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From: **Jim Cowden** <jimcowden@yisinc.com>

Date: Fri, Jul 25, 2014 at 7:44 AM

Subject: Department of Transportation Proposed Regulation #18-460 (IRRC #3065) entitled: "Mechanical, Electrical and Electronic Speed-Timing Devices"

To: cbrandt@irrc.state.pa.us

Corinne,

My name is Jim Cowden from YIS/Cowden Group, Inc and we are an approved speed-timing station, we have reviewed the changes and before getting your email had passed some concerns along to Kay Kisbaugh at PennDOT, the follow is what we discussed -

1. In reviewing the 105 changes for speedometers I see under 105.34 about forms - (and this language puzzled me before) it says - **duplicate copy**, executed and signed in the same manner as the original, has the same force and effect as the original.

If the Certificate of Accuracy may be reproduced and a duplicate copy how is that the copy "executed and signed in the same manner as the original" not just another original?

Am I missing something? A copy of the original would mean the signature is a copy, right?

2. We discussed the addition of the +/- 2 MPH window for speedometers, in the past this was not there and a PD was given there cert showing the actual speeds for the vehicle. What we have seen is even in 2014 model vehicles they may be off 3 or more MPH.

We will now have to tell the PD it cannot be certified? Or that it must be brought into this new spec? That is not as simple as the old days when you could just change a gear in the transmission.

When a police officer uses his speedometer for 3/10ths of a mile to pace (clock) a speeder, he has the information of what his actual speed is from the cert he received. Lets say his speedometer reads 70 MPH but his actual speed (from the test and on the cert) is 73 MPH, he can still use these numbers because the car has been certified be be traveling 73 when showing on the speedo 70.

I hope that makes since, there is really no reason to now add a +/- to the speedometer testing.

3. The last thing we brought up was this, on the signature issue, what about an electronic signature with a corporate seal or water mark on the cert? This would be a big step into the 21st century (we'll leave the 20th out for now) in that we could then email a pdf cert that could be printed as needed by the police agency. Saving big mailing costs, (as an example for us we spend an average of about \$200 a week to mail certs to police departments).

Thank-you for your work and efforts on these changes, should you want to speak with me you can contact me directly on my cell at 570-220-5274.

Jim Cowden
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