



STATE OF CONNECTICUT

DEPARTMENT OF MOTOR VEHICLES

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<http://ct.gov/dmv>



*Testimony of Department of Motor Vehicles Commissioner Melody A.
Currey
Transportation Committee Public Hearing
February 18, 2011*

S.B. No. 723 (COMM) AN ACT EXTENDING THE EXEMPTION FROM
EMISSIONS INSPECTION FOR NEW VEHICLES.

The Department of Motor Vehicles is opposed to this proposed bill. There are several issues of concern to the agency:

- The current emissions inspection network failure rate is 10.8%. This failure rate pertains to all motor vehicles, new and used, and is relatively high. The failure rates for initial inspections of new vehicles in the first year upon becoming eligible in the current program (after the four-model-year exemption) are also relatively high. Model year 2006 vehicles tested in 2009 had a failure rate of 8.7%, while model year 2007 vehicles tested in 2010 failed at a rate of 7.9%. Therefore, the assumption that these "new" vehicles are clean from an emissions standpoint is incorrect.
- The majority of vehicles tested in their first year of eligibility, are still within the 8 year/80,000 mile new vehicle emission warranty, which covers most notably, the Pollution Control Module (PCN) and the catalytic converter (CAT). Therefore, newer vehicle owners are protected from these historically expensive emission-related repairs. As vehicles become older, they may not have this same protection, thus subjecting their owners to costly repair changes.
- The majority of vehicles tested in their first year of eligibility are dealer vehicles, presumably about to be sold to consumers. These vehicles are required to be emission compliant when sold, such that consumers are protected from purchasing a vehicle with known or existing emissions or emissions-related problems.
- The average volume of 'newly' eligible vehicle inspections during the first year of a testing cycle is approximately 31,000 inspections (initial and paid retests). Exempting these vehicles as proposed would cause the following approximate annual financial losses to those businesses directly involved in Connecticut's Emission Testing Program:

Testing Contractor - \$217,000
EDBMS Contractor - \$ 23,000
Test Stations - \$387,500

- An increase in the 'New Vehicle' exemption fee paid on each new vehicle registration would increase from the present \$40.00 to \$50.00. (This represents \$10.00 for each year, the same fee paid by those who are required to have their vehicles inspected). As such, we believe that there will probably be concerns raised by the public, due to this increased cost to them.
- Finally, and very importantly, expanding the new vehicle exemption from four years to five years will have a direct impact on Connecticut's State Implementation Plan (SIP), which is mandated under the Federal Clean Air Act. A significant change such as this lowers the credits that the State receives under its plan and makes it more difficult to attain compliance. Failure by the State to meet its SIP provisions may trigger a loss in Federal highway monies if offsetting credits cannot be identified and achieved. There are no such easy alternatives. For example, one option that would have to be entertained would be to increase the frequency of the emissions inspections from biennial to annual, an option that surely would not be well-received. While this issue will be addressed more appropriately and directly by the Department of Environmental Protection, which is ultimately responsible for overseeing Connecticut's SIP, DMV nevertheless has serious concerns about the impact of this proposed bill.

Thank you for the opportunity to share with you the concerns of this agency.