



SVAO's Response to the MTO's Proposed Draft Light-Duty Inspection Standards

The Specialty Vehicle Association of Ontario appreciates the opportunity to forward its comments on these proposed changes to MTO's light-duty inspection standards. The SVAO strives to be the voice of the specialty vehicle community in its dealings with the provincial and municipal governments within Ontario.

The SVAO circulated the proposed changes to its members and asked them to either respond directly to the Ministry through its link or to forward comments to us and we would combine them in a submission. Thus the following is a compilation of these comments. Most members thought the idea of up grading the standards was a positive step but there were some concerns with some of the suggestions and / or the wording.

- **Floor Repairs** - As many antique and classic vehicles have a full frame, a number of comments were received on the proposal to ban flame weld repairs to the floor area. Most understood the application of the proposed change to uni-body vehicles but felt that flame welded floors should be allowed on full framed vehicles. In fact, a few master welders commented that a properly done flame weld was stronger than a comparable MIG / TIG weld. Perhaps further thought could be given to this area?

- **Test Drives and Plating** - How does an inspecting technician go about performing a road test on a vehicle which is brought in unplated and seeking a certification? Does this mean that all inspection stations must have a dealer plate?

- **OEM or Equivalent Standards** – A good deal of comments were generated as to how easily technicians will be able to access this information. If they can't readily check this information, then will it get done?

- **Window Tint, Ride Heights, Lamp Height, etc** - While many agreed with the need for better standards, they also questioned how it could be checked in a cost effective manner.

- **Brakes Pulsation** - Some concern was expressed as to whether this was really needed and to the fact that this could lead to overselling of brake rotors and / or drums. A number of members expressed their opinions that slight pulsation had no adverse effects on braking distances.

- **ABS and ESC** – The general feeling was that while these were worthwhile extras, there are plenty of vehicles safely on the road without them, so why are they being considered as being mandatory for a safety inspection. More possible overselling and costs to the consumer?

- **Cost of Inspections** - It appeared to many who reviewed these proposals that there would have to be a significant rise in consumer costs of these inspections to allow for time to research OEM standards as well as record all of the data.

All of the above discussion points are offered back to the MTO with the hope that due consideration can be done before any new rules and regulations are cast into stone.

The SVAO is interested in promoting safety within the old car hobby without causing any undue hardships to those involved with the preservation of our automotive history. We are always available for consultation in that regard with any of the government ministries about changes to policies that could adversely affect the hobby.

Sincerely yours,

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