



Senate Transportation Committee

Senator Judy Ward
Chairman

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June 16, 2025

Victoria P. Edwards, Esq.
Regulatory Counsel, Office of Chief Counsel
PA Department of Transportation
400 North Street, 9th Floor
Harrisburg, PA 17120-8212

Dear Ms. Edwards:

As Chair of the Senate Transportation Committee, I write to provide comments regarding the Department of Transportation's ("PennDOT") proposed regulation, *Vehicle Equipment and Inspection (18-484)*.

I commend PennDOT for updating the regulatory framework for the modern inspection of vehicles, as well as incorporating various laws passed by the General Assembly. I also value the addition of monetary penalties on the official inspection station in lieu of suspending their operations, which is feedback my office received from PennDOT's business partners.

Pennsylvania's annual safety inspection program is not required by the Federal Government, unlike the annual emissions test imposed in 25 counties. As you know, the Commonwealth solely determined an annual safety inspection was necessary to maintain safer vehicles on the road. According to a study posted on PennDOT's website, the annual safety inspection has been effective in reducing fatal crashes.

Since Pennsylvania judiciously decided to require the annual safety inspection, the most concerning change being proposed in this regulation is the additional expense on vehicle owners to require an inspection of all four tires. The potential for higher, market-driven fees by the official inspection stations was contemplated by PennDOT under the "fiscal impact" section. Can PennDOT supply empirical evidence driving the decision to inspect all four tires? There is also the potential for escalated inspection costs on vehicle owners due to the proposed changes to the following standards, including and not limited to, the bumper cover, seats, safety seat belt system, windshield wiper path, wiper blades and wiper arms, opening and closing doors or tailgate, fender flares and lamps and lenses.

Additionally, I offer the following questions and comments for PennDOT's review:

- Does the new definition for "airless tires" under § 175.2 align with federal standards? The promulgation of a new regulation for a relatively novel product is unique, therefore, the definition must align with federal guidance.
- The proposed regulations seek to remove "other than farm vehicles for which a biennial certificate of exemption has been issued" from § 175.5 without re-adding the permitted exemption from the Vehicle Code under § 175.6. Please ensure these farm vehicles remain exempted under PennDOT's regulatory framework.
- Can PennDOT provide clearer guidance, or an example of a violation, to maintain an inspection area "free of debris" under § 175.25?
- In regards to the driver's vision through the windshield wiper path under § 175.67, is it a violation if a vehicle owner attaches an E-ZPass transponder in the windshield wiper path?
- PennDOT proposed comprehensive changes to the annual safety inspection and disregarded the opportunity to modernize the annual emissions test, including and not limited to, replacing the outdated dynamometer equipment and eliminating the gas-cap test on vehicles without a gas cap.

I look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Judy Ward". The signature is fluid and cursive, with the first name "Judy" and the last name "Ward" clearly distinguishable.

Senator Judy Ward (R-30), Chair
Senate Transportation Committee

cc: Honorable Kim Ward, Senate of Pennsylvania
Honorable Joe Pittman, Senate of Pennsylvania
Honorable Marty Flynn, Senate of Pennsylvania
Honorable Ed Neilson, House of Representatives
Honorable Kerry Benninghoff, House of Representatives