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1:15 P.M.
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**H.B. 1651, H.D. 1
RELATING TO VEHICLE INSPECTIONS**

Senate Committee on Transportation

The Department of Transportation **opposes** H.B. 1651, H.D. 1.

The director already does the things listed in the bill via 19-133.2, Hawaii Administrative Rules.

We oppose the proposal in paragraph (6) of Section 1, because imposing fines is an inequitable method of penalizing inappropriate inspector behavior. To illustrate, suppose inspector A does 15 inspections per month and makes \$20 per inspection. His monthly income is \$300. Inspector B does 150 inspections per month. His monthly income is \$3,000. If the fine for an infraction is \$300, it will hurt inspector A much more than inspector B. If you use suspensions as the penalty, all inspectors will experience relatively the same discomfort.

Subsection (b) of Section 1 proposes a two-year validity period for inspector certificates. We oppose this proposal. The current certificates are valid for four years. Reducing the period will result in 50% more administrative work, which will decrease the man-hours available for monitoring station activities. It will also be an unnecessary burden for the inspectors.

Subsection (c) of Section 1 proposes the elimination of the practical test when an inspector renews certification. We oppose this proposal. The current administrative rules require the inspector to take both a knowledge and practical test for a renewal. The testing for renewal is the same as the testing for initial certification. It is important for inspectors to be able to demonstrate that they know how to do a proper inspection, not only during the certification process, but also when they are being monitored by the County officers. Many inspectors leave parts of the inspection out to reduce the time required for the inspection. A popular item to leave out is the wheel bearing test, because it requires jacking up a front wheel. The headlamp aim is also popular, because it takes time to set up the headlamp test unit. So instead of testing the aim, inspectors will save time by simply checking to see if the bulbs work. After an inspector

makes a habit of making abbreviated inspections, doing a correct inspection can sometimes be a challenge. The PMVI officers can't monitor every inspection each inspector does, but they should at least be able to make sure inspectors know how to do one correctly before renewing an inspector's certification.

Thank you for the opportunity to provide testimony.