



STATE OF RHODE ISLAND

DIVISION OF MOTOR VEHICLES
ADMINISTRATION OFFICE
600 New London Avenue
Cranston, RI 02920-3024
Phone: 401-462-4368
www.dmv.ri.gov

April 28, 2026

The Honorable Carol Hagan McEntee
Chair, House Committee on Judiciary
State House
Providence, RI 02903

**RE: 2026 H-8098 - AN ACT RELATING TO MOTOR AND OTHER VEHICLES –
SUPER SPEEDER ACCOUNTABILITY ACT**

Dear Chair McEntee:

The Division of Motor Vehicles (“DMV”) writes to express concerns with House Bill 8098, An Act Relating to Motor and Other Vehicles – Super Speeder Accountability Act.

The proposed bill would provide for the mandatory installation of Intelligent Speed Assistance (“ISA”) devices as a sentencing option or enhancement for drivers convicted of certain driving violations, including reckless driving and multiple moving offenses.

This letter is not intended as a position in support of or opposition to the bill, but only as recommendations on drafting to provide clarity in the bill and to aid in compliance by the DMV. As currently drafted, the bill is set to take effect upon passage. The concerns of the DMV are as follows:

- Caution should be exercised prior to mandating or rapidly deploying ISA systems. While the underlying objective of improving roadway safety is sound, ISA technology is not yet uniformly reliable across all driving environments. These systems depend heavily on accurate speed limit data, GPS precision, and real-time environmental interpretation. In practice, inconsistencies in digital mapping, temporary construction zones, weather interference, and poorly mapped roads can result in incorrect speed readings. A system that misidentifies speed limits or intervenes unpredictably could create confusion or even increase accidents rather than reduce them.
- Presently, there are only three jurisdictions which have enacted ISA legislation. The District of Columbia recently started their program. The State of Virginia passed legislation in 2025, with their program set to begin later this year. The State of Washington has also passed legislation for an ISA program, which is to commence in 2029. Rhode Island would be better

served by taking a deliberate approach and observing the experiences and lessons learned of these jurisdictions prior to enacting its own ISA legislation.

- On page 2 in the definitions section of the proposed bill, the Division of Motor Vehicles is incorrectly defined as “Department”, and that improper definition is repeatedly used in subsequent sections. Additionally, the duties and responsibilities of the DMV, as set forth in R.I. Gen. Laws § 31-2-1, are far more extensive than the functions listed in the definition.
- The proposed definition of “eligible offender” on page 2 contains multiple undefined terms, including “racing” and “reckless driving”. Such terms, and all violations which would qualify a motorist as an “eligible offender”, should be defined with references to specific statutory provisions, similar to how “aggressive driving” is defined in R.I. Gen. Laws § 31-27.1-3.
- The proposed definition of “eligible offender” also includes “a person who has been convicted of multiple moving offenses and is subject to the provisions of § 31-27-24.” While certain speeding violations are included on the list of what qualifies as a “moving violation” under § 31-27-24, there are numerous non-speeding violations also on that list. Theoretically, it is possible for a motorist to be subject to the provisions of § 31-27-24 without ever committing a speeding violation. Requiring such motorists to install and use an ISA device may not be the most effective and proper means to correct their behavior.
- It appears to be merely a scrivener’s error, but at the top of page 3, reference is made to “§ 31-27-34” regarding individuals convicted of multiple moving offenses. The correct section of the General Laws is § 31-27-24.
- On page 3, proposed § 31-27.2-4 contains references to ignition interlock device providers and installers. The reason for their inclusion in this bill is unclear, particularly given that the certification of ignition interlock systems is governed by Chapter 31-49 of the General Laws.
- On page 4, proposed § 31-27.2-6 contains penalties for noncompliance, but it is not clear whether those additional penalties may be imposed by the court, the DMV, or both. It should be noted that with respect to noncompliance with ignition interlock device requirements, the General Assembly removed the DMV’s authority to impose any penalties in 2016.
- Similarly, on page 5, it is required in proposed § 31-27.2-8 that “[d]ata related to violations involving tampering with, circumventing, or removing the ISA device shall be sent by notice to the [DMV] or the judge who ordered the installation of the device.” The proposed bill does not state, however, what the DMV is to do with any such report, as its authority (or lack thereof) with respect to noncompliance is not clear from the language of the section.

- On page 4, proposed § 31-27.2-6(d) states that “Non-restricted license reinstatement shall not occur until the user has satisfied the period of time required by the court or department to use the device . . .” Nothing in the proposed bill, however, authorizes the DMV (“department”) to order or require the use of an ISA device. That authority is left exclusively to the Rhode Island Traffic Tribunal and the District Court.
- The proposed § 31-27-2.9 requires the DMV to “submit an annual report to the governor, speaker of the house and the senate president summarizing program data, including recidivism rates, and user compliance.” The DMV would not, however, be the repository of this type of data. The courts which order the use of ISA devices would possess the data regarding recidivism rates and user compliance.
- As presently drafted, the proposed bill is set to take effect upon passage. Although the two devices serve entirely different functions, implementation of an ISA program is expected to be similar to that which was required when legislation requiring the use of ignition interlock devices was enacted. Modifications to the DMV’s computer system and code, as well as to its business processes will be required. The DMV will also need to work with its driver’s license vendor to add the new restriction to the license of individuals who are ordered to utilize an ISA device. Additionally, the proposed bill requires the DMV to draft and publish regulations governing the certification of ISA device providers and installers. As such, the DMV respectfully requests an amendment to the proposed bill to provide that it shall take effect eighteen (18) months after passage.
- R.I. Gen. Laws § 31-49-2 requires that all costs associated with the installation of an ignition interlock system shall be born by the individual who is ordered to install the system, and the DMV is to collect an administrative fee of one hundred dollars (\$100.00) from the person ordered to install the system. No such similar provision pertaining to ISA devices is found in the proposed bill.
- Finally, R.I. Gen. Laws § 31-27-2.8(i) authorizes the court, after making specific findings, to permit a person who is subject to an ignition interlock system requirement to operate a motor vehicle owned or provided by that person’s employer without an ignition interlock system installed in the course of their employment. No such similar provision pertaining to ISA devices is found in the proposed bill.

The DMV takes no position with respect to the remainder of the proposed bill. Rather, the DMV is concerned solely with issues of clarity, DMV compliance, and

The Honorable Carol Hagan McEntee
April 28, 2026
2026 H-8098
Page 4

DMV administration. As such, the DMV respectfully suggests that the bill be amended or redrafted for clarity.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Walter R. Craddock". The signature is fluid and cursive, with a large initial "W" and "C".

Walter R. Craddock, Esq.
Administrator

Cc: The Honorable Members of the House Committee on Judiciary
The Honorable Julie A. Casimiro
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House
Jane E. Cole, Interim Director, Department of Revenue