



STATE OF RHODE ISLAND

**DIVISION OF MOTOR VEHICLES
ADMINISTRATION OFFICE**

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April 2, 2024

The Honorable Evan P. Shanley
Chair, House Committee on State Government and Elections
State House
Providence, RI 02903

**RE: 2024 H-8013- AN ACT RELATING TO MOTOR AND OTHER VEHICLES
– DEFINITIONS AND GENERAL CODE PROVISIONS**

Dear Chair Shanley:

The Division of Motor Vehicles ("DMV") writes to express strong concerns with House Bill 8013, An Act Relating to Motor and Other Vehicles-Definitions and General Code Provisions.

The proposed bill would prohibit any future registrations of "Kei" cars or trucks. More importantly, the proposed bill would ensure that any of these vehicles which were validly registered as of August 1, 2021, shall not be denied renewal of that registration based solely on the fact that the vehicle is a "Kei" vehicle. Those "Kei" vehicles which are permitted to remain registered would be restricted as to which types of public roadways on which they could be operated.

The vehicles in question are primarily mini-trucks manufactured for the Japanese market designated as "keijidosha" light weight vehicles. They can weigh up to 1,500 pounds and many of them are able to reach speeds of up to 75 m.p.h. These "Kei" vehicles were never manufactured in compliance with Federal Motor Vehicle Safety Standards (FMVSS). They are, however, permitted to be imported under federal law if they are over 25 years old. Despite that fact, federal law does not contain any determination that these vehicles are safe for use on the public highways, and their registration for such use is left to the individual states. In fact, the National Highway Traffic Safety Administration (NHTSA) has issued guidance which indicates that the mini-trucks are intended mainly for off-road use, such as on college campuses, farms and industrial plants. Additionally, the American Association of Motor Vehicle Administrators (AAMVA) has published best practices which warn that "Kei" cars and trucks should not be operated or registered for use on public roadways, regardless of age, unless the vehicle bears certification labels attesting to compliance with the applicable FMVSS.

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Based on these warnings, the DMV has made efforts over the last several years to prevent any additional registration of these vehicles and to recall any existing registrations. There are, however, a handful that still remain registered, and the proposed bill would restrain the DMV's ability to further eliminate unsafe vehicles from the public roadways of the state.

One final aspect of the "Kei" vehicles should be pointed out. Very often, these vehicles are referred to interchangeably with the low-speed vehicles ("LSVs"), which will be permitted to be legally registered in Rhode Island as of July 1, 2024. The LSVs contemplated by the new law, however, must comply with federal safety standards contained in the Code of Federal Regulations (CFR), and they are specifically defined in the CFR as having maximum speeds of no more than 20-25 m.p.h. Most of the "Kei" vehicles have maximum speeds of 60 or sometimes even 75 m.p.h. This speed potential, combined with their inherent unsafe design, present a danger to their occupants as well as other members of the public on Rhode Island's streets and highways.

Thank you for your consideration.

Sincerely,



Walter R. Craddock, Esq.
Administrator

Cc: The Honorable Members of the House Committee on State Government
and Elections
The Honorable Michelle E. McGaw
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House
Thomas A. Verdi, Director, Department of Revenue