

**MEMORANDUM**

TO: Pamela Watkins, Rules Administrator, Ohio Department of Public Safety

FROM: Sydney King, Regulatory Policy Advocate

DATE: August 28, 2014

RE: **CSI Review – Self-Assembled Motor Vehicle Inspections (OAC 4501-33-01 through 4501-33-06)**

On behalf of Lt. Governor Mary Taylor, and pursuant to the authority granted to the Common Sense Initiative (CSI) Office under Ohio Revised Code (ORC) section 107.54, the CSI Office has reviewed the abovementioned administrative rule package and associated Business Impact Analysis (BIA). This memo represents the CSI Office's comments to the Agency as provided for in ORC 107.54.

Analysis

This rule package consists of four no-change and two amended rules proposed by the Ohio Department of Public Safety (ODPS). The rules were reviewed as a five-year rule review as required by ORC 119.032. The draft rules were submitted to the CSI Office on June 26, 2014 with the comment period ending on July 10, 2014.

The rules regulate self-assembled motor vehicle inspections. Self-assembled motor vehicles are required to be inspected by the State Highway Patrol. The rules provide the requirements for the application, inspection, documents to be presented at the time of inspection, and the identification of component parts used to build the vehicle or to rebuild or repair a salvage vehicle.

ODPS describes a detailed stakeholder outreach for the draft rules in the BIA. Various industry members were contacted to provide feedback. The BIA indicates no feedback was provided during stakeholder outreach. No comments were received during the CSI public comment period.

The BIA identifies any business that builds a motor vehicle from component parts or salvage title vehicles as the impacted industry. The expected adverse impact is the cost to maintain documents required for inspection and the fifty-dollar inspection receipt fee. The receipt fee is established

pursuant to ORC Section 4505.111. The rules are necessary to ensure that no stolen parts are used in the assembly of the vehicles.

Upon review of the proposed rules and BIA, the CSI Office determined that the rules satisfactorily meet the standards espoused by the CSI Office, and the purpose of the rules justifies the adverse impact identified in the BIA.

Recommendations

For the reasons discussed above, the CSI Office does not have any recommendations for this rule package.

Conclusion

Based on the above comments, the CSI Office concludes that the Ohio Department of Public Safety should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.

cc: Mark Hamlin, Lt. Governor's Office