

**MOTOR
VEHICLE
INSPECTION
ADMINISTRATION**

A CRITICAL REVIEW

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June 1967

ABSTRACT

This critical review of Periodic Motor Vehicle Inspection (PMVI) surveys the cognizant administrators in States implementing the PMVI systems. The report is divided into a section dealing with problem areas that have been experienced in beginning and operating PMVI systems and into recommendations about specific aspects of the programs. The findings are organized to facilitate reference by those seriously interested in the details of PMVI administration. Although it was not intended that the study report general findings, an "overview" has been prepared on some points that received an unusual number of responses or comments. Finally, a section has been included on the aspects of the public trust residing in PMVI administrators.

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A CRITICAL REVIEW

INTRODUCTION

This is a report of a study designed as a critical review of periodic motor vehicle inspection (PMVI) administration. The work was conducted during the winter and early spring of 1967.

The purpose of the study was to gather information from those knowledgeable in administering PMVI programs and to disseminate that information to agencies that will probably be engaged in developing PMVI programs in the near future. The need for the study resulted from the increase in interest in PMVI programs created by the initial State Highway Safety Program standards proposed by the National Highway Safety Bureau (NHSB) in implementing the Highway Safety Act of 1966. The NHSB listed PMVI as a tentative standard in December 1966 and the study reported here was begun soon after. On February 16, 1967, the NHSB published PMVI as "Draft Highway Safety Program Standard No. 4.4.1," requiring at least annual inspection of every registered motor vehicle, motor cycle, trailer and semi-trailer. Although some states* challenge the proof offered by the NHSB that PMVI improves highway safety and some** suggest less ambitious interim programs, it seems certain that PMVI in some form will be a permanent standard. As a consequence, many, if not all, states can be expected to develop PMVI programs for two reasons: to conform to the national program, and to avoid suffering the penalties for nonconformance specified by the Highway Safety Act of 1966. This report is directed to those who may soon find themselves active in PMVI programs for the first time.

*For example, California

**For example, Michigan

METHOD

This study was a follow-on to an earlier one (1)* designed to learn the opinions of state officials as to why various jurisdictions had never adopted PMVI programs. The replies in that study, information obtained in discussions with administrators in existing PMVI jurisdictions, and information in the literature provided the background for the review of the problems in PMVI administration.

The critique is organized in two parts. Part I, "Problem Areas," is intended to warn of problems that have been associated with developing and operating PMVI programs. Part II, "Recommendations," is intended to suggest particular organizational or operational techniques to handle various phases of the program. The respondents were encouraged to amplify and supplement with their comments to offset any omissions and weaknesses in the structure of the review.

Materials were mailed the responsible official (typically the Commissioner of Motor Vehicles) in the 21 states** (including the District of Columbia) currently operating or, in the case of Kentucky, organizing PMVI programs. A letter of introduction and explanatory statements accompanied each request for participation. Copies of these documents are included as attachment 5.

COOPERATION

The response was excellent: 24 of the 24 critique forms were completed and returned. The critique seems to have been given careful attention by most of the respondents. Eighteen (75% of the total) were returned under a covering letter from a responsible official, typically a senior official in the cognizant department. Seventeen (71% of the total) added comments to particular and/or general aspects of the critique.***

THE CRITIQUE

This study is intended to offer suggestions from those experienced in PMVI administration to aid those officials about to become engaged in organizing and operating PMVI programs. Consequently, little effort has been made to generalize the findings. Instead, the data have been organized in the following fashion for easier reference to the details of the replies:

PART I. PROBLEM AREAS

- A. Matters of Internal Administration
- B. Public Relations: Common problems in governmental regulation

*Numbers in parentheses indicate references found at the end of the document.

**The states are listed in attachment 1. Hawaii is listed three times since each of the counties, Honolulu, Hawaii, and Kauai, operates its own PMVI organization and each participated in the critique. (Maui was not surveyed.)

***In general the replies received without covering letter were the same as those without any comments. We may assume that these received the least attention. However, two replies were received with covering letter and without other comments and one received without covering letter contained comments.

- C. Public Relations: Matters related directly to PMVI operations
- D. General comments

PART II. RECOMMENDATIONS

- A. Administrative Organization
- B. Inspection Organization
- C. Inspection Procedures
- D. Enforcement
- E. General Comments

PART III. SUPPLEMENTARY REMARKS

Presenting the data in this manner requires some change in the statement numbering from that used in the critique form. To allow cross-reference to the original format (see attachment 2) each statement has been given two numbers. The first number is sequential in the order presented in this report and the second number enclosed in parenthesis is the number assigned in the original form. Whenever a statement is referred to by number, both will be included.

The critique is comprised of two groups of statements. Those in Part I were designated "Problem Areas" and each statement could have been marked as significant, not significant or no opinion to indicate the level of difficulty experienced with that particular problem in the respondent state. Those in Part II were designated "recommendations" and each statement could have been marked as recommended, not recommended, or no opinion. In addition, some of the statements in Part II asked that a specific recommendation be supplied.

After each statement the number of respondents marking each of the three alternative responses is noted. Because a particular state (for example, Nevada) might be most interested in the responses of states with similar geographical and demographical characteristics (for example, New Mexico and Utah), charts have been prepared showing the response of each state to each statement (see attachments 3 and 4). Furthermore, any specific comment follows its antecedent statement and the identity of the supplying state is noted. Finally, several statements of Part II required specific recommendations. Those submitted are listed along with the identities of the recommending states.

In summary, the statements in each part have been reorganized into internally related subgroups and they have been associated with their respective responses in such a way that both the total response pattern and the individual responses of a specific state may be identified.

PART I. PROBLEM AREAS

A. Matters of Internal Administration

- 1. (1) Obtaining the required number of acceptable licensed inspection stations.

Significant	4 (17%)
Not Significant	16 (68%)
No Opinion	3 (15%)

Comments:

"I would recommend that care be taken to establish high standards for the stations from the start. This should include moral, financial, and business integrity as well as physical facilities and knowhow." (Pennsylvania)

2. (2) Obtaining the required number of qualified mechanics.
- | | |
|-----------------|----------|
| Significant | 7 (29%) |
| Not Significant | 14 (58%) |
| No Opinion | 2 (13%) |

Comments:

"The only qualifications required for the official inspection mechanic is that he is to be qualified and that he has the necessary tools and supplies to actually perform the inspection and repair any defects. I am of the opinion that simply because one states he is qualified and that he has the required amount of tools on hand, does by no means qualify the person as a mechanic. A more stringent regulation should be implemented to insist that mechanics are qualified to inspect vehicles." (New Mexico)

3. (11) Finding that the public timing of inspection is irregular, causing periods of low work load followed by periods of high work load and long delays to the public.
- | | |
|-----------------|----------|
| Significant | 9 (37%) |
| Not Significant | 14 (58%) |
| No Opinion | 1 (5%) |

Comments:

- (a) "Formerly (1961) Maine required inspections during April and October. We changed our system in January, 1962 to leave the choice of inspection months to the vehicle owner or operator in order to eliminate the heavy work load on the stations during the latter parts of April and October." (Maine)
- (b) "Because of the state's expiration system used in New Mexico where expirations occur throughout the twelve months, complaints relating to this segment of the inspection program are relatively nil." (New Mexico)
- (c) "This is alleged by new car dealers who do not participate in commercial vehicle inspections." (Pennsylvania)
- (d) "Colorado has two inspection periods each year — April-May, October-November.

"There is generally a high work load during the last week of each inspection period which, in our opinion, causes some problems and results in some improper inspections. The current session of the Colorado Legislature has amended our law to provide for a twelve months inspection program so that we

will have staggered inspections throughout the entire year. Vehicles will still be required to be inspected twice each year. We do not begin implementation of this law until July 1, this year. After we have had some experience we may be able to comment on this new procedure.

"The theory on the new legislation is that the work load will be more evenly spread out and inspection stations will be able to maintain competent personnel throughout the year."
(Colorado)

4. (12) Having inadequate administrative manpower for proper field supervision, routine checks of inspection stations and mechanics and investigations of reported violations.

Significant	17 (71%)
Not Significant	7 (29%)
No Opinion	0

Comments:

- (a) "There is never enough manpower available to train and test mechanics. We could double the number of troopers available for inspection duties and still be short." (Pennsylvania)
- (b) "In 1965 the Department of Motor Vehicles had ten full-time inspectors to supervise 1350 inspection stations, or approximately 135 stations per man. However, due to the area that inspectors must cover to meet these inspections (New Mexico is very sparsely populated, having only one-third of the population centered in one county, wherein Albuquerque is located), the number of supervising inspectors was not adequate and must be increased to insure proper supervision of the licensee."
(New Mexico)
- (c) "Still a problem—our officers have other duties, when they should be full time on inspection supervision." (Maine)

5. (13) Having inadequate administrative manpower and facilities for training and testing inspection mechanics.

Significant	14 (58%)
Not Significant	9 (42%)
No Opinion	0

Comments:

"Still a problem—our officers have other duties, when they should be full time on inspection supervision." (Maine)

6. (16) Finding that the income from the inspection program to be too little to cover administrative expenses.

Significant	7 (33%)
Not Significant	15 (62%)
No Opinion	1 (5%)

Comments:

"The funds for defraying the cost to the state of operating the PMVI system comes from the Virginia general revenue sources." (Virginia)

7. (18) Having inadequate resources for conducting follow-up activities to insure that rejected vehicles do not continue to operate in violation of the law.
- | | |
|-----------------|----------|
| Significant | 12 (50%) |
| Not Significant | 12 (50%) |
| No Opinion | 0 |

Comments:

- (a) "This can be a problem, but we feel that we now have it pretty much under control by using spot checks. There are several methods which could be used to eliminate this problem depending on (the) basic system in use, for example, rejection slips, officer availability, etc." (Maine)
- (b) "This is a very controversial area. Whatever system is adopted must insure that the vehicle is repaired and made safe for operation." (Pennsylvania)
- (c) "This is a question which I feel cannot be answered as significant, however, I do not think 'not significant' is the answer. Our present system and personnel resources does not permit us to follow up on all rejection vehicles. I cannot say how significant this affects the program." (Colorado)

B. Public Relations: Common problems in governmental regulation.

8. (4) Receiving public criticism because of the inconvenience of the PMVI inspection.
- | | |
|-----------------|----------|
| Significant | 6 (25%) |
| Not Significant | 18 (75%) |
| No Opinion | 0 |

Comments:

"One of the most important elements of this program is to win public acceptance, to be accepted, the program must be convenient." (Pennsylvania)

9. (7) Receiving public criticism because of the expense to the motorist of paying the inspection fee.
- | | |
|-----------------|----------|
| Significant | 3 (12%) |
| Not Significant | 21 (88%) |
| No Opinion | 0 |
10. (8) Receiving public criticism because of the cost to the motorist of vehicle repairs required to pass the inspection.
- | | |
|-----------------|----------|
| Significant | 5 (20%) |
| Not Significant | 19 (80%) |
| No Opinion | 0 |

Comments:

"While this is no longer a factor for us, it will be a critical item to a state initiating an inspection program. Lead into the program gradually." (Pennsylvania)

11. (15) Receiving public complaints that motor vehicle inspection works primarily to the benefit of the automobile repair industry.

Significant	3 (12%)
Not Significant	21 (88%)
No Opinion	0

12. (17) Receiving public criticism that the inspection requirements are superficial and not being rejected leads to a false sense of security.

Significant	6 (25%)
Not Significant	18 (75%)
No Opinion	0

C. Public Relations: Matters related directly to PMVI Administration

13. (19) Receiving public criticism because of the driving distance to the nearest inspection station.

Significant	3 (12%)
Not Significant	21 (88%)
No Opinion	0

14. (3) Receiving public criticism because of high vehicle rejection rates.

Significant	3 (12%)
Not Significant	20 (83%)
No Opinion	1 (5%)

15. (5) Receiving public criticism because of discourtesy of inspection personnel.

Significant	5 (20%)
Not Significant	19 (80%)
No Opinion	0

16. (6) Receiving public criticism because of lack of knowledge on the part of inspection personnel.

Significant	7 (29%)
Not Significant	17 (71%)
No Opinion	0

Comments:

"Question number 16(6) is not too clear since the 'yardstick' of comparison is not shown." (District of Columbia)

17. (9) Receiving public criticism because of the laxness in the manner the inspections are conducted.

Significant	10 (42%)
Not Significant	14 (58%)
No Opinion	0

- | | |
|--|---|
| 18. (10) Receiving public criticism because of reported incidences of "pay-off" to inspection personnel or similar illegal activities. | Significant 6 (25%)
Not Significant 18 (75%)
No Opinion 0 |
| 19. (14) Receiving public criticism because of adopting too stringent inspection requirements in the beginning inspection campaigns. | Significant 9 (37%)
Not Significant 15 (63%)
No Opinion 0 |

Comment:

- (a) "See comment number 8 (10). We have recommended that the D-7.1 Code be the minimum acceptable, but, for other than new vehicles, this should be incorporated over a period of time which might be as much as (3) years." (Pennsylvania)
- (b) "This was the basis of some criticism when we tightened up our requirements in 1962, however, with the passage of time and some minor compromise this is no longer a problem." (Maine)

D. General Comments

1. "Colorado has had a vehicle and safety inspection program since 1936. The program was strengthened in 1957, raising the fee, adding enforcement and requiring more strict inspection of vehicles.

"Since the program has been in effect so long in Colorado, it is well accepted by the public." (Colorado)
2. "Since the Pennsylvania program has been in operation since 1929, the questions in Part I would necessarily be not significant." (Pennsylvania) (but see the comments supplied by Pennsylvania under the individual items. Editor's note.)
3. "The answers indicated to the questions 8(4), 9(7), 10(8), 14(3), 15(5), 16(6), and 17(9) are all significant but a good public relations program during the inaugural period would do much to overcome such criticism." (District of Columbia)
4. "Our inspection law was passed in 1960 and required from six months to a year getting (the) Department set up and making surveys in several other states with inspection system.

"We began our first year's operation in 1961, and had a little public criticism the first year because the public was not accustomed to the inspection and some thought it was just another law passed to take the people's money. However, after we were in operation for one year our fatality rate was reduced by 100 over the previous year, which certainly proved that the inspection played a part.

"At the present time, we are in our 7th year of operation and we feel that we have at least a 95% public compliance, and we are receiving very little criticism from the public on the inspection in this state." (Mississippi)

5. "In this State of Hawaii, there are two types of Motor-Vehicle Safety Inspection stations, however both types are handled by licensed garages.

"1) One type is controlled by the STATE (PUC) Public Utilities Commission. Those licensed under the PUC handle all vehicles weighing in excess of ONE ton and over. Sixty (60) PUC stations are on the Island of Oahu.

"2) The other type, is controlled by the Municipal Government, with administration and enforcement of the Licensed garages controlled by the City Police, or the Honolulu Police Department. These licensed Test stations, of 357 in number, safety check all vehicles under one ton on the Island of Oahu.

"For effective administration of Motor-Vehicle Safety Inspection Stations, Organization, planning well, communication and a dedicated staff is essential." (Hawaii, Honolulu)

6. "We are very proud of our inspection program which is state owned and operated, under the supervision of the Motor Vehicle Department.

"In the State of Delaware we have four inspection locations. The inspection lanes in Kent and Sussex Counties each have one inspection lane, in New Castle County we have two inspection lanes, making a total of four lanes for the inspection of vehicles.

"Our stations are so located that at no time does an owner have to drive more than 35 miles to have their car or truck inspected. We do not make any charge for this service in Delaware. However, I feel that any state having state owned inspection stations should make a charge of \$2.00 per unit, which would help take care of building the facilities, paying for supplies and manpower. In this case there would be no cost to the State for the inspection system. If the state has an inspection and the inspection is handled by independent garages and gas stations I am sure that it would cost much more money and the state would not have as good control as if it was owned and supervised by the state." (Delaware)

7. "Our Motor Vehicle Inspection Program, which was started in this County in 1952, is far from being perfect, but it has added tremendously to traffic safety in this state. The work is done by privately-owned garages and service stations. It has removed many unfit motor vehicles from our highways and has required repairs on many others." (Hawaii, Kauai)

8. "We are now in process of getting our program underway. Our program goes into effect 1-1-68.

"The above opinions are based to a great degree on our experience in implementation and not actual experience with (the) program underway." (Kentucky)

PART II. RECOMMENDATIONS*

A. Administrative Organization

1. (2) That the PMVI system be operated under the department of the State Police.
- | | | |
|--|-----------------|----------|
| | Recommended | 11 (46%) |
| | Not Recommended | 10 (41%) |
| | No Opinion | 3 (13%) |

Comments:

- (a) "We have no State Police here." (Hawaii, Kauai)
- (b) "I am of the opinion that State Police can adequately supervise Safety Inspection Stations, however all states do not have a State Police as North Carolina." (North Carolina)
- (c) "State appointed." (District of Columbia)

2. (3) That the PMVI system be operated under the (see recommendations below) Department.
- | | | |
|--|-----------------|----------|
| | Recommended | 21 (87%) |
| | Not Recommended | 0 |
| | No Opinion | 3 (13%) |

Specific Recommendations Were:

<u>Recommended Department</u>	<u>Number of States Recommending</u>	<u>Recommending States</u>
Motor Vehicle	8	Colorado, Delaware, Massachusetts, District of Columbia, New Jersey, North Carolina, Rhode Island, Vermont
Motor Vehicle or Safety	1	New Hampshire
State Police	8	Georgia, Louisiana, Maine, Mississippi, New Mexico, Texas, Virginia, West Virginia
Police	2	Hawaii (Honolulu), Hawaii (Kauai)
Highway Patrol	1	Utah
Division of Public Safety	1	Kentucky
No Opinion	3	Hawaii (Kauai), New York, Pennsylvania (See Comments)

*In some instances in Part II the respondent did not mark any of recommended, not recommended, or no opinion where he was also required to make a specific comment. In those cases, where possible, his response has been judged either recommended or not recommended, based on his specific recommendations or comments, for the purpose of the summary following each statement. However, the chart in attachment 3 shows those same statements to have been not marked. In one or two cases the respondent apparently skipped an entire statement. Those are indicated as not marked here as well as in the chart of attachment 3.

Comments:

- (a) "I think the ideal situation would be for an Inspection Division under the Motor Vehicle Department or State Police that would work entirely with motor vehicle inspection and no other duties." (North Carolina)
- (b) "Under the New Mexico system, the PMVI is administered and to some extent enforced by the Department of Motor Vehicles, with enforcement assistance being given by the New Mexico State Police. Under this type of arrangement, and if the Department of Motor Vehicles could budget enough manpower to supervise and enforce the regulations, I would recommend that the program be administered and enforced by the Department of Motor Vehicles. However, it is apparent that the Department of Motor Vehicles cannot budget for the needed enforcement necessary to insure proper supervision of the program, and under these conditions, it is my recommendation that the Department of Motor Vehicles stay strictly within the realm of administering the program, allowing the State Police to enforce the provisions." (New Mexico)
- (c) "Depends on organization of State functions." (Pennsylvania)
- (d) "The Mississippi Inspection Law, passed in 1960, did not specify uniformed field inspectors, even though this system operates under the Department of Public Safety. We feel that we have been most successful in operating this system with civilian personnel, with the exception of the director and two field inspectors, who are uniformed personnel and long-time career officers.

"Actually, I do feel that the inspection system should be manned by well-trained, uniformed personnel but, as stated, most of our civilian field inspectors are expolicemen, deputy sheriffs and other officers, and have made excellent field men." (Mississippi)
- (e) "It is being operated under the Police Department here." (Hawaii, Kauai)

3. (5) That one field supervisor be assigned for about each (see recommendations below)(number) of the licensed inspection stations to field monitor inspection programs, investigate violations and carry out related activities.

Recommended	22 (91.6%)
Not Recommended	0
No Opinion	2 (8.4%)

Specific Recommendations Were:

Recommended Number	Number of States Recommending	Recommending States
3 to 4	1	Virginia
12	1	New Hampshire
50	6	District of Columbia, Georgia, Hawaii (Kauai), Louisiana, Maine, Mississippi

Specific Recommendations (Continued)

Recommended Number	Number of States Recommending	Recommending States
50 to 75	1	Massachusetts
75 or less	1	New Mexico
75	1	Kentucky
85	1	Texas
100	4	New Jersey, North Carolina, Rhode Island, West Virginia,
150	2	Hawaii, (Honolulu), New York
150 to 200	1	Utah
200	1	Pennsylvania
250	1	Colorado
1250	1	Delaware
No Opinion	2	Hawaii (Kauai), Vermont (See Comment)

Comments:

- (a) "It will vary greatly on the number of inspection stations per registered motor vehicles and the geographical area covered."
(Vermont)
- (b) "I base this (50—by editor) or our approximately 150 stations per field supervisor. With our officers' other duties we could more adequately control the operation with 50 per man."
(Maine)
- (c) "Supervision being a routine duty for an officer in Virginia, three or four stations can be adequately supervised without interfering with the officers' other responsibilities." (Virginia)
4. (6) That the field supervisors be uniformed law enforcement officers.
- | | |
|-----------------|----------|
| Recommended | 16 (67%) |
| Not Recommended | 5 (21%) |
| No Opinion | 3 (12%) |

Comments:

"Plain clothes in Mississippi." (Mississippi)

5. (23) That the cost to the State of administering the PMVI program be paid by collecting a stated sum per inspection from the stations conducting the inspections.
- | | |
|-----------------|----------|
| Recommended | 14 (60%) |
| Not Recommended | 6 (25%) |
| No Opinion | 4 (15%) |

Comments:

- (a) "Through the sale of inspection certificates to the station."
(Texas)
 - (b) "From the sale of inspection stickers only." (West Virginia)
 - (c) "Establish cost and sell stickers to stations." (Pennsylvania)
 - (d) "This can best be accomplished by charging so much per
each inspection certificate." (Colorado)
 - (e) "The registered owner of the vehicle should pay the cost by
paying the inspection stations for the stickers and inspection."
(Utah)
 - (f) "No such charge made in this County." (Hawaii, Kauai)
6. (24) That the funds for defraying the cost
to the State of operating the PMVI
system come from the State's general
revenue sources.

Recommended	8 (33%)
Not Recommended	14 (60%)
No Opinion	2 (7%)

Comments:

"In this county, the inspecting stations pay for necessary ma-
terials and supplies." (Hawaii, Kauai)

B. Inspection Organization

7. (1) That at least (see recommendations
below) months be allowed from the
day the first activity begins in es-
tablishing a PMVI organization until
the first day that motor vehicles
are to be inspected. At least this
much time should be required for de-
veloping an organization, designating
inspection stations, licensing mechan-
ics, producing materials, and related
activities.

Recommended	20 (83%)
Not Recommended	0
No Opinion	4 (17%)

Specific Recommendations Were:

<u>Recommended Number of Months</u>	<u>Number of States Recommending</u>	<u>Recommending States</u>
3	1	Hawaii (Honolulu)
6	4	Colorado, Hawaii (Kauai), Mississippi, Pennsylvania
6 to 12	1	Maine

Specific Recommendations (Continued)

Recommended Number of Months	Number of States Recommending	Recommending States
12	7	Delaware, Louisiana, New Hampshire, New Jersey, New York, North Carolina, Utah
18	6	District of Columbia,* Kentucky, Massachusetts, Texas, Virginia, West Virginia
24	1	Georgia**
No Opinion	4	Hawaii (Kauai), New Mexico, Rhode Island, Vermont

*"Less than 12 months not recommended"

** (Georgia is speaking from very recent experience in beginning a PMVI program. Editor's note.)

8. (4) That about (see recommendations below) inspection stations be licensed for every 1,000,000 cars registered in the state.

Recommended	16 (66%)
Not Recommended	1 (4%)
No Opinion	7 (30%)

Specific Recommendations Were:

Recommended Number	Number of States Recommending	Recommending States
200	1	Hawaii (Kauai)
500	1	Hawaii (Honolulu)
600	1	Georgia
750	1	Kentucky
850	1	Delaware
1000	4	Louisiana, Massachusetts, Mississippi, North Carolina
1200	3	New Mexico, Texas, Virginia
1500	2	New York, Utah
1600	1	West Virginia
3000	1	New Hampshire

Specific Recommendations (Continued)

Recommended Number	Number of States Recommending	Recommending States
No Opinion	7	Colorado, District of Columbia, Hawaii (Hawaii), Maine, New Jersey, Rhode Island, Vermont
Not Recommended*	1	Pennsylvania

*Apparently this respondent directed his reply to a point different from the one intended (Editor's note).

Comments:

- (a) "This would depend largely upon the motor vehicle density and geographical problems." (Colorado)
- (b) "(About a 1,000—added by editor) on a semi-annual basis. If staggered on a monthly basis, fewer stations would be required." (Massachusetts)
- (c) "Because Maine has only 450,000 vehicles I am unable to express an opinion here. We have 1500 stations which seems adequate for us." (Maine)
- (d) "Will necessarily have to vary depending upon size of station and size of town and population." (Vermont)

9. (7) That a standard inspection fee be pre-scribed throughout the state.
- | | |
|-----------------|----------|
| Recommended | 21 (87%) |
| Not Recommended | 3 (13%) |
| No Opinion | 0 |

Comments:

"Recommended with a maximum set and then leaving it to the discretion of the station if they wish to charge less." (Vermont)

10. (8) That a maximum inspection fee be pre-scribed but that the exact amount be determined by competition.
- | | |
|-----------------|----------|
| Recommended | 5 (21%) |
| Not Recommended | 18 (75%) |
| No Opinion | 0 |
| Not Marked | 1 (4%) |

11. (13) That the state undertake a brief, formal training course and examination of mechanics conducted away from their places of employment.
- | | |
|-----------------|----------|
| Recommended | 21 (87%) |
| Not Recommended | 2 (9%) |
| No Opinion | 1 (4%) |

Comments:

- (a) Louisiana suggests that both this training and on-the-job training be employed. (editor's note)
- (b) "Circumstances will have to decide this." (Virginia)
- (c) "Very important." (Georgia)

12. (14) That all inspection mechanics be licensed by the State.

Recommended	24 (100%)
Not Recommended	0
No Opinion	0

Comments:

"Very important." (Georgia)

13. (15) That the training and testing of mechanics be done on the job at their places of employment by field supervisors.

Recommended	11 (46%)
Not Recommended	12 (50%)
No Opinion	1 (4%)

Comments:

- (a) "Combined with (training conducted by the state away from the place of employment—editor's note) and with other training." (Pennsylvania)
- (b) Louisiana suggests both on-the-job training and a special training course conducted by the state. (editors note)
- (c) "Circumstances will have to decide this." (Virginia)

14. (20) That fleet operators and others operating a large number of vehicles and having adequate garage facilities be licensed to inspect their own vehicles.

Recommended	23 (96%)
Not Recommended	0
No Opinion	1 (4%)

Comments:

- (a) "Maine licenses as a 'fleet' station, anyone with adequate facilities to conduct inspections, who owns or controls ten or more vehicles. We do not so license the vehicle dealer." (Maine)
- (b) See Delaware's remarks under paragraph #3, Part II, E. (editor's note).

15. (21) That the inspection system operate on a year-around basis with sticker expiration dates falling on the motorists' birthdays or on some other random basis so that the number of inspections falling due remains fairly constant throughout the year.

Recommended	14 (58%)
Not Recommended	5 (21%)
No Opinion	5 (21%)

Comments:

- (a) "I believe there are better approaches than using the motorists birth date to implement this procedure." (Colorado)
 - (b) "Has advantages but not so easy to enforce." (Massachusetts)
 - (c) "North Carolina used the last numerical digit on the license number to stagger the inspection of vehicles the first year which worked very effectively. Numerical digit number 3 had to have vehicle inspected prior to March 31st; 4, April 31st; etc.; 0, October; November, 1, and December 2. This year we are reverting back to the number punched on the inspection certificate." (North Carolina)
 - (d) "The New Mexico system where inspection certificates expire throughout the twelve months has proved very successful and should be given thorough consideration by jurisdictions proposing a PMVI inspection program." (New Mexico)
 - (e) "This is highly recommended, however we'd think that having the birthdate tie in with an expiration date on a sticker would pose difficulties in enforcement." (Maine)
16. (22) That inspection campaigns be limited to one or more two or three month periods with all of the stickers in the State expiring during those periods.

Recommended	6 (25%)
Not Recommended	15 (62%)
No Opinion	3 (13%)

Comments:

"This county's period is three months." (Hawaii, Kauai)

17. (27) That, except in unusual cases, no motorist be required to drive more than (see recommendations below) miles to the nearest inspection station.

Recommended	21 (87%)
Not Recommended	1 (4%)
No Opinion	2 (9%)

Specific Recommendations Were:

<u>Recommended Maximum Number</u>	<u>Number of States Recommending</u>	<u>Recommending States</u>
5	4	Georgia, Louisiana, New Mexico, Virginia
10	6	Hawaii (Honolulu), Massachusetts, New Jersey, Rhode Island, North Carolina, Pennsylvania

Specific Recommendations (Continued)

<u>Recommended Maximum Number</u>	<u>Number of States Recommending</u>	<u>Recommending States</u>
12 1/2	1	District of Columbia
15	1	Vermont
15 to 20	1	New York
20	3	Kentucky, Mississippi, New Hampshire
25	1	West Virginia
30	2	Colorado, Maine
35	1	Delaware
No Opinion	2	Hawaii (Hawaii), Hawaii (Kauai)
Not Recommended*	1	Texas
1*	1	Utah

*Apparently these respondents directed their replies to a point different from the one intended (Editor's note).

Comments:

- (a) "Depending upon the opinion of the officer, if the car is in an unsafe mechanical condition—the nearest station; if safe enough to drive, and it can be either driven home or to station of their own request." (Utah) (Apparently the respondent directed this comment to a point not intended for the statement.)
- (b) "The number of miles to be driven is going to be dependent on the geographical location of the individual state's population. Speaking for New Mexico, there are areas where one would not have to drive more than a very short distance for an inspection, whereas in the more sparsely populated areas (which are prevalent within our state), one might drive as much as 25 miles to obtain an inspection." (New Mexico)

C. Inspection Procedures

- 18. (9) That the ASA D7.1 inspection requirements serve as the basic inspection procedures and standards.

Recommended	23 (96%)
Not Recommended	0
No Opinion	1 (4%)

19. (10) That the inspection requirements from the beginning of the program conform as a minimum to the complete requirements of ASA D7.1.

Recommended	16 (66%)
Not Recommended	7 (30%)
No Opinion	1 (4%)

Comments:

- (a) "Item 19(10) . . . should be considered on the basis of spot surveys. Even with minimum requirements the D.7 Code should be utilized as near as practicable." (District of Columbia)
- (b) "This depends on your public information program, public acceptance, training of your personnel and quality of stations chosen." (Massachusetts)

20. (11) That the beginning inspection requirements cover only a limited number of vehicle components, including lights, brakes, steering, tires, and (see recommendations below).

Recommended	15 (62%)
Not Recommended	9 (38%)
No Opinion	0

Specific Recommendations Were:

Recommended Item	Number of States Recommending	Recommending States
Glass (Glazing)	7	Delaware, Kentucky, Louisiana, Massachusetts, New Jersey, New Mexico, Utah
Exhaust	7	Kentucky, Maine, Massachusetts, New Mexico, North Carolina, Utah, Virginia
Windshield Wipers	3	Kentucky, New Jersey, Pennsylvania
Horn	2	Kentucky, Pennsylvania
Turn Signals	1	Kentucky
Rear View Mirror	1	Kentucky
Number Plates	1	Massachusetts
Wheel Alignment	1	Hawaii (Kauai)

Comments:

- (a) "Items—19(10) and 20(11) should be considered on the basis of spot surveys. Even with minimum requirements the D.7 Code should be utilized as near as practicable." (District of Columbia)

- (b) "Maine is faced with carbon-monoxide deaths each winter. We feel a tight exhaust system should be included as part of even a minimum program." (Maine)
- (c) "All inspection requirements should be required to meet standards from the beginning of an inspection program." (Vermont)

21. (12) That at least (see recommendations below) years be allowed for car owners to gradually build up their vehicles' conditions to meet the full requirements of a standard such as ASA D7.1.

Recommended	16 (66%)
Not Recommended	5 (21%)
No Opinion	3 (13%)

Specific Recommendations Were:

Recommended Number of Years	Number of States Recommending	Recommending States
Lead Time Not Recommended	5	Colorado, Massachusetts, North Carolina, Rhode Island, Vermont
1	6	Hawaii (Honolulu), Maine, Mississippi, New Hampshire, Utah, West Virginia
2	4	Delaware, Georgia, Louisiana, Texas
2 to 3	1	District of Columbia
3	4	Kentucky, New Jersey, Pennsylvania, Virginia
4	1	New York
No Opinion	3	Hawaii (Hawaii), Hawaii (Kauai), New Mexico

Comments:

- (a) "Very important." (Georgia) (2 years lead time)
- (b) "Vehicles should meet requirements without lead time." (Vermont)

22. (16) That licensed inspection stations be visited and inspected by field supervisors at least once in each (See recommendations below) months.

Recommended	23 (95%)
Not Recommended	1 (5%)
No Opinion	0

Specific Recommendations Were:

<u>Recommended Period</u>	<u>Number of States Recommending</u>	<u>Recommending States</u>
Each Week	2	Massachusetts, Mississippi
Half-month	3	District of Columbia, Louisiana, Hawaii (Kauai)
One-month	8	Georgia, Kentucky, Maine, New Jersey, Utah, Virginia, West Virginia
One month to 1 1/2 months	1	New York
45 days	1	New Mexico
Two months	1	Colorado
Three months	4	Delaware, Hawaii (Honolulu), North Carolina, Rhode Island
Six months	2	New Hampshire, Pennsylvania
Other	1	Vermont (See Comment)
No Opinion	1	Hawaii (Hawaii)

Comments:

"Recommended that licensed stations be visited at least once a month and during the actual inspection month at least once every two weeks." (Vermont)

23. (17) That the inspection devices be checked, verified and certified periodically by field supervisors using calibrated equipment.

Recommended	24 (100%)
Not Recommended	0
No Opinion	0

Comments:

"Two times per year." (Texas)

D. Enforcement

24. (18) That incidences of "selling inspection stickers" or improperly rejecting vehicles can be dealt with by imposing moderate fines, short suspension of inspection privileges, or both.

Recommended	9 (37%)
Not Recommended	13 (54%)
No Opinion	2 (9%)

Comments:

- (a) "Circumstances will have to determine the punishment."
(Virginia)
 - (b) "For first violation." (Hawaii, Kauai)
 - (c) "Have checked both of these (24 (18) and 25 (19) — editor's note) as 'recommended' because of our feelings toward, what we considered to be two separate offenses, that is, 'selling a sticker' and 'improperly rejecting a vehicle.'" We feel that 'selling a sticker' is a fairly clear-cut offense and should be dealt with severely, on the other hand 'improperly rejecting a vehicle' is an offense where intent would be difficult to prove and could even be a mistake in judgment. Due to the possibility of human error involved in this we feel the offense should not be subject to maximum punishment." (Maine)
25. (19) That incident of "selling inspection stickers" or improperly rejecting vehicles be dealt with firmly by imposing substantial fines and long suspensions or revocations of inspection privileges, or both.

Recommended	23 (95%)
Not Recommended	0
No Opinion	1 (5%)

Comments:

- (a) "Recommend permanent revocation on first conviction."
(Pennsylvania)
 - (b) "Circumstances will have to determine the punishment."
(Virginia)
 - (c) "For repeated violations." (Hawaii, Kauai)
 - (d) See Maine's comment under question 4. (editor's note).
26. (25) That follow-up investigations of rejected vehicles not appearing for reinspection be turned over to the local police.

Recommended	6 (25%)
Not Recommended	16 (67%)
No Opinion	2 (8%)

Comments:

- (a) "State Police." (West Virginia)
- (b) "Follow-up investigation should be conducted by Department of Motor Vehicles personnel." (Vermont)

27. (26) That follow-up investigations of rejected vehicles not appearing for re-inspection be an integral activity of the inspection organization.

Recommended	22 (91%)
Not Recommended	2 (8%)
No Opinion	0

Comments:

- (a) "In conjunction with above (follow-up investigation by local police — editor's note)." (District of Columbia)
- (b) "Recommend if combined with law enforcement facilities of (the) program." (Pennsylvania)
- (c) "Already answered by number 26 (25) above." (Vermont)

E. General Comments

1. "I feel any public criticism is significant.
 - a) Enough time should be allowed to get PMVI organized and have first deadline set so inspections will be uniformly divided each month so there will be no slack or rush months.
 - b) Approve only qualified mechanics.
 - c) Repairs not required in inspection station. Can take anywhere to be repaired.
 - d) Enforce each item in inspection and following any complaints." (Georgia)
2. "This county being rural is nature, with only relatively small towns scattered throughout it, understandably, there are more inspecting stations authorized to do this work, according to motor vehicle registrations, than is usually found in an urban community." (Hawaii, Kauai)
3. "The following are my comments to part two of your survey:

"The inspection system is state owned and there is no additional cost to the owners for this service. We feel that, being a state owned operation, we have better control of the inspection. We do realize that the State of Delaware is a compact state and it is easy for the residents of Delaware to go to one of our lanes and, at no time does a resident have to travel more than 35 miles to have their car inspected.

"Our inspection law requires that a vehicle must be inspected before the registration is renewed. Our registration is staggered - the expiration periods are: March 31, June 30, September 30 and December 31. An owner of a vehicle having an expiration of any of the above periods can have their unit inspected anytime during the three month period but does not have to buy registration until the end of the period, if it is more convenient for them financially.

"As to fleet accounts, and we consider a fleet account 15 or more units, can be a self inspection agency, providing that they have facilities that

meet the Motor Vehicle Department's specifications and their facilities must be inspected and approved by the Motor Vehicle Commissioner, or any authorized agent of the Department. However, this part would be entirely up to the states as to the agency they would want to make the inspection.

"In a large area, like your state,* it might be possible to use both state owned and appointed stations to render a service to the public. In metropolitan areas, I am sure, you could use state owned to a good advantage. I do not feel that it would be practical for the state to operate an inspection lane with less than 75,000 units to be inspected over a 12 month period.

"Our inspection equipment is manufactured by Weaver Manufacturing Company, Springfield, Missouri, and it is very satisfactory." (Delaware)

PART III. SUPPLEMENTARY REMARKS

These comments, taken from the covering letters returning the completed survey forms, provide relevant general information about existing PMVI programs and, in some cases, qualifications to the direct responses to the survey statements;

- (1) "Some questions that I have marked as significant may not of necessity be of prime importance alone or in few instances. A great many of the questions posed could hinge on the caliber of supervision and lead time allowed. Any inspection program must stand or fall on the effort expended in gaining public support through education. This will not be an easy task in any case but dedication must be a criteria for selection of key personnel for the success of the program." (District of Columbia)
- (2) "We are now in process of implementation of our Motor Vehicle Inspection Program, which goes into effect January 1, 1968. Therefore, our answers to your questionnaire cannot be from knowledge learned through experience of an inspection program. The answers we have given you are from information that we have learned from other state programs and the questions that we have been confronted with during this implementation period." (Kentucky)
- (3) "Louisiana is now in the process of expanding our program along the guidelines of the ASA D7.1. It is anticipated that the new expanded program will become effective December 1, 1967." (Louisiana)
- (4) "We have had compulsory inspections for over thirty years and the public takes it for granted, generally speaking. We do have a very limited number of complaints during each inspection and occasionally some receive publicity, but with 2,000,000 vehicles and 3,000 Inspection Stations, we cannot expect 100% perfection.

As far as I know, there has never been any concentrated effort to repeal the law. Our biggest mistake has been our acceptance

* Michigan.

over the years of too many inspection stations and our neglect to collect any fee from the station owners." (Massachusetts)

- (5) "I feel that our program here in this state is one of the tops on inspection and it certainly is self-sustaining." (New Hampshire)

- (6) "As you know, the New Jersey inspection system is classified as state-owned and operated. We believe that this type of system provides simplified control over the entire operation and assures unbiased and uniform inspections. However, this type of system is best suited to states which are small in area and densely populated.

We believe that any type of inspection program, if it is properly administered, can be an important part of a sound overall traffic safety program for any jurisdiction.

Of course a sound basic law is required for any program. Any such law must be administered fairly and equitably. The operation should be designed to suit the needs of the jurisdiction to be served. Facilities should be adequate, inspection tolerances and equipment specifications should be equal to and be in compliance with nationally accepted standards; and operating personnel should be of a high type and properly trained." (New Jersey)

- (7) "In many of these areas our replies will not be conclusive since our citizens have had thirty-eight years to adapt themselves to this Program. The vast majority of our citizens have lived with P.M.V.I. since they first started to drive.

While we have a very extensive inspection, we do not recommend its adoption by any jurisdiction initiating an inspection system. The program should be developed gradually over a period of time to enable acceptance and a minimum of inconvenience to the owner.

It is difficult to answer your questions with a simple recommended or not recommended answer as there are many factors which can alter the situation." (Pennsylvania)

- (8) "The State of Utah, once a year and not more than twice a year, requires that every motor vehicle, trailer, semi-trailer and pole-trailer registered in the State of Utah be inspected and that an official certificate of inspection and approval be obtained for each such vehicle.

The inspections are performed by private garages and service stations licensed by the state. Materials for the inspection are furnished free-of-charge by the Utah Highway Patrol. The \$1.00 inspection fee reverts to the station.

This law has been in effect since 1935. We have no definite proof that there is a decrease in the accident rate since its inception; however, the program has proven very satisfactory for our State's need. We do not anticipate any changes in our Inspection Law at present time. However any changes we would suggest would be made by the Legis-

lature this year. One change we might suggest would be that more money be charged for the inspection by the mechanic for his labor and inspection with some of the money reverting to the Highway Patrol for the purpose of administration and enforcement of the program. The Department is authorized to make necessary rules and regulations for the administration and enforcement of the Inspection Law and to designate any period or periods of time during which owners of any vehicles, subject to this law, shall display upon such vehicles certificates of inspection and approval duly issued for such vehicle.

The inspection alone is all that is required. The motorist may take their cars wherever they choose, or they may repair them themselves. Most of the vehicles however are repaired at the stations performing the inspection.

The inspection stations are checked thoroughly once each year by the troopers of the Highway Patrol for the necessary tools and to see that the equipment is in good operating condition and that the light machines are calibrated. They also check to see that the inspectors are approved by this Department.

The inspection stations are generally cooperative with the program and give a good and proper inspection. There are a few stations each year, however, that violate the rules and regulations. About 100 stations are cancelled or suspended each year.

The Department also conducts training schools throughout the state, once a year, and attendance at one of these schools is mandatory in order to be qualified as an Official Inspection Station." (Utah)

AN OVERVIEW

The preceding section constitutes the "meat" of this report and its usefulness, if any, resides there. Nevertheless, it may be valuable for perspective and as a matter of curiosity to highlight the issues receiving a preponderant of attention one way or the other.

Perhaps the most surprising result of Part I was the few issues reported generally as significant problems. Perhaps this indicates the wrong issues were offered for evaluation; however, the respondents were not shy in adding their comments and no unlisted critical issues appeared.

The following Part I statements, were marked significant by one-third or more of the respondents and are listed under the appropriate sub-section by order of most frequent significant responses. The percentage so marked is noted in parentheses after each statement.

A. Matters of Internal Administration

4. (12) Having inadequate administrative manpower for proper field supervision, routine checks of inspection stations and mechanics and investigations of reported violations. (71%)
5. (13) Having inadequate administrative manpower and facilities for training and testing inspection mechanics. (58%)

7. (18) Having inadequate resources for conducting follow-up activities to insure that rejected vehicles do not continue to operate in violation of the law. (50%)
 3. (11) Finding that the public timing of inspection is irregular, causing periods of low work load followed by periods of high work load and long delays to the public. (37%)
 6. (16) Finding that the income from the inspection program to be too little to cover administrative expenses. (33%)
- B. Public Relations: Common Problems in Governmental Regulation
- None
- C. Public Relations: Matters Related Directly to PMVI Operations
17. (9) Receiving public criticism because of the laxness in the manner the inspections are conducted. (42%)
 19. (14) Receiving public criticism because of adopting too stringent inspection requirements in the beginning inspection campaigns. (37%)

It appears from these results that the principal problems of widespread concern have to do with limitations of resources. Apparently, the programs have received favorable public response, or at least public squawks do not seem to be ruffling the administrative feathers. These remarks should be tempered with the knowledge that each stated problem was viewed as significant by no fewer than three respondents. Furthermore, most of the respondents were officials in states having programs established for a considerable number of years. Possibly some matters formerly of public concern have been satisfactorily resolved and were by oversight omitted from the critique.

Perhaps the surprising result of Part II was the large number of statements generally endorsed by the respondents. Since the exceptions to the trend were those not recommended, those are the statements we will highlight. The high proportion of recommended statements may indicate a weakness in the design of the critique; apparently, a suitable number of alternatives was not offered.

Indeed, some of the statements proved to be such "good things" that they were recommended unanimously. Maybe that fact will prevent someone from overlooking an "obvious" point in the design of a PMVI program.

In some cases both statements of a pair intended as alternatives were recommended by the same respondents. In some cases this may have been a mistake, but it does not necessarily indicate an inconsistency because the alternatives were not always contradictory. Some respondents explained their responses in their remarks.

The following statements were not recommended by one-half or more of the respondents. The percentage of responses marked not recommended is indicated. The treatment of the alternative statement (which is not always contradictory) is also indicated.

A. Administrative Organization

6. (24) That the funds for defraying the cost to the State of operating the PMVI system come from the State's general revenue sources. (58% not recommended)

(58% of the respondents recommended that the inspection program pay for itself.)

B. Inspection Organization

10. (8) That a maximum inspection fee be prescribed but that the exact amount be determined by competition. (75% not recommended)

(87% of the respondents recommended a standard fee.)

13. (15) That the training and testing of mechanics be done on the job at their places of employment by field supervisors. (50% not recommended)

(87% of the respondents recommended training conducted away from the place of employment.)

16. (22) That inspection campaigns be limited to one or more two or three month periods with all of the stickers in the State expiring during those periods. (62% not recommended)

(57% of the respondents recommended year-around programs.)

C. Inspection Procedures

None were marked not recommended by as many as 50% of the respondents.

D. Enforcement

24. (18) That incidences of "selling inspection stickers" or improperly rejecting vehicles can be dealt with by imposing moderate fines, short suspension of inspection privileges, or both. (54% not recommended)

(96% of the respondents recommended "substantial fines" and "long suspensions" or both.)

26. (25) That follow-up investigations of rejected vehicles not appearing for reinspection be turned over to the local police. (67% not recommended)

(92% of the respondents recommended follow-up procedures as an "integral activity" of the inspection organization.)

Each of the statements not recommended by as many as 50% of the respondents had an alternative which was recommended by more than 50% without exception. Those statements without alternatives, particularly those asking for specific recommendations, were recommended generally. Study of the preceding section detailing the responses will indicate those matters receiving general approval and the qualifications included in the comments.

MOTOR VEHICLE INSPECTION—THE PUBLIC TRUST

The preceding portion of this report has attempted to faithfully present the views of PMVI administrators in a critique of their programs. Any practical value to be derived will come from the ideas expressed there. This section is written to re-emphasize that PMVI administration is a matter of public trust.

After the legislatures have acted, administration begins; issues about what is good for the public necessarily yield in large part to practical matters of program implementation. Moreover, legislative mandates can pressure administrators into moving more vigorously than may seem to them prudent. Indeed, the National Highway Safety Bureau has been subject to legislative investigation of standards setting practices before the half-year anniversary of the Bureau's creation (2). As a consequence of this attitude, there is a place for continued discussion of the public trust residing in legislatures and administrators.

Let us put that trust in perspective by considering the following statements of what PMVI is not. It does not produce efficiency and regularity in the flow of highway traffic as do traffic control devices. It does not condemn and control overt acts of undesirable behavior as do drinking-driving and speed laws. Nor does it of itself specify the equipment needed for safe conduct of vehicles on the highways. Existing equipment codes require those in every state.

Now consider what PMVI can be. PMVI can be a nuisance to the public. It can consume several hours of a motorist's time in driving to and waiting for inspections, and it can deprive him of the use of his car for long periods for repairs. As with any governmental regulation, it can spawn the conditions for bribery and corruption of officials entrusted with the public good; and it can set up an industry to decide arbitrarily what is and what is not a safe vehicle and to fleece the public by those decisions. Cheating can mean dollars for unneeded repairs. Cheating also can result in blood in the wrecks of defective cars believed by their drivers to be in safe condition.

In short, PMVI is a program that the public could do without quite nicely. How, then, can PMVI be justified? The only justification is greater highway safety. The savings of lives, injuries, and dollars that would otherwise be lost, and nothing else, constitute the case for it. This is the mandate for PMVI.

Having isolated that mandate, let us discuss points relating to achieving that goal.

First of all, what function is performed by PMVI? As pointed out above, motor vehicle equipment codes specify the equipment required, and in many cases its performance, for legal operation of vehicles on the highways. Each owner is charged with the responsibility to insure that his vehicle is properly equipped and maintained for legal operation. If every motorist routinely inspected his vehicle and detected and repaired defective equipment, PMVI programs would be unnecessary and unjustified. However, we know from experience that a sizeable share of the almost 100 million vehicles on the highways of the United States are not maintained in this fashion and some suspect that defective equipment is a contributing factor in a great many motor vehicle mishaps. Consequently, PMVI has been instituted in many states as a means of enforcing the requirements for safe vehicles by insuring that they are periodically inspected. Essentially, PMVI is an important element in a preventative maintenance program for all of the motor vehicles in a state.

If PMVI is successful, it could contribute to savings of lives, injuries, and dollars in several ways. First, and most important, it could prevent vehicle mishaps caused by defective equipment that would occur in the absence of PMVI.

Second, and less confidently, it could contribute indirectly toward the nonoccurrence of vehicle mishaps by conditioning driver behavior toward safety. Third, of least importance and of itself no justification for PMVI, it could save motorists' money by insuring proper maintenance of equipment that would have failed.

The year 1966 saw an upsurge of interest in highway safety culminating in the legislation issuing from the United States Congress. As a result of that action, particularly, and of the public awareness of highway safety, generally, many states are going to have new and/or reinvigorated safety programs which will include PMVI.

It seems safe to say that as the public becomes more enlightened it also will become more sophisticated and discriminating. What sort of proof will PMVI administrators present if the public asks to be convinced that PMVI is doing its job in improving traffic safety? In the past, arguments have been made that go like this: "Everybody knows that defective vehicles cause accidents; PMVI removes defective vehicles from the roads; therefore, PMVI prevents accidents." Logically that argument is sound. However, the hypotheses themselves may be put in question.

A. Do Defective Vehicles Cause Vehicle Mishaps?

Although many claims have been made that defective vehicles cause accidents, and although the hypothesis is intuitively appealing, no sound scientific evidence presently available indicates just how often defects contribute to accident causation. Police agencies seem to be generally aware that they do not have the resources to do the kinds of accident investigations necessary to pinpoint defective equipment as causative factors. Moreover, the scientists coming into the field of accident research are finding many methodological difficulties, not to mention the lack of time and money, inherent in careful investigation of accident causation. Optimistically, accident investigation may yet yield valuable information. A number of extensive accident causation studies are being conducted presently that may clarify the contributions of defective components to vehicle mishaps. In the meantime the place of defects in accident causation wants proof.

A second method for proving the value of PMVI has been to show that PMVI states experienced lower highway death rates than do the non-PMVI states. Several researchers have conducted studies that indicate that PMVI states are correlated with lower highway death rates than are non-PMVI states (3, 4, 5). They have been careful not to claim that PMVI caused the lower death rate: their studies don't justify that. Unfortunately, however, the National Highway Safety Bureau has seized on one of the studies as proof that PMVI causes lower death rates (6). At least one state has seriously challenged that proof in its reply (7) to the proposed state safety standards issued by the Bureau.

Here are a few of the reasons why the current studies don't constitute proof that PMVI causes lower death rates. First, multitudes of demographic, geographic, climatologic, political and social variables are uncontrolled among the several states. The researchers cited above made attempts to place some of these things in perspective but did not draw any conclusions as to which caused what or why. Second, the causal linkage between PMVI and death rate is exceedingly tenuous. We have already discussed the lack of present evidence that defects cause many

accidents. How may we then say that PMVI will reduce death rates? Moreover, certain peculiar fatal accident characteristics, whose importance is becoming better known, tend to indicate that significant factors other than vehicle condition occur with great regularity in fatal accidents. High blood-alcohol levels appear in upwards of 50% of the samples in every recent study of fatal accident drivers (8). Furthermore, the circumstances of fatal accidents are causing much speculation about the association of emotional disorders; some people are beginning to suspect suicide as a frequent cause; falling asleep and fatigue are believed to be significant villains. These sorts of factors are known to occur in a great proportion of fatal accidents—not just a small percentage. Therefore, in the cases of fatal accidents involving these kinds of driver behavior, vehicle condition, whether good or bad, may have little effect. That is, these accidents would probably have occurred regardless of vehicle condition and, therefore, in spite of PMVI. This is not to say that PMVI will not eliminate some fatal accidents. It probably would. The point is that the fatalities caused by deviant behavior may be such a large proportion that the removal of those caused by vehicle defects will not appreciably alter the highway death rate.

This line of reasoning is speculative, of course, but present evidence gives it considerable credence. It casts doubt on the wisdom of pegging the validity of PMVI on lower death rates as the National Highway Safety Bureau has done. If death rates don't fall appreciably, the belief in the value of PMVI may suffer. That would be regrettable if in fact PMVI reduces significantly the number of non-fatal accidents.

Furthermore, with the spate of new safety measures being introduced at about the same time it will be exceedingly difficult to attribute to any one a causative role in reducing vehicle mishaps, if that does occur. Any given program introduced into a system as large and complex as the highway traffic system is likely to produce at most only a few percentage points change in mishap rate (9). Consequently, proving the differential effectiveness of several individual measures introduced simultaneously or in close succession might be considered a major methodological feat.

Those insistent upon proof for PMVI might consider this approach. PMVI is an element in preventative maintenance. If it works effectively, the improvement in the condition of the vehicles in the population should be measurable* after the institution of PMVI in a non-PMVI state. That measurement would prove that PMVI does the thing that it can do directly: decrease the number of vehicles operating with defects in the components that would be inspected under PMVI. Closing the loop for proving increased safety, would then require showing that defects in those same components do cause vehicle mishaps. Fortunately, that proof which may be forthcoming from research programs mentioned earlier is clearly separable from proving that PMVI reduces the number of defects. In view of the present knowledge and program plans, it would seem expedient to tentatively adopt the attitude that proving that PMVI reduces the number of defective vehicles in

*It should be pointed out that to constitute scientific proof these measurements would require techniques and quantitative records not necessary for routine PMVI.

the population is tantamount to proving that PMVI improves highway safety. Certainly to prove the converse would put the value of PMVI in serious doubt.

This "before and after" evaluation of PMVI is applicable to states not yet having PMVI and who will be instituting it. Or, it could be used to compare conditions in non-PMVI states to those in PMVI states. Of course, other measures may be devised. This one follows the logical argument: PMVI; therefore, fewer defects; therefore, reduction in numbers of mishaps caused by defects.

B. Does PMVI Remove Defective Vehicles From the Roads?

We have just discussed the first hypotheses that defects cause accidents. Although there are difficulties in proving that hypothesis, it has certainly not been disproved and we may consider the second: "Does PMVI remove defective vehicles from the roads?" That is the question of most direct concern to PMVI administrators because it is the thing that PMVI can do directly. If it is not successful in this, it cannot be successful in improving highway safety.

In fact the proposed method of proof discussed in the last paragraphs of section A would constitute proof of this question. Therefore, let us accept for argument that PMVI can, if properly administered, improve highway safety. The potential remains for the program to be run poorly so as to fail to accomplish that goal and to create those evils alluded to earlier. The underlying attitudes about the program adopted by the administrators can affect its success.

We begin with the ideas that improved highway safety can be achieved through mandatory preventative maintenance, and that PMVI can enforce the maintenance. The requirements will apply to all motorists just as does any other traffic regulation. Unlike other controls, however, PMVI causes every vehicle owner—not just traffic law violators—to do something he would not otherwise do. That is, all must submit to inspection without regard to how well their vehicles are maintained. In view of this universal application the public should be encouraged by official policy to view PMVI as an important element of a statewide preventative maintenance program for the purpose of "keeping the vehicles safe."

The positive desire for safety through repairing defective cars should prevail over any negative inclination to treating motorists, whose vehicles fail to pass, as law offenders against whom punitive measures should be exacted. In that regard it might be desirable for an agency other than the police to operate PMVI programs. Nevertheless, as this study shows, many PMVI programs are operated with great success by police agencies.

Notwithstanding a positive attitude, PMVI does cost the motorist something. The inspections are generally paid for by the vehicle owners, and many owners are required to purchase repairs before their vehicles pass the inspection requirements. Those dollars are intended to be the price of safety. However, the sting need not be accentuated by exacting fines for defective equipment except in cases of incorrigible refusal to either repair the vehicles or remove them from the highways. Most PMVI states apparently adopt the positive view which seems sure to enhance the public acceptability of the program.

Another fundamental consideration is the best use of available resources. The preceding critique shows that limited resources are viewed as significant

problems for PMVI administrators in many states. Consequently, questions about how much should be attempted and how soon to do it are sure to arise. Two points seem clear. Poor quality inspections will prevent PMVI from having its full effect on improving safety. Inspecting a car will not in itself make it more accident proof. Detecting and repairing defects will. Therefore, the inspection should, if necessary because of inadequate resources, be limited in numbers of cars and/or in numbers of vehicle components inspected so that all inspections may be of a quality reckoned to be effective. Second, poor internal policing of PMVI operations could lead to improprieties on the part of officials or inspection personnel. The program is attended with the flow of money for fees and repairs and the seeds of corruption drift inevitably with that flow. A program that can be misused will be. Furthermore, it will fail to maintain public acceptance and can hardly attain its potential value for safety.

Therefore, PMVI programs should be designed for quality at the expense of quantity if necessary. A good program will contribute to a safety-conscious environment even if it cannot reach each vehicle directly as often or as minutely as desired. A poor program will likely generate only antagonism.

Moreover, the internal policing by the PMVI administrators should be designed to detect surely improprieties of all kinds and to deal with them so as to effectively deter their repetition. Fortunately, PMVI programs are conducive to self-policing. Inspection franchises are valuable and the threat of losing them can be an effective control. The public as well as honest operators are bound to learn of unscrupulous dealings and they will react so long as it does any good. Furthermore, techniques can be designed to process inspection records to tip off unusual rejection rates by individual operators. In short, violations can be found out and they can be largely eliminated if the rules are clearly laid out and if the administrators firmly and evenly apply them. On the other hand, failure to correct these faults will eventually thwart the achievement of the goal of PMVI—improved highway safety.

These remarks will bear few revelations for experienced PMVI administrators. To their credit the present programs seem to run clear of the potential problems discussed here, at least as measured by their self-critique. However, the potential for these sorts of difficulties is real and it is safe to say they have created considerable difficulties for some programs in the past. In any event, it seemed appropriate for some one not a PMVI administrator to reiterate some matters of public trust residing in the operation of PMVI programs.

REFERENCES

- (1) Joseph W. Little, "Motor Vehicle Legislation: A survey of Patterns Opposition," Report PUF-1, Highway Safety Research Institute, The University of Michigan, January 1967.
- (2) Automotive News, March 27, 1967, p. 3.
- (3) E. Allgaier and S. Yaksich, "Factors Related to Traffic Death Rates," American Automobile Association, Highway Research Board Bulletin, 142, 1956.
- (4) Recht, "Multiple Regression Study of the Effects of Safety Activities on the Traffic Accident Problem," National Safety Council, Chicago, December 1965.
- (5) Buxbaum and Colton, "Relationship of Motor Vehicle Inspection to Accident Mortality," Journal of the American Medical Association, July 4, 1966, Vol. 197, No. 1, pp. 101-1-6.
- (6) Speech by William Haddon, Jr., M.D., Administrator, National Highway Safety Agency, delivered before the Industry Dinner, 51st Annual Detroit Auto Show, Cobo Hall, Detroit, Michigan, November 29, 1966. See also the introduction to Draft Highway Safety Program Standard No. 4.4.1 released by the Department of Commerce on February 16, 1967.
- (7) California's comments entitled "State Highway Safety Program Standards, Vehicle Inspection."
- (8) Robert A. Moore, "The Problem: Drinking, Driving and Death - An Overview," a paper presented at a Symposium on the Prevention of Highway Injury sponsored by The University of Michigan Medical School and the Highway Safety Research Institute. The proceedings, to be published by the Highway Safety Research Institute, will be available in the summer of 1967.
- (9) See, Jacobs, "Research Problems in Accident Prevention," Social Problems, Vol. 8, 1961, p. 340.

ATTACHMENT 1

U. S. Jurisdictions Participating in the Critique

Colorado	New Hampshire
Delaware	New Jersey
District of Columbia	New Mexico
Georgia	New York
Hawaii (Hawaii)	North Carolina
Hawaii (Kauai)	Pennsylvania
Hawaii (Oahu)	Rhode Island
Kentucky	Texas
Louisiana	Utah
Maine	Vermont
Massachusetts	Virginia
Mississippi	West Virginia

ATTACHMENT 2
ORIGINAL CRITIQUE FORM
PROBLEM AREAS

Part One

We have encountered difficulties in setting up or operating our P.M.V.I. program in the following respects.

- | | | |
|---|--|-------------------------|
| 1. Obtaining the required number of acceptable licensed inspection stations. | Significant
Not Significant
No Opinion | _____

_____ |
| 2. Obtaining the required number of qualified mechanics. | Significant
Not Significant
No Opinion | _____

_____ |
| 3. Receiving public criticism because of high vehicle rejection rates. | Significant
Not Significant
No Opinion | _____

_____ |
| 4. Receiving public criticism because of the inconvenience of the P.M.V.I. inspection. | Significant
Not Significant
No Opinion | _____

_____ |
| 5. Receiving public criticism because of discourtesy of inspection personnel. | Significant
Not Significant
No Opinion | _____

_____ |
| 6. Receiving public criticism because of lack of knowledge on the part of inspection personnel. | Significant
Not Significant
No Opinion | _____

_____ |
| 7. Receiving public criticism because of the expense to the motorist of paying the inspection fee. | Significant
Not Significant
No Opinion | _____

_____ |
| 8. Receiving public criticism because of the cost to the motorist of vehicle repairs required to pass the inspection. | Significant
Not Significant
No Opinion | _____

_____ |

9. Receiving public criticism because of the laxness in the manner the inspections are conducted.
- Significant _____
 Not Significant _____
 No Opinion _____
10. Receiving public criticism because of reported incidences of "pay-off" to inspection personnel or similar illegal activities.
- Significant _____
 Not Significant _____
 No Opinion _____
11. Finding that the public timing of inspection is irregular, causing periods of low work load followed by periods of high work load and long delays to the public.
- Significant _____
 Not Significant _____
 No Opinion _____
12. Having inadequate administrative manpower for proper field supervision, routine checks of inspection stations and mechanics and investigations of reported violations.
- Significant _____
 Not Significant _____
 No Opinion _____
13. Having inadequate administrative manpower and facilities for training and testing inspection mechanics.
- Significant _____
 Not Significant _____
 No Opinion _____
14. Receiving public criticism because of adopting too stringent inspection requirements in the beginning inspection campaigns.
- Significant _____
 Not Significant _____
 No Opinion _____
15. Receiving public complaints that motor vehicle inspection works primarily to the benefit of the automobile repair industry.
- Significant _____
 Not Significant _____
 No Opinion _____

- | | |
|--|--|
| 16. Finding that the income from the inspection program to be too little to cover administrative expenses. | Significant _____
Not Significant _____
No Opinion _____ |
| 17. Receiving public criticism that the inspection requirements are superficial and not being rejected leads to a false sense of security. | Significant _____
Not Significant _____
No Opinion _____ |
| 18. Having inadequate resources for conducting follow-up activities to insure that rejected vehicles do not continue to operate in violation of the law. | Significant _____
Not Significant _____
No Opinion _____ |
| 19. Receiving public criticism because of the driving distance to the nearest inspection station. | Significant _____
Not Significant _____
No Opinion _____ |
| 20. Comments and additions: | |

Part Two

RECOMMENDATIONS

1. That at least ___ months be allowed from the day the first activity begins in establishing a P.M.V.I. organization until the first day that motor vehicles are to be inspected. At least this much time should be required for developing an organization, designating inspection stations, licensing mechanics, producing materials, and related activities.

Recommended _____
Not Recommended _____
No Opinion _____
2. That the P.M.V.I. system be operated under the department of the State Police

Recommended _____
Not Recommended _____
No Opinion _____
3. That the P.M.V.I. System be operated under the _____ Department.

Recommended _____
Not Recommended _____
No Opinion _____
4. That about ___ inspection stations be licensed for every 1,000,000 cars registered in the state.

Recommended _____
Not Recommended _____
No Opinion _____
5. That one field supervisor be assigned for about each _____ (number) of the licensed inspection stations to field monitor inspection programs, investigate violations and carry out related activities.

Recommended _____
Not Recommended _____
No Opinion _____
6. That the field supervisors be uniformed law enforcement officers.

Recommended _____
Not Recommended _____
No Opinion _____
7. That a standard inspection fee be prescribed throughout the state.

Recommended _____
Not Recommended _____
No Opinion _____

8. That a maximum inspection fee be prescribed but that the exact amount be determined by competition.
- Recommended _____
 Not Recommended _____
 No Opinion _____
9. That the ASA D7.1 inspection requirements serve as the basic inspection procedures and standards.
- Recommended _____
 Not Recommended _____
 No Opinion _____
10. That the inspection requirements from the beginning of the program conform as a minimum to the complete requirements of ASA D7.1
- Recommended _____
 Not Recommended _____
 No Opinion _____
11. That the beginning inspection requirements cover only a limited number of vehicle components, including lights, brakes, steering, tires, and _____
- Recommended _____
 Not Recommended _____
 No Opinion _____
12. That at least ___ years be allowed for car owners to gradually build up their vehicles' conditions to meet the full requirements of a standard such as ASA D7.1
- Recommended _____
 Not Recommended _____
 No Opinion _____
13. That the State undertake a brief, formal training course and examination of mechanics conducted away from their places of employment.
- Recommended _____
 Not Recommended _____
 No Opinion _____
14. That all inspection mechanics be licensed by the State
- Recommended _____
 Not Recommended _____
 No Opinion _____
15. That the training and testing of mechanics be done on the job at their places of employment by field supervisors.
- Recommended _____
 Not Recommended _____
 No Opinion _____

16. That licensed inspection stations be visited and inspected by field supervisors at least once in each ___ months.
- Recommended _____
 Not Recommended _____
 No Opinion _____
17. That the inspection devices be checked, verified and certified periodically by field supervisors using calibrated equipment.
- Recommended _____
 Not Recommended _____
 No Opinion _____
18. That incidences of "selling inspection stickers" or improperly rejecting vehicles can be dealt with by imposing moderate fines, short suspension of inspection privileges, or both.
- Recommended _____
 Not Recommended _____
 No Opinion _____
19. That incidences of "selling inspection stickers" or improperly rejecting vehicles be dealt with firmly by imposing substantial fines and long suspensions or revocations of inspection privileges, or both.
- Recommended _____
 Not Recommended _____
 No Opinion _____
20. That fleet operators and others operating a large number of vehicles and having adequate garage facilities be licensed to inspect their own vehicles.
- Recommended _____
 Not Recommended _____
 No Opinion _____
21. That the inspection system operate on a year-around basis with sticker expiration dates falling on the motorists' birthdays or on some other random basis so that the number of inspections falling due remains fairly constant throughout the year.
- Recommended _____
 Not Recommended _____
 No Opinion _____
22. That inspection campaigns be limited to one or more 2 or 3-month periods with all of the stickers in the State expiring during those periods.
- Recommended _____
 Not Recommended _____
 No Opinion _____

23. That the cost to the State of administering the P.M.V.I. program be paid by collecting a stated sum per inspection from the stations conducting the inspections.
- Recommended _____
 Not Recommended _____
 No Opinion _____
24. That the funds for defraying the cost to the State of operating the P.M.V.I. system come from the State's general revenue sources.
- Recommended _____
 Not Recommended _____
 No Opinion _____
25. That follow-up investigations of rejected vehicles not appearing for re-inspection be turned over to the local police.
- Recommended _____
 Not Recommended _____
 No Opinion _____
26. That follow-up investigations of rejected vehicles not appearing for re-inspection be an integral activity of the inspection organization.
- Recommended _____
 Not Recommended _____
 No Opinion _____
27. That, except in unusual cases, no motorist be required to drive more than _____ miles to the nearest inspection station.
- Recommended _____
 Not Recommended _____
 No Opinion _____
28. Comments and additions:

	Colorado	Pennsylvania	Washington D.C.	West Virginia	Texas	Louisiana	Virginia	Massachusetts	Utah	New York	North Carolina	Rhode Island	Georgia	New Jersey	Hawaii, HILO	New Mexico	Delaware	Kentucky	Hawaii, Oahu	Mississippi	Hawaii (Kauai)	Maine	Vermont	New Hampshire
1 (1)		S	S						S								X							
2 (2)			S																					
14 (3)		S																						
8 (4)		S																						
15 (5)		S		S																				
16 (6)		S																						
9 (7)		S																						
10 (8)		S																						
17 (9)		S																						
18 (10)		S																						
3 (11)	S																							
4 (12)		S																						
5 (13)		S																						
19 (14)		S																						
11 (15)			S																					
6 (16)																								
12 (17)																								
7 (18)																								
13(19)		S																						

S - Significant
Blank - Not significant
X - No opinion

Attachment 3. Individual Responses— Part I

	Colorado	Pennsylvania	Washington D.C.	West Virginia	Texas	Louisiana	Virginia	Massachusetts	Utah	New York	North Carolina	Georgia	New Jersey	Hawaii HILO	New Mexico	Delaware	Kentucky	Hawaii Oahu	Mississippi	Hawaii (Kauai)	Maine	Vermont	New Hampshire
7(1)	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
1(2)	N	N	R	R	R	R	R	R	R	X	O	N	R	R	R	N	N	N	R	R	R	X	R
2(3)	R	X	R	R	O	R	R	R	X	R	R	O	R	R	R	R	R	R	O	X	R	R	N
8(4)	X	N	X	R	R	R	R	R	R	R	R	X	X	X	R	R	R	R	R	R	X	O	R
3(5)	R	R	O	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
4(6)	X	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
9(7)	R	N	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
10(8)	N	R	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
18(9)	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
19(10)	R	N	O	R	N	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
20(11)	N	R	O	N	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
21(12)	N	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
11(13)	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
12(14)	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
13(15)	R	R	N	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
22(16)	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
23(17)	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
24(18)	N	N	N	R	N	N	X	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
25(19)	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
14(20)	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
15(21)	R	N	R	N	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
16(22)	N	R	N	N	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
5(23)	R	R	N	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
6(24)	N	N	R	N	N	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
(25)	X	N	R	N	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
(26)	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R
17(27)	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R	R

O - No answer
R - Recommended
N - Not recommended
X - No opinion

Attachment 4. Individual Responses— Part II

ATTACHMENT 5

Introductory Letter and Explanatory Statement
Accompanying Original Critique Form

HIGHWAY SAFETY RESEARCH INSTITUTE

Institute of Science and Technology/The University of Michigan
City Center Building, Third Floor/220 East Huron, Ann Arbor 48108

(date)

Mr. John Lawman
Chief of Police
County of Doe
Pleasantown, U. S.

Re: Motor Vehicle Inspection

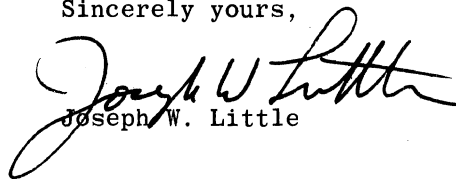
Dear Mr. Lawman:

The Highway Safety Research Institute has developed the enclosed survey form as a part of our continuing study of motor vehicle inspection. For your information, I am enclosing a report of a related motor vehicle inspection survey conducted among the principal highway officials in the states not now having motor vehicle inspection.

We are requesting that the twenty states and the District of Columbia, who have implemented periodic motor vehicle inspection programs, help us to compile a set of recommendations and a list of potential pitfalls with respect to organizing and operating such programs. We plan to make the data available to those jurisdictions planning motor vehicle inspection programs and any other interested agencies.

Would you please assist us by completing the enclosed form and returning it to me? Because of the rapid development in this field, we would appreciate your attending to this as soon as you can conveniently.

Sincerely yours,


Joseph W. Little

JWL/m
Enc.

PERIODIC MOTOR VEHICLE INSPECTION ADMINISTRATION

- A CRITICAL REVIEW -

The Highway Safety Act of 1966 decrees that each state shall have a highway safety program approved by the Secretary of Commerce (whose duties will be assumed by the Secretary of Transportation when that department becomes active in 1967). Failure to comply by January 1, 1969, will result in a loss to the state of federal funds available under the Highway Safety Act and ten percent of the state's share of the federal aid highway funds. In a release of December 5, 1966, the administrator of the National Highway Safety Agency, established to administer the new legislation, announced tentative proposed standards. Periodic motor vehicle inspection (P.M.V.I.) was at the top of the list. Consequently, it seems highly probable that many states not now having P.M.V.I. legislation will enact such legislation during the coming two years.

The purpose of this survey is to obtain comments that might prove useful to those states planning motor vehicle inspection programs from states presently operating inspection systems; to collate and summarize the suggestions; and to disseminate the gathered information to those agencies that will probably be engaged in developing new P.M.V.I. programs.

In an attempt to achieve a reasonably comprehensive pattern for assimilating the responsive information, this survey of 48 elements has been prepared. However, the survey statements are merely a guide and are not intended to replace more detailed comments and suggestions that may prove valuable. For that reason, you are requested to append your amplifying remarks and additional information.

This survey is slanted towards a P.M.V.I. system utilizing licensed garages as the inspection agents rather than one utilizing state-operated inspection facilities. Nevertheless, those jurisdictions presently operating state-owned facilities, the District of Columbia, Delaware and New Jersey, are being asked to respond and to include any special observations concerning their systems in the comments.

The survey is made up of two sets of statements. The first is intended primarily to list some difficulties in establishing and administering a P.M.V.I. program that should be expected and possibly avoided by planning in the beginning stages. The second set is intended to make rather specific recommendations. Because these statements may not be the best possible choices, your additional comments and

recommendations may be the most valuable information.

Please respond to each statement. Those statements in Part One require that you consider them to be: significant; not significant; or that you have no opinion. The statements in Part Two require that you rate them as: recommended; not recommended; or that you have no opinion. Some of the statements in Part Two also have a blank to be filled in.

