



ATTENTION: Official Inspection Stations, Quality Assurance Officers, and Pennsylvania State Police		
BI25-04	Vehicle Inspection Division Bulletin	November 2025

TOPICS IN THIS BULLETIN:**Inspection Procedure and Road Test Clarification****Illegible License Plates****Inspection of Frame Components and Frame Tapping****CDL Licensing and Inspection of Medium and Heavy Trucks**

INSPECTION PROCEDURE AND ROAD TEST CLARIFICATION

In accordance with **75 Pa.C.S. § 4727 (Issuance of Certificate of Inspection)**, no vehicle shall be inspected **unless it is duly registered or titled** in the Commonwealth of Pennsylvania or another jurisdiction (i.e. another state), except for vehicles held by a dealer or manufacturer for which titling is not required, or mass transit vehicles exempt from titling.

Certified Inspection Mechanics are required to examine the vehicle registration card, title, or other documentation as specified in **75 Pa.C.S. § 4727** and **67 Pa. Code, Chapter 175 (Pennsylvania Vehicle Equipment and Inspection Regulations)** to confirm the vehicle is properly registered, titled, or that an application for title has been submitted by the vehicle owner.

Additionally, under **75 Pa.C.S. § 4726 (Certification of Mechanics)** and **67 Pa. Code, Chapter 175**, all Certified Inspection Mechanics must perform a complete and proper **road test** as an essential component of the inspection procedure.

Per **67 Pa. Code, Chapter 175 (Sections 175.80, 175.110, 175.130, 175.160, 175.190, and 175.220)**, the **inspection sequence shall begin with the External Inspection and conclude with the Road Test**. After review of applicable statutes and regulations, the **Vehicle Inspection Division (VID)** has determined the **following compliance requirements:**

1. Inspection Sequence

- The inspection **must be conducted in the prescribed order** outlined in the regulations: beginning with the external inspection and ending with the road test.
- The **external inspection**, including verification of registration/title status, must occur **first** and must be performed **within the approved inspection area of the station**.

2. Location of Inspection Activities

- All inspections must **begin and conclude at the Official Inspection Station**.
- All Inspection Procedure components must be conducted entirely within the approved inspection area of the station except for the road test.
- A road test must be initiated from and returned to the approved station premises.

3. Issuance of Sticker

- If the vehicle passes inspection, the inspection sticker must be **immediately affixed to the vehicle** upon completion of the inspection, on the premises of the official inspection station (or within 100 feet thereof on the same side of the street, as permitted) and properly recorded in the MV-431 or MV-480, as applicable, or in an electronic data collection and storage program.
- If the vehicle fails inspection, it must be **rejected on the premises** of the official inspection station and properly recorded in the MV-431 or MV-480, as applicable, or in an electronic data collection and storage program.

ILLEGIBLE LICENSE PLATES

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 deemed 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 other plate. If it is a registration plate that is no longer issued, it will be replaced a standard registration 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.

INSPECTION OF FRAME COMPONENTS AND FRAME TAPPING

The VID has received many inquiries related to obstacles encountered during frame inspections and the proper tapping techniques to use when assessing frame components. During the inspection procedure, visual inspection of frame components remains a crucial step. Inspectors are encouraged to carefully assess all accessible areas of the frame, including those beyond obstacles, while minimizing any manipulation of vehicle parts and components. Current regulations only require the removal of two opposite wheels for inspection, and no additional parts should be removed. For example, both non-permanently attached splash guards (such as those secured by clips or screws) and permanently attached splash guards must remain in place during inspections. If these requirements limit inspection capabilities, such limitations should be clearly noted on the receipt or work order.

It is important to note that certified inspection mechanics and stations are not responsible for parts that cannot be inspected visually, especially after reasonable efforts have been made to perform the inspection without causing damage. While station insurance and bonding may cover potential damages during the inspection procedure, the preferred method to inspect obscured areas is by using a light for visual examination.

Regarding the tapping of frame components, only fingers or knuckles should be used to lightly tap on the frame to detect differences in sound that might indicate the presence of body filler, metal, or other materials. This

method is designed to prevent unintentional damage to the vehicle and reduce liability for the station. It also ensures that the inspection procedure does not contribute to or accelerate potential frame failures. This cautious approach is consistent with the inspection philosophy applied to other vehicle components, such as tires, where a minimal tread depth of 2/32" is passing even if the tire may not last until the next inspection cycle. The vehicle owner shall be informed in writing on the receipt or work order of any parts which, although in passing condition, the mechanic believes may become dangerous before the next inspection period.

CDL LICENSING & INSPECTION OF MEDIUM AND HEAVY TRUCKS

The VID reminds all inspection stations and certified inspection mechanics of important requirements regarding driver licensing and inspection area regulations for medium and heavy truck inspections. Mechanics inspecting vehicles **up to 26,000 pounds** must hold a valid Class C driver's license or higher.

For vehicles over 26,000 pounds, mechanics are required to hold the appropriate Commercial Driver's License (CDL) with the required endorsements, unless the entire road test is conducted on Department-approved private property. In such cases, a valid Class C license is sufficient, provided the private property testing area is adequate for a complete and proper road test as approved by the Department.

School Buses: A certified inspection mechanic who wishes to inspect school buses is not required to hold a school bus driver endorsement (S) but must have a CDL with Passenger (P) endorsement.

Empty Placarded Tankers: A certified inspection mechanic who wishes to inspect an empty tanker that is placarded must possess a CDL with both tank vehicles and hazardous materials endorsements (the 'X' endorsement represents a combination of hazardous materials ('H') and tank vehicle ('N') endorsements). However, if the tanker is empty, a valid purge certificate—which is only valid for 24 hours—must be presented at the inspection station. With a valid purge certificate, the inspection and road test may proceed without the "X" or "H" endorsements, but the "N" (tank vehicle) endorsement is still required. (See 75 Pa.C.S. § 1610.) The station must retain a copy of the purge certificate with the work order for auditing purposes.

Motorcycles: A certified inspection mechanic who wishes to inspect motorcycles may hold a Class M (Motorcycle) license only but is then only certified to inspect and road test motorcycles.

Medium trucks, weighing between 11,001 and 17,000 pounds, must be inspected entirely within a sound, enclosed building, shall be in good repair; and shall be kept in good condition. Stations that cannot accommodate these vehicles within their inspection area due to size or access limitations are not authorized to inspect them.

Heavy trucks and motor carrier vehicles weighing over 17,000 pounds may utilize an expanded inspection area up to 64 feet in length, which may include outdoor space that shall be of a hard surface and in sound condition, as per 67 Pa. Code § 175.25. If the inspection area or any part is located outside the building, the area shall also be kept clear of snow or other substances which would curtail or interfere with inspections.

During site visits and audits, Quality Assurance Officers (QAOs) will verify that inspection mechanics possess the proper licenses and endorsements for the vehicles they inspect. They will also assess and document the dimensions and condition of the inspection area.

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

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