

Motor & Equipment Manufacturers Association

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January 27, 2020

The Honorable Jay Jones
Chairman
House Transportation Sub-Committee: Motor Vehicles
House Transportation Committee
Virginia House of Delegates
Pocahontas Building
900 E. Main Street
Richmond, Virginia 23219

RE: Opposition to H.B. 130

Dear Chairman Jones:

On behalf of the Motor & Equipment Manufacturers Association (MEMA), I am writing to express our concern with H.B. 130 which will be heard before the House Transportation Sub-Committee on Motor Vehicles today.

MEMA represents more than 1,000 companies that manufacture and supply motor vehicle parts and components for use in the light-duty and heavy-duty vehicle industries. MEMA represents its members through its four specialized divisions: Automotive Aftermarket Suppliers Association (AASA); Heavy Duty Manufacturers Association (HDMA); Association for Sustainable Manufacturing (MERA); and Original Equipment Suppliers Association (OESA).

Motor vehicle component manufacturers are the largest sector of manufacturing jobs in the U.S., contributing nearly 3 percent of the U.S. gross domestic product. Suppliers directly employ more than 871,000 Americans and generate a total direct and indirect employment impact of 4.26 million jobs. In Virginia, there are over 3,400 motor vehicle supplier jobs.

MEMA's aftermarket division, the Automotive Aftermarket Suppliers Association (AASA), exclusively represents the North American aftermarket supplier industry by manufacturing quality parts in support of safer vehicles driven on U.S. roads.

As you know, neglecting routine maintenance and replacement of vehicle safety components is dangerous for the motoring public. Annual inspection programs maintain the safety of vehicles by keeping vehicles that do not adhere to a minimum safety standard off Virginia's streets and highways.

The importance and efficacy of safety inspection programs has been reinforced by federal recommendations and studies conducted by state agencies. The National Highway Traffic Safety Administration (NHTSA) recommends that each state implement a vehicle safety inspection program to "reduce the number of vehicles with existing or potential conditions" that cause or contribute to crashes in the Uniform Guidelines for State Highway Safety Programs.



State agency studies, including those published by the Texas Department of Public Safety (October 2018), the Pennsylvania Department of Transportation (March 2009), and the Missouri State Highway Patrol (November 2008), demonstrate that safety inspection programs can and do save lives every year.

The Texas study concluded that “The number of fatalities per number of defective vehicles in crashes is about three times higher than that of vehicles without defects.” This highlights the importance of regular vehicle inspection tests to ensure the safety of the passengers and other vehicle drivers on the road.

The Pennsylvania study estimated that the state will have between 115 and 169 fewer fatal crashes each year due to its safety inspection program, corresponding to between 127 and 187 fewer fatalities annually. The largest difference between states with and without programs in which an equipment failure caused or contributed to a crash occurred for vehicles that were three years of age or older.

The Missouri study reached a similar conclusion in comparing nationwide crash causation to state crash causation. The Missouri data demonstrated that crashes with a vehicle defect causation factor were lower in the state, which has a robust program, compared to the nation. In Missouri, a defect was a causation factor in one out of every 131.2 fatal crashes. Nationwide, a vehicle defect was a causation factor in one out of every 79.7 fatal crashes over the same period.

Vehicle safety technology is quickly advancing. With these advanced technologies, such as automatic emergency braking, adaptive cruise control, and lane keeping assist devices, it’s important that vehicles are routinely inspected to ensure systems are functioning properly and calibrated accurately. Consumers are becoming more reliant on these technologies and expect them to operate as designed.

To further the importance of safety inspections, consumers are keeping vehicles longer and underperformed vehicle maintenance remains high. Nationally, the average age of passenger cars and light trucks combined is now 11.8 years. At the same time, AASA estimates \$61 billion worth of vehicle maintenance was underperformed in 2018. As these trends continue, the highway safety benefits of robust annual vehicle safety inspection programs will increase in the coming years.

We appreciate the opportunity to provide comments; please contact Melanie Weiland at 202-312-9242 or mweiland@mema.org if you have any questions or would like additional information. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Ann Wilson". The signature is written in a cursive, flowing style.

Ann Wilson,
Senior Vice President, Government Affairs