



**ATTENTION: Official Inspection Stations, Quality Assurance Officers,
and Pennsylvania State Police**

BI18-01

Vehicle Inspection Division Bulletin

March 2018

**TOPICS IN THIS BULLETIN: Policy Statement on LED Lighting
Sticker Security
Pulsating Stop Lamps**

PennDOT has been asked by certified safety inspectors on how they should apply pre-existing safe lighting requirements to Light Emitting Diode (LED) light fixtures now being used on motor vehicles. PennDOT's Bureau of Motor Vehicles (BMV) and the legislated Inspection Advisory Board (IAB) have been researching this subject for quite some time. Currently, there is no federal guidance on this issue. The current, Pennsylvania inspection regulations were promulgated before LED lighting existed and require replacement of the light assembly if a bulb is not functioning. We have historically treated LED lighting the same as all other traditional lighting under the regulations, so if one diode is out, the whole light assembly would be replaced. This treatment of LED lighting led to feedback from certified safety inspectors that the loss of one or even several diodes did not create a safety concern because the light's remaining diodes were sufficiently bright for safety purposes. Because current safety inspection regulations do not specifically address LEDs, PennDOT is addressing the issue by policy.

POLICY STATEMENT

PennDOT's policy regarding LED lighting is to allow its certified and authorized safety inspection technicians who perform vehicle safety inspections to exercise their discretion and to pass or fail LED light fixtures based on the technicians' determination of whether the fixture emits sufficient light to be safe. In making their safety determination, technicians would be required under the existing regulations to fail a fixture when none of the diodes are working, and the Department recommends against passing a fixture when more than half (50%) of the diodes are not working. The 50% threshold was suggested by the IAB based on its members' knowledge of and experience with LED fixtures.

It should be noted that law enforcement could interpret the regulations differently.

We believe this policy is reasonable and would not unduly burden vehicle owners by requiring what could be seen as unnecessary repairs to LED fixtures that are down a few diodes but the light fixture still emits sufficient light to be safe as determined by a certified safety inspector.

STICKER SECURITY MEASURES

The Department recently discovered a potential scam involving counterfeit certificates of inspection. Vehicle owners are approaching stations with a small piece of alleged replacement glass with a sticker attached claiming they had a new windshield installed and need a new sticker. The sticker attached to the piece of windshield is counterfeit, resulting in the vehicle owner getting a new valid certificate of inspection for a vehicle that hasn't had the proper safety inspection completed. If approached by a vehicle owner requesting a replacement sticker, it is recommended you ask for the receipt from the windshield replacement company, to verify the windshield was replaced. Attached you will find a fact sheet detailing some of the security features found on a legitimate certificate of inspection. If you suspect the sticker in your possession is counterfeit, please contact your Quality Assurance Officer and Law Enforcement immediately.

PULSATING STOP LAMPS

The Vehicle Inspection Division receives inquiries regarding passenger cars and light trucks that have pulsating stop lamps. Federal Motor Vehicle Safety Standard No. 108 requires stop lamps to be steady burning. For safety inspection purposes a stop lamp that is not steady burning would be rejectable under 175.80 (a)(9): Check the lamps and lenses and Reject if one or more of the following apply(i) An exterior bulb or sealed beam, if originally equipped or installed, fails to light properly, except ornamental lights.

If you have any questions, please contact the Vehicle Inspection Division at (717) 787-2895.

Anita M. Wasko, Director
Bureau of Motor Vehicles

Kay E. Kishbaugh, Chief
Vehicle Inspection Division



Inspection Sticker Security Features

Inside Stickers:

- Two distinct holographic colors in the background design
- Wide-Angle movement on the circle. When the viewing angle is changed, the elements appear to move in and out
- Two different matte areas in the PennDOT logo, viewable from any angle
- Roadway lines in the background switch from dark to light and back when viewed from left and from right
- 3D Relief effect in the “dot” of the Keystone
- Serial numbering to the right of decal printed vertically
- Pattern destruction of printing upon removal, leaving behind a diamond pattern

Outside Sticker:

- Portrait layout, serial numbering on bottom of decal
- Decal destructs upon removal leaving behind a “VOID” pattern