

Eric R. Nelson, Member
57th Legislative District

Harrisburg Office:
P.O. Box 202057
Harrisburg, PA 17120-2057
Phone: (717) 260-6146

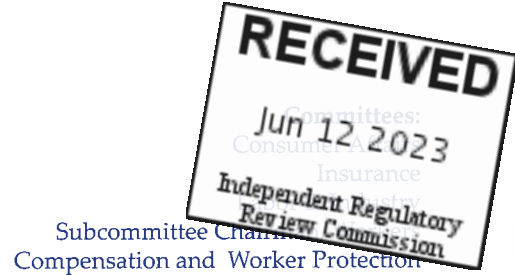
Greensburg Office:
101 Ehalt Street, Suite 105
The Train Station
Greensburg, PA 15601
Phone: (724) 834-6400

E-mail: enelson@pahousegop.com
Web: RepNelson.com

George D. Bedwick
Chairman, Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, PA 17101



House of Representatives
Commonwealth of Pennsylvania
Harrisburg
June 9, 2023



Subcommittee Chair
Compensation and Worker Protection

Policy, Deputy Chair
State Government

Caucus:
Gas & Oil, Chair

Re: IRRC #3373 Concerns for undo cost and logistical impact on dealerships and salvage operations

Dear Chairman Bedwick,

I'm writing to share cost concerns and operational impact related to IRRC #3373, proposed rule changes to 37 PA Code amending Chapter 301. I am requesting the removal of the 500 mile-reinspection requirement and a clear exclusion of salvage vehicle operations from this rule change. It seems the salvage industry may have been overlooked when these proposed rules were developed.

I'm confident the suggested changes from the Attorney General's office are well intended; however, the consequences of these mandated requirements would be considerable. In Westmoreland County, I have numerous auto dealerships and a salvage facility which would be negatively impacted by these changes.

Specifically, the 500-mile re-inspection requirement far exceeds Pennsylvania's current annual inspection standard. The inference that a dealership's initial certified inspection is somehow inaccurate after a short travel distance raises larger questions on the effectiveness of annual inspections and lacks a factually supported public safety justification.

The salvage vehicle industry currently has a well-developed disclosure notification process for damaged vehicles whose former titles were exchanged for salvage status, auction paperwork clearly states the vehicle is inoperable. In addition, if a salvage vehicle was repaired and became road ready, existing regulations already mandate a certified vehicle inspection is required before returning to road service.

Pennsylvania's two largest salvage operators (Copart and IAA) sell over 250,000 salvaged vehicles in our state each year. Additional requirements for certified inspections of recognized inoperable vehicles would be redundant, unnecessary and cost them millions of dollars annually. I am respectfully asking that salvaged titled vehicles be clearly exempted from these revised standards.

I appreciate your consideration of these recommendations.

Sincerely,

Eric Nelson, MS, CSP
State Representative of the 57th District