

DEPARTMENT OF CUSTOMER SERVICES
CITY & COUNTY OF HONOLULU
DIVISION OF MOTOR VEHICLE, LICENSING AND PERMITS
ADMINISTRATION
P.O. BOX 30300
HONOLULU, HAWAII 96820-0300

MUFI HANNEMANN
MAYOR



GAIL Y. HARAGUCHI
DIRECTOR

DENNIS A. KAMIMURA
LICENSING ADMINISTRATOR

March 8, 2010

The Honorable Joseph M. Souki, Chair
and Committee Members
Committee on Transportation
House of Representatives
State of Hawaii
State Capitol, Room 403
Honolulu, Hawaii 96813

Dear Chair Souki and Committee Members:

Subject: S.B. No. 2455 SD2, Relating to Motor Vehicle Sun Screening Devices

The City and County of Honolulu has no objections to S.B. No. 2455 SD2 which will exempt the use of transparent sun screening materials applied to a vehicle's windshield.

The amendment will ensure that federal requirements will continue to be met after the sun screening material is applied to the windshield.

Sincerely,

A handwritten signature in black ink, appearing to read "Gail Y. Haraguchi".

Handwritten initials "jms" in black ink.

Gail Y. Haraguchi
Director

TESTIMONY IN FAVOR OF SB 2455, SD2
RELATING TO MOTOR VEHICLES SUN SCREENING DEVICES

By:

Tommy Silva, President / CEO – T&T Tinting Specialists, Inc
3035 Koapaka Street, Honolulu HI 96819 808-695-4461

To:

House Transportation Committee
Representative Joseph Souki, Chair

Wednesday, March 10, 2010; 9:00 am
State Capitol, Conference Room 309

My name is Tommy Silva and I have been in the window tinting business for more than 30 years and my company T&T Tinting Specialists, Inc. has tinted the windows of more than 250,000 vehicles on Oahu alone.

Over the past 3 decades, I have been an avid and vocal supporter of safe auto tinting laws for the State of Hawaii and have testified here on behalf of the industry many times over that period.

I strongly support **SB 2455 SD2** which adds a provision (Sec 1d; paragraph 11) which reads: "Transparent sun screening materials, when applied to the AS-1 portion of the windshield, which meets the requirements of Federal Motor Vehicle Safety Standard 205."

However, I do have a concern about the House Bill (**HB2297 HD2**) which is suggesting to remove the section that currently reads *"or no lower than four inches below the top of the windshield, when measured from the middle point of the bottom edge of the top windshield molding if no AS-1 markings can be found in the left or right upper margin of the windshield"*; because that section was added as an amendment back in the early 90's to allow vehicles with front windshields that do NOT have an "AS-1 marking" to continue to be allowed to have the four inch visor strip at the top edge of the windshield. Removing that section now could create mass confusion at the Safety Inspection Stations who would now be instructed to fail these vehicles that currently have a legal 4" visor strip, but have no AS-1 marking on their front windshield.

Because of that, I strongly support the *Senate* version of this measure as it allows the new Nano-Ceramic Technology mentioned below, yet it leaves the current language in place to allow the 4" visor strip to any windshield.

The front windshield on most vehicles is typically the largest window on a vehicle, yet the current / stock glazing does not reduce *any* heat and only blocks *some* of the UV rays.

This proposed amendment will allow the use of the most recent technological breakthrough in Clear "Nano-Ceramic" Window Film Technology, also known as "smart films" that reduce 99.9% of the UV and almost half the heat, but does not reduce the light transmission below the Federal minimum standard of 70% VLT (Visible Light Transmission).

This technology boosts UV-A and UV-B protection up to the Skin Cancer Foundation endorsed value of 99.9%, along with reducing an unprecedented 43% of the heat that normally passes through the windshield into the vehicle. Over 500,000 vehicles make the daily trek in the morning and afternoon rush hours from the West side to town and back, while driving directly into the sun rising then the sun setting at the end of the day. This exemption would allow these and other drivers much more comfort, energy savings and safety than ever before.

Even though this technology has only very recently become available, four States (North Dakota, North Carolina, Virginia and Ohio) have already modified their State Laws to allow this new technology on front windshields, and many others are currently following suit to use the "greenest" technologies available to save energy and add comfort.

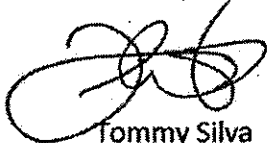
This bill allows our State Law to catch up with technology while completely complying with the Federal VLT minimums of 70% for the front windshield.

Our current law states that *no film* shall "encroach upon the AS-1 portion" of the windshield because when our current law was written back in 1982, this technology was not even dreamt of. This amendment leaves that strict condition in place, only adding that encroachment would be allowed **only if the film and glass combined still meet the 70% minimum Federal standard.**

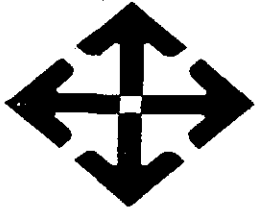
Enforcement will be very simple as Safety Inspection Stations already meter the sides and back windows of every tinted vehicle annually; they would only need to add another quick test of the front windshield with *70% and higher readings passing and 69% and lower failing.*

Please support and pass this bill so that Hawaii will continue to be on the forefront of the "green energy movement" while providing the best safety, comfort and protection for Hawaii's drivers that are so fortunate to be able to drive in year-round tropical weather.

Thank you for your favorable support,



Tommy Silva
President / CEO



The Hawaii Business League

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Phone: (808) 533-6819 ♦ Facsimile: (808) 533-2739

March 10, 2010

Testimony To: House Committee on Transportation
Representative Joseph M. Souki, Chair

Presented By: Tim Lyons
President

Subject: S.B. 2455, SD 2 – RELATING TO MOTOR VEHICLE SUN SCREENING DEVICES

Chair Souki and Members of the Committee:

I am Tim Lyons, President of the Hawaii Business League, a small business service organization. We support this bill.

This bill has been offered in order to update the law as it relates to sun screening devices often called "tinted windows". When the law was passed many years ago it specifically provided that the only part of the windshield which could have a film on it was the upper four (4) inches known as the AS-1 line. This is that small narrow strip that you often see on windshields near the top that provides the driver with at least some relief from the sun.

Now however, new technology has brought forth a clear film which effectively screens out over 50% of the heat but does nothing to reduce the light transmission that passes through the windshield.

We specifically provided years ago that there could be no treatment of the windshield because at that time there was nothing that would reduce the heat and at the same time not reduce visibility.

The Committee should know that there is really no such thing as a "clear" windshield. In other words, even from the manufacturer when your car is first purchased, the windshield will often times, just based on its thickness and angle, reduce the light transmittance by 10% or 12%. The federal standard is that at least 70% of the light should be transmittable through the windshield.

Therefore, we request your favorable adoption of the amendment that this bill proposes which allows film on the windshield, as long as it still meets the federal minimum standards.

Thank you.