

**Statement of Ted Leonard**  
**Executive Director**  
**Pennsylvania AAA Federation**  
**To the Senate Transportation Committee**  
**May 10, 2019**

First, I want to thank Senator Ward and Senator Sabatina and the entire Senate Transportation Committee for the opportunity to address two very important vehicle programs-the annual vehicle safety inspection and the vehicle emissions testing program.

Second, I want to personally and publicly thank Senator Ward as I and our clubs and the entire Pennsylvania AAA Federation have been speaking out on these issues for years and we very much appreciate your bringing these issues to the forefront. This is something we have wanted for a very long time. Thank you.

I also want to make sure that we publicly thank those members of the Senate who have, in the past, issued legislation about these two issues about which I am to speak. Those members include Senator Vogel, who has been a prime sponsor of the bill, and Senators Scarnati Hutchison, Yudichak, Costa and Brewster... All of whom were sponsors of legislation on the issues about which I am to speak. And I would be remiss if I didn't also thank Senator Vogel who has worked with us on these issues for many years. Thank you to all of you.

In researching background on the annual safety inspection, I found two studies that were conducted on the Pa. safety inspection program. The first was a March 2009 study entitled Pennsylvania's Vehicle Safety Inspection Program Effectiveness conducted by Cambridge Systematics for PennDOT. This research considered the effectiveness of vehicle safety inspections on the number of fatal crashes, and compared the benefits of the program to the cost of inspections. The study did not address failure rates but concluded the benefits of the program exceeded the user costs and that the Vehicle Safety Inspection program in Pennsylvania is effective and saves lives. The second study, Failure Rates and Data Driven Policies for Vehicle Safety Inspections in Pennsylvania, was conducted by Carnegie Mellon University and published in *Science Direct* in August 2015. This study concluded that the overall failure rate of inspections was in the 12-18 percent range. The study also noted that vehicles older than three years old or have more than 30,000 miles had higher failure rates than newer vehicles, and that due to technology, the vehicle fleet is getting safer. The report also noted that accurate inspection data is limited. The accompanying chart is drawn from the report.

The second program I'd like to address is the Emissions Testing program. In 1998-1999, I participated in an Emissions Testing Stakeholder group hosted by PennDOT and DEP (Deputy Secretary Betty Serian presiding.) The group forwarded recommendations in January 2000 but a

lawsuit subsequently overtook those recommendations and a US District court ordered into place the program we have had for nearly twenty years now.

In October 2017 the National Bureau of Economic Research published a report with the rather lengthy title of Technology and the Effectiveness of Regulatory Programs Over Time: Vehicle Emissions and Smog Checks with a Changing Fleet. The study concluded that emissions inspections have become less effective at reducing air pollution as more high-polluting vehicles from the 1970s and 1980s leave the fleet.

Emissions testing programs vary widely from state to state. Previously, California exempted six newer model years from testing. As of January 1, 2019, California now exempts eight model years and testing is biennial. Ohio requires testing in just seven of the state's eighty-eight counties and testing there is also biennial. Delaware exempts seven model years and again testing is biennial. New Jersey exempts five model years and testing is biennial. New York exempts two model years. Rhode Island exempts two model years and testing is biennial. Virginia tests in five northern counties, exempts four model years and testing is biennial.

AAA suggests the following policies regarding vehicle emissions testing and annual safety inspections:

- PennDOT should permit states to test only vehicles two years or older to be subject to safety inspections.
- PennDOT should only require vehicles ten years or older to be subject to emissions testing.
- State I/M programs should be subjected to comprehensive and periodic review to ensure programs are both reasonable and cost effective. This suggestion would also apply to the safety inspection program.
- Inspection of onboard diagnostic (OBD) systems should serve as a replacement for other types of emission inspection on vehicles so equipped, if it can be demonstrated that false failures are not a factor, and that this means of inspection is both cost effective and produces the desired emission reductions.

Review of Statistics