AMECA Better Brakes Friction Material Registration Program

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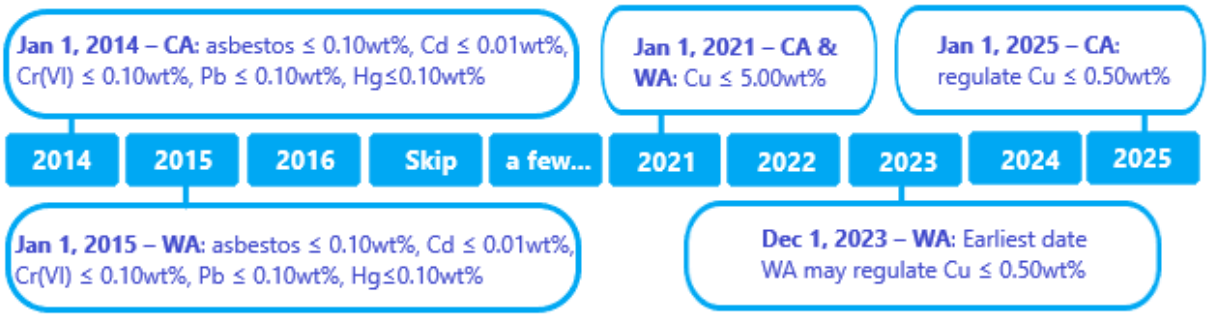
General Program Questions:

1. **What does AMECA offer for this program?**
   AMECA is a third-party registrar that works in partnership with an independent lab, Link Engineering, for testing. Link performs the third-party testing and AMECA can register a complying material, allowing it to be accurately marked and legally sold. AMECA is able to rely on fast and accurate testing through Link Engineering while offering the fastest and most cost-effective registration available.

2. **What is the effective timeline for constituent limitations?**



3. **What information will I need to submit?**
   We can guide you through the entire registration process and direct you to assistance with testing through our lab partner. Eventually, you will have to do all of the following:
   -Create a Manufacturer User Account on our web portal and complete the user agreement.
   -Have your company complete and sign a contract to release tests to AMECA from the lab and complete registration steps, including authorizing users for digital signatures.
   -Submit any samples that need to be tested to the lab.
   -Authorize the lab to release completed test reports to AMECA.
   -Submit any baseline data if you are non-compliant with Washington State law.
   -Complete and sign an affidavit on a self-certification form listing all registered edge codes.
   -Complete and sign LeafMark agreement with MEMA and copy AMECA.

4. **Where can I find the forms?**
   All forms are embedded in the Manufacturer User Account through the AMECA Web Portal. You will have to create an account in order to access and utilize these forms. These forms will include:
   -Web Portal User Agreement
   -Authorization of representative as administrator, user, and signer. Includes an agreement to authorize AMECA to request the release of test reports from other labs and provide AMECA with the information regarding which edge codes should be registered.
   -Edge Code Modification is an embedded form feature in the Manufacturer User Account. It specifies which edge codes should be added or removed from reports AMECA has been authorized to receive.

5. **What is the penalty for non-compliance with the law?**

The states may issue a fine up to $10,000 USD per violation. Every single brake pad being out of compliance can be an individual violation.

6. **What is a formulation?**
   A formulation is the unique combination of raw materials that are processed into friction material.

7. **What is an edge code?**
   An edge code is the identifier printed, stamped, or ink jetted onto the side of friction material or the back of the pressure plate. The edge code identifies the friction material company identification code, the formulation, and friction coefficient/environmental rating information. Edge codes are defined in SAE J866/VESC V3. The list of registered edge codes is here. Washington has issued a guideline for marking edge codes on friction materials.

   AMECA contains the master list of all company edge code identifications back to 1967. *Before* using a company identification code, a company *must* check with AMECA that the identification is available. We have many company edge codes which are not currently in use but were involved with asbestos liability or other legal proceedings.

8. **Can a single formulation have multiple edge codes?**
   Yes, a single formulation can have multiple edge codes. Formulations often have multiple edge codes associated with them when the same formulation is known by multiple names. For example, a formulation may internally be called "AMC-A1". The edge codes which use the "AMC-A1" formulation are "AMC-AC1", "AMC-AC2", "AMECAeca", and "AMM A2Z". All 4 edge codes are unique but all 4 edge codes use the same formulation. This is acceptable in the Friction Material Registration and Testing programs.

9. **Where can I find more information about these regulations?**
   More information can be found at:
   – AMECA Friction Material Testing / Registration services
   – List of edge codes registered as compliant with the California and Washington laws
   – California legislation
   – Washington legislation
   – Washington Better Brake Rules
   – Washington guidance for marking friction materials
   – Vehicle Equipment Safety Commission (VESC)

10. **What experience does AMECA have with auto parts testing and registration?**

    Formed in 1994 to continue the Equipment Compliance Program which was conducted by the American Association of Motor Vehicle Administrators (AAMVA) since 1967. AAMVA transferred all program documents, files, agreements and all information regarding the Vehicle Equipment Safety Commission to AMECA.

Automotive Manufacturers Equipment Compliance Agency, Inc. (AMECA) is the agent for various states of the United States to provide safety equipment compliance services. The AMECA program is the only program of its type in the United States. This Equipment Compliance Program is centralized, one-stop, and notifies government, industry and the general public about compliant motor vehicle safety equipment. Our Notice of Equipment Compliance is recognized as evidence of compliance with the regulatory requirements with our representative jurisdictions.

Every item listed by AMECA has been tested by an AMECA-accredited laboratory and found to be in compliance with applicable United States standards. Our clients are the national and international automotive industry, the standards-setting community, numerous state governments, as well as some foreign governments.

Testing Questions:

11. **What standards are used for friction material testing?**
    The law requires that either SAE J2975 or an alternate test method (proven to be as effective as SAE J2975) which the states have approved be used for testing friction materials. AMECA partners with Link Engineering lab which uses SAE J2975:2013 to perform all friction material testing. Link is an ISO 17025 accredited lab with SAE J2975 on their scope of accreditation and is qualified to perform the required testing.

12. **Is testing performed on each edge code or each formulation?**
    Each unique formulation must be individually tested. Even if a single formulation is used for multiple edge codes, a single test report can be used to register all edge codes which use that formulation.

13. **What friction material constituents are tested and how many times are they tested?**
    The following constituents: Asbestos, Antimony, Cadmium, Chromium (total)*, Copper, Lead, Mercury, Nickel, and Zinc are tested **3 times**.
    *Chromium (VI) is tested 3 times if the average Cr total is greater than 0.10wt%.

14. **What are the advantages of testing through AMECA (via Link Engineering)?**
    - **AMECA is fast**. We guarantee a 30 day turnaround time from submission of edge codes to posted certification, and our target goal is 10 days.
    - **AMECA is easy**. We offer a bulk upload service for your data and make it easy to check and make corrections, at any point through the process.
    - **AMECA is transparent**. You can log in and track the progress of each edge code and test report request and see where it is in the process at any time. No more email chase to find out where your submission is.
    - **AMECA cares**. We offer immediate customer service and partner with you to make sure you have clarity and realistic expectations from us. We care about you and want to

make sure you are receiving excellent service at each step of the way. We will be honest about any issues or concerns and will make sure we live up to our commitment as your registrar.

- **AMECA only focuses on automotive**. We are specialists with over 25 years of experience.

15. **Can other third-party labs besides AMECA (via Link Engineering) perform the testing?**
    Not at this time. The only lab that is AMECA approved to perform the friction material testing is Link Engineering.

16. **What is the cost to test friction materials through AMECA's partnership with Link Engineering?**
    AMECA charges $75.00 per test report. For cost information or a quote, email us at support@ameca.org

17. **What is the first step to testing through AMECA's partnership with Link Engineering?**
    Visit our website and visit the landing page for our web portal at www.ameca.org/Brake-Environmental-Certification and then AMECA will assist you in completing the next steps.

Registration Questions:

18. **What is the baseline information that must be submitted to Washington State?**
    Manufacturers must submit "baseline" information on all friction materials they manufactured in 2011. Baseline specifically refers to a term in the Better Brakes Law, as opposed to a first submission of data to a registrar. Baseline data includes: – Manufacturer contact information – Concentrations of antimony, copper, nickel, and zinc for each friction material manufactured in 2011 – If the formulation was used for light vehicles, heavy vehicles, or both light & heavy vehicles.
    If you are non-compliant and failed to provide this information to Washington State at the time mandated by law, please let us know and AMECA will assist you in submitting baseline data for the first time to Washington State.

19. **What is the cost to use AMECA as the registrar for submitting baseline data to Washington State?**
    For cost information or a quote to submit non-compliant baseline data, email us at support@ameca.org

20. **Is registration performed on each unique formulation or each unique edge code?**
    Registration is performed for each individual edge code.

21. **If multiple edge codes use the same formulation, how many test reports do I need to submit?**
    Only 1 test report is needed to register all the edge codes which use the same formulation.

22. **How long does registration last?**

Per the requirements of the laws, registration expires after 3 years. Therefore, testing and registration must be redone every 3 years.

23. **Does AMECA receive the test reports directly from the manufacturer?**
    No – according to the law AMECA must receive the test reports directly from the test lab. To release test reports to AMECA, create a Manufacturer User Account in our web portal and after submitting to the user agreement, your company will receive the **AMECA Web Portal User and Digital Signature Authorization Agreement** which will allow AMECA request and receive the test reports you authorize us to have through the web portal.

24. **I have already registered an edge code through NSF, but now I want to register the same edge code through AMECA, or I have already registered an edge code through AMECA and now want to register a new edge code which uses the same formulation. Do I need to retest the same formulation?**
    No – you do not need to retest. If you have already certified an edge code with another registrar (NSF), then when you submit your data to AMECA for the first time, you may delineate it as historical data immediately after submission using the Review and Revise Edge Code feature in the web portal. Using the publicly available signed affidavit and self-certification document previously created for that edge code, AMECA can utilize that document to validate the previous certification. If it's a new edge code being registered for the first time, however, and AMECA already has the test report you want to use for registering the new edge code, then just use the Review and Revise Edge Code feature in the web portal to make corrections or additions.

25. **What are LeafMarks?**
    The LeafMarks are trademarks owned by the AASA which AMECA sublicenses to manufacturers when they complete the registration process. LeafMarks must be put on the packaging of friction material which complies with the laws. Permission to use the LeafMarks is only granted when the agreement between the manufacturer and MEMA has been signed and any fees due to MEMA have been paid.

26. **After registration, does my edge code change?**
    Once you've completed the registration process, then the last part of your edge code must be the "environmental marking". The environmental marking is your compliance level ("A", "B", or "N") and 2- digit year of manufacture. For example, a level B friction material manufactured in 2018 would have an environmental marking of B18.
    Go here for examples of where the environmental marking can be placed.

27. **Where is the list of AMECA registered edge codes?**
    The public list of registered edge codes is here.

28. **What is the cost to register edge codes through AMECA?**
    AMECA does not charge per edge code, we only charge $75.00 per test report. You may register any number of edge codes; we will only charge you per test report we must review. For cost information or a quote, email us at support@ameca.org

29. **What is the first step to registering through AMECA?**
    Visit our website and visit the landing page for our web portal at www.ameca.org/Brake-Environmental-Certification and then AMECA will assist you in completing the next steps.

30. **What happens if I have some edge codes registered with NSF and some with AMECA?**
    If you have already certified an edge code with another registrar (NSF), then when you submit your data to AMECA for the first time, you may delineate it as historical data immediately after submission using the Review and Revise Edge Code feature in the web portal. Using the publicly available signed affidavit and self-certification document previously created for that edge code, AMECA can utilize that document to validate the previous certification.