



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF MOTOR VEHICLES
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January 1, 2012

Rhode Island State Senate
Special Senate Commission—Division of Motor Vehicles
c/o Senator Louis P. DiPalma
82 Smith Street, Room 318
Providence, RI 02903

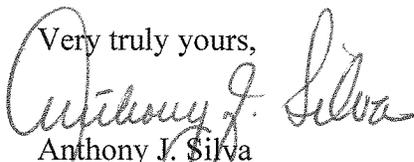
Dear Senator DiPalma:

The Division of Motor Vehicles (DMV) has completed, per your request, an analysis of the document entitled "Best Practices Guide for Improving Automated License Plate Reader Effectiveness through Uniform License Plate Design and Manufacture" issued by the American Association of Motor Vehicle Administrators (AAMVA).

As requested, the DMV conducted a thorough review of the first forty-two (42) pages, sections I – VI. This review includes a short summary of each section and a brief statement on suggestions/recommendations.

I look forward to discussing this document with you and the members of the Special Senate Commission. Please feel free to contact me at 401-462-5701 with questions or for additional information.

Very truly yours,


Anthony J. Silva
RIDMV Administrator

A Review of the
**“Best Practices Guide for Improving Automated License Plate Reader
Effectiveness through Uniform License Plate Design and Manufacture”**

Prepared by the
Rhode Island Division of Motor Vehicles (RIDMV)
January 1, 2012

The following comments/suggestions have been written to correlate with Sections I –VI.

Section 1: Problem Statement

Summary:

The business rules utilized by the RIDMV are consistent with the national standards for license plate formats that are necessary to maximize the efficiency and effectiveness of Automated License Plate Reader (ALPR) technology. Rhode Island acknowledges these best practices and the role of ALPR technology in improving police officer, traffic, and public safety as well as maximizing toll road and toll bridge revenue.

Rhode Island is compliant with the best practices as identified within the problem statement of the AAMVA report. Additionally, Rhode Island does not permit the following:

- The use of stacked characters on license plates
- The use of non-alpha/numeric characters
- The use of license plate covers, frames, and lighting (prohibited by law)

Rhode Island does have a requirement for the issuance and display of two license plates and also follows best practices for license plate design and manufacture. However, as discussed later, Rhode Island does allow for the same plate number to be issued for various types of plates (i.e. passenger, combination, etc.) which can cause misidentification.

Suggestion/Recommendation:

Continue to follow the current RIDMV business rules as recommended by AAMVA in accordance with industry best practices.

Section 2: License Plate History and Background

Summary:

As previously stated, Rhode Island does follow the best practices standard of issuing two license plates per vehicle.

Rhode Island currently produces license plates with raised (embossed) alpha/numeric characters. However, newer technology introduced in the late 1990's resulted in flat, digitally printed license plates which are now used in twenty-seven (27) states.

Although Rhode Island does not employ the newer technology, our license plates do meet the most important functions of a license plate as identified by AAMVA. These include:

- Display of information necessary for fast and accurate identification
- Display of information necessary to show compliance with motor vehicle registration laws
- Providing a margin of visibility and safety by use of a bright reflective surface of the plate

Currently, license plates must undergo testing to determine readability and reflectivity at a minimum distance of seventy-five (75) feet. All testing is completed independently by the Rhode Island State Police on new issuances of license plates to ensure compliance with best practices.

DMV has adopted standards for the issuance specialty plates. These prescribed procedures provide an orderly process to ensure and require a minimum of 900 pre-ordered plates prior to manufacture and distribution.

The license plate sheeting used in Rhode Island is glass bead reflection technology that is also used in all fifty (50) states.

Suggestion/Recommendation:

Rhode Island should consider digitally printed "flat" license plates. "Flat" technology permits the simultaneous printing of the graphic and the plate and provides for an expedited and efficient plate printing process. Plate orders can be processed (ordered) electronically and duplicate orders are virtually eliminated. Additionally, the plates are more visible from a camera perspective, i.e., license plate readers at bridge tolls, resulting in increased revenue. It should be noted, however, that the Rhode Island Police Chiefs Association has acknowledged that there are not any problems or issues with the readability of RI license plates at this time.

The decision to change plate type and production process should be thoroughly evaluated as to costs and benefits. The analysis should include the upfront capital costs for required

equipment to produce flat plates including the change in production costs per plate. This can be accomplished by obtaining true cost data through a RFP process through the Division of Purchasing.

Section 3: Fundamentals of Automated License Plate Readers (ALPR)

Summary:

The demand for ALPR systems will continue to increase in both law enforcement and commercial applications. Several police departments in Rhode Island are currently using plate readers and the same camera technology is used at toll bridges and red light intersections.

Suggestion/Recommendation:

Rhode Island should plan for continued demand and growth. Therefore, license plate design and manufacture should be prepared to meet the demand with this technology.

Section 4: Law Enforcement and Public Safety Benefits

Summary:

ALPR equipment has proven to be a major advancement in technology and has established itself as a benefit to the following:

- Officer safety
- Traffic safety
- Criminal investigation
- Public safety
- Homeland security

The explosion of new license plates designs across the country has made it almost impossible for instant visual recognition by law enforcement. As a result, the ALPR is likely to quickly become a popular and effective tool.

Suggestion/Recommendation:

As suggested by the AAMVA report, the ALPR technology has, among other things, become an important national security tool. It is recommended that Rhode Island continue to design and manufacture license plates in accordance with national best practices.

Section 5: Mobility and Revenue Loss

Summary:

Automatic License Plate Reader systems provide a benefit for toll collection on roads and bridges with a corresponding rise in revenue for highway maintenance and improvement. In addition, federal highway grants have allocated funding to Rhode Island in the form of a CVISN (Commercial Vehicle Information System Network) grant. Mobile and stationary (static) license plate readers will be purchased for law enforcement to monitor roadside compliance of commercial vehicles with federal and state regulations.

Suggestion/Recommendation:

It is recommended that Rhode Island continue to design and manufacture license plates in accordance with national best practices that will support Automatic License Plate Reader systems and improved compliance. The second phase of the RIMS technology project includes accommodations for this enforcement aspect. The estimated \$2.5 million CVISN grant is expected to fund the necessary changes to the DMV system to track commercial vehicles. This would require an amendment to the HP contract or a new vendor after completion of phase I of the RIMS project.

Section 6: Best Practices for License Plate Design & Manufacture

Summary:

Presently, there are no national standards that govern the design and manufacture of license plates. As a result, the effectiveness of license plate readers is limited with a corresponding effect on the improvement of highway and public safety.

Section 6 of the AAMVA report provides recommendations which are restricted to:

- The physical characteristics of license plates
- Information displayed on plates
- Placement of license plates on motor vehicles and trailers

Rhode Island meets or exceeds the recommendations contained within this section of the report including the following:

- Two license plates are issued for all passenger type vehicles and single unit trucks
- RI General law requires the display of plates in the front and rear when two plates are issued and the display of plates in the rear when one is issued
- RI General law prohibits license plate frames/covers from interfering with readability of plates

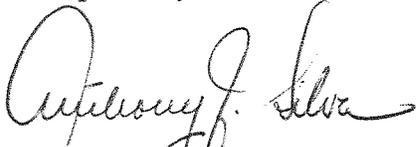
- License plates in Rhode Island are readable from distances of 75 feet in both daylight and darkness
- RI License plates meet the plate size standards and character sizing as recommended by AAMVA and utilize only alpha numeric characters (letters and numbers).
- Security features make Rhode Island's license plates difficult to duplicate

The AAMVA report recommends the same license plate number should not be used on multiple plates regardless of the plate type. (i.e., plate number 1234 should not be used on multiple plates). Rhode Island issues same license plate numbers to multiple plates and does not follow this recommendation.

Suggestion/Recommendation:

Rhode Island should continue to design and manufacture license plates in accordance with national best practices as outlined by the AAMVA report and should consider eliminating the longstanding practice of issuing the same license plate numbers to multiple plates. This could be accomplished over time, rather than recalling all duplicate plates by instituting an administrative process to prevent the new or reissuance of duplicate plates.

Respectfully Submitted,



Anthony J. Silva
Administrator