

TESTIMONY BEFORE THE HOUSE
TRANSPORTATION COMMITTEE
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by

JOHN A. PACHUTA, DIRECTOR
BUREAU OF TRAFFIC SAFETY OPERATIONS

Honorable Chairman, Members of the Transportation Committee, Ladies and Gentlemen, good morning. I am John Pachuta, Director of the Bureau of Traffic Safety Operations for the Pennsylvania Department of Transportation. I would like to express my appreciation for the opportunity to testify before this committee with regard to House Bill 562.

I am certain you are aware that the Department embraces the concept proposed in this legislation that would reduce our current vehicle safety inspection requirement from twice yearly to once a year. We believe the statistical evidence in the January, 1981, report entitled Motor Vehicle Inspection produced by the Office of Budget and Administration is both clear and valid. This report concludes that an annual periodic motor vehicle inspection (PMVI) for safety will not adversely affect highway safety in Pennsylvania.

Under Secretary Larson, the Department has continually strived to provide a safe and efficient transportation system to the citizens of this Commonwealth. Our commitment to service is one which I believe is unparalleled in the Department's history. Much of our improvement is a direct result of the recognition of changing conditions in the transportation needs of the people. This has led to a need for change of the old standards and practices which are no longer effective. Changes have been made which I believe we all have been pleased to see. Today's Department of Transportation is a lean, efficient, and effective agency that

has maximized Federal aid, improved road maintenance, and provided better service for the tax dollars invested by the citizens. The proposed annual PMVI will add to this by providing a cost effective highway safety program to insure the safety of our constituency.

Periodic vehicle safety inspection is recognized as a requisite portion of an overall highway safety program. The Highway Safety Act (23 U.S.C. 402 et seq.) and the Motor Vehicle Safety Act (15 U.S.C. 1381 et seq.) are basically regarded as the foundations of PMVI. One result of these enactments was the development of 18 Highway Safety Program Standards covering topics from accident investigation and traffic control devices to driver licensing and traffic courts. Standard Number 1 is Periodic Motor Vehicle Inspection.

The purpose, as stated in the Manual for PMVI is "To increase, through periodic vehicle inspection, the likelihood that every vehicle operated on the public highways is properly equipped and is being maintained in reasonably safe working order. . . ."* Pennsylvania has had PMVI since 1929 with the express purpose of reducing the number of motor vehicle accidents caused by unsafe or defective vehicles. The evidence cited in the OBA report that I mentioned earlier demonstrates that the existing procedure has outgrown its usefulness and accrues more costs to Pennsylvania citizens than benefits. We are

*Highway Safety Program Standard 1, Periodic Motor Vehicle Inspection, p. I-1.

obligated to change this situation when the data shows that inspecting a vehicle twice a year is no more likely to improve highway safety than a once a year safety inspection.

Our program must address the needs of Pennsylvanians - both in the highway safety as well as the economical arenas. We believe that an annual inspection as proposed in House Bill 562 will provide such a program. We feel that compulsory annual periodic inspection is essential in minimizing the risks associated with the operation of unsafe vehicles, but any system should not place an undue hardship on the vehicle owner.

Current vehicle inspection laws and regulations in the Commonwealth need revision. Engineering and design enhancements have given us a vehicle mix that is equipped with longer wearing and less failure ridden components. Lengthened maintenance intervals for today's automobiles are evidence of this fact. Disc and self-adjusting brakes, dual braking systems, longer wearing brake linings, brake wear indicators, improved safety glazing, improved traction tires, and longer wearing tires with wear indicators are but a few of these items. Additionally, on-board vehicle component monitoring devices provide the operator with information that previously was only reported to him by the inspection mechanic that he visited twice a year.

The other major input to the formula which logically leads to annual inspection is the general change in vehicle usage patterns which has accompanied higher fuel costs. Since many of the items just listed are designed such that they degenerate through use - that is brake shoes wear out as they are utilized, a reduction in individual vehicle miles of travel results in a decreased wear rate for many components.

Since our existing regulations have developed over many years, they include items which are not directly safety related. In recognition of this fact, we are currently working on a revision to the safety inspection regulations which concentrates on critical component inspection, brakes, tires, steering/suspension, exhaust, glazing, etc., and eliminates many items which are not relevant.

A complete inspection, performed according to the Vehicle Equipment and Inspection Regulations Manual, would take about one and one-half hours. According to the OBA report, Pennsylvania passenger car inspections are routinely done in thirty to forty-five minutes. In other words, inspection stations are doing their own streamlining of the regulations. The time has come for the Department of Transportation to revise the rules in a realistic, safety-conscious way.

Today you will probably hear the contention that more extensive and expensive repairs would be necessary to correct defective components under an annual inspection system. However, according to the OBA report, vehicle repair costs

are not expected to be any greater under an annual inspection cycle. This is because, under the present system, most defective components already require complete replacement when discovered. In addition, very few component failures adversely affect other sound or undamaged vehicle parts.

For example, many cars fail to pass inspection because of lighting or electrical system failures. Their failure, obviously, requires their complete replacement and does not cause accelerated wear on other parts.

It is true that worn brake pads or linings could damage other portions of the braking system. However, the current method for determining the remaining life of brake pads or linings could be changed to conform with the annual inspection cycle. We do not intend to radically alter our standards as you might be led to believe. The idea that minimum brake lining thickness measurements should be changed causing good linings to be discarded is incorrect. As previously mentioned, brakelining wear is use related and since our inspection period is not tied to vehicle usage (as would be the case if the inspection period was based on mileage and type of driving), we do not propose increasing these standards.

Even if the contention concerning more expensive repairs were true, even if our present inspection process demonstrably resulted in better maintained cars in Pennsylvania, the point would be irrelevant. The Department of Transportation has no business telling the public how to maintain their autos. Our concern is safety. State vehicle inspection is

intended solely to identify and correct worn-out or defective equipment that could lead to highway accidents. Anything else is the individual citizen's responsibility.

You will also hear a variety of reports regarding the number of vehicles requiring repair under the current program along with cost figures for this service. In the Bureau of Traffic Safety Operations we randomly sample these items each month, and based upon information submitted by every inspection station on the TS-431 form over the past eighteen months, just under 36% of the vehicles inspected required maintenance. The sampling for this same period revealed the state-wide average inspection cost (both fees and repairs) to be approximately \$49 with the urban areas averaging about \$15 more.

While we are on the subject of costs, a question regarding insurance rates had been raised with respect to this proposed change from twice yearly to a once a year vehicle safety inspection program. A recent study by an Insurance Research Analyst for the Commonwealth stated that the probability of the inspection period change causing an increase in insurance rates is ". . . remote to the point of non-existence at this time".

Now, let me briefly describe two of the changes in the inspection process proposed in House Bill 562. First, only passenger vehicles and light trucks would be affected. All heavy trucks would still be inspected semi-annually, mostly because these vehicles tend to have unusually high mileage.

Transit vehicles, school buses and emergency vehicles would all be inspected semi-annually. The rationale here is that those riding on these vehicles do not have the control over maintenance or close knowledge of the vehicles that the owners of passenger vehicles do.

Second, we plan to coordinate the annual inspection of vehicles with the staggered registration renewal program. Before a vehicle could be registered or its registration renewed, that vehicle must pass inspection. Because most vehicle inspections would expire at the same time as their registrations, inspection station workloads would be evenly distributed throughout the year.

An annual inspection program as proposed in House Bill 562 would result in dramatically reduced motorist inconvenience and cost while maintaining present levels of traffic safety. It is estimated that Pennsylvania's 6.8 million automobiles and small truck owners would save more than \$61 million a year in inspection fees alone. The administrative burden in certain areas of the Department would also decrease resulting in reduced operating costs for the Commonwealth. Additionally, we believe that security control to eliminate the use of stolen or forged inspection certificates would be greatly enhanced.

In summary, the Department believes that annual safety inspection will provide another major step in reducing unnecessary government regulation, reduce motorist expense

and inconvenience while not adversely affecting present levels of traffic safety.

Thank you for the opportunity to testify in regards to House Bill 562.