



Republic of the Philippines  
Department of Transportation  
**LAND TRANSPORTATION OFFICE**

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August 1, 2025

**BERNARDO S. CHANG, JR.**

*Chairman, PETCOA*

No. 3 Roxas St. Beltran Subd. Bo. Luz,  
Limay, Bataan

**SUBJECT : REQUEST TO RESCIND LTO MEMORANDUM NO.  
VDM-062025-10 AND IMPLEMENT UNIFORM  
ROADWORTHINESS STANDARDS BASED ON UN ECE  
REGULATIONS**

Dear Mr. Chang:

This refers to your letter dated 4 July 2025 expressing concerns regarding LTO Memorandum No. VDM-062025-10, issued on 30 June 2025.

Your letter highlights several points, including potential operational limitations imposed by the current memoranda, concerns regarding the scope and safety of inspection procedures that seemingly restrict the capacity of LTO district and extension offices, discrepancies with UN ECE Regulations, and employing a biased preference for PMVICs.

In response, we wish to assure you that the Land Transportation Office (LTO) remains committed to upholding the principles of transparency, efficiency, and fairness in all regulatory activities.

LTO Memorandum No. VDM-062025-10 was issued to address the prevalent practice of poorly conducted vehicle inspections and “non-appearance” transactions, ensuring that no vehicle bypasses basic safety checks. It reiterates the visual inspection processes outlined in the memorandum dated 28 October 2021. Contrary to some interpretations, these memoranda do not limit vehicle capacity at LTO District or Extension Offices. Rather, they reinforce the need for bona fide manual and visual roadworthiness inspections based on accepted safety standards.

As established, PETCs conduct emissions tests only and do not perform roadworthiness inspections. Therefore, vehicles tested at PETCs must still undergo manual/visual inspection at LTO. In contrast, vehicles inspected at PMVICs—where both emissions and roadworthiness are assessed—need not be re-inspected at LTO. While LTO offices may lack advanced equipment for undercarriage inspections, inspectors are expected to identify observable defects to the best of their ability. This approach, though limited, adds a vital layer of safety.

Although the Philippines has acceded to the 1958 UNECE agreement on vehicle type approval, it has not joined the 1997 agreement which concerns the adoption of uniform conditions for periodic technical inspections of vehicles. This does not mean global standards are ignored; many advanced nations have not acceded either. The memoranda reflect international best practices adapted to local conditions.

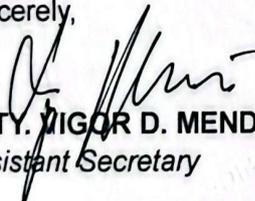
More importantly, the perception of biased preference toward PMVICs and the Agency's apparent disregard for the scope and safety of inspection procedures should not be sustained. Issuance of LTO Memorandum No. VDM-062025-10 implies that vehicles tested at PETCs receive the necessary roadworthiness checks at LTO. In areas without PMVICs, PETCs remain vital for emissions testing, and LTO provides the complementary safety inspection. This continuity ensures equitable access to safe vehicle registration nationwide.

Disregarding the prescribed checklist and inspection duration would effectively mean bypassing the established procedures. As the authority responsible for motor vehicle registration, LTO's foremost concern is to ensure the safety of the public, motorists, and pedestrians alike. Reiterating the guidelines outlined in the LTO Memorandum dated 28 October 2021 is a crucial step toward achieving this goal.

We acknowledge PETC owners' concerns but emphasize that the memoranda do not impose new burdens on PETCs nor invalidate their operations. PETCs remain essential partners in emission control, especially in underserved regions.

We hope we have sufficiently addressed your concerns. We appreciate PETCOA's active engagement and dedication to road safety.

Sincerely,

  
**ATTY. MIGOR D. MENDOZA II**  
*Assistant Secretary*



Copy furnished:

**Hon. Vivencio B. Dizon**  
*Secretary, DOTr*

**Atty. Jonathan B. Ronulo**  
*Undersecretary for Legal Affairs*

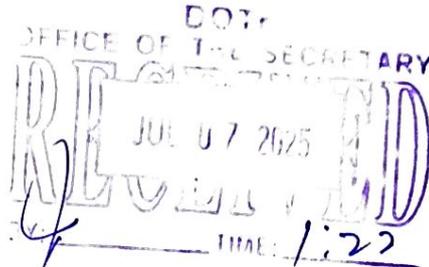
**Ramon G. Reyes**  
*Undersecretary for Road Transport & Non-Infrastructure*

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

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July 04, 2025

**HON. VIVENCIO B. DIZON**  
Secretary  
Department of Transportation (DOTr)  
9F Floor, PRIMEX Towers  
EDSA corner Connecticut St.  
San Juan City



**Subject: Request to Rescind LTO Memorandum No. VDM-062025-10 and Implement Uniform Roadworthiness Standards Based on UN ECE Regulations**

Dear Secretary,

The Private Emission Testing Center Owners' Association (PETCOA), through its officers and members, wishes to bring to your attention **LTO Memorandum No. VDM-062025-10**, dated June 30, 2025. This memorandum, among other directives, mandates LTO Motor Vehicle (MV) inspectors to strictly adhere to the inspection points, items, and duration previously outlined in LTO Memorandum dated October 28, 2021, under threat of sanction.

For your convenience, both aforementioned memoranda are attached to this letter.

As you may be aware, these LTO memoranda appear to be designed to significantly limit the capacity of LTO district and extension offices for the required re-inspection of motor vehicles that have already undergone testing at a Private Emission Testing Center (PETC). Specifically, LTO Memorandum dated October 28, 2021, restricts these offices to accommodating only twelve (12) units per eight (8) work-hours.

This severe limitation forces motorists who utilize PETCs to endure prolonged waiting periods for re-inspection at LTO offices, or to return on a different day. This bottleneck creates excessive queues in the registration renewal process, effectively undermining the public-service convenience that the LTO is mandated to provide and reducing the process to a state of triviality.

The clear intent and consequence of these memoranda is to divert motorists away from PETCs towards Private Motor Vehicle Inspection Centers (PMVICs). While PMVICs offer similar emission testing services, they are notably exempt from the re-inspection requirement at LTO district or extension offices. This regulatory framework unjustifiably creates an undue preference for PMVICs over PETCs, despite both offering essential emission services.

The visual inspection processes, items, and duration outlined in the LTO Memorandum dated October 28, 2021, are also highly questionable and contentious, based on the following grounds:

- 1. Road Test Requirements and Inspector Qualifications:** The memorandum requires LTO inspectors to operate the motor vehicle for a certain distance (i.e., a road test) to assess brake and speed performance. This clearly exceeds the scope of a "visual inspection."

Furthermore, not all LTO inspectors possess the necessary professional driver's licenses or specialized training to accurately and professionally evaluate brake and speed performance. Due to this inadequacy, such brake and speed performance inspections cannot be properly or reliably conducted within LTO district or extension offices.

2. **Below-carriage Inspection Feasibility and Safety:** The directive for LTO inspectors to examine the vehicle's under-chassis (below-carriage) is problematic. These inspectors are neither professionally knowledgeable nor adequately equipped with essential tools like crawler devices and tappers, which are necessary to properly inspect ball joints or identify loose nuts and bolts. Performing under-chassis inspections without a dedicated pit is also inherently dirty and dangerous, exposing inspectors to potential oil and chemical leaks. This practice necessitates special clothing and Personal Protective Equipment (PPE), which are not typically provided by LTO.
3. **Inconsistent Inspection Duration Standards:** The forty (40) minute duration allocated for visual inspection, if intended as a standard, should be equally applied to PMVIC visual inspections. A visual inspection for roadworthiness conducted at an LTO district or extension office should not differ from one performed at a PMVIC. We are perplexed by the double standard evident in these LTO Memoranda, where the 40-minute inspection duration is not mandated for PMVICs.
4. According to DOTr Department Order 2023-008, 'PETC PMVIC Guidelines,' PMVIC inspection activities are bifurcated into 'visual inspection' and 'automated equipment inspection.' Given that PMVIC visual inspections are manual and necessitate a thorough visual assessment, it is only logical that the LTO's established norm of a 40-minute visual inspection duration should similarly apply to PMVICs.
5. However, data from the LTO Motor Vehicle Inspection Division (MID) indicates that some individual PMVICs report inspecting over 200 vehicles in a single day. If the integrity and authenticity of PMVIC activities are to be trusted, this high volume strongly suggests that the actual visual inspection duration at PMVICs is significantly shorter than the prescribed LTO standard. This discrepancy leads us to conclude that the aforementioned LTO memoranda, which seemingly favor PMVICs, may be predicated on a false premise regarding consistent inspection standards and thoroughness across all authorized centers.
6. Even assuming, for the sake of argument, that the forty (40) minute duration covering sixty-one (61) inspection points/items is appropriate for cars and light trucks, these sixty-one points are not fully applicable to motorcycles and 3-wheeled vehicles. DOTr Department Order 2023-008 explicitly differentiates inspection items across vehicle types, stipulating only thirteen (13) items for motorcycle inspections.
7. Therefore, if the 40-minute duration for 61 items is considered accurate, a proportional calculation suggests that the inspection of only thirteen (13) items for motorcycles should logically take approximately eight (8) minutes. The current blanket application of a more extensive and time-consuming inspection standard to motorcycles & 3-wheeled vehicles is thus disproportionate and inefficient, or outrightly untrue.
8. **Senate Findings on the Lack of Motor Vehicle Inspection Standard:** The 18th Congress Senate Committee Report No. 184, dated February 24, 2021, explicitly detailed the confusion and widespread complaints among motorists stemming from the haphazard and arbitrary implementation of the DOTr's PMVIC program, specifically citing a glaring lack of a clear motor vehicle inspection standard. Regrettably, this critical issue remains unresolved. The challenged LTO Memorandum dated October 28, 2021, further exacerbates the problem by failing to provide the essential inspection standards upon which LTO inspectors are to base their pass/fail judgments.

9. **International Roadworthiness Inspection Standard:** The Philippines, as an active participant in WP.29 – the United Nations' arm for automotive standards harmonization – has no need to 'reinvent the wheel' regarding international roadworthiness inspection standards. DOTr/LTO can readily access and adopt UN ECE publications on roadworthiness inspection standards, and subsequently implement these across LTO, PMVIC, and PETC inspections. Adopting these UN ECE regulations would not only significantly upgrade the LTO's roadworthiness inspection standards but also effectively address the deficiencies highlighted and recommended for improvement by the 18th Congress Senate findings.
10. **Lack of Uniformity and Disparity in Implementation:** The memorandum fosters inconsistency across the country, as not all regions have access to PMVICs, and implementation mechanisms differ at the regional and district levels. PETCs remain more widespread and accessible, especially in far-flung provinces. Forcing uniform compliance with a PMVIC-centric model imposes undue burden on vehicle owners in underserved areas and contradicts the principle of equal access to public services.
11. **Questionable Legal Basis:** The memorandum lacks a clear legal and regulatory foundation for preferring one inspection modality over another. It also exceeds the LTO's administrative authority by effectively overriding the equal recognition granted to PETCs and PMVICs under existing DOTr and LTO issuances. Regulatory instruments must not go beyond enabling statutes or parent department policies, or they risk being invalid for being *ultra vires*.
12. **Consumer Protection and Choice:** By creating a de facto monopoly favoring PMVICs, the policy undermines consumer choice and raises serious competition concerns. It limits motorists' ability to select service providers and may lead to unchecked pricing practices. In contrast, the coexistence of PETCs and PMVICs encourages healthy competition and more efficient service delivery.
13. **Economic Impact on Small Businesses:** PETCs are mostly small-to-medium enterprises that have long complied with LTO guidelines and have invested in periodic upgrades and training. The memorandum's implementation jeopardizes the viability of hundreds of PETCs nationwide, resulting in job losses, stranded investments, and the erosion of long-standing public-private partnerships with the LTO.
14. **Violation of Due Process and Absence of Stakeholder Consultation:** There was no meaningful consultation with key stakeholders, including PETCOA, before the issuance of the memorandum. This contravenes the principles of transparency, accountability, and participatory governance under the Administrative Code of 1987 and undermines stakeholder confidence in LTO policymaking.
15. **Poor Cost-Benefit Justification:** The memorandum fails to provide empirical justification or cost-benefit analysis demonstrating why the PMVIC model alone ensures superior roadworthiness. Independent studies have shown that UN ECE-based standards, regardless of testing modality, yield better outcomes when properly enforced and monitored. It is therefore more logical to pursue standard harmonization, not institutional favoritism.
16. **Misalignment with International Standards:** The current memorandum appears to implement an inspection system that is not harmonized with UN ECE vehicle inspection standards, as recognized by the 1958 and 1997 Agreements under the UN framework. Alignment with these protocols would modernize the LTO's inspection system, improve international credibility, and ensure objective and verifiable safety benchmarks.
17. **Erosion of Public Confidence:** The apparent arbitrariness of the LTO memorandum has sown confusion and distrust among motorists and inspection center operators alike. This loss of confidence undermines the LTO's mission to ensure safe roads and regulatory fairness.

Public perception of bias and inconsistency can be more damaging than technical gaps in policy.

In light of the concerns detailed above, it is clear that LTO Memorandum No. VDM-062025-10, which implements the LTO Memorandum of October 28, 2021, is **impractical, lacks basis in globally accepted inspection protocols, will cause confusion amongst motorists, creates regulatory uncertainty, and widens the gap** in compliance enforcement among PETCs, PMVICs, and LTO offices. Moreover, the Memorandum appears to **unfairly favor PMVICs despite their limited accessibility nationwide**, resulting in unequal treatment of motorists, especially in provinces where PMVIC coverage is sparse or non-existent.

This policy also **contradicts the principle of equitable public service delivery and runs counter to the DOTr's mandate to promote transparency, competition, and consumer choice** in the delivery of regulatory function. Instead of fostering interoperability among all authorized inspection centers, it imposes a rigid and centralized framework that is **highly divisive, procedurally unclear, and devoid of empirical validation**.

We urge the DOTr to rescind LTO Memorandum Circular VDM-062025-10, as its implementation will **erode public trust, compromise operational consistency and exacerbate disparities** across the vehicle inspection network. A **re-evaluation in enforcement** would also allow a period of **public consultation and technical validation**.

The PETCOA is ready to engage in a constructive dialogue with both the DOTr and the LTO. Our aim is to collaborate on developing fair and widely acceptable solutions for motor vehicle roadworthiness, ensuring these solutions are grounded in established international inspection standards and institutional inclusiveness.

We look forward to your prompt response and the opportunity to discuss these critical matters further.

Respectfully yours,

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

cc: **Chief Justice Lucas P. Bersamin**  
Executive Secretary  
*Handwritten: by Manny Halon*  
**Senator Raffy T. Tulfo**  
Chairman - Committee on Public Services

*Handwritten: EARNI, allysa, 7/7/25, 11:37pm*

← **Mr. Ramon G. Reyes**  
DOTr - Undersecretary for Road Transport & Non-Infrastructure

**Atty. Jonathan B. Ronulo**  
DOTr - Undersecretary for Legal Affairs

**Atty. Vigor D. Mendoza II**  
LTO Assistant Secretary

**Office of the President**  
REPUBLIC OF THE PHILIPPINES

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OFFICE OF UNDERSECRETARY  
FOR ROAD TRANSPORT & NON-INFRASTRUCTURE



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DOTr Central Office - SGO

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*Handwritten: 1:27, 1:40*