



From: RON TURNER <rонт56@comcast.net>
Sent: Wednesday, May 28, 2025 11:58 AM
To: Langletz, Tim <tlangletz@pa.gov>
Subject: [External] Proposed rule comments

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Tim,

These are my comments. Did you find out how this would slow down the process?

175.26. Tools and equipment.

(a) *General requirements.* An inspection station shall have tools and equipment in good operating

condition sufficient to inspect each type of vehicle to be inspected, including the following:

* * * * *

(17) A **[brake-lining]** gauge capable of indicating the amount of usable **brake** lining on both

riveted and bonded lining in increments of 1/32 inch.

Add manuals or information to look manufacturers spec as needed. Example Ball joint. drum and rotor specifications.;

175.65. Tires and wheels.

Need to add to definitions Dry Rotting tires.

(9) Check the lamps and lenses and reject if one or more of the following apply:

(i) An exterior bulb or sealed beam, if originally equipped or installed, fails to light properly **or fails to direct light properly**, except ornamental lights.

Add must be Dot approved,

(ii) **[The gear box is loose on the frame.] The tilt or telescopic steering wheel does not hold adjustment.**

Add steering gear box or rack and Pinion

(2) Inspect the steering system and reject if one or more of the following apply:

(i) Steering gear **[box is loose on frame]** is loose on its mounting, or is binding or leaking preventing proper operation of the system.

Add Rack and pinon

(v) The sway or stabilizer bar **[is]** and mounting components are loose, missing or broken.

Add Stabilizer system components. Includes links and some active stabilizer have electric control.

(2) Inspect the steering system and reject if one or more of the following apply:
The **measured TIE ROD** movement is in excess of the manufacturer's specifications
using the manufacturer's recommended procedures.

(4) Check brake pedal and **REJECT IF** one or more of the following apply:

(iv) A brake warning lamp or other device indicates a malfunction of the braking systems unless the

vehicle is equipped with an antilock braking system (ABS) which is designed to revert to standard

braking operation and no driveability deficiency or loss of braking performance is present.

Reject if the brake warning does not illuminate with key on engine off Bulb check

EDITS TO Proposed Rulemaking # 18-484 — 67 Pa. Code, Chapter 175 Vehicle Equipment and Inspection

P 6 (Preamble P 4): Critical/acute area: change language to specify "the full windshield wiper path on the windshield as originally equipped by the manufacturer". This would

help prevent somebody from putting shorter wipers on or modifying a two-wiper system to single. I know that this is specified later in the document, but I believe it should be clear here as well.

P 18 (Preamble P 16): Incorrect name of MAACA. Correct it to “Mid-Atlantic Auto Care Alliance (MAACA)”

P 36 (Preamble P 34): Replace the word “rust” with corrosion to cover all types of metal. Rust only occurs on ferrous metals. Aluminum, for example, does not rust; it corrodes. I also recommend replacing the word “rust” with corrosion anywhere it occurs in the regulations.

P 83 (Document P 41): (b)(2) Language should be added that the length of wiper blades shall not be shorter than the length of the blades that were originally installed by the manufacturer. Again, I believe adding this language in multiple places in the regulation provides more clarity.

P 93 (document page 51): Add language to end of item (11) “or inoperative”. Something to allow rejection if the non-cap device has been tampered with or otherwise damaged.

P 98 (document page 56): (ii) Change order of wording to, “any tire’s overall outside diameter...”

P 105 (document page 63): Edit (7)(xiii) and (xiv) to match language about surface corrosion. I prefer the language in (xiv) but would further clarify to “Light surface corrosion is not a cause for rejection”, as all the corrosion is on the surface anyway.

(8)(iv): same as above

Thanks

Ron Turner
Director MAACA
215 837 4008



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