



June 16, 2025

Stephen J. Madrak
 Director
 Bureau of Motor Vehicles
 Pennsylvania Department of Transportation
 1101 South Front Street
 4th Floor
 Harrisburg, PA 17104
RA-PDOCCPUBCOMMENTS@pa.gov

RE: Regulation #18-484: Vehicle Equipment and Inspection / IRRC Number 3435

Dear Mr. Madrak:

The Pennsylvania Motor Truck Association (PMTA) appreciates the opportunity to offer the following comments on the proposed regulation -- 18-484: Vehicle Equipment and Inspection - 67 Pa. Code Chapter 175 – IRRC Number 3435.

PMTA is the only statewide professional association advocating for the trucking industry. PMTA was organized in 1928 to promote the professional and economic growth of the trucking industry and the businesses that support it. PMTA seeks to advance legislative and regulatory solutions that improve road safety, particularly around commercial vehicles. This includes supporting targeted education campaigns, safer infrastructure design, and encouraging collaboration among state agencies, industry leaders, and law enforcement.

PMTA is supportive of this proposed regulation as it is intended to provide clear standards for the inspection of vehicles by deleting outdated procedures, modernizing language, and including provisions that reflect today's vehicles and their associated equipment. The amendments to the regulations will provide a more thorough inspection and ensure vehicles are in safe operating condition.

PMTA appreciates that the rulemaking updates the department's regulations to reflect annual, instead of semiannual, state inspection for motor carrier vehicles in excess of 17,000 pounds, as provided by Act 165 of 2017. This provision saves trucking companies, 96% of which are small businesses, money and the hassle of ensuring that their trucks are available in Pennsylvania for inspection more than once a year.

While PMTA is supportive of this proposed regulation, we raise the following concerns with the existing regulations at § 175.80 (Inspection procedure) (2) (ii)ⁱ regarding the inspection procedure for the windshield prohibiting anything mounted below 3 inches from the top.

- (ii) This paragraph does not prohibit the use of a product or material along the top edge of a windshield as long as the product or material is transparent and does not encroach upon the AS-1 portion of the windshield as provided by FMVSS No. 205, and the product or material is not more than 3 inches from the top of the windshield.

This provision is more restrictive than the Federal inspection criteria, which prohibits anything mounted below 8.5 inches from the top.ⁱⁱ

(e) *Prohibition on obstructions to the driver's field of view—*

(1) *Devices mounted on the interior of the windshield.*

(i) Antennas, and similar devices must not be mounted more than 152 mm (6 inches) below the upper edge of the windshield. These devices must be located outside the area swept by the windshield wipers, and outside the driver's sight lines to the road and highway signs and signals.

(ii) Paragraph (e)(1)(i) of this section does not apply to *vehicle safety technologies*, as defined in § 393.5, that are mounted on the interior of a windshield. Devices with vehicle safety technologies must be mounted:

(A) Not more than 216 mm (8.5 inches) below the upper edge of the area swept by the windshield wipers;

(B) Not more than 175 mm (7 inches) above the lower edge of the area swept by the windshield wipers; and

(C) Outside the driver's sight lines to the road and highway signs and signals.

Pennsylvania's more restrictive criteria have served as a disincentive to the use of safety equipment like windshield-mounted cameras. Therefore, **PMTA respectfully requests your consideration of an exemption to allow the voluntary mounting of certain devices on the interior of the windshields of commercial motor vehicles (CMVs), including placement within the area that is swept by the windshield wipers, in accordance with the Federal Motor Carrier Safety Regulations (FMCSRs).**ⁱⁱⁱ

In addition, though we appreciate the department's implementation of annual, rather than biannual, inspections for heavy duty vehicles, we would like to point out that having a required state-based inspection program for tractors is a provision more stringent than federal standards.

As you know, all commercial vehicles operating in interstate commerce must pass an inspection at least annually. Though Pennsylvania's inspection program complies with Federal Motor Carrier Safety Regulations standards, requiring a PA-based inspection acts as a disincentive to registering trucks in PA. Carriers who can choose to register their tractors in the 27 states that require a federal inspection only find flexibility to have their vehicles inspected anywhere in the nation, rather than taking the time and managing the expense to return it to Pennsylvania. Many companies find themselves in the circumstance of having to have both inspections for their trucks, an unnecessary and burdensome expense. In short, the requirement for a PA-specific inspection programs puts Pennsylvania trucking companies at a competitive disadvantage with those in other states and likely results in fewer registered trucks in the Commonwealth, meaning less funds available for road and bridge projects in the state.

The studies and reasoning on safety cited by PennDOT in the regulatory materials to justify an inspection program pertain to cars and light-duty trucks only, not to heavy-duty commercial vehicles registered to operate in interstate commerce.

PMTA respectfully requests that the department consider an amendment to recognize annual inspections conducted in accordance with 49 CFR section 396.17 and Appendix G of the Federal Motor Carrier Safety Regulations as satisfying Pennsylvania's annual safety inspection requirement for commercial

motor vehicles. This change would align state requirements with existing federal standards, reduce duplicative inspections for interstate carriers, and ease compliance burdens for motor carriers operating in Pennsylvania without compromising safety.

If you should have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Rebecca K. Oyler
President & CEO
Pennsylvania Motor Truck Association
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ⁱ 67 Pa. Code § 175.80. Inspection procedure. (2) (ii)

<https://www.pacodeandbulletin.gov/Display/pacode?file=/secure/pacode/data/067/chapter175/s175.80.html&d=reduce>

ⁱⁱ 49 CFR 393.60

<https://www.ecfr.gov/current/title-49 subtitle-B/chapter-III/subchapter-B/part-393/subpart-D/section-393.60>

ⁱⁱⁱ FMCSA Issues Final Rule on Windshield-Mounted Technologies

<https://www.fmcsa.dot.gov/newsroom/fmcsa-issues-final-rule-windshield-mounted-technologies>