



**House
Legislative
Analysis
Section**

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VEHICLE EMISSIONS INSPECTION

**House Bill 4165 (Substitute H-2)
Revised First Analysis (7-13-93)**

**Sponsor: Rep. Mary C. Brown
Committee: Transportation**

THE APPARENT PROBLEM:

Since 1980, after the federal government adopted rules that required states to establish air quality implementation plans so that certain designated areas within their borders would meet national ambient air quality standards, Michigan has had in operation a vehicle emissions inspection/maintenance (VEIM) program (also known as "auto exhaust testing") in the tri-county area of Detroit. This program was required to be implemented in the counties of Wayne, Oakland and Macomb by the federal Clean Air Act as levels of air pollution there were found by the U.S. Environmental Protection Agency (EPA) to exceed the standards set forth in the act. In 1990, however, changes were made to the Clean Air Act that raised the air quality standards that must be "attained" in any regions known to have significant air pollution problems caused by, among other things, vehicle emissions. As the more stringent standards--that is, a 15 percent overall reduction in air pollution levels--must be met by 1996, the three Detroit-area counties will not likely, with current programs, be able to meet the targeted levels; moreover, seven other Michigan counties (recently designated by the EPA as not having attained current standards) probably will not be able to either. As a result, the state is currently faced with the requirement to adopt an enhanced VEIM program, more stringent than that currently in effect in the tri-county area of Detroit, in the ten counties designated by the EPA as having non-attainment areas. To ensure that states will take action to bring those areas within their borders into compliance with EPA air quality standards, the 1990 Clean Air Act authorizes the EPA to threaten states with various sanctions, including forfeiture of hundreds of millions of dollars in federal transportation funds, unless those states adopt legislation by November 15, 1993, that provides for the implementation of enhanced VEIM programs in the affected areas no later than January 1, 1995.

THE CONTENT OF THE BILL:

The bill would create the Michigan Vehicle Emission Inspection and Maintenance Act to establish a mandatory motor vehicle emissions inspection and maintenance (VEIM) program in certain counties of the state that had areas within them designated by the U.S. Environmental Protection Agency (EPA), pursuant to the federal Clean Air Act, as "moderate" to "extreme" non-attainment areas. Under the bill, these counties--which would include Macomb, Oakland, Wayne, St. Clair, Livingston, Washtenaw, Monroe, Kent, Ottawa and Muskegon--would have to implement a VEIM program by certain specific dates, and a person could not drive a motor vehicle that was registered in one of them unless he or she had a valid certificate of compliance or a certificate of waiver, or was otherwise exempt from the bill's requirements. ("Motor vehicle" generally would mean a self-propelled motor vehicle with a gross vehicle weight of 8,500 pounds or less.) The bill also would repeal Public Act 83 of 1980, which established a VEIM program that currently applies to the tri-county area of Detroit.

Implementation of VEIM program. The department would have to implement and administer a motor vehicle emissions inspection program that was designed to meet the performance standards for a VEIM program as established by the EPA. The program would have to include the following test procedures and components:

- * biennial testing;
- * a "test-only network" (which would mean a network of inspection stations that performed official vehicle emissions inspections and in which owners and employees of them, or companies owning them, could not engage in the repair or service, parts sales, and sale and leasing of motor vehicles, either directly or indirectly, and could not refer vehicle owners to particular providers of motor vehicle repair services);

* transient mass-emission evaporative system, purge and pressure testing on 1981 and later model year vehicles using the "IM240 driving cycle";

* two-speed idle testing, antitampering and pressure test on 1975 to 1980 vehicles (where antitampering inspection of the catalytic converter and fuel inlet restrictor and a pressure test of the evaporative system would be required on "light duty gas" vehicles and trucks under 8,500 pounds; and

* on-board diagnostic check for vehicles so equipped.

The department could promulgate rules to require the inspection of vehicles through the use of on-road testing devices which, if promulgated, would have to specify the methods and procedures that were to be used in such testing. The rules could provide for on-road testing for research purposes, but could not provide for any checklanes or other measures by which motorists would be stopped on highways or other areas open to the general public.

Under the bill, the first initial inspection for each even-numbered model year vehicle would have to occur within six months before the expiration of the vehicle's registration in an even-numbered calendar year, while the first initial inspection for odd-numbered model year vehicles would have to occur within six months before the vehicle registration's expiration in an odd-numbered calendar year.

Certificates of compliance, waiver. Each motor vehicle subject to the bill's provisions would have to be inspected, and a person could not operate a vehicle that was subject to inspection whose certificate of compliance had expired or who had not received a time extension or waiver, and whose vehicle failed to meet "emission cut points" (indicating allowed levels of emitted pollutants) established by the Department of Transportation (DOT) or another emission control requirement established by it under the bill. If a vehicle subject to testing had not been tested within the previous 12 months, the prospective seller of it would have to have it tested and have necessary repairs completed before offering it for sale.

The Department of State, upon receipt of documentation from the transportation department, could suspend the registration of any vehicle that was not in compliance with the bill's provisions and rules promulgated under it and for which a certificate of compliance had not been obtained. Further, the department could not renew the

registration of a vehicle subject to the bill's provisions unless the vehicle had been inspected and a certificate of compliance or certificate of waiver had been issued.

A certificate of waiver would have to be issued for a motor vehicle that failed an initial inspection and a subsequent reinspection if the actual cost of maintenance already performed (that was intended to bring the vehicle into compliance with clean air standards in accordance with the inspection report) was at least \$200, adjusted in January of each year according to inflation. The costs covered by a vehicle warranty and those needed to repair or replace any emission control equipment that had been removed, dismantled, tampered with, misfueled or otherwise rendered inoperative could not be considered in determining eligibility for a certificate of waiver. Certificates of waiver would have to be available at each public inspection station.

Owners of vehicles subject to a transient IM240 emission test (that is, of those built in 1981 or later) could apply to the department for a certificate of waiver after failing an initial inspection and a subsequent reinspection even though the \$200 limit for maintenance already performed had not been met. The department would have to perform a complete, documented physical and functional diagnosis and inspection, and if this showed that no additional emission-related repairs were needed, or that the vehicle presented "prohibitive inspection problems" or was "inappropriate for inspection," the department could issue a certificate of waiver. Issuance of a certificate of waiver would be conditioned, however, upon meeting criteria established by EPA regulations. A temporary certificate of waiver, which would be valid for no more than 15 days, could be issued for a vehicle to allow time for necessary maintenance and reinspection, but could not be issued more than twice for the same vehicle.

A certificate of compliance/waiver that was issued under the bill would be valid for two years.

Program implementation dates. The vehicle inspection program would have to be implemented according to the following schedule:

* By January 1, 1995, in the counties of Wayne, Oakland and Macomb;

* By July 1, 1995, in the counties of Livingston, Monroe, St. Clair, Washtenaw, Kent, Ottawa and Muskegon;

* After January 1, 1996, in counties that contained areas newly designated by the U.S. EPA as moderate, serious, severe or extreme nonattainment areas that had not previously been subject to a VEIM program, by January 1 of the year following that designation; and

* By January 1, 2000, in counties that contained areas designated by the EPA pursuant to the Clean Air Act as nonattainment areas for ozone that were not classified as moderate, serious, severe or extreme nonattainment areas.

The transportation department, in consultation with the Department of Natural Resources (DNR), could determine by rule whether the vehicle inspection program (proposed to begin January 1, 2000, in counties designated by the EPA as nonattainment areas for ozone) needed to be implemented earlier in order to protect the "health and environment of the [state's] citizens" and to meet the Clean Air Act's requirements. Any area in the state that was redesignated by the EPA as being in attainment with the national ambient air quality standards for ozone and carbon monoxide and had demonstrated maintenance of the standards without a VEIM program would be exempt from the bill's requirements. However, if the maintenance plan for any such redesignated area as approved by the EPA included an inspection and maintenance program as part of its contingency plan, the bill's provisions would apply.

Judicial relief. The bill specifies that the state would retain the ability to pursue judicial relief, either alone or in cooperation with other states, from the bill's requirements or penalties imposed by the Clean Air Act or regulations promulgated under it.

Inspection fees, requirements. The transportation department, in consultation with the Department of State, could establish an inspection fee not exceeding \$30 that would be indexed to inflation. In establishing the fee or other funding source, the department would have to include the direct and indirect costs of the vehicle emissions inspection, estimated start-up costs, estimated cost for a public information program, administration and oversight by the department, and enforcement costs by the Department of State.

The fee, if established, would be paid by the motor vehicle owner to the operator of the inspection station at the time of an initial inspection. A vehicle presented for initial inspection after the expiration of its vehicle registration date would be subject to an additional delinquency charge of \$10 for each calendar month or part of one after the expiration, not to exceed \$50. By the fifteenth day of each month, each inspection station would have to remit the amount of every inspection fee and delinquency charge collected for the preceding month to the Department of Treasury for deposit into a special fund that would be created by the bill.

Initial inspections would have to be done within six months before expiration of a vehicle's registration, or before a certificate of compliance, time extension or certificate of waiver issued under the bill had expired. Vehicles subject to the bill that did not have to be registered in Michigan would have to be presented for inspection during each biennial inspection period at a time set by the transportation department.

VEIM Fund. The bill would establish the Vehicle Emissions Inspection and Maintenance Fund that would be maintained by the transportation department as a separate fund in the state treasury. Money received and collected for vehicle emissions inspections and for delinquency charges would have to be deposited into the state treasury and credited to the fund. Money in the fund would have to be appropriated by the legislature for the following purposes:

- * A public education program to be conducted by the transportation department;
- * Start-up costs required to implement requirements of the VEIM program;
- * Administration and oversight of the program by the department;
- * Enforcement of the program through the vehicle registration process by the Department of State;
- * Reimbursement of inspection station operators for inspections performed; and
- * Other activities related to the program.

Funds remaining in the VEIM Fund created by Public Act 83 of 1980 (which the bill would repeal) would be transferred to the VEIM Fund that would be created by the bill. These funds would have to be made available for appropriation to the department for start-up costs to implement the VEIM program, to conduct a public information program to educate the general public about the

bill's requirements, and for various other duties it would have under the bill.

Exempt vehicles. The following vehicles would be exempt from the bill's inspection requirements:

- * Motor vehicles that were exempted by rules promulgated by the department because of prohibitive inspection problems or inappropriateness for inspection;
- * Motor vehicles that were manufactured before the 1975 model year;
- * Vehicles that had been licensed as historic vehicles under the Michigan Vehicle Code;
- * Motor vehicles that had as their only fuel source an "alternative fuel," which would mean compressed natural gas, diesel fuel, electric power, propane or any other source as defined by rule promulgated by the department;
- * Motorcycles;
- * Motor vehicles used by DOT for covert monitoring of inspection facilities; and
- * A new motor vehicle immediately after issuance of its first title, until the year of the next biennial inspection for the vehicle model year, as specified in the bill.

Public inspection stations. The transportation department would have to contract with a private entity or entities for the design, construction, equipment, establishment, maintenance and operation of public inspection stations to conduct vehicle emissions inspections, and would have to seek to obtain the highest quality service for the lowest cost through a competitive evaluation process for contractors. The department would have to provide adequate public notice of the requests for proposals by advertising in a newspaper of general circulation in the state not later than the bill's effective date. In addition, it would have to award a contract with reasonable promptness by written notice to the responsible offeror whose proposal had been evaluated and was determined to be the most advantageous to the state, considering the bill's requirements and rules promulgated under it or as otherwise required by the Department of Management and Budget.

The director (presumably, the director of the Department of Transportation) would have to give balanced consideration during the contractor evaluation process to the following factors:

- * The public convenience of an inspection station, including "the provisions for average mileage to an inspection station" and the waiting time at a station;

- * The unit cost per inspection;
- * The degree of technical content of the proposal, including test-accuracy specifications and quality of testing services, and the data and methodology used to prepare the network design and other technological aspects of the proposal;
- * A contractor's experience and the probability of his or her successful performance, including an evaluation of the capacity, resources and technical and management skills to adequately construct, equip, operate and maintain a sufficient number of stations to meet public demand; and
- * A contractor's financial stability. The department could make reasonable inquiries to determine an offeror's financial stability, and if an offeror failed to promptly supply information related to such inquiries it would be grounds for a determination of nonresponsibility relative to that offeror.

A contract authorized under the bill would have to contain 1) the minimum requirements for adequate staff, equipment, management and hours of operation of inspection stations, 2) the submission of reports and documentation concerning the operation of official inspection stations as required by the bill, and 3) surveillance by the Department of State Police to ensure compliance with vehicle emissions standards, procedures, rules, regulations and laws.

The number and locations of inspection stations would have to provide convenient service for motorists and be consistent with the following:

- * The network of stations would have to be sufficient to assure short driving distances and to assure that waiting times to get a vehicle inspected did not exceed 15 minutes more than four times a month;
- * When there were more than four vehicles in a queue waiting to be tested, spare lanes would have to be opened and additional staff employed to reduce wait times;
- * People would not have to make appointments for vehicle inspections;
- * There would have to be adequate queuing space for each inspection lane at each inspection station to accommodate, on the station property, all motor vehicles that awaited inspection; and
- * At least two inspection stations would have to be located within each county subject to a VEIM program under the bill.

Each public inspection station would have to furnish, upon failure of a vehicle to pass inspection,

a written inspection report listing each reason that the vehicle failed the inspection, and a notice that stated, "A vehicle's failure to pass the emissions inspection may be related to a malfunction covered under warranty."

Inspection stations would have to inspect and reinspect motor vehicles in accordance with the bill and rules promulgated under it by the department. An inspection station would have to issue a certificate of compliance for a vehicle that had been inspected and was shown to be in compliance with the department's standards and criteria. If a certificate of compliance was not issued, the station would have to provide a written inspection report describing why and, if appropriate, the repairs needed or likely to be needed to bring the vehicle into compliance with the standards and criteria.

Recommendations for low- or fixed-income persons.

The transportation department would have to develop recommendations on how low-income or fixed-income persons could comply with the bill's requirements. The recommendations would have to include, but not be limited to, equity with other vehicle owners, loss of transportation for low-income workers, consideration of extended time limits for such persons to comply with the bill, compliance with federal law and regulations, and a vehicle scrappage program for vehicles owned by these persons. The recommendations would have to be reported to the "House [of Representatives] and Senate standing committees on transportation" by September 1, 1993.

Administrative duties. The Department of Transportation, either directly or by contract, would have to implement continuing education programs to begin six months before a VEIM program began in a county. An education program would have to consist of a component designed to educate the general public about the VEIM program and a component to inform those who would perform maintenance tasks as specified in the bill. The department would have to institute procedures and mechanisms to protect the public from fraud and abuse by inspectors, mechanics and others involved in the program, including a process in which a vehicle owner could contest the results of an inspection. Mechanisms and programs designed to protect whistleblowers, to follow up on complaints made by the public or others involved in the inspection/maintenance process, and to assist owners in obtaining warranty-covered repairs for

eligible vehicles that failed a test would also have to be established.

The department would have to evaluate, inspect and provide quality assurance for the VEIM program to ensure proper and accurate emission inspection results, and would be responsible for issuing certificates of waiver and time extensions. The department would have to evaluate costs, effectiveness and benefits of the program, and would have to compile data on failure rate, compliance rate, the number of certificates issued and similar information. The department would have to make an annual report on the operation of program to the standing committees of the legislature that primarily addressed public health and environmental issues by January 1, 1995, and annually thereafter.

In addition, the department, in consultation with the DNR and Department of State, could promulgate rules for the administration of the VEIM program which would have to include at least the following criteria:

- * Standards for public inspection station equipment, including emission testing equipment;
- * Emission test cut points and other emission control requirements based on the Clean Air Act and the state implementation plan;
- * Exemptions from inspections as would be granted by the bill;
- * Standards and procedures for the issuance of certificates of compliance/waiver from VEIM program requirements; and
- * Rules to ensure that owners of vehicles registered in the state who temporarily lived outside of the state were not unduly inconvenienced by the bill's provisions, which could include 1) reciprocal agreements with other states that had similar requirements, and 2) provision for time extensions of not more than two years for persons that temporarily lived in another state, the District of Columbia or a U.S. territory with which Michigan had not entered into a reciprocal agreement for vehicle emissions inspection/maintenance.

Other provisions, penalties. A contractor could not issue a certificate of compliance for a vehicle that had not been inspected and had not met or exceeded emission cut points established by the department. Someone who violated this provision or forged, counterfeited or altered an inspection certificate or who knowingly possessed an unauthorized certificate would be guilty of a

misdemeanor and could be imprisoned for up to one year or fined up to \$1,000; each violation would constitute a separate offense.

An employee, owner or operator of a public inspection station could not furnish information, except that provided by the state, about the name or other description of a repair facility or other place where maintenance could be obtained. The department would have to develop guidelines for providing this information in cooperation with the Department of State, and would have to provide them to the House and Senate standing committees that dealt with transportation matters before January 1, 1995. In addition, a person could not do any of the following:

- * Tamper with a motor vehicle that had been certified to be in compliance with the bill or rules promulgated under it so that the vehicle was no longer in compliance. Under the bill, however, "tampering" would not include alterations made to a vehicle by MDOT employees for purposes of monitoring and enforcing the bill.
- * Provide false information to a public inspection station or the department about estimated or actual repair costs or repairs needed to bring a vehicle into compliance.
- * Claim an amount spent for repair if the repairs had not been made or the amount was not spent.

A person who violated any of these provisions would be guilty of a misdemeanor. Someone who drove a vehicle in violation of the bill or rules promulgated under it would be subject to a civil fine of up to \$500, where each violation would constitute a separate offense.

Repeal. Public Act 83 of 1980, which established a vehicle emissions inspection and maintenance program in the tri-county metropolitan Detroit area, would be repealed effective January 1, 1994.

FISCAL IMPLICATIONS:

According to the Department of Transportation, the bill would not affect state or local budget expenditures as the cost for developing, implementing and maintaining the Vehicle Emissions Inspection/Maintenance Program that would be required under the bill would be paid for from inspection fees proposed in the bill, as well as from funds accumulated in the existing VEIM Fund created by Public Act 83 of 1980. The department, however, says that failure to enact the bill before

November 15 of this year could result in the loss to Michigan of up to \$500 million in federal transportation money as a result of sanctions that could be imposed by the U.S. EPA. Moreover, if a VEIM program were not adopted by January 1, 1995, in the nonattainment areas specified in the bill (in the counties of Wayne, Oakland, Macomb, Livingston, Monroe, St. Clair, Washtenaw, Kent, Ottawa and Muskegon), the local economies in these areas could be damaged in two ways: First, the EPA could require stationary sources of pollution (industries) that were located there to reduce the amounts of emissions they produce by half in order to bring the areas into compliance with EPA standards for air quality; and second, industrial development in the areas could be reduced or prohibited altogether in order to bring them into compliance with air quality standards. (7-6-93)

ARGUMENTS:

For:

Because of changes made to the Clean Air Act (CAA) in 1990, certain states are required to put in place vehicle emissions inspection/maintenance programs that will more likely reduce "ground level ozone" pollutants (resulting when vehicle emissions combine with heat and sunlight) than would other programs. Enhanced VEIM programs must be implemented and in operation early enough to bring certain areas of the state that have been designated by the U.S. EPA as being "non-attainment" areas into compliance with targeted levels for air pollution by 1996. Essentially, the CAA calls for a 15 percent reduction in levels of air pollution in these areas; in order to meet this requirement a "centralized" VEIM program (referred to in the bill as a "test-only network") will have to be implemented in the non-attainment areas. The centralized program, which is currently operating in at least one other state and will be implemented in a number of others, is believed to be more effective at containing or reducing vehicle emissions than decentralized programs. (The program currently operating in the tri-county Detroit area is a decentralized program--meaning that both inspections and repairs may be performed at the same location, and any licensed repair facility may perform both functions.) As it is expected that the goal for a 15 percent reduction in air pollution levels produced by both mobile and stationary sources cannot be met as things currently stand, either in the Detroit-area counties or in the other seven non-attainment counties in Michigan, the EPA--pursuant to its authority under the CAA--

requires the enhanced VEIM program to be implemented in those areas.

To comply with CAA requirements, states must adopt enabling legislation providing for enhanced programs to be implemented in the affected counties before November 15 of this year, and at least 30 percent of the vehicles in those areas will have to be tested by January 1, 1995. Failure to meet these deadlines could leave Michigan open to federal sanctions, which could include the withholding of up to half a billion dollars in federal transportation funds. Further, EPA could require industries within the affected areas to cut their emissions by up to half to offset what otherwise would be reduced by having a VEIM program, and could prevent any new development there until the area was brought into compliance. Simply put, the state faces severe economic sanctions if it refuses or otherwise fails to implement enhanced programs in its nonattainment areas, which itself is good enough reason to enact the bill. Ultimately, however, the threat that ground level ozone (i.e., "smog") presents to the health of citizens living in the affected areas and to the state's environment demands that action be taken to reduce a major source of this air pollution problem--toxic vehicle emissions caused when emission control devices on cars and trucks are inadequately maintained, or are neglected, modified or otherwise tampered with.

Against:

A number of arguments can be made against the general thrust of the bill, as well as specific provisions within it:

* Simply adopting an enhanced VEIM program for various counties in the state will not guarantee that they or the state will meet the 15 percent reduction in pollution levels required to be met by 1996 under the Clean Air Act. Will the state be sanctioned later by the federal government if, after complying with CAA requirements, it fails to meet the reduction goals established in the CAA? Furthermore, as economic growth increases and population centers expand into the suburbs and countryside, this growth brings with it an increase in "vehicle miles traveled." This state, or any state intent on encouraging economic growth no matter what the cost, cannot expect to contain or reduce air pollution in future years simply by "monitoring" the sources of that pollution, without also encouraging--perhaps even requiring--its citizens to change their lifestyles (i.e., limit their use of

automobiles). The state would have a much better chance of meeting the 15 percent reduction in air pollution levels by 1996 if more people simply used public transportation or car-pooled to get somewhere rather than driving alone. Of course, federal, state and local governments would have to increase what they spend on public transportation, and encourage people to use such a system, before individuals would even consider changing bad habits so that overall vehicle miles travelled can be reduced and air pollution levels lowered.

* Reportedly, the three counties of Wayne, Oakland and Macomb have recently applied to the EPA to be reviewed for redesignation regarding their status as non-attainment areas as air pollution levels there apparently are lower now than they were only a few years ago. Before any new requirements are adopted or implemented for vehicle testing in these areas, the results of that application should be reviewed to determine whether these counties are, in fact, still non-attainment areas. But the fact that air pollution levels in these areas seem to have abated in recent years argues against the need for the bill. Some people argue that as newer vehicles, which are more fuel efficient and have better emissions-control devices, are purchased and driven air pollution levels will necessarily be reduced.

* Moving from a decentralized testing program to a centralized, "test-only" program could be economically devastating to many of the service stations and auto repair shops that currently provide both inspections and repairs in the Detroit area.

* Much of the air pollution present in the counties of Ottawa and Muskegon reportedly did not originate there but was transported via air currents over Lake Michigan from the Chicago area. Is it fair to subject vehicle owners in these areas to vehicle inspections, and to the costs of those inspections, when they are not the primary source of the air pollution problems in their own counties? In effect, the citizens of these areas will be forced under the bill (ultimately, by the EPA pursuant to the CAA) to pay for the inability of other cities and states to limit the amount of air pollution they produce and to keep what they produce from being transported to other regions.

* An earlier version of the bill (Substitute H-1) would provide for Medicaid recipients to receive grants for paying for repairs that might be needed if their cars failed to pass an inspection. People on

Medicaid are more likely to be driving older vehicles and, in most cases, probably could not afford to keep them maintained to the standards required in the bill. Under the substitute reported by the House Transportation Committee, MDOT would merely have to develop recommendations for how low- and fixed-income persons could comply with the bill's provisions. Nothing in the bill guarantees that low-income people will be able to pay to have their vehicles brought up to EPA standards regarding vehicle emissions.

POSITIONS:

The East Michigan Environmental Action Council strongly supports the bill. (7-7-93)

The Michigan Chemical Council supports the bill. (7-6-93)

The Michigan State Chamber of Commerce supports the bill. (7-6-93)

The Michigan Manufacturers Association supports the bill. (7-6-93)

The American Lung Association of Michigan supports the bill. (7-6-93)

The Michigan Environmental Council, which represents 23 environmental groups in Michigan, supports the bill. (7-7-93)

The Sierra Club, Mackinac Chapter, supports the bill. (7-7-93)

The Southeast Michigan Council of Governments (SEMCOG) supports the bill. (7-7-93)

The American Automobile Manufacturers Association (which represents the so-called "Big Three" auto companies--General Motors Corporation, Ford Motor Company, and Chrysler Corporation) supports the bill. (7-6-93)

The Department of Transportation generally supports the bill, but has not yet reviewed Substitute H-2 reported by the House Transportation Committee, and so has not yet taken an official position. (7-6-93)

The Automotive Service Association of Michigan, Inc., which represents over 800 independent auto repair shops in the state, opposes the adoption of a

centralized vehicle inspection program as proposed in the bill. (7-7-93)

The Monroe County Board of Commissioners opposes the bill. (6-29-93)

Muskegon County opposes the bill. (7-7-93)

The Detroit Automobile Dealers Association opposes the bill. (7-9-93)

The Service Station Dealers Association of Michigan opposes the bill. (7-9-93)