MINUTES

ENVIRONMENT AND PUBLIC RESOURCES COMMITTEE
April 14, 1977

Members Present: Chairman Moody
Mr. Chaney
Mr. Kissam
Mr. Jeffrey
Mr. Polish
Mr. Ross
Mr. Serpa
Mr. Rhoads

Members Absent: Mr. Coulter

Guests Present: John Holmes
Bill Parsons, Nevada Fish and Game Department
Glen Griffith, Nevada Fish and Game Department
Fred Wright, Nevada Fish and Game Department
Dick Serdoz, Nevada Air Quality Officer
Chuck Breese, Washoe County Health Department
Bob Hunter
Bob Frank, Washoe Indian Tribe
Harold Wyatt, Inter-Tribal Council
Robert Paisano, B.I.A.
Vernon Wyatt, Washoe Indian Tribe
Lawrence Astor, Reno-Sparks Indian Colony
Janet B. Allen, Nevada Indian Commission
Ken Boyer, Environmental Commission
John Ciardella, Department of Motor Vehicles
Dale Reid, Department of Motor Vehicles
Norman Allen, Nevada Indian Commission
Daisy Talvitie, League of Women Voters
Dan Stone, Hamilton Test Systems
Larry Taylor, Hamilton Test Systems
Don Arkell, Clark County Health District
Jim Hannah, Environmental Protection Service
Roger L. Steele, Desert Research Institute
Virgil P. Anderson, A.A.A.
Robert F. Guinn, Nevada Franchised Auto Dealers
Carl Haviland, Cold Springs Development

The meeting was called to order by Chairman Moody. He announced that the first item on the agenda was A.B. 189, a Fish and Game bill introduced by the committee which was given a do pass and amended by the committee. It was felt by the committee that before a vote was taken on the amendment repealing Sec. 4, NRS 502.280, which would do away with free hunting and fishing licenses for resident Indians, that the Indian representatives should have an

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opportunity to express their views. He asked Glen Griffith, of the Fish and Game Department, to explain the reasons for the requested change.

Glen Griffith, Nevada Fish and Game Department, presented a prepared statement and a copy of the proposed amendment to A.B. 189, a copy of which is attached hereto and marked Exhibit A. The department had an interim study since the last session to see if they could qualify for additional funds from the General Fund to assist the Department and were not successful. They feel that the free licenses are being subsidized by a few people rather than the general populace and it is time take a more realistic view of the situation and charge the Indian population the same as anyone else.

Chairman Moody called for testimony in opposition to A.B. 189. Norman Allen, Executive Director of the Nevada Indian Commission, said that the granting of free hunting and fishing privileges to Indians has been a mutual agreement between the citizens of Nevada and has been in existence for many years. In his opinion, it has promoted a lot of the harmony between the Indians and the other citizens of Nevada. We don't have the type of situations that are present in other states where there is a great deal of tension betwee tribes and it is difficult to get anything going, and have the Indiand get along with their white neighbors. He feels that we get along well, but this bill would strain things. He feels that if the bill were passed the tribal council at Pyramid Lake would entertain some type of thing to increase the amount of fees on the reservation and would give less access to the lake to non-Indians and possibly limit it to Indians only.

Mr. Kissam asked if Mr. Allen was representing all Indian tribes or the resident tribes. Mr. Allen said he was not representing anyone but was here to offer recommendations on legislation affecting Indian tribes. He feels that the wording in the statute is vague and doesn't distinguish between Indians who are members of Nevada tribes and those from other states and tribes who are just residents of the State of Nevada. This creates a problem with the wording in the Fish and Game regulations which seems to restrict the licenses to enrolled members of Nevada tribes who are residents of the state.

Mr. Griffith explained the certificate problem. The Department issues certificates of eligibility to be filled out by the Indians to be presented to the license agents in order to be issued a free license. They sent 1,800 certificates and only 375 have been filled out by the Indians and presented to the licensing agents. The agents have still been issuing the free licenses without the certificates if the person looks like an Indian or had a license in the past, whether that was the correct thing to do or not. It is difficult to control the agents as there is such a diversity of types of places that issue licenses and the agents don't seem to be able to understand the system too well. Consequently, there have

been many licenses issued that should not have been and the situation is very difficult to control and the department does not have the cooperation of the Indians in filling out the eligibility certificates. Therefore, they feel that this part of the statute should be repealed.

Mr. Ross asked if there has been a per capita increase in game in the past 54 years. Mr. Griffith said there has not been.

Mr. Griffith said the department would have about a $200,000 deficit this year and the approximately $43,500 that would be realized from Indian licenses would be a help to the department. If the law is just it should be incumbent on all the people of the state to subsidize it, not just the hunters and fishermen.

Bob Hunter, Superintendent of the Western Nevada Agency located at Stewart and a member of the Washoe Tribe, testified as an Indian within the State of Nevada and a member of a Nevada Indian tribe. He feels that a lot of the problem is distinguishing who is a resident Nevada Indian and the definition of what a resident Nevada Indian is. He claimed they did not know about this meeting until they came into it today and were not prepared with no prior opportunity to study the matter. Mr. Moody contradicted that statement and said that they had been notified.

Robert Frank, Chairman of the Washoe Tribe in Nevada and California, showed his own hunting certificate identifying him as a Nevada Indian and his resident hunting license and his seasonal fishing permit for Pyramid Lake, which cost him $6.00 as he is not a member of that tribe. He said that for the past couple of years he and several members of the Intertribal Council Board have met with Mr. Griffith and the Nevada Fish and Game and tried to resolve this issue. They know they are entitled to the free licenses. They feel that the term resident Nevada Indians means one of the three tribes, Washoe, Paiute and Shoshone. There are many Indian tribes in Nevada now that are not native Nevadans. The Fish and Game is concerned over the loss of income by not having Indians pay for their licenses. He feels that they should not be penalized by the clerks that sell licenses not knowing the rules regarding the certificates of eligibility and the Fish and Game Department should be responsible for seeing that the rules are carried out. He believes the Indians will then work along with the Department.

Mr. Serpa asked Mr. Frank how the Fish and Game Department can get the Indians to present the certificates, as they have not been able to do so up to this time. Mr. Frank says he gives them out, and if they are not presented to the licensing agent a licence should not be issued.

Mr. Ross moved that this hearing on A.B. 189 be continued to April 19, was seconded by Mr. Kissam, and the motion carried unanimously.

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Chairman turned the meeting over to Mr. Ross, head of the sub-committee which worked on A.B. 464, to conduct the hearing on this bill.

Mr. said that the first presentation would deal with what the present system is and the alternatives of the expansion of that system. Then the independent contractor system would be presented. Copies of both systems were passed out, copies of which are attached hereto and marked Exhibit B. Document A covers the garage method of inspection and A-3 the independent contractor method.

Mr. Ross called on John Ciardella to explain the present method.

John Ciardell, Department of Motor Vehicles, presented a prepared statement and a copy of a survey, both of which are attached hereto and marked Exhibit C.

Mr. Kissam asked what the major deficiencies are of the present system. Mr. Ciardella said that one is that they don't have the quality control on the inspection as there would be in the centralize plan, and the second flaw is the possibility of falsification of a certificate of emission control for a friend or dealer. They would try to correct these deficiencies with a new field investigator and the new lab.

Mr. Chaney asked about the new lab and whether it is based on the present program. Mr. Ciardella said it is already completed and equiped and paid for. It would be a necessity for whichever of the plans were adopted.

In the survey, which is part of Exhibit C, that only 28 out of 2,000 cars needed any repairs of those inspected, and these were minor. This is from the program in Clark County. The program is self funding.

Mr. Ciardella pointed out that the advantages to the garage method are, (1) there will be a sufficient number of stations that can be licensed in all areas where the program is implemented, (2) the test and repairs necessary to achieve the air quality standards can be done at one place, and (3) the concept leaves the inspection maintenance program in the free enterprise system whereas anyone who qualifies as an authorized station can be licensed, and (4) the calibration of the equipment adjustmentments to the carbirator and ignition timing prior to the test passes the majority of the vehicles and insures that the vehicle is adjusted to the ultimate and results in a cleaner burning engine which should result in a prolonged deterioration factor.

Expansion of the existing program in Clark County, which is right now transferring only from a new registered owner, effective July 1, 1977, they could include all vehicles being registered at one time. They would only need to augment the staff by one

additional emission control officer and a clerk typist. In the Reno area it could be implemented February 1, 1978, for a pilot program. Clark County could be fully implemented by February 1, 1979, for an annual and a year later for Washoe County.

Mr. Rhoads asked if cars coming in from outlying counties to Clark and Washoe Counties would have to be inspected. Mr. Ciardella answered no. Not unless you become a resident of those counties.

Mr. Ross asked what the pros and cons are of the present and expansion system. He said they would be the same.

Dick Serdoz, Nevada Air Quality Officer, presented a prepared statement and a report, which contained the advantages and disadvantages between the two systems on Page 7 of the report. A copy of the statement and report are attached hereto and marked Exhibit D.

Mr. Ross explained that either system is financed by a fund paid by the owner of the car, and would not come out of the General Fund.

A question was asked of Mr. Ciardella of how many stations there would be in Clark County and Washoe County to implement this program. He answered that at the present time in Clark County there are 122 and that would be expanded to 200 with approximately 300 inspectors.

Mr. Ross explained that there is a fleet exception for self inspections that are not included in those figures.

Mr. Moody asked if the fleet inspectors were checked by the state. Mr. Ciardella answered yes.

Mr. Ciardella said Washoe County would have 80 authorized stations with 300 authorized inspectors.

Mr. Ross called on Larry Taylor and Dan Stone of Hamilton Test Systems to present the independant contractor concept.

Mr. Stone, Manager of Hamilton Test Systems, presented a prepared statement, a copy of which is attached hereto and marked Exhibit E. He also said that they have been selected to handle California's testing program. He said a set fee for inspection of $7.00, which would be close to their fee, multiplied by 400,000 tests per year, would cost the motorists of about 2.8 million dollars, while a cost of $12.00 per inspection would come to about 4.8 million dollars. This would include minor adjustments, but they calculate that 70 percent need no adjustments. Their system takes less than ten minutes, which would be impossible in the private garage system. Public surveys conducted in Colorado, New Jersey, Arizona, California,

and Nevada and showed by a wide margin that the public prefers a state owned and operated system, and a close second is the contracto approach and a very distant third is the private garage approach.

Mr. Kissam asked what the cost of inspection was when it was started in Arizona as compared to what it is now. Mr. Stone said the Arizona Legislature set in statute that no motorist could be charged more than $5.00 for inspection and it is anticipated that it will remain the same through 1980. He said the Legislature should set the fee ceilings and they could only be changed by the Legislature. There would be competitive bidding, cost being one of the factors. The state would receive a portion of the fee for administration.

Mr. Ciardella said that the fee schedule now ranges from $8.00 to $14.00, and averages $10.00.

Mr. Chaney asked what happens to the vehicle which can't be brought up to specification within the fee ceiling for costs. Mr. Stone stated that usually the state issues a waiver for these vehicles so there won't be undue hardship on anyone. The Arizona ceiling for pre 1968 vehicles is $25.00 and $75.00 or ten percent of the market value for newer vehicles, whichever is lower, and no one has to spend more than that in pursuing compliance with the standards.

In answer to a question from Mr. Kissam, Mr. Stone stated that the approach in Arizona is that the state hires a contractor as it would any other state contractor, and they are subject to the same terms and conditions and regulations. They build the stations, buy the equipment, usually by competitive bid, and operate the network so everything is exactly the same at all stations. The state approves all publicity. He left a copy of California's request for bid with Chairman Moody.

In response to a question from Mr. Chaney, Mr. Stone said that the company policy is to obtain as much contractors, financing, services equipment and personnel from the region in which they work. In Arizona they have 166 employees and two of those came from out of state. He estimated they might need around 100 employees from Nevada.

Don Arkell, Clark County Health District, presented a prepared statement, a copy of which is attached hereto and marked Exhibit F. He stated that after studying the two basic systems under consideration, the Clark County Health District supports the independent contractor system as it would be more publically acceptable. The inspection and repair functions should be separate, and the data that is produced is not easily challenged and is accurate. He feels that there should be limits on the amounts charged for repairs so noone would be without transportation due to this program.

Chairman Moody announced that Assemblyman Joe Dini would present amendments to A.B. 79.

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Assemblyman Dini feels that the two amendments which he is proposing will make A.B. 79 a good law along with taking out the language which he has objected to and it would also cover the area of federal intervention. He read an amendment dealing with land use planning conflict between two or more government entities.

The second amendment that the State Land Use Planning Agency shall review and evaluate land use policies and activities for lands in Nevada which are under federal management and shall represent and defend the interests of the citizens of the state as these interests are affected by federal land use policies and activities.

This does not take out the state control of land use planning activity. It only takes out words of critical environmental area.

Mr. Kissam moved that the committee recommend do pass as amended on A.B. 79, was seconded by Mr. Polish, and the motion was passed unanimously, following a brief discussion.

Chairman Moody announced that the committee would meet on Friday, April 15, 1977, during the noon recess of the Assembly to continue taking testimony on A.B. 464.

Respectfully submitted,

Ruth Olguin

RUTH OLGUIN

STATE OF NEVADA
DEPARTMENT OF FISH AND GAME

Elimination of Free Indian Hunting and Fishing License
Proposed in AB 189

All resident Indians of the State of Nevada were first exempt from payment to obtain hunting and fishing licenses in 1923. The statute was amended in 1965 to require written identification signed by an officer or official that the bearer is a resident Indian of the State of Nevada.

Indian Certificates of Eligibility have been used for a number of years as proof of entitlement to a free Indian license. However, their effectiveness is questionable. For example, 5,000 certificates were printed by the Department in 1974 and 1,800 were charged out to designated authorities. To date, 375 copies of issued certificates have been returned while during that period 5,000 to 6,000 free licenses have been issued.

Over the past several years the number of free licenses issued is as follows:

1971	1,274
1972	2,382
1973	2,592
1974	2,810
1975	2,756
1976	2,601

Each license issued results in a credit to the license agent of 25¢ each in 1975 and 1976; 10¢ each prior to 1975. The fee equivalent lost (had each bought a resident license) ranged from $16,000 to $45,000 over the period 1971 - 1976.

Under the Department's present economic straights, where cutbacks are necessary as income is down, it is recommended that the free license to hunt and fish off Indian lands be discontinued. The change does not alter Indian status on reservations.

Nevada, to the best of our knowledge, is the only western state with a free Indian license. Kansas is the only other state noted as having such a license.

Proposed Amendment
April 14, 1977

A. B. 189

ASSEMBLY BILL NO. 189—COMMITTEE ON ENVIRONMENT AND PUBLIC RESOURCES

JANUARY 28, 1977

Referred to Committee on Environment and Public Resources

SUMMARY—Revises various regulatory provisions on fish and game. (BDR 45-210)
FISCAL NOTE: Local Government Impact: No.
State or Industrial Insurance Impact: Yes.

EXPLANATION—Matter in *italics* is new; matter in brackets [ ] is material to be omitted.

AN ACT relating to fish and game; deleting pheasant stamp requirements; revising schedule of permits and fees; clarifying durational residence requirements; modifying fishing and hunting license exemptions and tag requirements for resident Nevada Indians; and providing other matters properly relating thereto.

The People of the State of Nevada, represented in Senate and Assembly, do enact as follows:

SECTION 1. NRS 502.035 is hereby amended to read as follows: — add bracket

502.035 Licenses [, state pheasant stamps] and permits granting the — delete bracket
privilege to hunt, fish or trap [during the open season] as provided in — delete brackets
this Title shall be issued by the department, upon payment of the fees required under this Title.

SEC. 2. NRS 502.120 is hereby amended to read as follows:

502.120 1. Every person required to have a license as provided in this [chapter] *Title* who, while hunting, trapping or fishing, refuses to exhibit such license or any wildlife which he may have in his possession, upon the demand of any officer authorized to enforce the fish and game laws of this state, is guilty of a misdemeanor.

2. Every person required to have a license as provided in this [chapter] *Title* who, while hunting, trapping or fishing, fails to have such license in his possession is guilty of a misdemeanor. No person charged with violating this subsection may be convicted if he produces in court [or the office of the arresting officer] a license theretofore issued to him and valid at the time of his arrest.

SEC. 3. NRS 502.240 is hereby amended to read as follows:

502.240 Annual licenses for the term of 1 year and limited permits shall be issued: [at the following prices:]

1. To any citizen of the United States who has attained his 12th birthday but who has not attained his 16th birthday and who has been

a bona fide resident of the State of Nevada for 6 months [,] *immediately preceding his application for a license,* upon the payment of $2.50 for an annual fishing or hunting license, or [upon the payment of] $4 for an annual combination hunting and fishing license.

2. To any citizen of the United States who has attained his 65th birthday and who has been a bona fide resident of the State of Nevada for 10 years [,] *immediately preceding his application for a license,* upon the payment of $2.50 for an annual combination hunting and fishing license.

3. Except as provided in subsection 2, to any citizen of the United States who has attained his 16th birthday and who has been a resident of the State of Nevada for 6 months [,] *immediately preceding his application for a license,* upon the payment of:

For a fishing license	$10.00
For a 10-day permit to fish	7.50
For a 2-day permit to fish	5.00
For a hunting license	10.00
For a combination hunting and fishing license	17.00
For a trapping license	7.50
For a fur dealer's license	5.00
For an annual master guide's license	100.00
For an annual subguide's license	50.00

4. To any alien or to any citizen of the United States who has attained his 12th birthday but who has not attained his 16th birthday, not a bona fide resident of the State of Nevada, upon the payment of $5 for an annual fishing license (except for a fishing license to fish in the reciprocal waters of the Colorado River and Lake Mead, which annual license shall cost a sum agreed upon by the commission and the Arizona Game and Fish Commission, but not to exceed $10).

5. Except as provided in subsection 4, to any alien or to any citizen of the United States, not a bona fide resident of the State of Nevada, upon the payment of:

For a fishing license (except for a fishing license to fish in the reciprocal waters of the Colorado River and Lake Mead, which license shall cost a sum agreed upon by the commission and the Arizona Game and Fish Commission, but not to exceed $10)	$20.00
For a 10-day permit to fish	7.50
For a 2-day permit to fish	5.00
For a hunting license	40.00
For an annual trapper's license	35.00
For a fur dealer's license	35.00
For an annual master guide's license	200.00
For an annual subguide's license	100.00

6. To any person, without regard to residence, upon the payment of:

For a noncommercial breeding ground *license*	$5.00
For a commercial or private shooting preserve *license*	35.00
For a commercial breeding ground *license*	35.00
For a commercial fish hatchery *license*	35.00
For a private noncommercial fish hatchery *license*	5.00
For a trained animal act license	10.00
For a live bait dealer's permit	50.00
For a competitive field trials permit	5.00
For a falconry license	15.00
For an importation permit	2.00
For an exportation permit	*2.00*
For an import eligibility permit	25.00
[For a tropical fish dealer's permit	25.00]
For a live bait seining and transporting permit	2.00
For a wildlife transportation permit	*2.00*
For a scientific collection permit	*10.00*

Any other license or permit determined to be necessary by the commission shall be issued at a price not to exceed $10. — add "special"

SEC. 4. NRS 502.280 is hereby ~~amended to read as follows:~~ — add "repealed"

502.280 1. All resident Indians of the State of Nevada are exempt from the payment of fees for fishing and hunting licenses.

2. [When applying for free fishing and hunting licenses, resident Indians of the State of Nevada shall exhibit to the county clerk or license agent written identification signed by an officer of the Bureau of Indian Affairs of the United States Department of the Interior, or the chairman of a tribal council or chief of an Indian tribe, or an officer of a reservation, colony or educational institution, stating that the bearer is a resident Indian of the State of Nevada.

3.] Before hunting [for deer or big game] , *fishing or trapping* off an Indian reservation in this state *for any wildlife for which a tag is required,* all resident Indians, otherwise exempt under subsection 1, shall [secure resident deer tags or other resident big game tags] *apply for such tags as may be required* and pay the fee provided therefor in NRS 502.-250. — delete

SEC. 5. NRS 502.300, 502.310 and 502.320 are hereby repealed.

A

ENGINE EMISSION CONTROLS

445.610 Definitions. As used in NRS 445.610 to 445.710, inclusive, unless the context otherwise requires:

1. "Authorized station" means a station licensed by the department of motor vehicles for inspecting motor vehicles and pollution control devices for compliance with this chapter or any applicable federal or commission regulation and for installing, repairing and adjusting pollution control devices and motor vehicles to meet the commission's requirements.

2. "Commission" means the state environmental commission.

3. "Motor vehicle" means every self-propelled vehicle in, upon or by which any person or property is or may be transported or drawn upon a public highway except devices moved by human or animal power or used exclusively on stationary rails.

4. "Certificate of waiver" means a serially numbered device or symbol, as may be prescribed by the commission, indicating that the requirement of passing reinspection has been waived for a vehicle pursuant to the provisions of this chapter.

5. "Factory-installed system" means a motor vehicle pollution control system installed by the vehicle manufacturer.

6. "Fleet emissions inspection station" means any inspection facility operated under a permit issued to a qualified fleet owner or lessee as determined by the department of motor vehicles.

7. "Inspection station permit" means a certificate issued by the department of motor vehicles authorizing the holder to perform vehicular inspections pursuant to the provisions of NRS 445.610 to 445.710, inclusive.

8. "Motor vehicle pollution control device" means equipment on a motor vehicle for the purpose of reducing the pollutants emitted from the vehicle.

9. "Official emissions inspection station" means an inspection facility, other than a fleet emissions inspection station.

445.620 Power of commission to prescribe uniform emission standards for internal combustion engines.

1. The state environmental commission may be regulation prescribe standards for exhaust emissions, fuel evaporative emissions and visible smoke emissions from mobile internal combustion engines on the ground or in the air, including but not limited to aircraft, motor vehicles, snowmobiles and railroad locomotives.

2. Such regulations shall be uniform throughout the State.

445.630 Power of commission to institute program of motor vehicle inspection and testing.

1. If the commission determines that it is feasible and practicable to implement a program of inspecting and testing motor vehicles and motor vehicle emission control systems, and if the implementation of such program is deemed necessary to achieve or maintain prescribed ambient air quality standards in areas of the state designated by the commission, the commission shall, in cooperation with the department of motor vehicles and any local air pollution control agency established under NRS 445.546 which has jurisdiction in a designated area, adopt such rules, regulations and transportation controls as may be necessary to implement such a program.

2. Such rules and regulations shall distinguish between light-duty and heavy-duty motor vehicles and may prescribe:

(a) Appropriate criteria and procedures for the approval, installation and use of motor vehicle pollution control devices; and

(b) Requirements for the proper maintenance of motor vehicle pollution control devices and motor vehicles.

3. Such rules and regulations shall establish:

(a) Requirements by which the department of motor vehicles shall license authorized stations to inspect, repair, adjust and install motor vehicle pollution control devices, including $1,000 surety bond, criteria by which any person may become qualified to inspect, repair, adjust and install such devices.

(b) Requirement by which the department of motor vehicles may license an owner of a fleet of ten [three] or more vehicles as an authorized station provided that such owner complies with the regulations of the commission. Such fleet owners shall only certify vehicles which constitute such fleet.

(c) Requirements for the proper maintenance of motor vehicle pollution control systems on vehicles owned by the State of Nevada or any of its political subdivision.

4. The commission shall consider, prior to promulgating any [rule or] regulation or establishing any criteria pursuant to subsection 2(a) of this section, the following:

(a) The availability of devices adaptable to specific makes, models and years of motor vehicles.

(b) The effectiveness of such devices for reducing the emission of each type of air pollutant under conditions in this state.

(c) The capability of such devices for reducing any particular type or types of pollutants without significantly increasing the emission of any other type or types of pollutant.

(d) The capacity of any manufacturer to produce and distribute the particular device in such quantities and at such times as will meet the estimated needs in Nevada.

(e) The reasonableness of the retail cost of the device and the cost of its installation and maintenance over the life of the device and the motor vehicle.

(f) The ease of determining whether any such installed device is functioning properly.

[445.635 Compulsory motor vehicle emission inspection program limited to certain used motor vehicles. The authority set forth in NRS 445.630 providing for the implementation in any county of a compulsory motor vehicle emission inspection program is limited to used motor vehicles being registered to a new owner as provided for in NRS 445.640.]

445.635 Compulsory motor vehicle emission inspection program limited to certain used motor vehicles. The authority set forth in NRS 445.610 to NRS 445.710 inclusive is limited as follows:

1. In areas where the commission has imposed motor vehicle emission controls prior to January 1, 1977:

(a) Prior to July 1, 1977, to used motor vehicles being registered to a new owner in this state.

(b) After July 1, 1977, and prior to July 1, 1978, to used motor vehicles being registered to a new owner or being registered for the first time in this state.

(c) After July 1, 1978, to all used motor vehicles being registered or reregistered in this state.

2. In all other areas where the commission elects to apply the provisions of NRS 445.630:

(a) After February 1, 1978, and prior to February 1, 1979, to used motor vehicles being registered to a new owner in this state.

(b) After February 1, 1979, and prior to February 1, 1980, to used motor vehicles being registered to a new owner or being registered for the first time in this state.

(c) After July 1, 1980, to all used motor vehicles being registered or reregistered in this state.

445.640 Certificate of emission control compliance prerequisite to transfer of used motor vehicle in certain areas.

1. Subject to any applicable limitation of NRS 445.610 to NRS 445.710 [NRS 445.650 inclusive or any regulation promulgated pursuant thereto, no used motor vehicle as defined in NRS 482.132 may be registered or reregistered by a new owner in certain areas of this state as designated by the commission unless the application for registration is accompanied by [a] evidence [certificate] of emission control compliance issued by any authorized station certifying that the vehicle is equipped with motor vehicle pollution control devices required by federal regulation or such other requirements as the commission may by regulation prescribe under the provisions of NRS 445.610 to 445.710, inclusive.

2. If the seller of a used vehicle is required, pursuant to the provisions of NRS 482.424, to complete a dealer's report of sale, such seller shall also provide the buyer with any certificate of emission control compliance required pursuant to subsection 1.

3. The requirements of this section apply only in counties where a program of inspecting and testing motor vehicles and motor vehicle emission control systems has been implemented pursuant to NRS 445.630.

445.650 Exceptions to requirement of certificate of emission control compliance. The provisions of NRS 445.640 do not apply to:

1. Transfer of registration or ownership between:

(a) Husband and wife; or

(b) Companies whose principal business is leasing of vehicles, if there is no change in the lessee or operator of such vehicle; or

2. Motor vehicles which are subject to prorated registration pursuant to the provisions of NRS 706.801 to 706.861, inclusive, and which are not based in this state.

3. On and after January 1, 1979, the provisions of NRS 445.640 shall not apply to:

(a) Transfer of registration of a vehicle if the vehicle has been issued a certificate of compliance or a certificate of waiver within 90 days of the transfer.

(b) Vehicles over fifteen (15) years old.

445.660 Department of human resources to provide assistance. In furtherance of the provisions of NRS 445.610 to 445.710, inclusive, and the enforcement thereof, the department of human resources shall consult with the department of motor vehicles and furnish them with technical information, including testing techniques, standards promulgated by the commission and instruction for emission control features and equipment.

445.670 Evidence of compliance prerequisite to registration of vehicle. Registration branch offies of the department of motor vehicles and county tax assessor offices, acting as department agents in the collection of registration fees, shall not register a vehicle which is based in areas [a county] required by regulation to comply with NRS 445.610 to 445.710, inclusive, until evidence of compliance with NRS 445.610 to 445.710, inclusive, has been provided. Owners of fleet of ten or more vehicles may, upon application to the department, be authorized to file evidence of compliance with the department based on schedules differing from registration or reregistration periods.

445.680 Installation or inspection of control device by authorized person required; unlawful issuance of certificate of compliance.

1. Any person may install a motor vehicle pollution control device, but no person who is not employed by an authorized station shall install a device for compensation. No such device shall be deemed to meet the requirements of NRS 445.630 to 445.670, inclusive, or rules or regulations of the commission or department unless it has been inspected in an authorized station and a certificate of compliance has been issued by such authorized station.

2. It is unlawful for any person, other than an inspector [or installer] in an authorized station, to sign or issue a certificate of compliance required by this act.

445.690 Exemption of certain classes of motor vehicles. The commission may provide for exemption from the provisions of NRS 445.630 to 445.670, inclusive, of designated classes of motor vehicles, including classes based upon the year of manufacture of motor vehicles and shall provide for exemption from full compliance with prescribed emission and equipment standards where such compliance would involve repair and equipment costs exceeding monetary limits established by the commission to avoid unnecessary hardships to vehicle owners.

445.700 Fees: Amounts; collection and deposit; use of money; maximum inspection fees.

1. In areas of the state where and at such times as a program of implementation is commenced pursuant to NRS 445.630 to 445.670, inclusive, the following fees shall be paid to the department of motor vehicles and deposited in the state treasury:

(a) For the issuance and annual renewal of license for an authorized station. $25;

(b) For each set of 25 forms certifying emission control compliance. . . . . 50.

2. All fees collected and deposited in the state treasury pursuant to subsection 1 of this section shall be held in trust as a credit to the department of motor vehicles to be withdrawn by that department as needed to implement NRS 445.610 to 445.710, inclusive.

3. The department of motor vehicles shall [may] prescribe by regulation routine inspection fees at the prevailing shop labor rate, including maximum charges for such fees, and for the posting of such fees and inspection procedures in a conspicuous place at the authorized station.

4. The authorized motor vehicle pollution control station shall not charge more than $10.00 for inspection of a motor vehicle in accordance with the vehicle emission inspection test procedures established by the commission.

445.710 Penalties.

1. A violation of any provision of NRS 445.610 to 445.710, inclusive, relating to motor vehicles, or any rule or regulation promulgated pursuant thereto relating to motor vehicles, is a misdemeanor. The provisions of NRS 445.610 to 445.710, inclusive, or any rule or regulation promulgated pursuant thereto, shall be enforced by any peace officer.

2. Satisfactory evidence that the motor vehicle or its equipment conforms to such provisions, rules or regulations, when supplied by the owner of such motor vehicle to the department of motor vehicles within 10 days after the issuance of a citation pursuant to subsection 1 may be accepted by the court as a complete or partial mitigation of the offense.

New Section:

The department shall investigate the operation of each authorized station as the conditions and circumstances of such operation may indicate. He may require the holder of any license for an authorized station to submit such documentation required concerning the operation of such inspection station. The director may revoke and require the surrender and forfeiture of any emissions certificates of inspection of such licensee if he finds that such station is not operated in accordance with Chapter 445 of NRS and the lawful regulations adopted by the commission or the holder of such permit has failed or refused to submit records or documentation required.

A-3

ENGINE EMISSION CONTROLS

445.610 Definitions. As used in NRS 445.610 to 445.710, inclusive, unless the context otherwise requires:

1. "Authorized station" means a station licensed by the department of motor vehicles for inspecting motor vehicles and pollution control devices for compliance with this chapter or any applicable federal or commission regulation PURSUANT TO SUBSECTION 2 OF NRS 445.640 and for installing, repairing and adjusting pollution control devices and motor vehicles to meet the commission's requirements.

2. "Commission" means the state environmental commission.

3. "Motor vehicle" means every self-propelled vehicle in, upon or by which any person or property is or may be transported or drawn upon a public highway except devices moved by human or animal power or used exclusively on stationary rails.

4. "CERTIFICATE OF COMPLIANCE" MENAS A SERIALLY NUMBERED, ADHESIVE STICKER, DEVICE, OR SYMBOL, AS MAY BE PRESCRIBED BY THE COMMISSION, INDICATING A VEHICLE HAS PASSED INSPECTION.

5. "CERTIFICATE OF WAIVER" MEANS A SERIALLY NUMBERED DEVICE OR SYMBOL, AS MAY BE PRESCRIBED BY THE COMMISSION, INDICATING THAT THE REQUIREMENT OF PASSING REINSPECTION HAS BEEN WAIVED FOR A VEHCILE PURSUANT TO THE PROVISIONS OF THIS CHAPTER.

6. "FACTORY-INSTALLED SYSTEM" MEANS A MOTOR VEHICLE POLLUTION CONTROL SYSTEM INSTALLED BY THE VEHICLE MANUFACTURER.

7. "FLEET EMISSIONS INSPECTION STATION" MEANS ANY INSPECTION FACILITY OPERATED UNDER A PERMIT ISSUED TO A QUALIFIED FLEET OWNER OR LESSEE AS DETERMINED BY THE DEPARTMENT OF MOTOR VEHICLES.

8. "INDEPENDENT CONTRACTOR" MEANS ANY PERSON, BUSINESS FIRM, PARTNERSHIP OR CORPORATION WITH WHOM THE DEPARTMENT OF MOTOR VEHICLES MAY ENTER INTO AN AGREEMENT PROVIDING FOR THE CCONSTRUCTION, EQUIPMENT, MAINTENANCE, PERSONNEL, MANAGEMENT AND OPERATION OF OFFICIAL INSPECTION STATIONS PURSUANT TO THE PROVISIONS OF NRS 445.610 TO 445.710, INCLUSIVE.

9. "INSPECTION STATION PERMIT" MEANS A CERTIFICATE ISSUED BY THE DEPARTMENT OF MOTOR VEHICLES AUTHORIZING THE HOLDER TO PERFORM VEHICULAR INSPECTIONS PURSUANT TO THE PROVISIONS OF NRS 445.610 TO 445.710, INCLUSIVE.

10. "MOTOR VEHICLE POLLUTION CONTROL DEVICE" MEANS EQUIPMENT ON A MOTOR VEHICLE FOR THE PURPOSE OF REDUCING THE POLLUTANTS EMITTED FROM THE VEHICLE.

11. "OFFICIAL EMISSIONS INSPECTION STATION" MEANS AN INSPECTION FACILITY, OTHER THAN A FLEET EMISSIONS INSPECTION STATION.

445.620 Power of commission to prescribe uniform emission standards for internal combustion engines.

1. The state environmental commission may by regulation prescribe standards for exhaust emissions, fuel evaporative emissions and visible smoke emissions from mobile internal combustion engines on the ground or in the air, including but not limited to aircraft, motor vehicles, snowmobiles and railroad locomotives.

2. Such regulations shall be uniform throughout the state.

445.630 Power of commission to institute program of motor vehicle inspection and testing.

1. [If the commission determines that it is feasible and practicable to implement a program of inspecting and testing motor vehicles and motor vehicle emission control systems, and if the implementation of such program is deemed necessary to achieve or maintain prescribed ambient air quality standards in areas of the state designated by the commission, the] THE commission shall, in cooperation with the department of motor vehicles and any local air pollution control agency established under NRS 445.546 which has jurisdiction in a designated area, adopt [such rules, regulations and transportation controls as may be necessary to implement such a program.] REGULATIONS FOR THE ANNUAL INSPECTION OF MOTOR VEHICLES TO INSURE COMPLIANCE WITH THE PROVISIONS OF NRS 445.610 TO 445.710, INCLUSIVE.

2. Such rules and regulations shall distinguish between light-duty and heavy-duty motor vehicles and may prescribe:

(a) Appropriate criteria and procedures for the approval, installation and use of motor vehicle pollution control devices; and

(b) Requirements for the proper maintenance of motor vehicle pollution control devices and motor vehicles.

3. [Such rules and regulations shall establish:

(a) Requirements by which the department of motor vehicles shall license authorized stations to inspect, repair, adjust and install motor vehicle pollution control devices, including criteria by which any person may become qualified to inspect, repair, adjust and install such devices.]

THE COMMISSION SHALL ENTER INTO AN INSPECTION AGREEMENT WITH AN INDEPENDENT CONTRACTOR SUBJECT TO PUBLIC BIDDING, TO PROVIDE FOR THE CONSTRUCTION, EQUIPMENT, ESTABLISHMENT, MAINTENANCE AND OPERATION OF OFFICIAL INSPECTION STATIONS IN SUCH NUMBERS AND LOCATIONS AS MAY BE REQUIRED TO PROVIDE VEHICLE OWNERS REASONABLY CONVENIENT ACCESS TO INSPECTION FACILITIES FOR THE PURPOSE OF OBTAINING COMPLIANCE WITH THE PROVISIONS OF NRS 445.610 to 445.710, INCLUSIVE, AND THE RULES AND REGULATIONS ADOPTED PURSUANT HERETO. THE INSPECTION AGREEMENT AUTHORIZED BY THIS SECTION AND ENTERED INTO BY THE COMMISSION SHALL CONTAIN, IN ADDITION TO ANY OTHER PROVISIONS, PROVISIONS RELATING TO THE FOLLOWING:

(a) THE INDEPENDENT CONTRACTOR OPERATING ANY PORTION OF THE INSPECTION PROGRAM SHALL NOT HAVE ANY FINANCIAL INTEREST IN ANY AUTOMOTIVE REPAIR STATION LOCATED WITHIN THE GEOGRAPHICAL AREA IN WHICH THE PROGRAM IS BEING CONDUCTED.

(b) THE INDEPENDENT CONTRACTOR SHALL HAVE THE CAPABILITY, RESOURCES AND TECHNICAL AND MANAGEMENT SKILL TO ADEQUATELY CONSTRUCT, EQUIP, OPERATE AND MAINTAIN OFFICIAL INSPECTION STATIONS.

(c) ALL PERSONS EMPLOYED BY THE INDEPENDENT CONTRACTOR IN THE PERFORMANCE OF AN INSPECTION AGREEMENT ARE DEEMED TO BE EMPLOYEES OF THE INDEPENDENT CONTRACTOR AND NOT THE COMMISSION.

(d) THE INSPECTION AGREEMENT SHALL PROVIDE FOR THE OPERATION OF THE OFFICIAL INSPECTION STATIONS FOR FIVE (5) YEARS WITH EQUITABLE COMPENSATION TO THE INDEPENDENT CONTRACTOR IF THE PROVISIONS OF NRS 445.610 to 445.710, INCLUSIVE, ARE REPEALED, RENDERED INOPERATIVE, OR IF THE PROVISIONS OF NRS 445.610 to 445.710, INCLUSIVE, ARE AMENDED RESULTING IN ADVERSE EFFECT ON THE INDEPENDENT CONTRACTOR'S COST OF PERFORMANCE.

(e) NOTHING IN THE INSPECTION AGREEMENT SHALL REQUIRE THE COMMISSION TO PURCHASE ANY ASSET OR ASSUME ANY LIABILITY IF SUCH INSPECTION AGREEMENT IS NOT RENEWED.

(f) THE COMMISSION SHALL PROVIDE FOR THE SURVEILLANCE OF THE INDEPENDENT CONTRACTOR TO ENSURE COMPLIANCE WITH THE TESTING STANDARDS, PROCEDURES, RULES, REGULATIONS AND LAWS.

(g) THE INSPECTION AGREEMENT REQUIRED BY THIS SECTION MAY CONTAIN, IN ADDITION TO ANY OTHER PROVISIONS, PROVISIONS RELATING TO STATE ACQUISITION AND OPERATION OF THE INDEPENDENT CONTRACTOR'S SYSTEM, AND PROGRAM EXPANSION TO OTHER GEOGRAPHIC AREAS, AND PUBLIC EDUCATION AND INFORMATION PROGRAMS.

(b) Requirements by which the department of motor vehicles may license an owner of a fleet of ~~ten~~ three or more vehicles as an authorized station provided that such owner complies with the regulations of the commission. Such fleet owners shall only certify vehicles which constitute such fleet.

(c) Requirements for the proper maintenance of motor vehicle pollution control systems on vehicles owned by the State of Nevada or any of its political subdivisions.

DISPUTE

4. The commission shall consider, prior to promulgating any rule or regulation or establishing any criteria pursuant to subsection 2 of this section, the following:

(a) The availability of devices adaptable to specific makes, models and years of motor vehicles.

(b) The effectiveness of such devices for reducing the emission of each type of air pollutant under conditions in this state.

(c) The capability of such devices for reducing any particular type or types of pollutants without significantly increasing the emission of any other type or types of pollutant.

(d) The capacity of any manufacturer to produce and distribute the particular device in such quantities and at such times as will meet the estimated needs in Nevada.

(e) The reasonableness of the retail cost of the device and the cost of its installation and maintenance over the life of the device and the motor vehicle.

(f) The ease of determining whether any such installed device is functioning properly.

[445.635 **Compulsory motor vehicle emission inspection program limited to certain used motor vehicles.** The authority set forth in NRS 445.630 providing for the implementation in any county of a compulsory motor vehicle emission inspection program is limited to used motor vehicles being registered to a new owner as provided for in NRS 445.640.]

445.635 COMPULSORY MOTOR VEHICLE EMISSION INSPECTION PROGRAM LIMITED TO CERTAIN USED MOTOR VEHICLES. THE AUTHORITY SET FORTH IN NRS 445.610 TO NRS 445.710, INCLUSIVE, IS LIMITED AS FOLLOWS:

1. IN AREAS WHERE THE COMMISSION HAS IMPOSED MOTOR VEHICLE EMISSION CONTROLS PRIOR TO JANUARY 1, 1977:

(a) PRIOR TO ~~JANUARY~~ 1979 TO USED MOTOR VEHICLES BEING REGISTERED TO A NEW OWNER IN THIS STATE. eliminate

(b) AFTER JANUARY 1, 1979 TO ALL USED MOTOR VEHICLES BEING REGISTERED OR REREGISTERED IN THIS STATE.

2. IN ALL OTHER AREAS WHERE THE COMMISSION ELECTS TO APPLY THE PROVISIONS OF NRS 445.630 ALL USED MOTOR VEHICLES BEING REGISTERED OR REREGISTERED IN THIS STATE WILL COMPLY WITH THE PROVISIONS OF THIS CHAPTER AFTER ~~JANUARY~~ 1, 1979.
February

START PROGRAM ALL AT ONCE OBJECTIONABLE

445.640 Certificate of emission control compliance prerequisite to [transfer] REGISTRATION OR REREGISTRATION of used motor vehicle in certain areas.

1. Subject to any applicable limitation of NRS 446.610 to NRS 445.710 INCLUSIVE [NRS 445.650] or any regulation promulgated pursuant thereto, no used motor vehicle as defined in NRS 482.132 may be registered OR REREGISTERED AFTER JANUARY 1, 1979, [by a new owner] in certain areas of this state as designated by the commission unless the application for registration is accompanied by [a certificate] EVIDENCE of emissions control compliance issued by any [authorized] OFFICIAL EMISSIONS INSPECTION STATION OR FLEET EMISSIONS INSPECTION station certifying that the vehicle is equipped with motor vehicle pollution control devices required by federal regulation or such other requirements as the commission may by regulation prescribe under the provisions of NRS 445.610 to 445.710, inclusive.

2. PRIOR TO JANUARY 1, 1979, NO USED MOTOR VEHICLE AS DEFINED IN NRS 482.132 MAY BE REGISTERED BY A NEW OWNER IN AREAS WHERE THE COMMISSION HAS IMPOSED MOTOR VEHICLE EMISSION CONTROLS PRIOR TO JANUARY 1, 1977, UNLESS THE APPLICATION IS ACCOMPANIED BY EVIDENCE OF EMISSION CONTROL COMPLIANCE ISSUED BY ANY AUTHORIZED STATION CERTIFYING THAT THE VEHICLE IS EQUIPPED WITH MOTOR VEHICLE POLLUTION CONTROL DEVICES REQUIRED BY FEDERAL REGULATION OR SUCH OTHER REQUIREMENTS AS THE COMMISSION MAY BY REGULATION PRESCRIBE UNDER THE PROVISIONS OF NRS 445.610 TO 445.710, INCLUSIVE.

[2.] 3. If the seller of a used vehicle is required, pursuant to the provisions of NRS 482.424, to complete a dealer's report of sale, such seller shall also provide the buyer with any certificate of emission control compliance required pursuant to subsection 1.

[3.] 4. The requirements of this section apply only in counties where a program of inspecting and testing motor vehicles and motor vehicle emission control systems has been implemented pursuant to NRS 445.630.

AREAS ←

445.650 Exceptions to requirement of certificate of emission control compliance. The provisions of NRS 445.640 do not apply to:

1. Transfer of registration or ownership between:

(a) Husband and wife; or

(b) Companies whose principal business is leasing of vehicles, if there is no change in the lessee or operator of such vehicle; or

2. Motor vehicles which are subject to prorated registration pursuant to the provisions of NRS 706.801 to 706.861, inclusive, and which are not based in this state.

3. ON AND AFTER JANUARY 1, 1979, THE PROVISIONS OF NRS 445.640 SHALL NOT APPLY TO:

(a) [TRANSFER OF] REGISTRATION [OR OWNERSHIP] OF A VEHICLE IF THE VEHICLE HAS BEEN ISSUED A CERTIFICATE OF EMISSIONS CONTROL COMPLIANCE OR A CERTIFICATE OF WAIVER WITHIN 90 DAYS OF THE TRANSFER.

(b) VEHICLES OVER FIFTEEN (15) YEARS OLD.

445.660 Department of human resources to provide assistance. In furtherance of the provisions of NRS 445.610 to 445.710, inclusive, and the enforcement thereof, the department of human resources shall consult with the department of motor vehicles and furnish them with technical information, including testing techniques, standards promulgated by the commission and instruction for emission control features and equipment.

445.670 Evidence of compliance prerequisite to registration of vehicle. Registration branch offices of the department of motor vehicles and county tax assessor offices, acting as department agents in the collection of registration fees, shall not register a vehicle which is based in areas [a county] required by regulation to comply with NRS 445.610 to 445.710, inclusive, until evidence of compliance with NRS 445.610 to 445.710, inclusive, has been provided.

2. Owners of fleet of ten or more vehicles may, upon application to the department, b authorized to file evidence of compliance with the department based on schedules differing from registration or reregistration periods.

445.680 Installation or inspection of control device by authorized person required; unlawful issuance of certificate of compliance.

1. Any person may install a motor vehicle pollution control device, but no person who is not employed by an authorized station shall install a device for compensation. No such device shall be deemed to meet the requirements of NRS 445.630 to 445.670, inclusive, or rules or regulations of the commission or department unless it has been inspected [in an authorized station] PURSUANT TO THE PROVISIONS OF THIS ACT and a certificate of compliance has been issued [by such authorized station.]

2. It is unlawfull for any person PRIOR TO JANUARY 1, 1979 other than an inspector or installer in an authorized station, to sign or issue a certificate of compliance required by this act.

3. IT IS UNLAWFULL FOR ANY PERSON, ON OR AFTER JANUARY 1, 1979, OTHER THAN AN INSPECTOR IN AN OFFICIAL OR FLEET EMISSIONS INSPECTION STATION, TO SIGN OR ISSUE A CERTIFICATE OF EMISSION CONTROL COMPLIANCE OR CERTIFICATE OF WAIVER REQUIRED BY THIS ACT.

445.690 Exemption of certain classes of motor vehicles. The commission may provide for exemption from the provisions of NRS 445.630 to 445.670, inclusive, of designated classes of motor vehicles, including classes based upon the year of manufacture of motor vehicles

and shall provide for exemption from full compliance with prescribed emission and equipmen standards where such compliance would involve repair and equipment costs exceeding monetary limits established by the commission to avoid unnecessary hardships to vehicle owners.

445.700 Fees: Amounts; collection and deposit; use of money; maximum inspection fees.

1. In areas of the state where and at such times as a program of implementation is commenced pursuant to NRS 445.630 to 445.670, inclusive, the following fees shall be paid to the department of motor vehicles and deposited in the state treasury:

(a) For the issuance and annual renewal of license for an authorized station..... $25;

(b) For each set of 25 forms certifying emission control compliance..... 50.

2. All fees collected and deposited in the state treasury pursuant to subsection 1 of this section shall be held in trust as a credit to the department of motor vehicles to be withdrawn by that department as needed to implement NRS 445.610 to 445.710, inclusive.

3. The department of motor vehicles shall [may] prescribe by regulation routine inspection fees at the prevailing shop labor rate, including maximum charges for such fees, and for the posting of such fees and ~~testing~~ INSPECTION procedures in a conspicuous place at the authorized station.

The authorized motor vehicle pollution control station shall not charge mo than $10.00 for inspection of a motor vehicle in accordance with the vehicle emission inspection test procedures established by the Commission.

4. ON OR AFTER JANUARY 1, 1979, THE ~~COMMISS~~DEPARTMENT ION SHALL BY REGULATION FIX, REGULATE AND ALTER IN ACCORDANCE WITH THIS SECTION, THE FEES REQUIRED TO BE PAID FOR THE INSPECTION OF EVERY VEHICLE INSPECTED PURSUANT TO THIS CHAPTER. SUCH FEES SHALL BE ORIGINALLY FIXED AND THEREAFTER ADJUSTED BY THE COMMISSION TO REFLECT THE CONTRACTUAL CHARGE PAYABLE TO ANY INDEPENDENT CONTRACTOR, AS WELL AS THE COST TO THE STATE OF PROVIDING AND ADMINISTERING INSPECTION SERVICES. THE FEES CHARGED FOR INSPECTION SHALL BE COLLECTED AT THE TIME OF INSPECTION AND SHALL BE UNIFORM FOR ALL CLASSES OF VEHICLES. THE COMMISSION SHALL NOT ESTABLISH AN INSPECTION FEE IN EXCESS OF $9.00 FOR THE TERM OF THE CONTRACT PROVIDED FOR BY THE PROVISIONS OF THIS ACT.

445.710 Penalties.

1. A violation of any provision of NRS 445.610 to 445.710, inclusive, relating to motor vehicles, or any rule or regulation promulgated pursuant thereto relating to motor vehicles, is a misdemeanor. The provisions of NRS 445.610 to 445.710, inclusive, or any rule or regulation promulgated pursuant thereto, shall be enforced by any peace officer.

2. Satisfactory evidence that the motor vehicle or its equipment conforms to such provisions, rules or regulations, when supplied by the owner of such motor vehicle to the department of motor vehicles within 10 days after the issuance of a citation pursuant to subsection 1 may be accepted by the court as a complete or partial mitigation of the offense.

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New Section 8:

1. Any operator of a fleet emissions inspection station under a valid license shall, upon filing a registration application in the manner and form prescribed by the department and paying the prescribed fee, receive a sufficient number of certificates of inspection for each vehicle in applicant's fleet. No certificate of inspection shall be issued to any fleet vehicle until it has been inspected and found to comply with applicable regulations.

2. The department shall issue certificates of inspection to owners of fleet emissi inspection stations. Each certificate shall be validated by the fleet emission inspection stations in a manner required by the director at the time that each owner's fleet vehicle has been inspected or has passed inspection. The validated certificate of inspection shall indicate at the time of registration that the owner's fleet vehicle has been inspected prior to January 1, 1979. After January 1, 1978, it will indicate that the vehicle has passed inspection.

New Section 9:

The department shall investigate the operation of each authorized station as the conditions and circumstances of such operation may indicate. THE DIRECTOR may require the holder of any license for an authorized station to submit such documentation require concerning the operation of such inspection station. The director may revoke and require the surrender and forfeiture of any emissions certificates of inspection of such licensee if he finds that such station is not operated in accordance with Chapter 445 of NRS and the lawful regulations adopted by the commission or the holde of such permit has failed or refused to submit records or documentation required.

SECTION 10. ON OR AFTER JANUARY 1, 1979, THE DEPARTMENT SHALL CONDUCT A SURVEILLANCE PROGRAM TO ENSURE THE CONTRACTOR'S COMPLIANCE WITH VEHICULAR EMISSIONS STANDARDS, PROCEDURES, RULES, REGULATIONS AND LAWS.

COMMENTS ON PRESENT EMISSION TEST PROGRAM

February 1, 1974 the Department of Motor Vehicles and the State Environmental Commission were directed to implement a pilot program in Clark County to test certain motor vehicles to see if these cars tested met the air quality standards adopted by the State Environmental Commission. As of November 10th of this year we had 122 licensed stations with 625 certified inspectors. All authorized stations are bonded by a $1,000.00 surety bond, established place of business and emission test equipment utilized must be equipment approved by the State Environmental Commission. The authorized inspectors must provide a certificate from the manufacturer of the testing equipment certifying their competency in operating the equipment. They must also pass a written examination which is administered by the Department of Motor Vehicles. This equipment is span-gas calibrated by the employees of the Department of Motor Vehicles to insure the accuracy of the equipment. If the equipment is found out of tolerance it is red-taged and the equpment cannot be used unitl it it repaired and re-calibrated.

Currently,our authorized stations are inspecting approximately 5,000 vehicles in Clark County monthly. These vehicles tested are vehicles which are being transferred to a new registered owner. The majority of them are vehicles sold by bonded and licensed dealers in the State of Nevada and they are required by law to provide a certificate of emission control compliance in conjuction with the Dealer Report of Sale.

Since the inception of the program in 1974 our authorized stations have certified 149,125 vehicles as meeting the emmission standards adopted by the State Environmental Commission.

The private garage program we have in Clark County is an inspection maintenance program. It requires that the vehicle to be tested to be adjusted to manufacturer's

specifications prior to test of the vehicle. When the vehicle leaves the station it is adjusted to the optimum rather than in most other plans which merely fail or pass. This minor adjustment on the vehicle for the most part passes the majority of the vehicles.

The authorized stations not only tests the vehicle, but it can effect the repairs if required, thus providing a convenience to the customer rather than being sent out to another area after failing the inspection for the repairs. Another important feature is that we can license sufficient stations to handle the volume of cars which must be inspected during a given time. ~~Many of the other plans suffered long lines which not only aggrivate the motorist but result in causing the motorists to become delinquent on their registrations.~~

~~The key to a successful Emission Program is public acceptance. If the public is subjected to undue red tape or excessive delays only complaints can follow and possible strong resentment to the program.~~

This program is completely self-funded. All monies derived from the sale of the certificates and authorized stations licenses are retained by the Department for implementation of this plan. To date we have 53 written complaints which were investigated and resolved by the staff of Emission Control where and both parties were satisfied. To date we have issued 7 citations - 5 convictions and 2 pending citations. Also, there were 6 written warning notices sent out for violation of the rules and regulations which involved certain non-conformance of the 8 step procedures in testing the vehicles. These written notices required written responses reflecting indication that the violations were corrected.

The current staff is a Supervisor, Emission Control Officer Clerk and a Clerk-typist and we have been given the authority to hire an Emission Control Investigator. We have recently completed our new test lab which will be utilized not only in testing of various vehicles but random sampling of vehicles which were tested by our authorized stations to insure compliance with our rules and regulations of the of the State of Nevada.

Advantages Of The Private Garage:

1- That a sufficient number of stations can be licensed in all areas of a air quality region whereas the program is required to be implemented.

2- The test and any repairs necessary to achieve air quality standards can be done in one place at one time. This is extremely convenient to the customer.

3- This concept also leaves the inspection maintenance program in free enterprize system whereas any one who qualifies as an authorized station can be licensed.

4- The caloboration requirement adjustments to the carborator and ignition timing prior to the test passes the majority of the vehicles and insures that the vehicle adjusted to the optimum, thereby resulting in a cleaner burning engine which should also result in prolonging the deterioration factor.

Disadvantages

1- We do not have quality control on the inspection as it would be in a centralized plan; however, if the centralized plan is only testing vehicles the authorized station who effected any needed repairs should be licensed.

2- A possible falsification of a certificate of emission control compliance for a friend.

Expansion of the Program

An expansion of the existing program in Clark County from the transfering to a new registered owner and all first time registered effective July 1, 1977 would approximately require that 1/3 of the Clark County vehicles be inspected

each year. We would increase our staff in Clark County by 1 additional Emission Control Officer plus 1 additional Clerk-typist. If authorized by the Legislature to expand to an annual inspection maintenance program for Clark County to be implemented by February 1, 1979, we will need 3 additional people - 2 Emission Control Officers and 1 Clerk-typist. These people would be supervising approximately 200 stations and approximately 300 additional inspectors. This program again is self-funded. Any expansion of the program would be taken care of fiscally by growth of the program.

Northern Area of the State

Effective February 1, 1978 we would begin a pilot program in Washoe County. It is estimated we would need 4 personnel in this area as follows: 1 Supervisor, 2 Emission Control Officers and 1 Clerk=typist. These people would begin licensing the authorized stations and inspectors for this area. It is estimated we will need 80 authorized stations and 300 authorized inspectors If Carson City and a portion of Douglas County is to be considered we would require approximately 94 stations in this area and approximately 350 inspectors. A year from that date we could increase the program to all first time registered whereas we would be inspecting 71,000 vehicles or approximately ½ of Washoe County population and finally July 1, 1979 we could begin the annual program in Washoe County. It is felt that our work personnel would be increase 3 additional persons - 2 Emission Control Officers and 1 Clerk-typist. The 7 Emission Control personnel will supervise the annual inspection program for over 120,000 vehicles. Finally, this program would then have an effective maintenance program for approximately 90% of the vehicles subject to inspection.

S-U-R-V-E-Y

Vehicles listed in this report are from a survey of BEFORE and AFTER tests conducted by twelve authorized stations from a period of April 29, 1976 until January 31, 1977.

The vehicles requiring minor adjustments would not meet state levels of HC's and CO's on the BEFORE test, and after minor adjustments met the state levels.

The vehicles requiring no adjustments would meet the state levels of HC's and CO's on both the BEFORE and AFTER test.

The vehicles requiring repairs would not meet state levels of HC'S and CO'S on the BEFORE test, and after the repairs would made met the state levels.

Total number of domestic and import vehicles tested - - - - - - - - - - - - - -2016

Total number of domestic vehicles tested - 1759

Total number of import vehicles tested - 257

Total number of vehicles with minor adjustments- - - - - - - - - - - - - - - - - 1013

Total number of domestic vehicles with minor adjustments - - - - - - - - - - - 866

Total number of import vehicles with minor adjustments - - - - - - - - - - - - 147

Total number of vehicles with no adjustments - - - - - - - - - - - - - - - - - - 975

Total number of domestic vehicles with no adjustments- - - - - - - - - - - - - 865

Total number of import vehicles with no adjustments- - - - - - - - - - - - - - 110

Total number of vehicles with repairs- 28

Total number of domestic vehicles with repairs- - - - - - - - - - - - - - - - - 28

Total number of import vehicles with repairs- - - - - - - - - - - - - - - - - - 0

D O M E S T I C -V E H I C L E S

MAKE	MINOR ADJUSTMENTS	NO ADJUSTMENTS	REPAIRS
AMC	24	24	0
Cadillac	43	67	2
Chevrolet	194	214	6
Chrysler	20	21	0
Dodge	63	66	4
Ford	265	193	11
GMC	7	12	0
Homemade	0	1	0
International	11	5	0
Jeep	8	7	0
Lincoln	17	12	0
Mercury	30	31	1
Oldsmobile	49	44	1
Pontiac	80	124	2
Plymouth	55	44	1
TOTALS	866	865	28

The above figures represent the total figures on each vehicle, separated into the different categories.

AMC

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	1	1	0	0	10.50	0	0
1962	3	0	3	0	0	10.00	0
1963	2	2	0	0	11.85	0	0
1964	3	2	1	0	12.10	16.00	0
1965	3	0	0	0	11.23	0	0
1966	3	1	2	0	11.70	12.25	0
1967	4	2	2	0	12.00	12.25	0
1968	4	4	0	0	12.12	0	0
1969	4	3	1	0	10.16	14.50	0
1970	4	3	1	0	12.00	12.50	0
1971	2	1	1	0	16.00	12.00	0
1972	1	1	0	0	12.00	0	0
1973	5	1	4	0	16.00	15.00	0
1974	2	0	2	0	0	13.00	0
1975	6	0	6	0	0	18.08	0
1976	1	0	1	0	0	14.00	0
1977	0	0	0	0	0	0	0
TOTALS	48	24	24	0	286.80	342.50	0
AVERAGE COST PER UNIT		$13.11			$11.97	$14.26	0

EXHIBIT C
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CADILLAC

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	1	0	1	0	0	10.00	0
1961	3	1	2	0	12.00	14.00	0
1962	1	1	0	0	12.00	0	0
1963	5	1	3	1	10.85	10.15	42.92
1964	2	1	1	0	12.00	10.00	0
1965	5	3	2	0	11.90	14.25	0
1966	10	5	5	0	11.54	11.80	0
1967	23	8	15	0	12.40	11.70	0
1968	2	1	1	0	9.70	12.00	0
1969	10	3	7	0	11.23	11.28	0
1970	4	2	1	1	14.00	10.00	6.95
1971	4	1	3	0	11.70	13.33	0
1972	8	2	6	0	11.60	14.16	0
1973	11	2	9	0	10.10	13.37	0
1974	6	2	4	0	10.85	10.37	0
1975	5	3	2	0	9.70	12.10	0
1976	11	7	4	0	10.28	12.55	0
1977	1	0	1	0	0	12.00	0
TOTALS	112	43	67	2	503.80	811.90	49.87
AVERAGE COST PER UNIT		$11.74			$11.19	$12.11	$24.93

CHEVROLET

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	12	7	5	0	10.65	10.00	0
1961	8	1	7	0	9.70	6.35	0
1962	15	8	7	0	11.80	11.71	0
1963	19	11	8	0	12.34	11.40	0
1964	20	15	5	0	11.46	9.40	0
1965	28	15	13	0	11.16	10.55	0
1966	23	15	7	1	11.68	11.50	10.00
1967	37	23	14	0	11.49	12.15	0
1968	29	18	9	2	11.84	11.72	15.12
1969	35	22	13	0	11.55	11.38	0
1970	21	12	8	1	10.96	12.87	45.00
1971	23	7	16	0	11.42	12.62	0
1972	32	14	18	0	10.74	12.88	0
1973	28	9	17	2	12.13	12.47	8.64
1974	40	11	29	0	12.75	13.74	0
1975	36	5	31	0	14.40	13.04	0
1976	7	1	6	0	12.00	15.41	0
1977	1	0	1	0	0	10.50	0
TOTALS	414	194	214	6	2258.00	2622.75	102.53
AVERAGE COST PER UNIT		$11.78			$11.29	$12.25	$17.08

EXHIBIT C
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CHRYSLER

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	2	2	0	0	11.85	0	0
1963	3	2	1	0	9.70	8.50	0
1964	4	3	1	0	12.66	8.50	0
1965	2	1	1	0	12.00	10.00	0
1966	4	1	3	0	14.00	11.66	0
1967	2	0	2	0	0	11.00	0
1968	8	4	4	0	11.93	9.63	0
1969	6	3	3	0	10.07	10.66	0
1970	3	2	1	0	10.70	8.50	0
1971	1	0	1	0	0	8.00	0
1972	2	1	1	0	10.00	16.00	0
1973	1	1	0	0	9.70	0	0
1974	1	0	1	0	0	16.00	0
1975	1	0	1	0	0	14.00	0
1976	1	0	1	0	0	10.00	0
1977	0	0	0	0	0	0	0
TOTALS	41	20	21	0	226.10	219.00	0
AVERAGE COST PER UNIT		$10.85			$11.30	$10.43	0

DODGE

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	2	1	0	1	11.00	0	9.78
1961	2	1	1	0	11.70	10.00	0
1962	0	0	0	0	0	0	0
1963	9	1	7	1	11.00	11.42	13.59
1964	11	3	8	0	11.33	10.93	0
1965	8	4	4	0	11.27	10.25	0
1966	9	7	2	0	11.67	10.00	0
1967	9	5	4	0	11.94	11.12	0
1968	6	4	2	0	11.17	10.25	0
1969	10	7	3	0	9.74	9.50	0
1970	9	6	2	1	12.14	13.00	57.57
1971	16	9	7	0	11.48	10.14	0
1972	10	2	8	0	11.10	13.37	0
1973	9	5	4	0	12.90	13.25	0
1974	12	5	6	1	11.25	12.83	2.33
1975	7	3	4	0	11.50	13.25	0
1976	4	0	4	0	0	13.05	0
1977	0	0	0	0	0	0	0
TOTALS	133	63	66	4	765.84	771.20	83.27
AVERAGE COST PER UNIT		$11.55			$11.43	$11.68	$20.92

FORD

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	2	2	0	0	10.95	0	0
1961	7	5	2	0	11.64	11.00	0
1962	18	9	8	1	11.18	11.06	1.50
1963	12	8	4	0	11.96	10.50	0
1964	16	10	5	1	11.62	11.20	42.55
1965	33	25	8	0	12.32	10.33	0
1966	43	29	13	1	11.47	10.19	4.95
1967	33	17	16	0	11.41	11.15	0
1968	29	22	7	0	11.52	12.00	0
1969	31	18	13	0	11.43	10.26	0
1970	41	28	9	4	11.60	11.88	4.55
1971	41	27	14	0	11.97	11.60	0
1972	38	16	20	2	12.05	9.10	43.64
1973	34	22	12	0	11.25	12.14	0
1974	32	15	15	2	12.26	11.80	47.21
1975	45	6	39	0	11.45	7.91	0
1976	14	6	8	0	10.98	11.18	0
1977	0	0	0	0	0	0	0
TOTALS	469	265	193	11	3222.59	1991.90	248.95
AVERAGE COST PER UNIT		$11.12			$11.67	$10.32	$22.63

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	2	0	2	0	0	10.00	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	3	1	1	0	14.00	12.00	0
1964	2	0	2	0	0	11.25	0
1965	1	0	1	0	0	10.00	0
1966	2	2	0	0	12.00	0	0
1967	1	1	0	0	9.70	0	0
1968	0	0	0	0	0	0	0
1969	0	0	0	0	0	0	0
1970	1	0	1	0	0	10.00	0
1971	2	2	0	0	10.10	0	0
1972	2	1	1	0	10.00	10.00	0
1973	1	0	1	0	0	10.00	0
1974	1	0	1	0	0	14.00	0
1975	1	0	1	0	0	8.50	0
1976	1	0	1	0	0	16.00	0
1977	0	0	0	0	0	0	0
TOTALS	19	7	12	0	77.90	133.00	0
AVERAGE COST PER UNIT		$11.10			$11.12	$11.08	0

HOMEMADE

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	1	0	1	0	0	8.50	0
1970	0	0	0	0	0	0	0
1971	0	0	0	0	0	0	0
1972	0	0	0	0	0	0	0
1973	0	0	0	0	0	0	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	1	0	1	0	0	8.50	0
AVERAGE COST PER UNIT		$8.50			0	$8.50	0

EXHIBIT C
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INTERNATIONAL

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	5	4	1	0	10.27	8.50	0
1962	0	0	0	0	0	0	0
1963	1	1	0	0	10.50	0	0
1964	1	1	0	0	14.00	0	0
1965	1	1	0	0	11.70	0	0
1966	2	1	1	0	10.00	16.00	0
1967	0	0	0	0	0	0	0
1968	1	1	0	0	10.50	0	0
1969	0	0	0	0	0	0	0
1970	2	1	1	0	12.00	9.70	0
1971	1	0	1	0	0	14.50	0
1972	1	1	0	0	11.70	0	0
1973	0	0	0	0	0	0	0
1974	0	0	0	0	0	0	0
1975	1	0	1	0	0	14.50	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	16	11	5	0	121.50	63.26	0
AVERAGE COST PER UNIT		$11.54			$11.04	$12.64	0

EXHIBIT C
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JEEP

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	1	1	0	0	14.50	0	0
1963	0	0	0	0	0	0	0
1964	1	0	1	0	0	8.50	0
1965	0	0	0	0	0	0	0
1966	2	2	0	0	12.85	0	0
1967	3	3	0	0	12.00	0	0
1968	1	1	0	0	14.00	0	0
1969	1	1	0	0	9.70	0	0
1970	2	0	2	0	0	9.10	0
1971	0	0	0	0	0	0	0
1972	2	0	2	0	0	11.00	0
1973	0	0	0	0	0	0	0
1974	0	0	0	0	0	0	0
1975	1	0	1	0	0	12.00	0
1976	1	0	1	0	0	12.00	0
1977	0	0	0	0	0	0	0
TOTALS	15	8	7	0	99.90	72.70	0
AVERAGE COST PER UNIT		$11.50			$12.48	$10.38	0

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	5	4	1	0	9.92	12.00	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	4	3	1	0	11.30	12.00	0
1970	1	1	0	0	9.70	0	0
1971	1	0	1	0	0	14.00	0
1972	4	3	1	0	11.90	12.00	0
1973	5	2	3	0	12.10	12.33	0
1974	7	3	4	0	11.90	13.50	0
1975	1	0	1	0	0	8.50	0
1976	1	1	0	0	9.70	0	0
1977	0	0	0	0	0	0	0
TOTALS	29	17	12	0	188.60	149.50	0
AVERAGE COST PER UNIT		$11.65			$11.09	$12.45	0

EXHIBIT C
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MERCURY

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	1	1	0	0	12.00	0	0
1961	3	1	2	0	14.00	11.00	0
1962	1	0	1	0	0	10.00	0
1963	2	1	0	1	9.70	0	91.69
1964	2	1	1	0	14.50	14.00	0
1965	3	1	2	0	11.70	9.25	0
1966	5	3	2	0	13.66	11.00	0
1967	5	2	3	0	8.25	10.83	0
1968	6	4	2	0	8.62	12.00	0
1969	4	4	0	0	12.47	0	0
1970	3	3	0	0	9.90	0	0
1971	8	4	4	0	12.92	11.37	0
1972	4	1	3	0	14.00	11.50	0
1973	4	1	3	0	14.00	11.66	0
1974	4	2	2	0	12.10	16.00	0
1975	5	1	4	0	11.70	13.12	0
1976	2	0	2	0	0	10.10	0
1977	0	0	0	0	0	0	0
TOTALS	62	30	31	1	358.80	362.70	91.69
AVERAGE COST PER UNIT		$11.63			$11.57	$11.70	$91.69

EXHIBIT C
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OLDSMOBILE

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT		
					Minor adjustment	No adjustment	Repairs
1960	1	0	1	0	10.00	0	0
1961	2	1	1	0	12.00	10.00	0
1962	0	0	0	0	0	0	0
1963	3	2	1	0	10.85	12.00	0
1964	4	1	2	1	13.10	10.25	5.65
1965	10	9	1	0	11.07	10.00	0
1966	6	6	0	0	9.86	0	0
1967	7	4	3	0	12.55	11.33	0
1968	13	6	7	0	11.15	12.35	0
1969	11	6	5	0	11.66	12.90	0
1970	9	6	3	0	13.33	10.66	0
1971	2	1	1	0	8.50	10.00	0
1972	11	4	7	0	14.97	10.21	0
1973	7	1	6	0	9.70	14.33	0
1974	3	1	2	0	14.00	11.00	0
1975	3	1	2	0	9.70	13.25	0
1976	2	0	2	0	0	11.25	0
1977	0	0	0	0	0	0	0
TOTALS	94	49	44	1	587.30	517.00	5.65
AVERAGE COST PER UNIT		$11.74			$11.74	$11.75	$5.65

PONTIAC

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	1	0	1	0	0	12.00	0
1963	0	0	0	0	0	0	0
1964	5	4	1	0	11.67	10.00	0
1965	7	2	5	0	14.00	9.30	0
1966	10	5	4	1	11.58	11.55	40.00
1967	9	6	3	0	11.26	11.50	0
1968	16	5	11	0	13.00	11.60	0
1969	12	5	6	1	12.33	11.75	1.76
1970	10	6	4	0	11.90	13.12	0
1971	9	5	4	0	13.64	10.12	0
1972	14	7	7	0	11.05	13.71	0
1973	24	11	13	0	14.65	11.32	0
1974	23	11	12	0	13.68	15.20	0
1975	45	10	35	0	13.65	11.00	0
1976	21	3	18	0	12.56	14.31	0
1977	0	0	0	0	0	0	0
TOTALS	206	80	124	2	1053.70	1508.80	41.76
AVERAGE COST PER UNIT		$12.44			$12.85	$12.16	$20.88

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	1	0	1	0	0	14.50	0
1962	0	0	0	0	0	0	0
1963	6	3	3	0	12.00	10.00	0
1964	3	2	1	0	11.00	12.50	0
1965	14	10	3	1	11.44	10.00	5.95
1966	10	5	5	0	11.38	9.20	0
1967	5	2	3	0	14.50	11.40	0
1968	7	2	5	0	10.85	11.70	0
1969	10	5	5	0	11.94	12.04	0
1970	11	9	2	0	11.95	10.00	0
1971	8	4	4	0	13.42	11.62	0
1972	11	7	4	0	10.95	14.00	0
1973	10	3	7	0	12.56	11.81	0
1974	4	3	1	0	12.66	10.00	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	100	55	44	1	664.90	501.10	5.95
AVERAGE COST PER UNIT		$11.66			$11.87	$11.38	$5.95

IMPORT VEHICLES

MAKE	MINOR ADJUSTMENTS	NO ADJUSTMENTS	REPAIRS
Audi	0	5	0
Austin	1	0	1
Capri	1	1	0
Daimler	1	0	0
Datsun	12	15	0
English Ford (EFD)	0	1	0
Fiat	3	3	0
Honda	4	1	0
Mazda	7	2	0
Mercedes Benz	4	1	0
MG	2	3	0
Opel	1	1	0
Porsche	1	1	0
Renault	1	1	0
Rolls Royce	0	1	0
Saab	2	1	0
Sabaru	1	0	0
Simca	1	0	0
Toyota	18	24	0
Triumph	3	2	0
Volkswagen	84	46	0
Volvo	0	1	0
TOTALS	147	110	1

The above figures represent the total figures on each vehicle, separated into the different categories.

AUDI

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	COST PER UNIT No adjustment	COST PER UNIT Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	0	0	0	0	0	0	0
1970	1	0	1	0	0	8.50	0
1971	1	0	1	0	0	16.00	0
1972	1	0	1	0	0	16.00	0
1973	1	0	1	0	0	10.50	0
1974	1	0	1	0	0	12.50	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	5	0	5	0	0	$63.50	0
AVERAGE COST PER UNIT		$12.70			-0-	$12.70	-0-

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	0	0	0	0	0	0	0
1970	1	1	0	0	10.00	0	0
1971	0	0	0	0	0	0	0
1972	0	0	0	0	0	0	0
1973	0	0	0	0	0	0	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	1	1	0	0	$10.00	0	0
AVERAGE COST PER UNIT		$10.00			$10.00	0	0

CAPRI

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	0	0	0	0	0	0	0
1970	0	0	0	0	0	0	0
1971	1	1	0	0	12.00	0	0
1972	1	0	1	0	0	12.00	0
1973	0	0	0	0	0	0	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	2	1	1	0	$12.00	$12.00	0
AVERAGE COST PER UNIT		$12.00			$12.00	$12.00	0

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DAIMLER

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	1	1	0	0	9.70	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	0	0	0	0	0	0	0
1970	0	0	0	0	0	0	0
1971	0	0	0	0	0	0	0
1972	0	0	0	0	0	0	0
1973	0	0	0	0	0	0	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	1	1	0	0	$9.70	0	0
AVERAGE COST PER UNIT		$9.70			$9.70	0	0

DATSUN

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	1	1	0	0	14.00	0	0
1967	0	0	0	0	0	0	0
1968	1	0	1	0	0	10.00	0
1969	3	3	0	0	9.70	0	0
1970	3	1	2	0	11.70	6.75	0
1971	7	1	6	0	12.00	11.83	0
1972	5	3	2	0	11.33	16.00	0
1973	3	2	1	0	9.00	12.00	0
1974	3	1	2	0	12.00	13.25	0
1975	1	0	1	0	0	12.00	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	27	12	15	0	$130.80	$177.00	0
AVERAGE COST PER UNIT		$11.40			$10.90	$11.80	

EXHIBIT C
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Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	COST PER UNIT No adjustment	COST PER UNIT Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	1	0	1	0	0	12.50	0
1970	0	0	0	0	0	0	0
1971	0	0	0	0	0	0	0
1972	0	0	0	0	0	0	0
1973	0	0	0	0	0	0	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	1	0	1	0	0	$12.50	0
AVERAGE COST PER UNIT		$12.50			0	$12.50	0

FIAT

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	2	1	1	0	14.00	8.50	0
1969	1	1	0	0	12.00	0	0
1970	0	0	0	0	0	0	0
1971	0	0	0	0	0	0	0
1972	1	1	0	0	10.00	0	0
1973	0	0	0	0	0	0	0
1974	1	0	1	0	0	12.00	0
1975	1	0	1	0	0	16.00	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	6	3	3	0	$36.00	$36.50	0
AVERAGE COST PER UNIT		$12.08			$12.00	$12.16	0

HONDA

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	0	0	0	0	0	0	0
1970	0	0	0	0	0	0	0
1971	1	1	0	0	9.70	0	0
1972	0	0	0	0	0	0	0
1973	0	0	0	0	0	0	0
1974	3	2	1	0	13.00	14.00	0
1975	1	1	0	0	11.70	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	5	4	1	0	$34.40	$14.00	0
AVERAGE COST PER UNIT		$12.28			$11.86	$14.00	0

EXHIBIT C
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MAZDA

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	0	0	0	0	0	0	0
1970	0	0	0	0	0	0	0
1971	0	0	0	0	0	0	0
1972	7	5	2	0	11.80	8.85	0
1973	2	2	0	0	12.85	0	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	9	7	2	0	$84.70	$17.70	0
AVERAGE COST PER UNIT		$11.38			$12.10	$ 8.85	0

EXHIBIT C
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Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	1	1	0	0	14.50	0	0
1969	0	0	0	0	0	0	0
1970	1	1	0	0	9.70	0	0
1971	1	1	0	0	9.70	0	0
1972	0	0	0	0	0	0	0
1973	2	1	1	0	11.70	14.50	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	5	4	1	0	$45.60	$14.50	0
AVERAGE COST PER UNIT		$12.05			$11.40	$14.50	0

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	1	1	0	0	12.00	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	1	0	1	0	0	12.00	0
1965	0	0	0	0	0	0	0
1966	1	1	0	0	9.70	0	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	0	0	0	0	0	0	0
1970	1	0	1	0	0	12.00	0
1971	1	0	1	0	0	12.00	0
1972	0	0	0	0	0	0	0
1973	0	0	0	0	0	0	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	5	2	3	0	$21.70	$36.00	0
AVERAGE COST PER UNIT		$11.54			$10.85	$12.00	0

OPEL

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	1	0	1	0	0	8.50	0
1968	0	0	0	0	0	0	0
1969	0	0	0	0	0	0	0
1970	1	1	0	0	10.00	0	0
1971	0	0	0	0	0	0	0
1972	0	0	0	0	0	0	0
1973	0	0	0	0	0	0	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	2	1	1	0	$10.00	$8.50	0
AVERAGE COST PER UNIT		$9.25			$10.00	$8.50	0

PORSCHE

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	1	1	0	0	12.00	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	1	0	1	0	0	10.00	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	0	0	0	0	0	0	0
1970	0	0	0	0	0	0	0
1971	0	0	0	0	0	0	0
1972	0	0	0	0	0	0	0
1973	0	0	0	0	0	0	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	2	1	1	0	$12.00	$10.00	0
AVERAGE COST PER UNIT		$11.00			$12.00	$10.00	0

RENAULT

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	1	1	0	0	12.00	0	0
1969	1	0	1	0	0	10.00	0
1970	0	0	0	0	0	0	0
1971	0	0	0	0	0	0	0
1972	0	0	0	0	0	0	0
1973	0	0	0	0	0	0	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	2	1	1	0	12.00	10.00	0
AVERAGE COST PER UNIT		$11.00			$12.00	$10.00	0

ROLLS ROYCE

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	1	0	1	0	0	14.50	0
1970	0	0	0	0	0	0	0
1971	0	0	0	0	0	0	0
1972	0	0	0	0	0	0	0
1973	0	0	0	0	0	0	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	1	0	1	0	0	$14.50	0
AVERAGE COST PER UNIT		$14.50			0	$14.50	0

SAAB

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	1	1	0	0	5.50	0	0
1969	1	0	1	0	0	8.50	0
1970	0	0	0	0	0	0	0
1971	0	0	0	0	0	0	0
1972	0	0	0	0	0	0	0
1973	1	1	0	0	14.00	0	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	3	2	1	0	$19.50	$8.50	0
AVERAGE COST PER UNIT		$9.33			$ 9.75	$8.50	0

SABARU

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	0	0	0	0	0	0	0
1970	0	0	0	0	0	0	0
1971	0	0	0	0	0	0	0
1972	0	0	0	0	0	0	0
1973	1	1	0	0	12.00	0	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	1	1	0	0	$12.00	0	0
AVERAGE COST PER UNIT	$12.00				$12.00	0	0

SIMCA

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repair
1960	1	1	0	0	12.00	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	0	0	0	0	0	0	0
1970	0	0	0	0	0	0	0
1971	0	0	0	0	0	0	0
1972	0	0	0	0	0	0	0
1973	0	0	0	0	0	0	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	1	1	0	0	12.00	0	0
AVERAGE COST PER UNIT		$12.00			$12.00	0	0

TOYOTA

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	1	0	1	0	0	12.00	0
1967	2	0	2	0	0	10.00	0
1968	3	2	1	0	10.70	14.50	0
1969	3	1	2	0	9.70	10.00	0
1970	5	3	2	0	13.33	11.00	0
1971	4	1	3	0	12.00	14.16	0
1972	8	5	3	0	13.00	14.66	0
1973	7	3	4	0	12.00	12.12	0
1974	6	3	3	0	12.66	9.83	0
1975	2	0	2	0	0	9.50	0
1976	1	0	1	0	0	10.50	0
1977	0	0	0	0	0	0	0
TOTALS	42	18	24	0	$222.10	$282.50	0
AVERAGE COST PER UNIT		$12.01			$12.33	$11.77	0

TRIUMPH

EXHIBIT C
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Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	2	1	1	0	8.50	10.00	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	1	1	0	0	12.00	0	0
1970	0	0	0	0	0	0	0
1971	0	0	0	0	0	0	0
1972	0	0	0	0	0	0	0
1973	2	1	1	0	14.00	12.00	0
1974	0	0	0	0	0	0	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	5	3	2	0	$34.50	$22.00	0
AVERAGE COST PER UNIT		$11.30			$11.50	$11.00	0

VOLKSWAGEN

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	4	3	1	0	10.06	12.00	0
1961	3	2	1	0	12.10	12.00	0
1962	6	4	2	0	10.05	9.50	0
1963	7	5	2	0	11.74	11.00	0
1964	7	5	2	0	14.40	11.00	0
1965	9	5	4	0	11.34	12.25	0
1966	9	8	1	0	11.83	10.00	0
1967	8	7	1	0	11.88	10.00	0
1968	10	4	6	0	11.87	10.41	0
1969	19	14	5	0	11.50	12.60	0
1970	11	6	5	0	11.78	12.40	0
1971	6	3	3	0	10.16	11.50	0
1972	9	8	1	0	11.01	8.50	0
1973	9	3	6	0	11.56	11.58	0
1974	11	5	6	0	11.84	12.00	0
1975	1	1	0	0	14.50	0	0
1976	1	1	0	0	14.50	0	0
1977	0	0	0	0	0	0	0
TOTALS	130	84	46	0	$980.40	$527.00	0
AVERAGE COST PER UNIT		$11.59			$11.67	$11.45	0

Exhibit 42
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VOLVO

Year of vehicle	Number of vehicles	Number requiring minor adjustment	Number requiring no adjustment	Number requiring repairs	COST PER UNIT Minor adjustment	No adjustment	Repairs
1960	0	0	0	0	0	0	0
1961	0	0	0	0	0	0	0
1962	0	0	0	0	0	0	0
1963	0	0	0	0	0	0	0
1964	0	0	0	0	0	0	0
1965	0	0	0	0	0	0	0
1966	0	0	0	0	0	0	0
1967	0	0	0	0	0	0	0
1968	0	0	0	0	0	0	0
1969	0	0	0	0	0	0	0
1970	0	0	0	0	0	0	0
1971	0	0	0	0	0	0	0
1972	0	0	0	0	0	0	0
1973	0	0	0	0	0	0	0
1974	1	0	1	0	0	10.00	0
1975	0	0	0	0	0	0	0
1976	0	0	0	0	0	0	0
1977	0	0	0	0	0	0	0
TOTALS	1	0	1	0	0	$10.00	0
AVERAGE COST PER UNIT		$10.00			0	$10.00	0

ASSEMBLY COMMITTEE ON ENVIRONMENT AND PUBLIC RESOURCES
ASSEMBLY BILL 464
April 14, 1977 3:00 p.m.
Room 214, Legislative Building

DICK SERDOZ, AIR QUALITY OFFICER

I have previously submitted testimony on the need for legislation on auto emission control (March 24, 1977), but I do want to highlight some points:

1. The Environmental Impact Statement prepared by the Highway Department indicated there will be continued violations of State and Federal ambient air quality standards through 1985. This will occur even when major roads are constructed or improved at a rate of $25 million per year.

2. Measured ambient air concentrations for carbon monoxide in the metropolitan areas are presently being violated. These violations are occurring in Las Vegas, Reno, and Lake Tahoe.

3. Based on measured 1976 ambient air data the total emission of carbon monoxide and hydrocarbons must be reduced by 50%. The new cars as they come on the market can account for one half, the inspection maintenance will account for one quarter, and the last quarter, plus growth, must be attained through transportation planning activity.

4. Any of the inspection programs will save approximately $9/vehicle inspected which would be approximately $2.4 million or 4 million gallons of gasoline a year, which is greater than a 1% saving of the total gasoline sold in the State.

REPORT ON METHODS OF IMPLEMENTING A COMPULSORY ANNUAL MOTOR VEHICLE EMISSION CONTROL INSPECTION PROGRAM

Submitted to
Fifty-Ninth Session of the
Nevada State Legislature
1977

By the
State Environmental Commission

EXECUTIVE SUMMARY

INTRODUCTION

Since 1970, measurement of the air pollutants of carbon monoxide (CO) and hydrocarbons (HC) in the Las Vegas metropolitan area have indicated an increasing deterioration of ambient air quality standards. The increase of these contaminants (CO) and (HC) is considered to be detrimental to both health and aesthetic values.

Inventory analysis indicates that 85-90% of these two contaminants are derived from motor vehicle emissions. The implementation plan adopted by the State, and approved by EPA, included as a control strategy for the reduction of (CO) and (HC) in Clark County, Nevada, an inspection-maintenance program (I/M) for motor vehicles. In 1973, the Legislature authorized the Environmental Commission and Department of Motor Vehicles to implement an I/M program in Clark County. This program became operational in 1974.

This report is an evaluation of the results of this project with respect to seeing whether or not a measurable effect on the emissions of contaminants as (CO) and (HC) can be obtained by I/M program of motor vehicles. Assuming that an I/M program would substantially and significantly reduce concentration of ambient air (CO) and (HC), the report additionally reviews the cost effectiveness of several alternative inspection systems.

CONTENT OF STUDY

The overall objective of this study is the analysis of the effectiveness of the present inspection maintenance (I/M) program in Clark County, Nevada, with respect to the reduction of ambient air concentration of the carbon monoxide and hydrocarbon contaminants, and an analysis of the cost and effectiveness of various alternative I/M programs. The fulfillment of this objective involves two major tasks, each of which is discussed below. The first task involves a detailed review of the current regulations for the Nevada I/M program and of all the associated test procedures, hardware selection, calibration practices, inspection procedures and quality assurance practices. Included is a detailed review of inspection results of several thousand automobiles of all makes and most years to the amount of reduction in emissions following an I/M inspection. Information on the present cost of the system is also presented.

The second part of the study is the analysis of the alternative I/M programs. Two basic I/M programs are the idle-mode testing and the loaded-mode testing. Each of these methodologies is analyzed in terms of the operational alternatives of a State run, contractor run and privately run systems. Each of these alternatives is analyzed in terms of its cost, effectiveness, energy impacts and consumer protection features.

DEFINITION AND PURPOSE OF INSPECTION/MAINTENANCE

Inspection/maintenance is an air quality strategy which deals with automotive pollutants. Under such a system, motorized vehicles are inspected at established intervals to ensure that they are complying with the environmental standards set by the State. Vehicles failing to pass such a test are required to have the necessary repairs performed in order to bring them into compliance with the standards. The minimum requirement of an emission test is that it be short, applicable to warmed-up vehicles and can identify the high emitting vehicles. Two distinct emission testing procedures have been developed for measuring pollutants emitted through the vehicle exhaust system, which satisfy these criteria. These test procedures are referred to as idle-mode and loaded-mode testing.

The idle-mode test is the test of the exhaust emissions with the vehicle in a neutral gear operating at an unloaded state. Often (HC) and (CO) levels are recorded at both a low and a high (or hot) idle speed. The test at the low idle speed is taken at the manufacturer's recommended idle, measured in revolutions per minute (rpm), then the engine speed is increased to 2250 ±10 percent rpm for the high (or hot) idle speed test. The standards must be met at both levels.

The loaded (or key) mode test is the test of the exhaust emissions with the vehicle in a forward drive gear operating at a loaded state. Pollutants are measured at various test conditions as specified by a testing procedure. The loaded-mode, steady state (simulated highway cruise) test measures emissions at high cruise, low cruise, and idle. Emissions are not tested at the transient modes of acceleration and deceleration. A chassis dynamometer is utilized to apply the desired loads to simulate driving conditions.

The primary purpose of inspection/maintenance is to improve air quality. I/M does this by providing a way by which pollutants from motorized vehicles can be kept to defined, acceptable levels. That air quality in Clark County needs to be improved is evidenced by data which indicates continuing violations of the National Ambient Air Quality Standards for carbon monoxide and oxidants. Table 1 presents the Clark County Health District's data for these pollutants from 1973 through 1975.

TABLE 1
MEASURED AIR QUALITY IN LAS VEGAS, NEVADA

	National Standard	High			Second High		
		1973	1974	1975	1973	1974	1975
Carbon monoxide	10 mg/m^3 (8-hour)	16.6	16.3	25.4	16.2	16.0	24.5
Oxidant	160 µg/m^3 (1-hour)	438	316	425	351	310	262

In addition to its air quality benefit, I/M is also an energy saving strategy. This is due to the fact that a well-tuned engine not only pollutes less, but consumes less fuel. Annual fuel savings of $9.00 per vehicle have been estimated to result from I/M.

REVIEW OF THE KEY ISSUES ASSOCIATED WITH INSPECTION/MAINTENANCE

The key issues associated with any I/M program are given in Table 2. As shown, these issues include the dimensions of the program, the instrumentation used, testing frequency required, the emission standards and rejection rates set, and the means by which the program is implemented.

TABLE 2
ISSUES ASSOCIATED WITH I/M

Program Issue	Objectives	Quality Control Activity
I Dimensions	Test all applicable motor vehicles.	Enforcement through registration process or window sticker program.
II Performance of I/M	Identify high emitting vehicles and repair.	Inspector training and licensing. Mechanic/garage training and licensing. Surveillance program. Public education programs.
III Instrumentation	Emission analyzing.	Equipment certification. Calibration methods.
IV Test frequency	Net emission reduction.	Data monitoring.
V Emission standards and rejection rates	Emission reduction per vehicle.	Data monitoring and surveillance for program effectiveness.
VI Implementation	Public acceptance.	Public education.
VII Operation	Effectiveness.	Rules and regulations.

REVIEW OF THE PRESENT NEVADA PROGRAM

The present I/M program in Clark County is a hot idle test administered by stations licensed by the Emission Control Section of the Department of Motor Vehicles. All light-duty vehicles which change ownership are required to be tested prior to being registered by the new owner. Through December 1976, 227,000 vehicles have been tested by the 125 certified inspection stations.

The inspection procedure consists of adjusting parameters as timing, dwell-angle, rpm, and carburetor to the manufacturer's specifications. The inspector then inserts an instrument probe into the vehicle exhaust pipe and measures the concentration of the carbon monoxide and hydrocarbons as a percentage of the total exhaust gases.

The tested vehicle in order to pass the inspection and thereby receive a certificate must have emissions less than those outlined in Table 3. By this simple procedure the average reduction in hydrocarbon and carbon monoxide were 37% and 42% respectfully. Expressed alternatively, the hydrocarbon and carbon monoxide emissions after testing wer 63% and 58% respectively of the pretest values.

These results were obtained with a consumer cost shown in Table 4. The average inspection fee which includes the initial adjustment and final measurement is $11.74. This fee applied to 97% of the vehicles tested. For those 3% of vehicles tested which did not pass the test, the repair costs averaged $10.96.

TABLE 3
EXHAUST EMISSION STANDARDS

Model Year of Vehicle	CO, %	HC, ppm
Up to and including 1967	7.5	1,200
1968 - 1969	5.0	600
1970	4.0	400
1971 and later[a]	4.0	400

[a]Vehicle engine must be tuned to manufacturer's emission control specifications.

NOTE: All measurements are to be made after engine has been operating a sufficient period of time to attain normal operating temperature and the engine purged if it has been operating at an idle for greater than five (5) minutes.

TABLE 4
AVERAGE CONSUMER COSTS OF THE CURRENT I/M PROGRAM

	Range	Average
Inspection cost[a]	$8.50-$17.00	$11.74
Repair cost	$1.95-$101.31	$10.96

[a]Includes the $2 charge for Certificate of Compliance.

A related question is the percentage of all used vehicles that could not even pass unless subjected to major engine rebuilding or overhaul. This estimate ranged from 2-10%, and averaged 4% as based on data from 20 inspection stations consisting of dealers, garages, and service stations.

A less apparent, but real economic spin-off from the I/M program is the savings in fuel costs. The estimate for each vehicle is $9.00 per year or approximately 15 gallons annually. The aggregate fuel savings for the 55,000 vehicles tested annually are $495,000 per year, or 825,000 gallons of gasoline.

It is estimated that for those vehicles tested, hydrocarbon emissions after testing were 63 percent of the emissions before testing. The ratio for carbon monoxide is 0.58. The estimate of fuel savings for each vehicle tested is $9.00 per year or approximately 15 gallons of gasoline. The aggregate fuel savings for the 55,000 tested annually are $495,000 per year or approximately 825,000 gallons of gasoline.

Table 5 presents the positive aspects of the current programs while Table 6 lists its negative aspects. It is felt that the present I/M program represents a good first step in the implementation of an annual I/M program for all light duty vehicles in Clark County. The analysis of selected alternatives for a total program follows.

TABLE 5
POSITIVE ASPECTS OF THE EXISTING NEVADA I/M PROGRAM

Area of Impact	Positive Aspect
Technical	1. Use of accepted instrumentation. 2. Setting dwell and ignition timing of all cars to manufacturer's specifications. 3. Inspection of vehicles required to have positive crankcase ventilation valve for connection and operation of same. 4. Observe for visible smoke.
Administrative	1. Certification of stations and inspectors.
Public acceptance	1. Minimal registered complaints.

TABLE 6
NEGATIVE ASPECTS OF THE EXISTING NEVADA I/M PROGRAM

Area of Impact	Negative Aspect
Technical	1. No separate standards for 1975 and 1976 vehicles.
	2. Only vehicles which change ownership are required to have emissions testing.
	3. Lack of chronological testing.
Administration	1. Inspection form precludes before/after evaluation.
	2. Poor program monitoring, especially data analysis. Initially, but marked improvement by 1976.
	3. Lack of mechanics' training program.
	4. Buyer in private transaction is liable for testing.
Public acceptance	1. No one fixed inspection fee for all inspection stations.
	2. No ceiling on repair costs.

ALTERNATIVE INSPECTION/MAINTENANCE PROGRAMS FOR CLARK COUNTY

Three alternatives exist for the operation of an I/M program:

1. State owned and operated;
2. private garage operation;
3. contractor hired by State.

Table 7 presents a comparison of these alternatives.

TABLE 7
COMPARISON OF I/M ALTERNATIVES

	Advantages	Disadvantages
State test lane	1. Designed specifically for high capacity emission testing.	1. Additional travel for consumers' vehicles which fail test.
	2. Economy of multilane inspection stations.	2. Long lead time for construction.
	3. Simplified data handling and processing due to minimum facility collection points.	3. Significant initial expenditure of State funds for capital construction.
	4. Effective monitoring of repairs and maintenance.	4. Minor adjustments not made at time of inspection
	5. Greater quality control potential.	5. Administrative function expense as unit cost for quality control.
	6. Diagnostic recommendation by trained personnel.	
	7. Benefits from computer applications.	
Private garage.	1. I/M at one station-indirect costs less to consumer.	1. Frequent use of highly trained and paid personnel for test performance-cost issue.
	2. Minor adjustments made at time of inspection.	2. A large number of private stations required.
	3. Large number of stations - greater convenience.	3. State administrative function expense as unit cost for quality control.
	4. Reduces financial burden of state-capital investments.	4. Nonuniformity of enforcing criteria.
		5. Data handling and reduction more cumbersome.
Contractor test lane	1. Same as 1 to 7 for State test lane.	1. Additional travel for consumers' vehicles which fail test.
	2. Stimulation of the local economy by private investment.	2. Long lead time for construction.
	3. Industry operations more efficient; flexible decision making capability and experience of program operation.	3. State administrative function expense as unit cost for quality control.
	4. Minimal investment.	4. Profit motives.

ASSUMPTIONS

The estimates made involve assumption on given features of the program. The general assumptions applicable to all alternatives include the following:

1. Vehicles are inspected annually. The number of annual inspections is the total number of light duty vehicles registered in Clark County minus exemptions for new vehicles. Fleet operations are assumed to perform their own emissions testing under the privately run system.

2. A failure rate of 33 percent is assumed. This is consistent with the failure rates observed in other I/M programs. A typical distribution of reasons for failure has also been assigned. Given the testing procedure followed in Clark County, however, only 3 percent of the initial inspections will have to be retested. This is due to the minor adjustments made as a standard part of the inspection procedure. In addition, this 3 percent retest assumes that engine overhauls will be exempt from the program due to a price limit placed upon repairs.

Table 8 presents a summary of the cost and benefit estimates for each alternative analyzed.

TABLE 8
SUMMARY OF I/M ALTERNATIVES
FOR CLARK COUNTY, NEVADA

Alternative	Inspection fee[a]	Annual Repair Costs/ Vehicle	Annual Energy Savings/ Vehicle	Percent Emissions Reduction HC	CO
Privately run idle mode	$3.50-6.26	$11.00[b]	$9.00	18	14
State run idle mode	$3.30-6.60	$20.00[c]	$9.00	20	16
Contractor run idle mode	$3.80-7.50	$20.00[c]	$9.00	20	16
Contractor run loaded mode	$4.75-9.40	$20.00[c]	$9.00	22	18

[a]Includes all construction, operating, and administrative costs.

[b]Average for 12 percent requiring retest.

[c]Average for 33 percent of the vehicle population.

IMPACT ON AMBIENT AIR WITH ANNUAL INSPECTION

Any estimate upon the improvement of ambient air concentration of (CO) and (HC) by an annual I/M of all light duty motor vehicles is based upon extrapolated data collected from the Clark County experience and others. While the Clark County data suggests an immediate approximate 40% reduction in emissions, the effect is relatively short-lived. Limited observational data indicates that the inspected vehicle's emission will be back to preadjusted levels within 7-8 months. On an annual basis the integrated improvement averages to 15-18% reduction in (CO) and (HC) emissions.

An annual inspection program probably would have only minimal effect on the ambient air concentration until at least 50-60% of the registered vehicles had undergone adjustment and inspection. Once all vehicles are on an annualized cycle, one should expect a reduction of current ambient concentration by approximately 6-10%.

With time, the effect will further improve as newer (after 1975) models become a greater proportion of the motor vehicle population. These models with catalytic converters have extremely low emission concentrations. Since the converters deteriorate from use or contamination, annual inspections will assist in detecting these defective systems. Additionally, if the standards to pass for these newer models should be more stringent, the result could be even greater in terms of improvement in the ambient air quality.

SUMMARY

This report presented information on the costs, benefits, and the issues associated with four alternate I/M systems for Clark County, Nevada. While no attempt has been made to recommend one alternative over another, the data provided should aid decision makers in their final evaluation of an I/M program for Clark County.

TESTIMONY TO THE ASSEMBLY ENVIRONMENT AND PUBLIC RESOURCES COMMITTEE

By Hamilton Test Systems, Inc.

One of the most important decisions to be made when establishing a vehicle inspection program is how to implement such a program. There are three (3) possible alternatives to select from: State owned and operated, independent contractor, and private garages.

The state owned and operated and independent contractor concepts are very similar in philosophy and nature. In fact, the major difference between them is that the state does not have to appropriate a large sum of the taxpayers' money when utilizing the independent contractor approach. The contractor assumes the responsibility for designing, financing, constructing, equipping and operating the inspection network under the supervision of the state.

In all other respects, the inspection network, its equipment, procedures, operating hours, station locations and numbers of stations, etc., will be the same since the independent contractor develops the inspection network according to state specifications and with state approvals and continuous surveillance throughout the construction and operation of the network.

The contractor recovers his investment, operating expenses, and a reasonable profit by receiving a portion of the inspection fee with the remaining portion going to the state to fund the state's program administrative functions. Thus, the program is self-supporting. The inspection fee charged is uniform for all classes of vehicles and at all inspection facilities.

Delegation of the day-to-day operational problems allows the state to concentrate on working with and monitoring the repair industry, the other crucial member of the inspection program.

A major philosophical difference between either the independent contractor or state owned and operated inspection network when compared to a system implemented in the private garages is the separation of the inspection and repair functions. The separation of these functions eliminates any vested interest in the test results by the party inspecting the vehicle. This separation provides a strong consumer protection flavor to the program, which aides dramatically in obtaining program acceptance and support of the public.

An independent contractor implemented inspection network employs high quality, automated, and computerized test equipment and procedures. The automated and computerized nature of the inspection process minimizes the inspection time and the possibility of human error or tampering with the inspection procedures or test results.

Computerization provides for convenient and timely accumulation of all test results for evaluation of the program's effectiveness. All data is submitted to the state on magnetic tape to insure the accuracy of the data rather than on thousands of manually recorded forms requiring additional data processing functions.

In addition, computerization aides in the quality control of the inspection procedures and equipment. Automatic routines for equipment calibration and compensation of the sensitive gas analyzers to accommodate variations in atmospheric pressure and temperature are included in the system.

Another point of comparison between an independent contractor system and the private garage approach is convenience. The large number of private garages required to implement that approach may result in shorter maximum driving distance for a portion of the public. However, driving distance is not the only ingredient to convenience; actual time spent to complete the inspection process is even more important. Since the sole function of the independent contractor's inspection facility is to inspect vehicles, potential time consuming situations, such as vehicle fueling or repair of another individual's vehicle, do not occur.

The objective of the program is to identify and repair the approximately 20 to 30% of the vehicle population, which are the so-called gross emitters. These gross emitters typically emit from 200 to 800 per cent more pollution than their appropriate emissions standards. It is only these vehicles which, having failed the inspection, receive repairs at the repair garage of their choice or by repairing the vehicles themselves, utilizing the information provided by the inspection to aid them in obtaining the correct repairs. A free re-inspection is then provided at the inspection station.

Vehicles passing the initial inspection would not proceed to a repair facility.

A private garage system generally results in a much larger state program management and surveillance force in order to adequately monitor the large number of private garages.

To the extent that rural geographical areas are not exempted from the program on the basis of low vehicle densities and, therefore, no vehicle pollution problems, these areas can be conveniently served, using a number of possible approaches,

such as mobile test units, permanent inspection facilities operating on a reduced hourly schedule, etc. The state can specify in the request for proposal what constitutes the minimum requirements for conveniently serving these rural areas. For instance, the State of California specified maximum driving distances for both metropolitan and rural areas.

Arizona obtained a consumer-oriented inspection program which has proven to be very effective at reducing vehicle pollution. A March 18, 1977, press release by the Arizona Department of Health Services indicates an average reduction of 38 per cent in hydrocarbon and 25 per cent carbon monoxide emissions for the entire vehicle population. Vehicles failing the initial inspection and having repairs performed are experiencing average reductions of 47 and 44 per cent, respectively, for hydrocarbon and carbon monoxide emissions. Las Vegas and Reno, which, like Phoenix and Tuscon, can attribute over 75% of their hydrocarbon and carbon monoxide air pollution problems to the motor vehicle, should experience similar dramatic improvements from an inspection and maintenance program.

The private garages in Arizona, through their various industry organizations, have generally supported the concept of separating the inspection and repair functions.

The repair industry has met the challenge with a minimal of consumer complaints, since the computerized data collection process allows the state to efficiently monitor the performance of the repair industry and take appropriate actions when necessary. This has been achieved without the need for licensing a percentage

of the repair garages and thereby excluding from others the right to participate in the inspection and repairs.

Equipment already purchased by repair facilities will certainly be put to good use in repairing vehicles and confirming the effectiveness of those repairs before the vehicle returns to the inspection station for its free retest.

Special provisions can be included in the legislation to allow for fleets and car dealers to do their own testing, to limit the required cost of repairs to protect those people living on low income levels, to confine the program to those areas having a vehicle pollution problem, and others.

Regardless of which approach is utilized to implement an inspection program, it is essential to have a well planned and executed public education and information program to alert the public to the need for and results from the inspection program.

STATEMENT OF DONALD R. ARKELL, DIRECTOR
AIR POLLUTION CONTROL DIVISION, CLARK COUNTY HEALTH DISTRICT

April 12, 1977

MR. CHAIRMAN --- MEMBERS OF THE COMMITTEE --- MY NAME IS DON ARKELL. I AM DIRECTOR OF THE AIR POLLUTION CONTROL DIVISION OF THE CLARK COUNTY HEALTH DISTRICT.

SEVERAL WEEKS AGO, I BRIEFLY APPEARED BEFORE YOU TO ILLUSTRATE THE NEED FOR SOME ADDITIONAL MEASURES TO CONTROL THE GROWING PROBLEMS OF AIR POLLUTION IN LAS VEGAS, AS WELL AS OTHER AREAS IN NEVADA.

AS I POINTED OUT TO YOU AT THAT TIME, HIGHER LEVELS OF AIR POLLUTION HAVE BECOME A MATTER OF GREAT CONCERN TO PEOPLE IN THE LAS VEGAS AREA. INCREASED CONCENTRATIONS OF POLLUTANTS CAN BE VIEWED AS A PREDICTABLE RESULT OF THE TREMENDOUS GROWTH WE ARE EXPERIENCING. ADDITIONAL PEOPLE AND THEIR MOTOR VEHICLES ARE BURNING MORE FUEL DAY BY DAY. ADDITIONAL EMISSIONS ARE BEING DISCHARGED INTO AN ENVELOPE OF AIR WHICH IS LIMITED IN VOLUME MUCH OF THE TIME.

WHILE WE REALIZE A SINGLE ACTION OR A SINGLE STRATEGY CANNOT FULLY CURE THIS COMPLICATED PROBLEM -- WE FEEL SOME THINGS CAN BE DONE TO SLOW AND/OR CONTROL ITS GROWTH.

ONE SUCH STRATEGY SHOWN TO BE EFFECTIVE IN OTHER AREAS WITH SIMILAR PROBLEMS, IS CONTROLLED YEARLY TESTING AND MAINTENANCE FOR MOTOR VEHICLES. WE SUPPORT THIS CONCEPT. WE ARE CONCERNED HOWEVER, ABOUT THE MANNER IN WHICH A PROGRAM REQUIRING ANNUAL INSPECTIONS AND MAINTENANCE OF MOTOR VEHICLES WOULD BE INSTITUTED.

AFTER REVIEWING INFORMATION AVAILABLE TO DATE, IT IS OUR POSITION THAT THE BEST WAY TO GO ABOUT CERTIFYING AND REPAIRING MOTOR VEHICLES WOULD BE TO SEPARATE THE CERTIFICATION FUNCTION FROM THE REPAIR FUNCTION. TWO BASIC -- BUT RELATED REASONS FOR THIS POSITION ARE:

1) PUBLIC ACCEPTANCE OF THE PROGRAM IS ESSENTIAL
2) COST EFFECTIVENESS MUST BE DEMONSTRATED IN ORDER TO GAIN PUBLIC ACCEPTANCE.

WE KNOW FROM EXPERIENCE THAT MOST ATTEMPTS TO SOLVE EVEN WELL RECOGNIZED SOCIAL PROBLEMS HAVE NOT BEEN MET WITH UNIFORM ENTHUSIASM --- IN FACT, DOWN-RIGHT HOSTILITY HAS BEEN EXHIBITED FROM TIME-TO-TIME AS WE ENDEAVOR TO FIND ANSWERS.

WE BELIEVE THAT IN ORDER FOR THE PUBLIC TO ADEQUATELY ASSESS INSPECTION/ MAINTENANCE, AS A WAY TO REDUCE POLLUTION AND SAVE FUEL, THERE MUST BE AN ACCURATE AND RELIABLE WAY TO MEASURE COST-EFFECTIVENESS, I.E., GAINS OF CLEANER AIR AND BETTER FUEL ECONOMY, VERSUS COSTS OF INCONVENIENCE AND INITIAL MAINTENANCE.

A SEVERAL-FOLD INCREASE IN THE NUMBER OF INSPECTIONS CONDUCTED BY A MULTITUDE OF INDIVIDUAL CERTIFICATION/REPAIR STATIONS PRESENTS REAL PROBLEMS IN ENSURING AND MEASURING COST-EFFECTIVENESS, ENFORCEMENT OF UNIFORM PROCEDURES, DATA HANDLING, CONSUMER PROTECTION, AND RESPONSE TO COMPLAINTS ARE CRITICAL ASPECTS ABOUT THE PROGRAM WHICH ARE ULTIMATELY REFLECTED IN PEOPLES' ATTITUDES.

THE FINAL YARDSTICK BY WHICH THE PUBLIC WILL MAKE A JUDGEMENT IS WHETHER THE REDUCTION OF AIR POLLUTION AND INCREASED FUEL SAVINGS ARE WORTH THE TIME AND

INITIAL COST OF HAVING VEHICLES PERIODICALLY CHECKED AND TUNED. WE THINK THE MOST COST-EFFECTIVE SYSTEM UTILIZES SEVERAL CONVENIENTLY LOCATED STATIONS AT WHICH MOTOR VEHICLES ARE TESTED AND CERTIFIED, AND THE NEEDED INFORMATION IS COLLECTED, PROCESSED AND ANALYSED, WHILE ALLOWING THE SERVICE INDUSTRY TO DO THE TUNE UP AND REPAIRS.

IN ASKING THAT YOU GIVE THESE CONCERNS OF OURS SOME CONSIDERATION IN YOUR FINAL DECISION, WE MUST STATE THAT WE BELIEVE STRONGLY THAT THERE IS A NEED NOW TO MOVE FORWARD ON THIS ISSUE, AND WE URGE THAT POSITIVE ACTION BE TAKEN BY THIS LEGISLATURE.