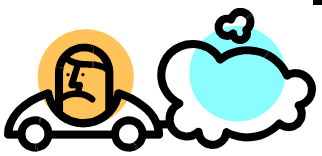
# FasTesT Emissions



9909 Osuna Rd. NE
Albuquerque, NM 87111
Tel. 505-417-9091

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Dear Board Members,

I have great concern on the proposal to allow Mobile Emission Testing. After reading 20.11.11.25 "Van Mounted or Movable Air Care Stations" I wasn't convinced that this can be implemented without large scale fraud occurring. I have been in the emissions testing business for more than 10 years and am very aware of the short comings of this proposal. Let me elaborate:

- Of all the States that do Emission Testing, there is not one State that sanctions Privatized Mobile Testing. Mobile Testing Units that do exist are run by the States sanctioning body that oversees the program such as VPMD. This is done to curtail fraud which can be done very easily with a privatized license.

- I recently conferred with NM MVD and Samba (NM State licenses Samba to access MVD database for third party uses for a fee) and both stated that their database is what they call a "Live" database. The current database that is offered is not backward searchable. Any new changes to a vehicles status will reflect in the database immediately.

- How will VPMD regulate these Privatized Mobile Testing Units? Unless VPMD is present on the days that the tests are actually done by the Privatized Mobile Testing Unit, how will VPMD determine that the cars tested were a "non-privately-owned vehicle" (20.11.11.25 - C) Audits on emission stations are done once or twice a year or VPMD may claim they can do it weekly or monthly. The vehicle can be sold the same day after the emission test. Once the car is sold to a "Private Citizen" the vehicle is no longer a "non-privately-owned vehicle". When this occurs, the MVD "Live" database will change accordingly. Will VPMD be able to do a backwards search on each vehicle that was tested 6 months ago to make sure there was no fraud? My point is that how is VPMD going to know if a Mobile Testing Unit is not set up some where just doing tests to the public with "privately-owned-vehicles" and not a dealership or fleet with "non-privately-owned vehicle" (20.11.11.25 - C).

- Currently VPMD requires all Emission Testing Facilities to type in "NP" (No Plate) if the car has no license plate, which may be a dealership vehicle, a privately owned vehicle with a Temporary Cardboard Plate or an out of state plate that is registering their privately owned vehicle in New Mexico. A "non-privately-owned vehicle" (20.11.11.25 - C) would require the license plate designation to be entered as "NP". What is going to prevent me from testing cars to the public that actually have a New Mexico License Plate and just entering "NP" as a plate designator. When registering your vehicle with the New Mexico MVD they don't look at the plate number, they look at the VIN number

(Vehicle Identification Number) so if it matches the title or the current MVD database it can be registered in New Mexico.

- The requirement of notifying VPMD with "a minimum of one-hour written notice (fax or email) provided to VPMD of the site name, address and requested number of vehicles" (20.11.11.25-D) is a non starter. What happens if I don't notify VPMD? How is VPMD going to know what I'm doing?

- I can currently buy a Dealers License from the State for approximately $50.00. I can then apply for a Mobile Testing Unit License and start testing cars. Will VPMD issue licenses to anyone that applies? How is VPMD going to determine if this Dealership is on the up and up or if its a Dealership setup in the backyard of a private home with intentions of testing publicly?

- Who is going to oversee the installation of the required equipment in the van? If it's someone from VPMD, will he or she need a certification to do these inspections? Will there be written specs for the installation of the equipment? Will it have to be approved by OSHA? Would it need to pass an inspection by the State or County? The required equipment would be mounting of a new machine, mounting of a compressor to test gas caps, mounting of a generator to supply electric to the machine and the compressor and mounting a cabinet to store supplies that are required by VPMD.

I have several concerns about this new program being implemented but what is very telling and the most obvious is that of all the States that do Emission Testing, there is not one State that sanctions Privatized Mobile Testing. I have concerns on how this new program was introduced to VPMD and the individual who actually requested this program. I know why this program was requested and how it was conceived to benefits a private business. I also have concerns that this is a "foot in the door" move and if this program is implemented, I know what will be requested next. If Dealerships or Fleets do not want to bring their vehicles to an existing brick and mortar emission station then a Dealership or Fleet has the option to get a license from VPMD, buy their own machine and set it up in their own building like all of the existing Emission Stations and Car Dealerships had to do. Maybe the Fleets that are complaining about driving all the way to a particular Emission Station could use some common sense, forget about politics and find an Emissions Station that was closer to them.

Thank you for your time and If there are any questions please don't hesitate to call 417-9091.

Sincerely,

Greg Howland