



The **New Hampshire Auto Dealers Association** is a statewide trade association, representing the interests of the motor vehicle industry.

NHADA consists of: all of the new-car and new-truck dealers in the state, along with motorcycle, snowmobile, on and off-road recreational vehicle, farm equipment, used-car, power equipment, and construction equipment dealers, as well as independent motor vehicle service, auto body repair, and motor vehicle parts sales facilities.



Background: HB 1391 is a bill that would allow new vehicles purchased in the model year or before to be inspected in the second year after purchase.

THIS BILL IS NOT ABOUT NEW CARS.

NHADA OPPOSES HB 1391 FOR THESE MAIN REASONS:

- 1** **HB 1391 weakens the integrity of our vehicle inspection program:** New Hampshire's inspection program ensures the safety of vehicles and roadways for motorists in the state by identifying safety-related recalls and providing cost savings to consumers for vehicles of all model years. Beginning with new model years, **HB 1391 represents just the start of legislative actions that weaken our robust vehicle inspection program.**

Previous legislation that proposed changes to this program has failed. The most recent attempt was in 2022 which the Transportation Committee overwhelmingly voted 18-0 to ITL as did the House of Representatives by a voice vote on the consent calendar. **Many other attempts, including 2011, 2015, 2018 and 2020 all have been defeated.**

- 2** **The Department of Safety opposes this bill because it will make NH less safe.** The bill provides no alternative stickering mechanism leading law enforcement to have no idea if vehicles are on the road and meeting their inspection requirement. Law enforcement cannot determine what model year a vehicle is or when a citizen's birth date is on the road.

Their options are to: Pull over ALL vehicles without a sticker or pull over NO vehicles at all.

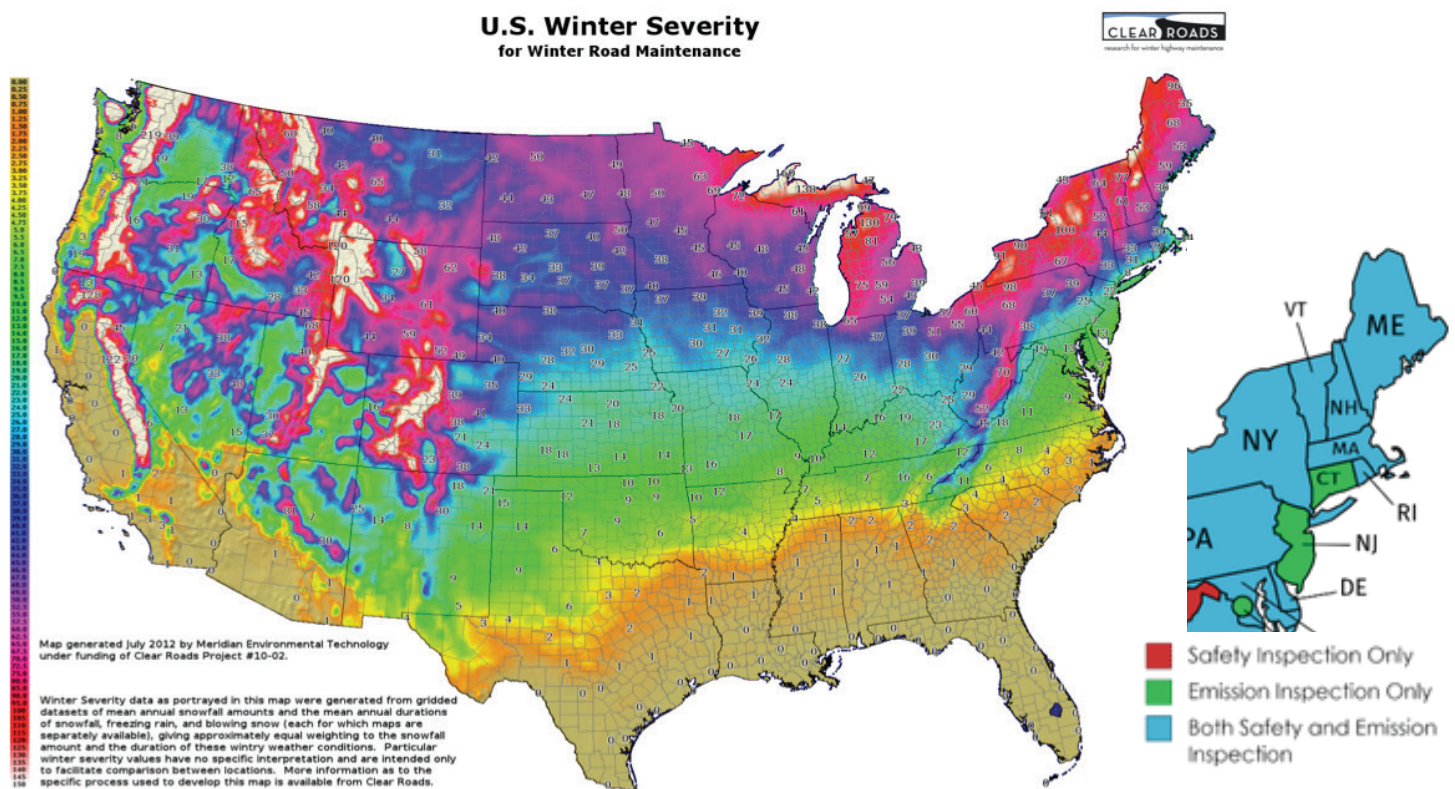
- 3** **Newer model year vehicle data is significantly flawed and drastically under represented.** In most cases, when a newer vehicle receives an inspection item failure, it is repaired on the spot. The inspecting technician never reports that vehicle with a failure due to the immediate correction of the safety deficient item. The data from the DMV highlights most failures are due to glass, this is due to the fact that inspection stations do not conduct glass replacement.

4 24-36 months is FAR too long for a required annual safety inspection. Expert technicians note that many people only repair their vehicles when absolutely necessary, resulting in more unsafe vehicles on the road. For example, components like tires and brakes can become dangerously worn in less than 12 months. In New Hampshire, it's common for drivers to accumulate 30,000 miles per year. Many tires, particularly on electric vehicles, do not last nearly that long. It is illogical to claim that mechanical failures do not lead to accidents and injuries.

5 It is unclear whether the EPA will grant new cars an exemption from emissions testing. If granted, the EPA may demand compensatory emissions reductions from other sectors such as trucking, manufacturing, or power generation to adhere to New Hampshire's Clean Air Act state implementation plan. This could increase operational costs for these industries, which would likely be passed on to consumers. This shoot first, aim second approach is not a wise way to write legislation.

THE VEHICLE INSPECTION PROGRAM IS IMPORTANT, ESPECIALLY IN NH.

- All neighboring New England states require annual vehicle safety inspections, and comparisons with other regions are not appropriate. Unlike Southern California, Florida, or Arizona, New England experiences more severe and variable winter conditions. Even states with snowy climates like Minnesota, Colorado, and Wyoming differ as they have drier and more consistent weather. In New England, we face unique challenges such as frost heaves and the use of brine—liquid salt water sprayed on roads—which coats and can damage the undercarriage of vehicles. **SEE ILLUSTRATIONS BELOW.**



OTHER SAFETY CONSIDERATIONS:

- A Pennsylvania study conducted in 2009 concluded that state inspections play a significant role in saving lives. It stated that the Pennsylvania inspection program has reduced the number of fatal crashes by 115-169, saving 127-187 lives. If the annual inspection program in NH saves but 1 life, it's worth it!
- The Institute for Research in Public Safety and the National Highway Transportation Safety Administration, mechanical defects and/or worn equipment on vehicles was a causative or an aggravating factor in 12.6 percent of crashes-over 850,000 accidents could have been avoided.

CONSUMER IMPACT:

- **This bill, impacting not just new cars, but two to three year-old cars as well, is not a cost-saver for NH citizens. Experts testified it will raise costs:**
- Preventative maintenance costs much less than catastrophic repair just like an annual check-up at your doctor or dentist. For example, a steering component repair can cost \$300 versus a steering component failure can cost over \$3,000. Annual inspections also catch items that may be under warranty, which the manufacturer pays for. The annual inspection program does a safety recall campaign check with NHTSA that the citizens do not regularly do.

Model Year 2022:

- 4,654 recall notices were distributed through the NHOST units in 2022
- 14,430 recall notices were distributed through the NHOST units in 2023

Model Year 2023:

- 378 recall notices were distributed through the NHOST units in 2022
- 4,531 recall notices were distributed through the NHOST units in 2023

FISCAL IMPACT:

- **The revenue impact to the state in HB 1391's fiscal note is flawed.** The fiscal note indicates an estimated \$270,000 loss to the state while more recent accurate estimates indicate a \$400,000 - \$650,000 loss annually to the highway fund, general fund, and motor vehicle air pollution abatement fund. A majority of which will hurt the highway fund. In this era of high miles-per-gallon vehicles and electric vehicles, revenue to the highway fund from gas tax is significantly decreased.
- 12 percent of highway fund road toll and motor vehicle fee revenue collected is distributed to municipalities, therefore, under this bill state expenditures and local revenue would decrease in all years going forward.

Comments: Vote ITL (inexpedient to legislate) HB 1391 and maintain the integrity of a program that keeps NH's roads and citizens safe. NHADA represents over 575 members and 13,000 employees involved in motor vehicle businesses in NH and strongly opposes HB 1391.



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