

SB 5702 Public Hearing February 12, 2020
Oral Testimony by Bill Erickson

Thank you for the opportunity to provide comments today. My name is Bill Erickson and I've been operating Ericson's Automotive in Lake Oswego for the past 30 years. For the past 3 years, my shop has been testing vehicles on the agency's behalf so my customers don't have to drive out of their way and wait in line at a DEQ Clean Air Station. It's called the DEQ Too™ program and the agency doesn't compensate me and I don't charge my customers a penny – yet DEQ still gets its full fee from the customers. Even though we hardly see any vehicles that fail the test, it is good for my business because it attracts new clients daily. However, I do have concerns over DEQ.

I submitted similar comments to the 2019 Legislature and it's my understanding the fee increase was not approved by Legislature at that time - which was a good decision. Unfortunately, just a couple of weeks ago I learned that DEQ went ahead and adopted the fee anyway and it might go into effect on April 1st. The fee increase was never well publicized by DEQ and they didn't even use the word "fee" in the title of their rulemaking. I *still* haven't heard a peep about this directly from the agency and as their official testing partners they should have at least sent an email to the DEQ Too businesses.

The fee increase should not apply to my customers or other motorists that use DEQ Too because it's actually saving DEQ money. But the agency contends that the DEQ Too test approach doesn't have a high enough volume so it doesn't generate enough revenue to cover its costs. Well I contend that it's *my* shop that is spending money on my technicians doing the work. It's not costing DEQ much, if anything, since they aren't using their inspectors. Also, DEQ has no problem tacking on a 20% surcharge when it costs them more to test at an auto dealership's location and they provide a 60% discount to self-testing fleet businesses because DEQ inspectors aren't doing the actual work. So DEQ should be consistent and provide a discounted fee for DEQ Too testing.

The other interesting part of DEQ's response is how the DEQ Too test approach doesn't have high enough volume. Well most people don't even know this approach exists because DEQ has only promoted it 1 time in the last 4 years! DEQ has wonderful videos describing the program but doesn't regularly get the word out via social media. The agency doesn't even mention DEQ Too on its main website and the VIP website only provides a location map of DEQ's publicly run 6 Clean Air Stations in Portland, It doesn't list the other 120 other private locations to test. If I had a particular approach in my shop that had such potential to help my bottom line, I would be advertising it as much as possible. Instead it seems as if DEQ prefers to keep steering motorists to their own stations instead of encouraging them to try this new money-saving approach. DEQ should be proud of its efficient and convenient program and tout it! Just like we are proud of it and tout it!

And finally, I know that Vancouver, Washington recently closed its VIP program because newer cars rarely fail the test anymore. Since Oregon is continuing the program, before letting DEQ raise its fee – I think they ought to at least look into how Washington was able to charge such a low fee. We should evaluate whether my customers and other motorists can get the same \$15 deal instead of DEQ's proposed \$25 fee.

Thank you.