



STATE OF RHODE ISLAND

**DIVISION OF MOTOR VEHICLES
ADMINISTRATION OFFICE**

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March 26, 2026

The Honorable Matthew L. LaMountain
Chair, Senate Committee on Judiciary
State House
Providence, RI 02903

**RE: 2026 S-2146 - AN ACT RELATING TO INSURANCE -- PEER-TO-PEER
CAR SHARING PROGRAM ACT**

Dear Chair LaMountain:

The Division of Motor Vehicles ("DMV") writes to express concerns with Senate Bill 2146, An Act Relating to Insurance-Peer-to-Peer Car Sharing Program Act.

The proposed bill would authorize and regulate peer-to-peer car sharing programs where motor vehicle owners make their vehicles available for others to operate. The regulatory framework for such programs would include provisions regarding insurance coverage during the vehicle sharing period, mandatory consumer protection disclosures, driver eligibility requirements, and limitations on the use of motor vehicles subject to safety recalls.

Peer-to-peer car sharing programs are another example of the creative ways 21st century technological innovations can be utilized to meet the transportation needs of the modern world and economy. The DMV supports such innovations provided the appropriate regulatory framework is in place to ensure their use is not detrimental to public safety.

The current language of the proposed bill raises questions as to how peer-to-peer car sharing programs will ensure that only safe and eligible drivers would be able to participate. While individuals would be required to hold a driver's license that authorizes them to operate vehicles of the class of the shared vehicle, there is no requirement that the programs verify the status of those licenses with the issuing state, only allow drivers to operate vehicles in accordance with the endorsements and restrictions contained on their licenses, or remove a driver's ability to participate in the program if their license is suspended or revoked. A significant concern is how these programs would prohibit a driver who has an ignition interlock device restriction on their license from operating vehicles where such devices are not installed.

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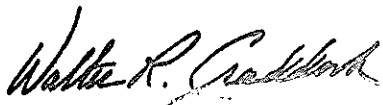
The current language of the proposed bill also raises questions as to how peer-to-peer car sharing programs will ensure that only safe and eligible motor vehicles would be shared. While vehicles would be ineligible for the program if they are the subject of a safety recall, there is no requirement that the programs verify the status of the registration of the vehicles with the issuing state or remove vehicles from the program if their registrations are suspended or revoked. Vehicles that have failed safety inspections or have had their registrations suspended for the owner's failure to maintain insurance should not be operated on the roadways by anyone, let alone unsuspecting third parties.

Finally, it is unclear if peer-to-peer car sharing programs and/or shared vehicle owners would be required to obtain a Rhode Island Lease/Rental Motor Vehicle License. Current law requires such a license for any person, firm, or corporation who rents or leases more than five (5) motor vehicles in any one year. The applicability provision in proposed section 27-8.4-2 dictates that the provisions of the proposed bill supersede any conflicting or contradictory provision of law; however, it is uncertain if the current lease/rental license requirement in fact conflicts with the proposed bill. Specific language should be added to clarify if such a license is required for these programs and their participating vehicle owners, and, if they are, the requirements for the licenses to the extent they would differ from current requirements.

The DMV reiterates its commitment to supporting the use of new transportation technological innovations. We look forward to working with you to draft amended language that creates a regulatory framework for peer-to-peer car sharing programs that balances the State's need to foster an environment for technological innovation with its duty to maintain the safety of Rhode Island's roadways.

Thank you for your consideration.

Sincerely,



Walter R. Craddock, Esq.
Administrator

Cc: The Honorable Members of the Senate Committee on Judiciary
The Honorable Hanna M. Gallo
Kristen Silvia, Deputy Chief of Staff/Director of Legislation
Jane E. Cole, Interim Director, Department of Revenue