

Motor & Equipment Manufacturers Association

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January 12, 2018

The Honorable Glen Dickey
New Hampshire House of Representatives
107 North Main Street
Concord, New Hampshire 03303
Via email: glen.dickey@leg.state.nh.us

Dear Representative Dickey:

On behalf of the Motor & Equipment Manufacturers Association (MEMA), I am writing to express our concern with H.B. 1328, which as introduced would change the annual vehicle inspection requirement to a biennial requirement.

MEMA represents more than 1,000 companies that manufacture and supply motor vehicle parts 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); Motor & Equipment Remanufacturers Association (MERA); and Original Equipment Suppliers Association (OESA).

Motor vehicle component manufacturers are the largest employer 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 New Hampshire, there are nearly 1,400 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 pass inspection and are unsafe off 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.

In 2015, the Government Accountability Office (GAO) [published a study](#) on state vehicle safety inspection programs. The study confirmed that 15 states, including New Hampshire, have vehicle safety inspection programs, and 4 additional states require vehicle safety inspections when a vehicle is moved into a state. The GAO study also confirmed that officials in those states attest to the effectiveness of the



safety inspection programs; in Pennsylvania for example, some 20 percent of vehicles failed their initial inspection.

State agency studies, including those published by 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 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.

Safety inspections are becoming more important as consumers keep vehicles longer and underperformed vehicle maintenance increases. Nationally, the average age of passenger cars and light trucks combined is now 11.5 years, which has been rising steadily for more than 15 years. At the same time, AASA estimates \$66 billion worth of vehicle maintenance was underperformed in 2013. As these trends continue, the highway safety benefits of robust annual vehicle safety inspection programs will increase in the coming years.

We encourage New Hampshire retain the requirement for annual vehicle safety inspections; should you or your staff have any additional questions, please feel free to contact Tom Lehner at tlehner@mema.org.

Sincerely,

A handwritten signature in black ink that reads "Bill Long". The signature is written in a cursive, slightly slanted style.

Bill Long
President & Chief Operating Officer
Automotive Aftermarket Suppliers Association

cc: members of the New Hampshire House of Representatives