



STATE OF RHODE ISLAND

**DIVISION OF MOTOR VEHICLES
ADMINISTRATION OFFICE**

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May 10, 2022

The Honorable Kathleen A. Fogarty
Chair, House Committee on Special Legislation
State House
Providence, RI 02903

**RE: 2022 H-8197- AN ACT RELATING TO MOTOR AND OTHER VEHICLES
- REGISTRATION OF VEHICLES**

Dear Chairperson Fogarty:

The Division of Motor Vehicles ("DMV") writes to express concerns with House Bill 8197, An Act Relating to Motor and Other Vehicles-Registration of Vehicles.

The proposed bill would require the DMV to make available "Rhode Island Manufacturing Industry" license plates for anyone who owns a manufacturing business or who works in the manufacturing industry. As presently drafted, however, the terms "manufacturing business" and "manufacturing industry" are undefined and the proposed bill also has the potential to create significant confusion among plate types already issued by the DMV.

The DMV currently issues manufacturer plates for certain individuals involved in the manufacture of motor vehicles. Those plates, just as the plates proposed in the bill, contain the letters "MFG" displayed down the left side of the plate in all capital letters.

When making an application for manufacturer plates a manufacturer must, among other requirements, "submit proof of his or her status as a bona fide manufacturer . . . as may reasonably be required by the division of motor vehicles." R.I.G.L. § 31-3-23. Such proof is demonstrated with a manufacturer's license issued by the Division of Motor Vehicles.

To obtain a manufacturer's license one must be a "manufacturer". A "manufacturer" is generally defined for purposes of Title 31 as "every person engaged in the business of constructing or assembling vehicles required to be registered under chapters 3 – 9 of this title at an established place of business in this state." R.I.G.L. § 31-1-19 (h). "Manufacturer" is also defined in reference to specific Chapters of Title 31. See R.I.G.L. § 31-5.1-1 (8) (For purposes of

Chapter 31-5.1, "Manufacturer" means "any person, partnership, firm, association, corporation, or trust, resident or nonresident, who manufactures or assembles new motor vehicles, or imports for distribution through distributors of motor vehicles, or any partnership, firm, association, joint venture, corporation, or trust, resident or nonresident, which is controlled by the manufacturer.") and R.I.G.L. § 31-5.2-1 (7) (For purposes of Chapter 31-5.2, "Manufacturer" means "any person, partnership, firm, association, corporation, or trust, resident or nonresident, which is engaged in the business of manufacturing or assembling new motor vehicles, or which is engaged in the business of importing new motor vehicles which are manufactured or assembled outside of the United States.")

All definitions of "manufacturer" in Title 31 thus make it clear that a manufacturer's license may be issued only to manufacturers of motor vehicles. Therefore, manufacturers of motor vehicles are the only individuals who may obtain manufacturer license plates. In addition to the conflict with already existing plates, the proposed bill contains no such definitions. As drafted, the phrase "works in the manufacturing industry" is not defined or ascertainable. This ambiguity will result in difficulty in determining which individuals actually qualify for this special plate type.

As drafted, the proposed bill would essentially create a new plate type for industrial manufacturers. A new plate type for industrial manufacturers would necessarily need to be separate and distinct from the existing vehicle manufacturers plate. This would require DMV would have to expend significant time and resources, 180 development hours at a cost of \$35,000.00, to add the new plate to its computer system, RIMS. This includes development, coding, and thorough testing both internally and with our interface partners to ensure proper implementation. The creation of such a new plate type would also potentially open the door to other business or industries (e.g. restaurants, plumbing, electrical, etc.) to request their own special plate types.

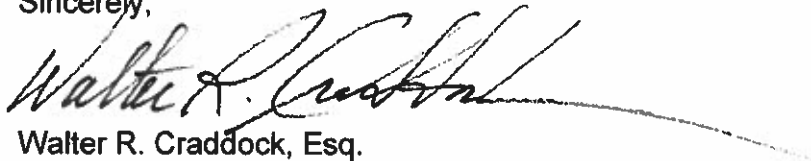
Finally, the DMV is making every effort to ensure that any new plate types conform to the license plate standards promulgated by the American Association of Motor Vehicle Administrators (AAMVA). This is important due to the recent proliferation of license plate readers for toll booths and other traffic control devices. AAMVA's most recent guidance on plate design indicates that license plate type identifiers (e.g. "Commercial", "Apportioned") should be placed at the bottom of the license plate between the bolt holes so as not to interfere with the identification of any of the characters. The proposed bill requires that the letters "MFG" be placed along the left side of the plate, in contravention of this standard, and again, in conflict with the existing motor vehicle manufacturer plates.

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The DMV looks forward to working with the sponsor to address these concerns and to allow for the continued administration of vehicle registrations in accordance with Rhode Island law.

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 long horizontal flourish extending to the right.

Walter R. Craddock, Esq.
Administrator

Cc: Honorable Julie A. Casimiro
Honorable Members of the House Committee on Special Legislation
Nicole McCarty, Chief Legal Counsel