

ATTENTION: Official Inspection Stations, Quality Assurance Officers, and Pennsylvania State Police

BI23-03 Vehicle Inspection Division Bulletin July 2023

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## **Extension Requests for Inspection Mechanic Certifications**

Pursuant to Section 175.28 of the Vehicle Equipment and Inspection Regulations, a mechanic shall be certified for no more than 5 years. Mechanics may renew their mechanic certification by passing the required examination within 180 days of receipt of notice from the Department that the mechanic card is due to expire.

It is the responsibility of the inspector to ensure the required examination is completed not later than midnight the day prior to the expiration date of their certification, which is also listed on their certification card. Additionally, inspectors will receive an email reminder to the email address on file 90 and 30 days from their expiration date. It is important that inspectors keep this information updated in the PennDOT Inspections Portal and at <a href="mailto:patrainingportal.com">patrainingportal.com</a>.

Should the inspector need an extension to complete this examination, a formal request must be made to the Department explaining the extenuating circumstance. Approval of the extension request is at the sole discretion of PennDOT, and inspectors will have ten days to complete their recertification from the date of extension approval. Any mechanic whose inspection certification has lapsed and was not granted an extension will be required to attend an inspection certification course at an approved school to obtain their inspection mechanic certification. Any questions can be directed to the Station Mechanic Unit at (717) 787-2895.

#### **Illegible License Plates**

In a continued effort to ensure that illegible license plates are replaced, PennDOT has revised the MV-46I, (Authorization to Replace Registration Plate) and are sending a small quantity of MV-46Is with each sticker order placed with the Department over the next several months.

Inspectors should continue to review registration plates to determine if they are illegible during the vehicle's periodic safety inspection (or upon request by the vehicle owner/registrant). A registration plate

may be deemed illegible when one or more numbers or letters cannot be recognized from 50 feet or if the plate shows any blistering, peeling, discoloration, or loss of reflectivity. As a reminder, an illegible registration plate is not cause for rejection for the purpose of the safety inspection procedure; however, a MV-46I must be offered to the customer.

Any registration plate that is deem illegible will be replaced, free of charge, with the same type of registration plate. For example, if the customer has a military registration plate, it will be replaced with the same military registration plate that is next in the series, unless it had been personalized. If the registration plate is personalized, it will be remade with the same personalized configuration for free, regardless of the type of plate. It is critical that any space or dash in a personalized configuration is accurately recorded on the MV-46I.

If the vehicle owner would like to keep their current configuration of a non-personalized registration plate, they will need to make application using the MV-904 for a standard issue plate or the appropriate form for the specialty plate they are replacing and pay all applicable fees for a personalized plate.

If the registration plate has been redesigned, it will be replaced with the current design. For example, if they currently have an illegible Conserve Wild Resources registration plate with the owl design, it will be replaced with the current otter plate. If it is a registration plate that is no longer issued, it will be replaced a standard registration plate.

Please discard any remaining stock you or your station have of the old MV-46 and only supply the new MV-46I to vehicle owners with an illegible plate. Stations may obtain additional MV-46I forms by requesting them on form MV-436A (Inspection Sticker and Insert Order Form). Stations that order Inspection Stickers and inserts online may request MV-46I forms by indicating the quantity requested in the remarks box on the on-line order form.

# **Partially Peeling Inspection Stickers**

PennDOT is aware that some safety and emission inspection stickers are partially peeling. As a reminder, inspectors must ensure the windshield is wiped dry and clean of road film, grease, and moisture to ensure proper adhesion. The sticker shall be positioned carefully, then squeezed until it is tightly affixed to the windshield. The sticker adhesive requires pressure to properly affix to the windshield. A small squeegee may be used to help apply the appropriate amount of pressure to the sticker to aid in proper adhesion.

Additionally, PennDOT is working with the manufacturer to implement a solution to further address this issue and PennDOT anticipates distribution of improved stickers to begin mid-July. While PennDOT will not replace a station's current inventory of stickers, stations may order new stickers. Use of old stock of stickers may be discontinued once the new order is received and kept for audit by your QAO. Stations may request a 75% refund of those stickers at the time of audit.

Partially peeling stickers are still valid. Vehicle owners may choose to have partially peeling stickers reaffixed or replaced. If the owner wishes to have the sticker reaffixed, please be sure that any method used to reaffix the sticker does not obscure any part of the sticker on either the back or front. If the vehicle owner wishes to have their sticker replaced, inspection stations may charge no more than \$13.00 to replace a safety inspection sticker and \$3.57 to replace an emissions inspection sticker. If the sticker has been completely removed, stations may replace the sticker using the same process as a windshield replacement. In this case, the station must retain the old sticker for audit purposes by the QAO.

We apologize for any inconvenience this has created for the customer as well as you the inspection station owner and/or technician. We want to assure you we are working to resolve this issue as quickly as possible and appreciate your understanding.

#### Miscellaneous Motor Vehicle Business Registrations

Pursuant to Section 1337 of the Vehicle Code, the department shall issue to owners of miscellaneous motor vehicle businesses, such as repair and towing, vehicle salvage dealers, transporters, financier or collector-repossessors, and watercraft trailer dealers, with established places of business special registration plates which may be displayed on vehicles operated on highways in lieu of registering each vehicle individually. The Inspection Procedures in the Vehicle Equipment and Inspection Regulations (Pub 45) requires verification of ownership and legality of a vehicle, which shall be proven by a vehicle registration card, certificate of title or manufacturer's statement of origin. The presentation of a miscellaneous motor vehicle business registration card is acceptable proof of vehicle ownership and legality for the purposes of a vehicle inspection when presented in conjunction with a certificate of title for the vehicle that is in name of the business or family member, only when the registration plates are displayed upon:

- a repair and towing business vehicle being used in the conduct of the repair business to retrieve, tow, or deliver other vehicles or parts; and
- a vehicle salvage dealer business vehicle being used in the conduct of the vehicle salvage dealer's business to retrieve or deliver vehicles, vehicle hulks, parts or materials; and
- a financier or collector-repossessor business vehicle being used to pick up vehicles that are being repossessed; and
- for all classes of miscellaneous motor vehicle businesses vehicles used for the personal pleasure or use of the owner of the miscellaneous motor vehicle business or members of the owner's immediate family, or when the business is a corporation, upon vehicles used for the pleasure or use of not more than three officers or members of the officer's immediate family or for the personal use of the regular employees of the business when operated by the employee.

## Rust within the Regulations

We have received questions from a few vehicle owners regarding when the appearance of rust applies in the safety inspection regulations. As a reminder, the Vehicle Equipment and Inspection Regulations (which are republished by PennDOT in Pub 45) identifies rust in only four subchapters. These sections regard a floor pan that is rusted through so as to cause hazard to occupants or permit exhaust gases to enter the passenger compartment. The four sections in the regulations are noted below.

- **175.80**(a) Passenger Cars & Light Trucks (Subchapter E)
  - (7) Check the flooring and floor beds and **REJECT IF** one or more of the following apply:

    (ii) the floor pan is rusted through so as to cause hazard to occupants or to permit exhaust gases to enter passenger compartment.
- 175.110(a) Medium & Heavy Trucks, Buses & School Buses (Subchapter F)
  - (7) Check the flooring and floor beds and **REJECT IF** any of the following apply:
    - (ii) The floor pan is rusted through so as to cause hazard to occupants or to permit exhaust gases to enter passenger compartment.
- 175.130(b) Recreational, Semi-and Utility Trailers (Subchapter G)
  - (ii) On passenger-carrying trailers **REJECT IF** any of the following apply:
  - (A) The flooring and floor beds are not substantially constructed to support occupants and cargo. The floor pan is rusted through to cause hazard to occupants or to permit exhaust gases to enter passenger compartment.
- **175.160**(a) *Motorcycles* (Subchapter H)
  - (5) Check the flooring and floor beds if applicable and **REJECT IF** any of the following apply:
    - (ii) The floor pan is rusted through so as to cause a hazard to occupants or to permit exhaust gases to enter passenger compartment.

A few vehicle owners have asked if a vehicle will fail inspection merely because there is some rust that is observable on the exterior of the vehicle. Unlike floor pan rust noted above, there is no specific "reject if" criteria for rust observed on the exterior of the vehicle in the safety inspection regulations.

We have also heard the term "rust" used when discussing protruding metal. As a reminder, the use of the term "rust" does not appear in regulation related to protruding metal, safety technicians need to determine at time of inspection if metal "protrudes from the surface of the vehicle" and if that protruding metal creates a hazard. See regulation:

**175.80**(a) – Passenger Cars & Light Trucks (Subchapter E)

(10) Check for protruding metal and reject if torn metal, glass, or other loose or dislocated parts protrude from a surface of the vehicle so as to create a hazard.

## Beneath the Vehicle Inspection

The procedure for inspecting the vehicle frame is found in the Beneath the Vehicle Inspection instructions in 175.80(e)(5) and note that a vehicle is to be rejected if one or more of the following apply:

- the frame is not in solid condition,
- repairs are made with tape, tar paper or cloth or made in another temporary manner,
- the frame components are missing, cracked, rotted or broken or are in a deteriorated or dangerous condition,
- body mounts do not hold as required,
- a body mount is broken, cracked, deteriorated or missing, or
- the difference in the body floor and the top of the frame rail exceeds 4 inches.

#### Unibody Vehicles

In unibody vehicles, body panels are an integral part of the structural integrity and rigidity of the vehicle by design. If the determination is made by an inspector that a body panel is deteriorated to the point where it is no longer providing the structure it was intended to, the vehicle is to be rejected for failure under the frame section.

### Body on Frame Vehicles

Body panels on vehicles that are constructed as a body on frame are not a stressed structural member and their deterioration would not change the structural integrity of the vehicle or its handling on the road.

Copies of previous Safety Bulletins are available to view online at www.dmv.pa.gov/safetybulletins.

Stephen J. Madrak, Director Bureau of Motor Vehicles

Laura J. Krol, Manager Vehicle Inspection Division