SB 5702 Public Hearing February 12, 2020 Testimony by Mike Christopherson

Thank you for providing this opportunity to comment on DEQ's fee increase. My name is Mike Christopherson and I own and operate Pro Tek Automotive in Portland. My colleague, Bill Erickson, owner of Erickson's Automotive in Lake Oswego, could not be here in person today, but I've submitted his written testimony and he's asked me to verbally cover his topics as I also make my remarks. Bill has been in business for 30 years and I've been in business for 12 years.

We are both among the first participants in the DEQ Too^{TM} program of which there are now almost 200 business participants. For the past three years, we've been testing vehicles on the agency's behalf so our customers don't have to drive out of their way and wait in line at a DEQ Clean Air Station. It's been a good partnership and we've helped a lot of customers get through their tests. However, we now have some concerns about DEQ's proposed fee.

First, we have not heard any announcement about this fee increase directly from DEQ. This is especially surprising since DEQ has our email addresses and we conduct tests on their behalf. If this is supposed to start on April 1, we should have at least heard something from DEQ by now as there are forms we need to change and our customers will need to be aware that the DEQ fee has gone up.

Second, while increasing the fee to \$25 may not seem like much, we've had quite a few customers over the years come to us from across the river in Vancouver for service and they only pay \$15 to pass Washington's emissions test which is very similar to Oregon's. Before DEQ raises its fee – we think they ought to at least look into how Washington was able to charge such a low fee.

Third, the fee increase should not apply to our customers or other motorists that use DEQ Too because it's actually saving DEQ money. 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 we contend that it's our shops that are spending money on our technicians doing the work. It's not costing DEQ much, if anything, since they aren't using their inspectors. Besides, charging a lower fee because it costs less is something DEQ already does. In DEQ's self-testing fleet program DEQ only charges a fee of \$10 because it doesn't use its inspectors. Well dealerships are not using DEQ inspectors when using their DEQ Too testing device on their fleet of inventory– nor are we using inspectors when we test at our shops. So the agency should be consistent and provide a similar discounted fee for all DEQ Too testing – just like for self-testing fleets.

And finally, there are thousands upon thousands of more motorists that could bring their vehicles to DEQ Too locations instead of taking up the time and staff and DEO stations – which will help keep DEO's fees stay low. For example, we have motorists trying to test at our shops at times other than just during vehicle renewal - like they just moved into DEQ's Portland test boundary from Salem to Portland and a test is required. There is no reason for DEQ to force these types of customers to go the DEQ stations. We conduct the exact same test as DEQ so it would be the same outcome for the vehicle. DEQ could also get thousands of more motorists to use DEQ Too if they'd promote the program more. DEQ has only promoted it 1 time in the last 4 years! We realize it's our responsibility as shops to advertise, and we do - Pro Tek actually made a TV commercial about DEQ Too. But DEQ should be doing its part too. They have wonderful videos describing the program but they aren't regularly getting the word out via social media. The agency doesn't even mention DEQ Too on its main website and the primary VIP website only provides a test locations map of its own testing locations, not our shops. If Bill or I had a particular approach in our shop that had such potential to help our bottom line, we 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!