



STATE OF RHODE ISLAND

**DIVISION OF MOTOR VEHICLES
ADMINISTRATION OFFICE**

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March 4, 2025

The Honorable Robert E. Craven, Sr.
Chair, House Committee on Judiciary
State House
Providence, RI 02903

**RE: 2025 H-5660- AN ACT RELATING TO MOTOR AND OTHER VEHICLES
– CERTIFICATES OF TITLE AND SECURITY INTERESTS**

Dear Chair Craven:

The Division of Motor Vehicles ("DMV") writes to express concerns with and respectfully requests an amendment to House Bill 5660, An Act Relating to Motor and Other Vehicles-Certificates of Title and Security Interests.

The proposed bill would allow an owner of a motor vehicle to transfer ownership and registration of the vehicle on their death by a designation on the vehicle's certificate of title and require the DMV to amend its title forms to include the transfer-on-death language.

Although the proposed bill does provide that any transfer-on-death is subject to the rights of any lienholder, there are potential issues in the case of a vehicle with a lien. First, the lienholder actually possesses the title until the lien is paid off, thus making it exceptionally difficult, if not impossible, for the customer to make changes to the title during that time period. Second, the situation might arise where the designated beneficiary does not meet the credit worthy standards of the lienholder.

The proposed bill also has the potential to lead to testamentary disputes. Should the designated beneficiary on the vehicle's title pass away prior to the owner of the vehicle, the question arises as to whether the heirs of the beneficiary inherit the beneficiary's rights to the vehicle. Such matters might be more easily and efficiently addressed through a will or a trust.

Finally, implementation of the proposed change would require structural changes in the DMV's computer system, "RIMS", to add new fields which presently do not exist on the titles it prints. RIMS programming would also be required to track the designated beneficiaries as distinct customers in the system. This would be

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a major change that would require a substantial diversion of resources currently dedicated to developing enhanced online transaction capabilities. New title application forms would also need to be designed and printed. As such, the DMV respectfully requests an amendment to the bill's effective date from September 1, 2025, to one (1) year after passage.

The DMV looks forward to working with the sponsor going forward to draft revisions to the proposed bill that are mutually agreeable.

Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "Walter R. Craddock". The signature is fluid and cursive, with a prominent initial "W" and a long, sweeping underline.

Walter R. Craddock, Esq.,
Administrator

Cc: The Honorable Members of the House Committee on Judiciary
The Honorable Kathleen A. Fogarty
Nicole McCarty, Esquire, Chief Legal Counsel to the Speaker
Thomas A. Verdi, Director, Department of Revenue