummins OBD system. The OBD system descriptions for all Test Groups have been submitted separately for OBD staff and also described in detail in the AECD document.

Section 9.01 - OBD Demonstration Compliance Statement

This durability group VCEXDPDNNC01 meets the full intent of both the Clean Air Act as amended in 1990, section 202(m), and the applicable federal OBD regulations contained in 40 CFR §86.005-17 and 40 CFR §86.1806-01, including a reference to those provisions pertaining to deficiencies in the limited instances where an OBD II system that complies with 1968.2 does not comply with all the requirements of section 1968.1.

For a complete description of the OBD Description please see: Common Application - Section 9

For OBD Agency Approvals please see: Received 11/21/2024.

Section 10 - Alternative Fuel Vehicle Description

NOT APPLICABLE

Section 11 - Auxiliary Emissions Control Devices for the Test Group

Please refer to AECD submitted separately to EV-CIS and/or M-File.



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Section 12 - List of All Vehicles & Complete Test Parameters for the Test Group

Section 12.01 - Vehicle Parameters

Valves per cylinder Engine
All 6.7L - 4

Section 12.02 - Test Parameters

SIL usage: NOT APPLICABLE

Cooling fan configuration: Models
Road Speed Fan

Additional Cooling: Models
All - None

Evaporative Testing Parameters: NOT APPLICABLE

Advance technology Modes: NOT APPLICABLE

Special Test Procedure: Models
All - None

Engine Starting Procedure: Models
All - None

Shift Schedule: All vehicles covered under this application are automatic transmissions.



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Section 14 - Request for Certificates

Section 14.01 - Business Confidentiality Statement

Cummins Inc. requests that certain types of information supplied for Certification purposes be treated confidential. We request that this type of information be withheld from public disclosure because it is either proprietary or trade secret information which would be of high competitive value to both domestic and foreign manufacturers. Furthermore, the disclosure of this information would result in damage to Cummins Incorporated.

Because some of the confidential information supplied for Certification purposes should be treated confidentially for longer periods of time than other confidential information, we have classified the time periods for which we believe confidential treatment should be afforded. This classification procedure is generally in accordance with the policy indicated by the General Counsel of the EPA entitled 'Class Determination 2-77' - "Confidentiality of Business Information Submitted in Applications for Light Duty Motor Vehicle Certification Through Model Year 1986" dated March 31, 1977, and sections of 2.207 and 2.301 of Subpart B, Part 2, Chapter I of Title 40 of the code of Federal Regulations.

INFORMATION TO BE TREATED CONFIDENTIALLY UNTIL THE NEW MODEL INTRODUCTION DATE

- . Engine family descriptions and schematic examples
- . Evaporative emission family descriptions and schematic examples
- . Engine family sales (including projected sales and family sales total)
- . Evaporative family sales (including projected sales and family sales total)
- . Optional equipment descriptions and sales projections
- . Vehicle descriptions and sales projections
- . Fleet vehicle information
- . Fuel filler inlet description and schematic examples
- . Data reporting procedures information (including vehicle log sheet, data log sheet, maintenance log, and tentative vehicle test schedule)
- . Telephone logs
- . Proposed maintenance to be performed on test vehicles



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- . Information including Statement of Compliance, Certification data, maintenance instructions, label, and supplemental information
- . Cost information (not voluntarily disclosed)
- . Description of electronic systems

CLASS III - INFORMATION TO BE TREATED CONFIDENTIALLY EVEN AFTER THE NEW MODEL INTRODUCTION DATE

- Catalyst information
 - Engine family sales (including projected sales and family sales total)
 - Evaporative family sales (including projected sales and family sales total)
 - Optional equipment sales projections
 - Vehicle sales projections
 - Fleet vehicle sales
 - Data reporting procedures information (including vehicle log sheet, data log sheet, maintenance log, and tentative vehicle test schedule)
 - Telephone logs
 - Cost information (not voluntarily disclosed)
 - Blue Prints submitted to EPA
 - Schematics indicating precise dimensions and tolerances
 - All projected sales volumes and optional equipment usage
 - Description of electronic systems
 - Engine oil surveys

Cummins believes that such class determinations as described above will cover most material which is routinely confidential. As a result, it would materially reduce the burden on both the manufacturer and the Agency of demonstrating and reviewing claims of confidentiality without impairing the release of meaningful information to the public.



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Virtually all of the material covered by the classes described above would be of interest only to the Agency, as a government regulator. Since competitors would benefit from the release of these classes of information, Cummins believes it should be properly classified as confidential. Further, release of this type of information would severely impair competition in the automobile industry, a result contrary to longstanding federal policy as evidenced by the antitrust laws. Release of these types of information to the competitive detriment of the submitting company is just the type of injury Congress sought to avoid through the FOIA exemptions.

Section 15 - Batteries and Fuel-fired Heaters Information

NOT APPLICABLE

Section 16 - Leak-Free Exhaust Statement

Cummins states for all MY2027 vehicles covered by the certificate for VCEXD06.78VV and VCEXD06.78WV have systems designed for leak free assembly, installation, and operation for the useful life of the vehicle. Engineering analysis has been conducted on the whole system to check the leak free system. Any necessary repairs can be made to maintain the leak free nature with the commonly available tools.

Section 17 - Additional Information

Section 17.01 - Catalyst Description

Please refer to AECD, CSI, and/or E-CERT submissions for catalyst description.