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**STATE OF HAWAII**  
**DEPARTMENT OF TRANSPORTATION**  
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HONOLULU, HAWAII 96813-5097

February 9, 2021  
3:05 P.M.  
State Capitol, Teleconference

**S.B. 227**  
**RELATING TO MOTOR VEHICLE SUN SCREENING DEVICES**

Senate Committee on Transportation

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The Department of Transportation **opposes** S.B. 227 which repeals the provision requiring light transmittance of no less than 35% on side and rear windows of certain vehicles when using sun screening devices and glazing material, and exempts from the section the side windows of any motor vehicle, provided the vehicle is equipped with rearview mirrors on both sides.

We oppose this bill because it reduces the minimum light transmittance requirement for side windows, that are to the rear of the driver, and for rear windows and reduces driving visibility. Manufacturers install glazing with 70% light transmittance to comply with federal motor vehicle safety standards (FMVSS). The National Highway Traffic Safety Administration (NHTSA) based this level on extensive scientific research. Hawaii's law already compromises the standard by allowing 35% transmittance.

NHTSA is federally funded to assist states by doing research and setting safety standards for motor vehicle manufacturers who build the standards into every vehicle intended for use in this country. Having a single government agency responsible for the standards relieves the states of doing the research and promotes consistency and safety.

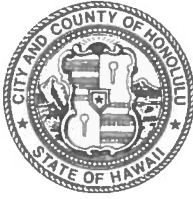
It is acknowledged that vehicles built on truck chassis (Sports utility vehicles and pickup trucks, for example) do not have restrictions on light transmittance for glazing behind the driver. In fact, some vehicles are designed with no windows behind the driver. Although these designs compromise visibility and safety, their functional value is given priority over whatever safety value is lost.

There is no functional value to be gained by reducing the light transmittance of glazing in vehicles designed for optimal driver visibility. Allowing darker tint for cosmetic purposes only compromises safety.

Thank you for the opportunity to provide testimony.

POLICE DEPARTMENT  
CITY AND COUNTY OF HONOLULU

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OUR REFERENCE

CT-LC

February 9, 2021

The Honorable Chris Lee, Chair  
and Members  
Committee on Transportation  
State Senate  
Hawaii State Capitol  
415 South Beretania Street, Room 224  
Honolulu, Hawaii 96813

Dear Chair Lee and Members:

SUBJECT: Senate Bill No. 227, Relating to Motor Vehicle Sun Screening Devices

I am Calvin Tong, Major of the Traffic Division of the Honolulu Police Department (HPD), City and County of Honolulu.

The HPD opposes Senate Bill No. 227, Relating to Motor Vehicle Sun Screening Devices.

The HPD opposes the proposal to repeal a provision requiring light transmittance of no less than 35 percent on the side and rear windows of certain vehicles using sun screening devices and glazing material. Light transmittance of anything less than 35 percent would pose a hazard for the driver and occupants of the vehicle. It impedes the vision of the driver even more so when encountering inclement weather. Lack of visibility during the night heightens the danger for the occupants of the vehicle and those that share the roadway with them. Eye contact with other drivers is key when approaching intersections or performing maneuvers that require hand signals or nonverbal communication with other drivers or pedestrians. Window tints less than 35 percent transmission would hinder this communication.

The HPD urges you to oppose Senate Bill No. 227, Relating to Motor Vehicle Sun Screening Devices, and we appreciate the committee's consideration of these concerns.

The Honorable Chris Lee, Chair  
and Members  
February 9, 2021  
Page 2

Thank you for the opportunity to testify.

Sincerely,



Calvin Tong, Major  
Traffic Division

APPROVED:



Susan Ballard  
Chief of Police

February 9, 2021

**Testimony of Tommy Silva  
In support of S.B. No. 227  
Relating to Motor Vehicle Sun Screening Devices.**

Good afternoon Senate Transportation Committee, Senators Dela Cruz, Chang, Keith-Agaran, Kidani and Wakai.

My name is Tommy Silva and I am the Founder & CEO of T&T Tinting Specialists, Inc. I want to testify in support of S.B. No. 227.

My company has been tinting vehicle windows in Hawaii since 1982 and I have 35 full-time employees working in two Honolulu locations. I have always been an advocate for safe & legal tinting standards, and I have testified at the Capitol dozens of times over the past 38 years in support of our current Hawaii State Tint Law and our current methods of enforcement through annual Vehicle Safety Inspection and HPD citations for violations found on the street.

Our current auto tint law has been on the books since July 13, 1983. It allows 35% (+/- 6%) Visible Light Transmittance for "Passenger Vehicles" windows (except for the front windshield), while windows rear of the driver on Pickup Trucks, Vans, SUV's and "Crossovers" (collectively called "MPV's" going forward) have been exempt from the ruling when the MPV is equipped with two side-view mirrors.

I fully support SB #227 because the current law is discriminatory against passenger vehicle owners and it is has been difficult to explain to passenger vehicle owners why they are not allowed to install window film as dark as they have on the rear windows of their MPV's. Our state allows the same "Type 3" driver's license to operate both Passenger Vehicles and MPV's, so it is illogical to have two different tint standards for these two categories of vehicles-- this bill clears this up.

Hawaii is not the first State to bring parity to Passenger Vehicle and MPV after-market window tinting... Passage of this bill will place Hawaii into the same status of other states who already allow the same level of after-market window tinting on Passenger Vehicles and MPV's such as California, Kentucky, Missouri, Montana, New Mexico, Arizona, Nevada, Oklahoma, Texas, Florida and Vermont.

I humbly request that you vote to pass this bill.

Respectfully Submitted,

*Tommy Silva,*  
CEO/President  
T&T Tinting Specialists, Inc.