



STATE OF RHODE ISLAND  
**DIVISION OF MOTOR VEHICLES**  
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April 7, 2026

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

**RE: 2026 H-7452 - AN ACT RELATING TO MOTOR AND OTHER VEHICLES  
– ELECTRONIC REGISTRATION AND TITLING**

Dear Chair Shanley:

The Division of Motor Vehicles (“DMV”) writes to express concerns with House Bill 7452, An Act Relating to Motor and Other Vehicles – Electronic Registration and Titling.

The proposed bill would, as set forth in its legislative explanation, “permit the implementation of a system of electronic registration and titling of motor vehicles” and require the DMV to promulgate rules and regulations for its implementation.

Electronic registration and titling are one of the many ways that promising new technology can be utilized to streamline DMV processes to better and more efficiently serve the public. The DMV fully supports the deployment of emerging technology and forward-looking programs such as those contained in the proposed bill. The DMV does have concerns, however, as to its ability to effectuate and administer the provisions of the bill as it is currently drafted.

Amongst the DMV’s concerns are as follows:

- The current language mandates that the DMV promulgate rules and regulations to implement the provisions of the proposed bill. The proposed bill should contain a statutory scheme which is sufficiently comprehensive to accomplish its goals without the immediate need for regulations to avoid potential delays to the start of the programs. The DMV should be authorized, but not mandated, to promulgate rules and regulations should they become necessary at a later date.
- “Business entities”, “financial institutions”, and their “service providers” are undefined terms, which could lead to ambiguity as to who is subject to the proposed bill’s mandates. These terms should be defined to provide clarity

The Honorable Evan P. Shanley  
April 7, 2026  
2026 H-7452  
Page 2


for both the users of these systems and the DMV in its administration and oversight.

- A thorough review and study of the interplay between the proposed bill and other relevant statutes, including Chapter 31-3.1, is needed to ensure the bill is administrable and operates as intended.
- The DMV should be allowed sufficient time for further testing and additional stakeholder input to avoid setbacks, increased costs, and/or loss of trust from stakeholders if the technology fails to perform as expected, especially if mandatory participation and use of each system by stakeholders is to be required by the bill.

The DMV looks forward to receiving such input and working with the sponsor as well as the stakeholders to address the issues raised in this letter.

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 Robert E. Craven, Sr.  
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House  
Jane E. Cole, Interim Director, Department of Revenue