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**STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION**
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March 2, 2023
10:00 A.M.
State Capitol, Teleconference

**S.B. 493, S.D. 1
RELATING TO MOTOR VEHICLE SAFETY INSPECTIONS**

Senate Committee on Transportation on Ways and Means

The Department of Transportation (DOT) **opposes** S.B. 493, S.D. 1, which establishes a three-year pilot program that provides that no new vehicle needs a safety inspection until three years after the date the vehicle was first sold; provides that electric vehicles shall require a safety inspection every twenty-four months; and provides that electric vehicles participating in a road usage charge fee shall pay a road usage charge fee based on a self-reported photo odometer reading.

Our Periodic Motor Vehicle Inspection Data for the number of vehicles that failed show that even newer vehicles, two years old, had a failure rate averaging 15 percent (see table below for additional years). This demonstrates the need to have safety checks annually, to prevent equipment failure that may result in a crash, or stalled vehicles that may cause delays for roadway users. Every minute that a lane remains blocked during peak travel time results in 4 minutes of delay, during and even well after the lane is cleared.

Test Year	Model Year	Vehicle Age	Total Tests	Total Failed	Fail Percentage
2023	2021	2	4,315	681	15.78
2023	2020	3	7,722	986	12.77
2023	2019	4	6,435	1,092	16.97
2022	2020	2	70,867	9,896	13.96
2022	2019	3	85,682	13,191	15.4
2022	2018	4	74,865	12,352	16.5
2021	2019	2	85,546	13,689	16
2021	2018	3	80,102	15,941	19.9
2021	2017	4	75,719	13,961	18.44
2020	2018	2	71,657	10,272	14.33
2020	2017	3	72,365	11,459	15.84
2020	2016	4	72,687	10,277	14.14

2019	2017	2	88,497	13,881	15.69
2019	2016	3	88,121	15,636	17.74
2019	2015	4	76,234	11,983	15.72

Additionally, by lengthening the duration between odometer readings and lengthening the time period when the first odometer reading is taken would create difficulties in implementing a per-mile Road Usage Charge (RUC) program in Hawaii. In separate measures, the DOT is recommending that the existing \$50 electric vehicle annual registration fee be eliminated and in its place, EV owners can be in per-mile state mileage-based RUC system, or they can choose to pay an annual flat fee.

We are concerned that the self-reported photo odometer reading data may not be accurate and impact the RUC program.

Various House and Senate bills such as H.B. 1110 and S.B. 1408 establishes a RUC beginning with electric vehicles, and mileage traveled would be collected by odometer readings taking under existing annual safety inspection process. Therefore, we recommend that the inspection periods remain unchanged from the current time periods and durations.

Thank you for the opportunity to provide testimony.



DATE: March 2, 2023
TIME: 10:00 AM
PLACE: VIA VIDEOCONFERENCE and Conference Room 211
BILL: SB 493, SD1, Relating to Motor Vehicle Inspections

Aloha Chair Dela Cruz, Vice Chair Keith-Agaran and members of the committee!

On behalf of the Hawai'i Automobile Dealers Association (HADA), we are writing to respectfully **comment** on SB 493, SD1, relating to motor vehicle inspections. This bill establishes a three-year pilot program that provides that no new vehicle needs a safety inspection until three years after the date the vehicle was first sold. It also provides that electric vehicles shall require a safety inspection every 24 months and that electric vehicles participating in a road usage charge fee shall pay based on a self-reported photo odometer reading.

HADA agrees all new gas, hybrid, electric and hydrogen vehicles, sold from licensed new car dealer, should not need an initial safety check. We strongly believe the time for which a safety check is not needed should be the same for all new vehicles to eliminate any confusion to the consumer and licensed professionals performing the safety checks.

Additionally, we are concerned and believe that to allow those participating in a pilot road usage charge fee program to "self-report" a photo odometer reading may lead to fraud, as well as be exceedingly difficult to enforce for compliance.

We look forward to working with policy leaders to seek the answers to these and other implementation and logistical questions. We thank you for the opportunity to testify.

The Hawai'i Automobile Dealers Association is the voice of more than 60 new car dealerships across the islands, accounting for over 4,000 direct jobs, \$6 billion total sales and more than \$250 million in general excise taxes paid.