



Republic of the Philippines  
**DEPARTMENT OF TRANSPORTATION**

**OCT 07 2024**

**BERNARDO S. CHANG, JR.**  
*Chairman*

**Private Emission Testing Center Owner's  
Association (PETCOA)**

No. 3 Roxas Street, Beltran Subdivision,  
Bo. Luz, Limay, Bataan  
(047) 244 - 8064 / 0933 816 - 3913  
[petcoa.inc@yahoo.com/](mailto:petcoa.inc@yahoo.com)  
[petcoa.region3@gmail.com](mailto:petcoa.region3@gmail.com)

Dear **Mr. Chang Jr.:**

This refers to your *letter* dated 22 July 2024,<sup>1</sup> following up on your comments and recommendations to the proposed *Department Order (D.O.)* on the Pilot Study for Mandatory Vehicle Inspection Test (Pilot Study) thru your organization's previous *letters*.<sup>2</sup>

Please know that we greatly appreciate your initiative and persistence in bringing these matters to our attention given your organization's valuable contribution in ensuring viability, effectiveness, and practicality of the proposed regulations. Rest assured that the undersigned PETC-PMVIC Authorization Committee duly considered your inputs and have incorporated the same as part of our recommendation to the Secretary.

As you may know, the main objective of the Pilot Study on Mandatory Vehicle Inspection is the promotion of overall inspection of motor vehicles to ensure roadworthiness and safety of these vehicles. Further to this objective is the main purpose of the Pilot Study which is data collection on roadworthiness testing. Kindly note that historical data from previous years would be inconclusive as inspection tests during said time frame were rendered non-mandatory in nature. In line with your organization's suggestion, the AC agrees that data from the conduct of the Pilot Study should ensure the smooth transition to roadworthiness testing.

Please note that the Pilot Study will be conducted under current guidelines, in which specifications and standards on full automation of inspection tests for PMVICs are being monitored and ensured.

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<sup>1</sup> PETCOA letter dated 22 July 2024, received 05 August 2024.

<sup>2</sup> PETCOA letter dated 11 March 2024, and 22 March 2024.

Moreover, we likewise note that through the proposed D.O., the Department adopts a definition on roadworthiness, in relation to *Republic Act (R.A.) Nos. 4136 and 8749*, which provides a standard of roadworthiness for purposes of motor vehicle inspection. Mandated inspection tests through the proposed D.O., parallel to that required under prevailing guidelines,<sup>3</sup> are likewise incorporated to ensure compliance with minimum vehicle safety standards.

Kindly note that motor vehicle inspection tests being mandated during pendency of the Pilot Study shall be required across all classification of vehicles (i.e. motorcycles, light vehicles and heavy vehicles), including trucks, buses and all classes of public utility vehicles. It is important to note that heavy vehicles, which necessarily includes trucks and buses, are likewise subjected to the same inspection standards to be conducted by LTO, albeit ensuring emission compliance will be through Private Emission Testing Centers (PETCs). Please note that provisions on PUVs and TNVS are likewise incorporated in the proposed D.O.

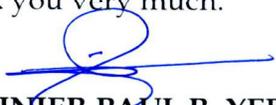
The Department likewise ensures that all motor vehicle inspections through both PMVICs and PETCs from affected regions of the Pilot Study shall be closely examined through PETC & PMVIC monitoring systems currently in place.

Further, equally important to highlight as the AC likewise agrees, is the importance of preparation and information-dissemination in the implementation of the Pilot Study. Rest assured that the Department shall likewise ensure the smooth execution of the Pilot Study taking into account concerns raised from various stakeholders such as your organization, as well as relevant agencies, such as DTI and DENR.<sup>4</sup> Kindly note that ensuring overall roadworthiness of vehicles is within the Department and LTO's authority to enforce.

Rest assured that other concerns raised by your organization from your previous letters were duly addressed and will likewise be applied in the implementation of the Pilot Study.

We greatly appreciate your feedback on the matter. Rest assured that this Department is actively reviewing input and recommendations from stakeholders and revisiting existing guidelines to enhance the proposed regulations.

Thank you very much.

  
**ATTY. REINIER PAUL R. YEBRA**  
*Undersecretary for Legal Affairs, DOTr*  
*Chairperson, PETC/PMVIC*  
*Authorization Committee*

  
**JESUS FERDINAND D. ORTEGA**  
*Undersecretary for Road Transport and*  
*Infrastructure, DOTr*  
*Co-Chairperson, PETC/PMVIC*  
*Authorization Committee*

<sup>3</sup> D.O. No. 2023-008, among others.

<sup>4</sup> Letters Request for Comments to DTI and DENR, attached as Annex " \_".

**ATTY. VIGOR D. MENDOZA II**  
*LTO Assistant Secretary &*  
*Member, PETC/PMVIC Authorization*  
*Committee*

**JAMES ANDRES B. MELAD**  
*Assistant Secretary for Road Transport*  
*and Infrastructure, DOTr*  
*Member, PETC/PMVIC Authorization*  
*Committee*



No. 3 Roxas Street, Beltran Subdivision, Bo. Luz, Limay, Bataan  
Telephone No. (047) 244-8064 CP No. 0933-8163913  
Email address: [petcoa.inc@yahoo.com](mailto:petcoa.inc@yahoo.com) / [petcoa.region3@gmail.com](mailto:petcoa.region3@gmail.com)

LAND TRANSPORTATION OFFICE  
AUG 05 2024  
RECEIVED BY: *Wedy 2:49 PM*  
OFFICE OF THE EXECUTIVE DIRECTOR

July 22, 2024

**Atty. Reinier Paul R. Yebra**  
**Undersecretary for Legal Affairs**  
Chairperson, PMVIC PETC Authorization Committee  
Department of Transportation  
PRIMEX Towers EDSA,  
San Juan City, NCR  
[rr.yebra@dotr.gov.ph](mailto:rr.yebra@dotr.gov.ph)  
[oula@dotr.gov.ph](mailto:oula@dotr.gov.ph)

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FOR LEGAL AFFAIRS & PROCUREMENT  
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BY: *JUN BRIONES 3:55*

**Subject: Follow Up on the PETCOA's Comments & Recommendations on the Proposed Department Order for Mandatory Vehicle Inspection Tests On Selected Pilot Areas**

Dear Usec. Atty. Yebra:

Respectfully, we would like to inquire on the response of PETC PMVIC AC's solicitation of comments from PETCOA, on the proposed mandatory PMVIC testing in selected pilot areas. Our comments and recommendations in two (2) separate letters dated 11<sup>th</sup> and 22<sup>nd</sup> of March 2024 were submitted to your Office on those dates via your email address, but until now we have not received any official feedbacks, hence this follow-up letter.

PETCOA would be interested to know the PETC PMVIC AC's response on issues raised, particularly the following:

- (a.) The definition of roadworthiness and the standards of determining roadworthiness. In the letters, we have cited international roadworthiness standard, existing local standards, and localized PUV standards that have yet to be developed, in determining MV safety inspection that can be adopted by DOTr; Also mentioned is the required participation of different local agencies in developing the said standards;
- (b.) The reduction of inspection items in the proposed Department Order in contrast with DO 2023-008, that would render roadworthiness testing half-baked and null;

(c.) The prioritization of trucks, buses, and all class of public utility vehicles in roadworthiness testing as envisioned by RA 8749, instead of concentrating on the 4-wheeled private vehicles and motorcycles that are the current focus of the PMVIC program;

(d.) The development of a strong system-based anti-fraud monitoring that will pre-empt any attempts on data manipulation and non-appearance testing, before any implementation of mandatory test in pilot areas.

(e.) The national I/M (inspection and maintenance) program enshrined in Section 21-d of RA 8749 "Philippine Clean Air Act of 1999" and its IRR under Section 3.2.3 of the DENR DAO No. 2000-82 "Air Quality Action Plan" that calls for MVIS capacity building and gradual transition for public acceptance, preparations that are crucial for the success of roadworthiness program, be seriously taken into consideration.

(f.) The use of historical data from 2021 up to the current period, to analyze issues encountered, find corrective interventions and regulatory recommendations for a legal and smooth acceptance of roadworthiness testing.

Additionally, we also have not seen a serious and extensive public consultation on the proposed department order, such as the motorists and/or motor vehicle owners, public utility vehicle operators, advocates of clean air and road safety, who all stand to be affected by the intended motor vehicle inspection.

We hope that this query into DOTr PETC PMVIC AC's response to PETCOA's comments and recommendations will receive your favorable consideration.

Respectfully yours,



**BERNARDO S. CHANG, JR.**  
*Chairman, PETCOA*

cc: **Atty. Vigor D. Mendoza II**  
*Assistant Secretary, Land Transportation Office*  
*Vice Chairperson, PETC/PMVIC Monitoring Committee*

**James Andres B. Melad**  
*Assistant Secretary for Road Transport & Infrastructure*  
*Member, PETC/PMVIC Monitoring Committee*

*ASEC FOR ROAD*  
*8/5/24 3:46pm*  
*ALYSA MARINER*

## Comments & Recommendations on the Proposed D.O for MVIT on Selected Pilot Areas

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From: PETC OWNERS (petcoa.inc@yahoo.com)

To: rr.yebra@dotr.gov.ph; oula@dotr.gov.ph

Cc: james.melad@dotr.gov.ph; oasec\_central@lto.gov.ph; bschangjr@yahoo.com

Date: Tuesday, July 23, 2024 at 10:17 AM GMT+8

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Dear Sirs,

Submitting herewith our follow up letter for the above subject.

Thank you for your prompt attention to this matter.

PETCOA



Letter to Atty. Yebra- Follow up on PETCOAs Comments - Proposed D.O for Mandatory Implementation...rev2.pdf  
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