



Robert F. O’Koniewski, Esq.

Executive Vice President

MEMORANDUM

TO: Rep. James Arciero, House Chair, Joint Committee on Transportation
Sen. Brendan Crighton, Senate Chair, Joint Committee on Transportation

CC: Joint Committee on Transportation Members

FR: Robert O’Koniewski, Esq.

DT: May 13, 2025

RE: **House 3603 (Rep Arciero) and Senate 2360 (Sen Cronin): *An Act Relative to the Certification of Inspection for New Motor Vehicles* – MSADA SUPPORTS; Plus, Comments on Other Bills on Hearing Agenda (H3676, H3677, S2371, S2374, H3690, and H3771)**

The Massachusetts State Automobile Dealers Association respectfully requests your **support for House 3603 and Senate 2360, *An Act Relative to the Certification of Inspection for New Motor Vehicles***. MSADA represents the interests of the 427 franchised new-car and truck dealers in the Commonwealth whose collective economic activity represents almost 20% of the Commonwealth’s retail economy and who employ over 25,000 men and women.

The legislation would amend the Massachusetts vehicle inspection law (MGL Chapter 90, Section 7A) administered by the Registry of Motor Vehicles (RMV) to require the RMV to establish a process in which the initial inspection of a new motor vehicle would not be required until the completion of the first full-year of the new vehicle’s initial registration. Such an amendment to the inspection law, essentially eliminating the initial inspection presently done at the time of the new vehicle’s first sale to a consumer, makes sense given the pre-delivery inspection (PDI) process conducted by a franchised dealer prior to delivery of a new vehicle to a buyer and would mirror a policy the RMV had in place over a decade ago.

Each manufacturer requires its franchised dealers to conduct a PDI on a new vehicle at some time once the vehicle reaches the dealer’s lot. The dealer complies with the checklist of items the manufacturer has developed to ensure the mechanical safety and operational aspects of the vehicle have not been compromised in transit from the factory to the dealer’s facility. A 100% score on the PDI means the buyer can take the vehicle home confident that the vehicle can be operated safely and as designed by the manufacturer.

At the same time, upon the sale of a vehicle to a Massachusetts consumer, state law (MGL Chapter 90) and the state inspection regulations (540 CMR 4.00 et al.) require a car buyer to submit the vehicle for a required inspection within seven days of the date on which the motor vehicle is registered to said owner in the Commonwealth and then submit it for inspection annually thereafter.

The PDI checklist parallels the state’s vehicle inspection checklist and, frankly, is duplicative of the state’s inspection process. A decade ago, as a result of our advocacy, the RMV’s safety inspection program allowed a dealer to use the PDI in lieu of the state vehicle inspection as long as the RMV had approved the PDI checklist as meeting the state’s vehicle inspection requirements. The baseline emissions test also was conducted by the dealer upon delivery from the factory. Dealers that participated in this process were able to speed up considerably the time of delivery of the new vehicle purchase to the

consumer, ensuring that the customer is happy and the dealer receives high customer satisfaction scores reported to the factory. High CSI scores are a lifeline for a dealer's success with a manufacturer. Unfortunately, the RMV at the time made the process so complicated and expensive for dealers to comply with that it was not included in the subsequent contract with the new vehicle inspection vendor the RMV selected.

Across the country, the vast majority of states do not conduct any vehicle inspection, regardless of the vehicle being new or used. In our opinion, the initial safety inspection of the new vehicle as required by the RMV could be eliminated without hindering the guaranteed safety of the vehicle for the buyer since franchised dealers are already undertaking the PDI prior to delivery of the vehicle to a buyer. Further, Connecticut is an example of a state which bypasses the initial vehicle inspection for a new vehicle similar to what is proposed in these bills. The other New England states do require vehicle safety inspections; however, the Rhode Island requirement is biennial while Vermont, New Hampshire, and Maine are annual.

We urge your support for this legislation. Should you require any additional information, please do not hesitate to contact me.

OTHER BILLS ON TODAY'S AGENDA:

House 3676 and Senate 2371, regarding electronic digital vehicle titles, and House 3677 and Senate 2374, regarding electronic digital signatures on all RMV transactional documents: MSADA supports these bills. MSADA has long advocated for the Registry of Motor Vehicles to greatly modernize the state's current vehicle title and registration processes by allowing for efficient technological solutions – namely the issuance of electronic vehicle titles and the allowance for electronic signatures on necessary documents – to replace the paper-dependent system currently used by the RMV.

Dealerships often engage in transactions that involve a trade-in vehicle that requires a loan payoff. These proposed reforms would be extremely helpful for a dealer who is anxiously awaiting the paper title from the RMV on a paid-off vehicle as it sits in the dealership's lot. Current law requires that a dealer possess a valid printed title in hand for a vehicle before that vehicle can be delivered to a buyer to complete the purchase process. This can cause considerable delay in a dealership's ability to sell a vehicle that required a loan payoff to a lender. Once a dealership makes a vehicle payoff on the trade-in, the dealership must wait for the lender/lienholder to accept payment, even in situations where the payoff is recognized as immediate under current lien/title law. The lender/lienholder then must electronically signal to the RMV that a lien is released, which causes the subsequent sending of a paper title from the RMV to the dealership. Awaiting delivery of the paper title by mail from the RMV can add upwards of several weeks delay between taking the vehicle in trade and then selling it, thereby causing a loss in value – and potential sales tax revenue to the Commonwealth – while the vehicle sits idle at the dealership; a motor vehicle's depreciation can average upwards of \$25 per day.

The bills' reforms are presented with an eye toward customer convenience. Electronic signatures will help speed up the vehicle purchasing process for buyers at each step, thereby increasing customer satisfaction in a purchase process very few consumers want to undertake. Further, the electronic titling process will enable dealers to sell vehicles in a more efficient manner, recognizing that we are now almost a quarter of the way through the 21st century and we still are forced to conduct transactions with procedures as if we are still in the 1980s. Finally, passage of these bills would not add any cost to the RMV's operations, as there are numerous vendors that dealers use today that have the technological capabilities to implement these new procedures seamlessly upon approval.

NOTE #1: Gov. Healey's House 1 for FY26 contained language to accomplish the intent of these bills. The House's engrossed FY26 budget contained similar language to House 1. The Senate Ways and Means Committee's FY26 budget proposal also contains similar language to House 1.

NOTE #2: House 3676 and Senate 2371 contain language in Section 1 to direct the RMV to create a program of reciprocal cross-border electronic vehicle titling and registration. Such language is not covered in either FY budget document. **MSADA supports this Section 1 language** as a means to improve our dealerships' abilities to sell vehicles to out-of-state customers.

House 3690 – cap on doc prep fees: MSADA opposes as drafted. New and used car dealers are allowed to charge a documentary preparation fee as part of the vehicle purchase or lease transaction. It must be included in the advertised vehicle price, and it is part of the sales taxed amount. Dealers use the fee as a mechanism for recovering costs in the execution of the vehicle purchase or lease, such as for computers, software, document storage, personnel, etc. An artificially imposed cap would limit dealerships' cost recovery capabilities.

House 3771 – used vehicle record book: This concept is currently law, enacted several years ago.

**RE: H.3641-An Act Relative to Education Requirements For class 2 Motor Vehicle Licenses.**

Currently, Cities and Towns issue Class 2 dealers Licenses. A retail license in Massachusetts does not require any training. It is the applicant's responsibility to read statute 940 CMR. Dealer Education exists in over 30 states across the country and helps in the regulation of our industry.

Cities and Towns are issuing Wholesale licenses that do not exist in the statute. These licenses sometimes are located on residential property. Vehicles are being retailed out of driveways and street corners across the state. This practice is commonly known as Curbstoning. Several people working off one license is common practice with this group. This is causing major headaches and a loss of revenues for the state and its agencies.

A Class 2 dealer that invests in a location and operates within the law are at an unfair disadvantage because these licenses exist. These "Wholesale Dealers" get caught by the State Police attaching plates to transport vehicles on a regular basis, because they do not qualify to apply for dealer plates.

The registry spends thousands of dollars every year turning dealers away because their paperwork is not correct. The AG's office spends thousands of hours investigating fraudulent auto sales because the cities and towns are issuing licenses without training.

There is no universal application for the cities and towns to use. Every City and Town issue their own version of the license with the city or towns numbering system that that does not coordinate with the state's numbering system.

There is no list of how many Class 2 licenses exist in Massachusetts because of the current system.

Cities and Towns are issuing a license to people who have no idea how to use it properly and are selling vehicles that could be unsafe to the public,

By educating these applicants before applying for a license, we can correct this issue. A universal application will be sent to the City, Towns and the State, so everyone knows the dealer's license exists.

Lou Tedeschi CMD***Executive Director SNEIADA******781-953-5452***



Outline of Education Program for Class 2 Dealers

- *Introduction to the industry- Wholesale/Retail. Do's and Don'ts
- *What is needed to properly apply for a dealer's license
- *Truth in Advertising. FTC rules and the Buyers Guide
Federal guidelines for advertising and what should be displayed on your vehicles.
- *Lemon Law- What qualifies and what does not. What AS-IS really means
- *Financing and the RED FLAG rules.
- * Insurance and Registration requirements/Sales tax, Title fees, and registration types
- *State forms needed to do a car deal. Software or manual entry. What to know so you don't get turned away at the registry. Types of titles and how to use DRT-1 forms
- * Doc Fee's – Do's and Don'ts
- *Dealer Plates- Who qualifies and proper use
- * Good practice in a car deal. How to stay out of court
- *Drive program – who qualifies
- *Temporary Tags for out of state deals
- *Floor Planning vehicles and buying at auction
- * How to survive and be prosperous in a very demanding industry

This will be taught in an 8 Hour session by NIADA Certified Master Dealers (CMD) in person. Classes will be limited to 30 participants at one time.



Mass Insurance Federation

Via Email

May 13, 2025

The Honorable Brendan P. Crighton
Senate Chair
Jt. Comm. on Transportation
Room 109-C
State House
Boston, MA 02133

The Honorable James Arciero
House Chair
Jt. Comm. on Transportation
Room 134
State House
Boston, MA 02133

RE: May 13th Hearing—Joint Committee on Transportation – Recorded Positions on S.2367, S.2381, H.3659, and H.3676/S.2173/S.2174.

Dear Chairs Crighton and Arciero:

Thank you for the opportunity to write to you on behalf of the Massachusetts Insurance Federation (“Federation”) to record our positions on the bills heard this week before the Joint Committee on Transportation. With 26 member insurance companies and four national insurance trade associations as associate members, the Federation serves as the leading voice of the property and casualty insurance industry in the Commonwealth. Many of our member companies are domiciled here in Massachusetts. Importantly for your May 13th agenda, Federation members write approximately 80 percent of the private passenger auto segment.

Please record the Federation’s position on the following bills:

- **S.2367**—The Federation **opposes** the change in insurance requirements included in this legislation, which shifts financial responsibility from rental vehicle companies to policyholders in the Commonwealth. Under the existing regulatory scheme, case law, and structure of private passenger automobile insurance policies in Massachusetts, the rental company’s policy is primary with respect to compulsory insurance. In a 1999 decision, the Supreme Judicial Court summarized the public policy implications of permitting this transfer of risk when Judge Gants ruled that “it was against public policy for a rental company to “unilaterally declare itself the insurer of last resort, but must instead be the primary insurer with respect to liability losses caused by the rental vehicles it owns”.¹ Given the pending premium increases for low- and moderate- income individuals that choose the minimum liability limits in the Commonwealth, this

¹ Alamo Rent-A-Car v Matchem, 11 Mass L. Rptr. 9 (1999).

bill will only further increase premiums across the board for Massachusetts' drivers.

This excerpt from the decision summarizes the context of current case law in Massachusetts: "Examining the public policy considerations from a different angle, it is plain that any business which permits others to drive its vehicles would want to be able to save on its insurance premium by obtaining an insurance policy with a super-escape clause that provides compulsory liability coverage only if the driver is uninsured. If the law were to allow every business to do this, the result would be a shifting of insurance costs to personal motor vehicle insurance and away from commercial insurance. In short, individuals would pay more for car insurance and businesses would pay less. ... **there is no such societal benefit from allowing rental car companies to shift these costs to their drivers** (emphasis added).

For these reasons the Federation urges S.2367 be held for further study.

- **S.2381**— An Act providing for motor vehicles transfer on death—The Federation **strongly supports** this legislation. Today, a policyholder has to request the insurer make a request for the original title from the lienholder, wait for that title to be sent to the lienholder in the mail to the insurer who then mails it to the customer. Then the policyholder must go to the RMV, change the title to their name and register the vehicle. This bill allows the surviving spouse to obtain a new certificate of title and register the vehicle without needing the original title from the leasing company upon written application to the registrar accompanied by a copy of the death certificate, which would be significantly more efficient and easier for the consumer. The specific circumstance addressed in this bill accounts for about 14% of the title request issues insurance companies experience. In these circumstances, there is nothing for the insurer to do other than provide the title to the customer and this creates many consumer issues, confusion, friction, and unnecessary delays. For these reasons the Federation urges the Committee to recommend the bill Ought to Pass.
- **H.3676/S.2173/S.2174**—Legislation related to Electronic Titles—The Federation **strongly supports** this regulatory modernization effort. Insurers support the evolution to electronic titles because they streamline processes, reduce costs, and improve accuracy. These digital versions of vehicle titles, offer benefits like faster document handling, reduced fraud, and improved data management. This translates to quicker insurance claim processing and reduced administrative burdens for insurers. It is also important to note that electronic titles help reduce insurance fraud because they offer improved security and protection against forgery and alteration, ensuring the integrity of vehicle ownership records. While the Federation does not have a particular view on which bill carries this issue forward, it is important that we modernize this process.
- **H.3659**—An Act Relative to Peer-to-Peer Car Sharing—The Federation is **generally supportive** of this legislation, however there are still some differences between H.3659 and the National Council of Insurance Legislators (NCOIL) Model

Act², which has been well vetted by stakeholders on all sides of this issue. Importantly, unlike the NCOIL model, H.3659 does not address vicarious liability, require claims cooperation, or explicitly address responsibility for the car sharing company in the event of a policy lapse. Again, the Federation supports this legislation as a framework, but additional amendments are necessary for alignment with the NCOIL Model Act.

Please do not hesitate to reach out regarding the Federation's position on any of the above-referenced bills.

Regards,



Christopher S. Stark
Executive Director
Massachusetts Insurance Federation
cstark@massinsurance.org

² <https://ncoil.org/wp-content/uploads/2021/04/NCOIL-P2P-Car-Sharing-Model-Amended-4-18-21.pdf>

May 16, 2025

RE: Supporting House Bill No. 3659 and Opposing Senate Bill No. 2402

Dear Chairs Arciero and Creighton:

The American Property Casualty Insurance Association (APCIA)¹ supports H.3659 and opposes S.2402. Both bills attempt to regulate peer to peer (P2P) carsharing activities which currently operate in a gray area as far as insurance coverage is concerned. Many insurers consider P2P car sharing to be a commercial activity and will not cover it under a private passenger auto insurance policy. Some insurance coverage may exist under a policy provided by the P2P platform, but coverage terms and conditions vary.

APCIA supports H.3659 because it is a comprehensive measure containing several provisions intended to deal with various aspects of P2P operations in the Commonwealth, including insurance coverage. Each element is based upon the National Council of Insurance Legislators (NCOIL) Peer-to-Peer Program Model Act. The NCOIL Model is the preferred format by states to address P2P – related insurance issues.²

Specifically, H.3659 requires P2P car sharing programs to ensure that the vehicle owner and driver are insured and lays out:

- The requirements of coverage
- Several options for maintaining coverage
- How insurance operates during each car sharing period under various circumstances.

The bill also explains how insurers must handle this coverage and gives the Insurance Commissioner authority to promulgate rules.

APCIA opposes S.2402. It is not based on the NCOIL Model and instead creates limited standards using broad language while leaving the bulk of the details to a future regulatory process. Notably, insurance is not even mentioned in the bill and the regulatory process is left

¹ Representing 67% of the U.S. property casualty insurance market, APCIA promotes and protects the viability of private competition for the benefit of consumers and insurers. APCIA members represent all sizes, structures, and regions, which protect families, communities, and businesses in the U.S. and across the globe. Several APCIA members are located in Massachusetts and many more do business here. APCIA members are integral to the state of Massachusetts. They write 75% of the property casualty insurance sold in this state. The P&C insurance industry employs over 15,000 residents in the Commonwealth and provides annual assistance of \$8.1 billion in claim payments to help customers here. Insurers contribute over \$780 million annually to the state in premium taxes.

²² About 15 states have enacted P2P legislation. With the exception of CA, OR and WA, which predate the model by a decade, the remaining states have followed the NCOIL format. In New England, ME and CT have passed P2P legislation. Rhode Island passed it in 2022, but repealed it in 2023 due to issues pertaining to some tax collection issues which appear unique to the RI bill.

entirely to the Department of Transportation without involvement of the Division of Insurance. Given the significant uncertainty surrounding insurance for P2P and the importance of assuring that P2P users and others they may come into contact with are protected, we believe the comprehensive guidance laid out in H.3659 is a preferable model.

For the foregoing reasons, we ask that H.3659 be given a favorable report and S.2402 be held for further study.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jon Schreiber", with a stylized flourish at the end.

Jonathan Schreiber
Associate Vice President, State Government Relations, APCIA
Jonathan.schreiber@apci.org, (202) 828-7121



The Commonwealth of Massachusetts

Massachusetts House of Representatives
State House, Boston, 02133-1054

William C. Galvin
STATE REPRESENTATIVE
6th NORFOLK DISTRICT
STATE HOUSE, ROOM 166
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CHAIRMAN
House Committee on Rules

May 7, 2025

The Honorable Brendan P. Crighton
The Honorable James Arciero
Joint Committee on Transportation
Massachusetts State House
Boston, Massachusetts 02133

Dear Chair Crighton and Chair Arciero:

Ahead of the Joint Committee on Transportation's public hearing on May 13th, I am writing today in support of **House Bill 3665, *An Act relative to low digit number plates on leased vehicles***, and to ask your consideration in releasing H.3665 favorably and swiftly.

This bill, which is a refile, would authorize the owner of a low digit number license plate, also known as a passenger, reserved or lottery plate, to transfer the plate from one leased motor vehicle to another leased vehicle by presenting authorized paperwork to any branch office of the Registry of Motor Vehicles. Presently, the transfer of a low number plate requires the owner of the plate to physically present the plate to the Registry of Motor Vehicles in Boston, only before a transfer would be allowed.

With the passage of this act, the Registrar shall develop a form to accomplish such a transfer and authorize the form to be accepted at any branch office of the Registry of Motor Vehicles. Requiring only a physical presentation of such plates at the time of transfer and only to the Boston office is unnecessary.

I would, therefore, urge that you report this favorable to the General Court, as your honorable committee did last session, and I encourage you to contact me if I may be of further assistance in the consideration of this bill. Thank you for your consideration.

Sincerely,

Representative William C. Galvin
6th Norfolk District



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1054

REPRESENTATIVE
DANIELLE W. GREGOIRE
REPRESENTING THE PEOPLE OF
THE 4TH MIDDLESEX DISTRICT

DIVISION CHAIR

STATE HOUSE, ROOM 21
TEL: (617) 722-2140
Danielle.Gregoire@MAhouse.gov

May 14, 2025

The Honorable James Arciero, Chair
Joint Committee on Transportation
State House, Room 134
Boston, MA 02133

The Honorable Brendan P. Crighton, Chair
Joint Committee on Transportation
State House, Room 109-C
Boston, MA 02133

Dear Chair Arciero and Chair Crighton:

Thank you for the opportunity to testify in writing regarding **H. 3676, *An Act relative to modernizing and expanding availability of motor vehicle titling and registration services***, and **H.3677, *An Act relative to the authorization for electronic signatures with motor vehicle title and registration transactions***. I support these bills and ask for your favorable consideration and report.

H.3676 authorizes the Registrar of Motor Vehicles to enter into agreements on behalf of the Commonwealth providing for the establishment of a reciprocal, cross-border electronic vehicle titling and registration program. **H.3677** requires the Registrar of Motor Vehicles to accept electronic signatures on any document, form, or record necessary for the purpose of registering or titling any motor vehicle in the Commonwealth. In an increasingly technological world, it is vital that our systems evolve to keep up with the times. Permitting the use of electronic titling, registration, and signatures for motor vehicle transactions is a crucial step in the pursuit to make our residents' lives easier and more efficient.

Thank you in advance for your consideration of this request. Please do not hesitate to contact me should you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "D.W. Gregoire".

Danielle W. Gregoire
State Representative

March 5, 2025

Chairman Aaron Michlewitz
House Committee on Ways and Means
Massachusetts State House
24 Beacon Street, Room 243
Boston, MA 02133

Chairman Michael J. Rodrigues
Senate Committee on Ways and Means
Massachusetts State House
24 Beacon Street, Room 212
Boston, MA 02133

RE: Concerns Regarding Proposed E-Title Provisions in Outside Sections 53, 54, 55, and 131 of H. 1

Dear Chairs Michlewitz, Rodrigues, and Members of the Committee:

On behalf of the Massachusetts Association of Insurance Agents (MAIA) and our nearly 1,000 independent insurance member agencies, we are writing to express our concerns with the proposed Electronic Liens and Titles (ELT) provisions included as outside sections in the Governor's FY26 budget. While MAIA supports the concept of ELT, it must be designed in a manner that prevents automobile theft and fraud and ensures compliance with the Commonwealth's insurance, title and registration laws

To comply with Massachusetts law, the ELT process must require that a seller provides the buyer with title to the vehicle *at the time of delivery* so that the buyer can properly insure and register the vehicle (**See** MGL C. 90 D s.15(a)). While the proposed law would enable e-titling for most vehicle transactions, the concept is being pushed primarily to facilitate online vehicle sales. Unfortunately, our agents have identified numerous examples of online dealers attempting to deliver vehicles to customers without providing proof of title, advising customers to transfer their existing plates to a new vehicle before receiving title, and even providing new plates to customers without assigning title.

In these instances, customers reach out to our agents at the dealer's direction to obtain an insurance binder and stamp a Registration and Title Application (RTA) to indicate that the vehicle is covered under the customer's insurance policy. Massachusetts law, however, clearly prohibits a vehicle from being insured unless the client has taken title (**See** MGL C. 90 §§1, 2 & 34A). As such, agents cannot stamp the form without risking potential professional liability and

errors & emissions exposure. This has resulted in numerous customers leaving our agencies to find other avenues to obtain an insurance stamp.

Allowing these practices to continue poses significant risks to consumers, motorists, and agents, and undermines the integrity of Massachusetts' time-tested insurance, title, and registration laws. These laws provide clear protections for all parties involved in the purchase, sale, insurance, and registration of vehicles. To safeguard against fraudulent behavior and ensure proper compliance, we offer the following amendments to the proposed ELT law:

1. **Mandatory Title Transfer Requirement:** Ensure that a valid title is provided and assigned to the purchaser at the point of vehicle delivery before the issuance of an insurance certificate or registration.
2. **Insurance Verification of Ownership:** Ensure proof of title is provided and assigned to the purchaser prior to the issuance of a certificate of insurance for registration.
3. **Insurable Interest:** Clarify that a non-owner can only have a motor vehicle liability policy on that vehicle if the owner also has an active policy on the vehicle.

We believe these changes would effectively address the gaps in the current proposed ELT framework, providing clearer guidelines for both consumers and industry players, and ensuring stronger protections for Massachusetts residents. Our proposed amendments would ameliorate current challenges by ensuring that vehicles are properly titled and insured before they can be registered or driven on public roads. We have attached these amendments for your review.

On behalf of our members, we thank you for your consideration. Please feel free to reach out with any questions you may have.

Sincerely,



Nicholas A. Fyntrilakis
President & CEO
Massachusetts Association of Insurance Agents

****H.1 Governor's proposed amendments** to current law in **red**

****MAIA proposed amendments** in **green**

Chapter 90: MOTOR VEHICLES AND AIRCRAFT

Section 34A: Definitions applicable to Secs. 34A to 34N

"Motor vehicle liability policy", a policy of liability insurance which provides indemnity for or protection to the insured and any person responsible for the operation of the insured's motor vehicle with his express or implied consent against loss by reason of the liability to pay damages to others for bodily injuries, including death at any time resulting therefrom, or consequential damages consisting of expenses incurred by a husband, wife, parent or guardian for medical, nursing, hospital or surgical services, or for indemnity, in connection with or on account of such bodily injuries or death, or by reason of the liability for contribution as a joint tortfeasor, in connection with or on account of such bodily injuries, sustained during the term of said policy by any person, other than a guest occupant of such motor vehicle or of any employee of the owner or registrant of such vehicle or of such other person responsible as aforesaid who is entitled to payments or benefits under the provisions of chapter one hundred and fifty-two, and arising out of the ownership, operation, maintenance, control or use of such motor vehicle upon the ways of the commonwealth or in any place therein to which the public has a right of access, other than by an employee of the federal government while acting within the scope of his office or employment and covered by the provisions of section 2679 of Title 28, United States Code, to the amount or limit of at least twenty thousand dollars on account of injury to or death of any one person, and, subject to such limits as respects injury to or death of one person, of at least forty thousand dollars on account of any one accident resulting in injury to or death of more than one person, or a binder as defined in section one hundred and thirteen A of said chapter one hundred and seventy-five providing indemnity or protection as aforesaid pending the issue of such a policy; provided, however, that in the case of a person who is engaged in the business of leasing motor vehicles under any system referred to in section thirty-two C, the words "motor vehicle liability policy" shall mean a policy of liability insurance as described herein and providing, in addition, except in the case of vehicles leased for a term of more than thirty days, indemnity for or protection to the insured and any person responsible for the operation of the insured's motor vehicle with his express or implied consent, including such consent imputed under section thirty-two E, against loss by reason of the liability to pay damages to others for injury to property or by reason of the liability for indemnity, or for contribution as a joint tortfeasor, in connection with or on account of such injury to property, other than by an employee of the federal government while acting within the scope of his office or employment and covered by the provisions of section 2679 of Title 28, United States Code, sustained during the term of the policy by any person, and arising out of the ownership, operation, maintenance, control or use upon the ways of the commonwealth of such motor vehicle, to the amount or

limit of at least one thousand dollars on account of any such injury to property; and provided further that no such policy shall be issued to an individual who does not own or lease the motor vehicle or have a beneficial interest in the motor vehicle through a trust or estate, unless the owner, lessee, or beneficiary has an active motor vehicle liability policy on said vehicle.

Chapter 90D: MOTOR VEHICLE CERTIFICATES OF TITLE

Section 11A: Electronic recording of security interests

Section 11A. The registrar is authorized to develop, establish and maintain an electronic data and communication system with banks, credit or other financial institutions for the purpose of electronically recording the existence of security interests under the provisions of this chapter. Where an electronic lien recording method is employed, the registrar may waive the issuance and mailing of the certificate of title to the lienholder required under section eleven.

Upon receiving notification of satisfaction of a security interest pursuant to section 24, the registrar may waive the issuance and mailing of the certificate of title to the owner, or a third party authorized by the registrar and requested by the lienholder. If the registrar waives the issuance and mailing of the certificate of title, the registrar shall ensure: (i) the owner or authorized third party may receive a paper certificate of title upon request; and (ii) there is a process or system established to ensure the owner or authorized third party may affect action that would otherwise be necessary upon the certificate of title. The registrar may promulgate rules and regulations related to this section.

Nothing in this section shall relieve a seller's obligation under section 15 of this chapter to assign and deliver title to a purchaser or the registrar at the time of delivery of the vehicle; nor shall anything in this section relieve a purchaser's obligation under sections 1A and 2 of chapter 90 to take title to said vehicle prior to insuring or registering the vehicle.

Section 24: Satisfaction of security interest in vehicle

Section 24. Upon the satisfaction of a security interest in a vehicle for which the certificate of title is in the possession of the lienholder, the lienholder shall, within three days after demand and, in any event, within ten days, execute a release of his security interest, in the space provided therefor on the certificate or as the registrar shall prescribe, and mail or deliver the certificate and release to the next lienholder named therein, or, if none, to the owner or any person who delivers to the lienholder an authorization from the owner to receive the certificate.

Upon the satisfaction of a security interest in a vehicle for which the certificate of title is in the possession of a prior lienholder, the lienholder whose security interest is satisfied shall within three days execute a release in such form as the registrar shall prescribe and deliver the release

to the owner, or to any person who delivers to the lienholder an authorization from the owner to receive it. The lienholder in possession of the certificate of title shall either deliver the certificate to the owner, or the person authorized by him for delivery to the registrar, or, upon receipt of the release, mail or deliver it with the certificate to the registrar, who shall release the subordinate lienholder's rights on the certificate or issue a new certificate.

If the payment in satisfaction of the security interest is in cash or by certified check, cashier's check, teller's check, intra-bank or inter-bank transfer of funds, or an electronic transfer of funds, the payment shall be considered cleared immediately upon receipt by a lienholder.

Notwithstanding subsection (a) of section 16, the registrar shall promulgate rules and regulations to establish an electronic process whereby a vehicle may be sold at retail, reassigned between dealers, or any other method of ownership transfer or sale approved by the registrar. The conveyor of the vehicle shall maintain, invalidate, or surrender the existing paper certificate of title, if applicable, upon completion of the transaction and update of the electronic certificate of title for a vehicle that is retailed, reassigned or transferred under this paragraph, in a form or format prescribed by the registrar.

Nothing in this section shall relieve a seller's obligation under section 15 of this chapter to assign and deliver title to a purchaser or the registrar at the time of delivery of the vehicle; nor shall anything in this section relieve a purchaser's obligation under sections 1A and 2 of chapter 90 to take title to said vehicle prior to insuring or registering the vehicle.

Section 39. Electronic signatures

Electronic signatures as prescribed in section 9 of chapter 110G shall be accepted by the registrar through the electronic process prescribed under section 24. The registrar may promulgate rules and regulations for the requirements for electronic signature authentication, maintenance, invalidation or surrender of a secure paper title bearing an original signature.

No later than 6 months after the effective date of this act, the registrar of motor vehicles shall promulgate regulations to implement section 54.

Nothing in this section shall relieve a seller's obligation under section 15 of this chapter to assign and deliver title to a purchaser or the registrar at the time of delivery of the vehicle; nor shall anything in this section relieve a purchaser's obligation under sections 1A and 2 of chapter 90 to take title to said vehicle prior to insuring or registering the vehicle.



May 13, 2025

Senator Brendan Crighton
Senate Chair, Joint Committee
on Transportation
State House, Room 109-C
Boston, MA 02133

Representative James Arciero
House Chair, Joint Committee
on Transportation
State House, Room 134
Boston, MA 02133

Re: Support of H.3676 and S.2371

Dear Chair Crighton and Chair Arciero,

On behalf of Carvana, I am writing to express strong support for H.3676 and S.2371, companion bills related to authorizing electronic signatures with motor vehicle title and registration transactions. These bills represent a critical opportunity to modernize processes at the Registry of Motor Vehicles (RMV).

Founded in 2012, Carvana is a Fortune 500 e-commerce platform that provides customers alternatives to the traditional vehicle purchasing process. By providing customers with the option of purchasing a vehicle online, Carvana allows customers to select, purchase, and have their vehicle delivered directly to their door. To date, over 36,000 Massachusetts residents have chosen to take advantage of the Carvana experience.

H.3676 and S.2371 aim to modernize and expand access to the Registry of Motor Vehicle's (RMV) Electronic Vehicle Registration (EVR) system, facilitate electronic titling, and expedite the transferability of vehicles following electronic lien satisfaction by a motor vehicle dealer. The bills accomplish this through four main sections:

- **Section 1** directs the RMV to establish a reciprocal cross-border electronic vehicle titling and registration program, enabling out-of-state purchases to be electronically titled and registered in the buyer's state of residence.
- **Section 2** expands EVR access to all motor vehicle dealers, regardless of transaction volume, reducing manual RMV processing and increasing electronic transactions. Further, the section prohibits the RMV from prohibiting vehicle dealers from participating in the EVR program based solely on transaction volume.
- **Section 3** permits the RMV to waive printing paper titles upon lien satisfaction, provided individuals can still request a paper title and the RMV has an alternative system or process available for necessary actions. This section provides a permissive allowance for the RMV to further electronic transfer opportunities.
- **Section 4** requires the RMV to create a process (paper or electronic) by January 1, 2026, allowing dealers to retail vehicles immediately upon lien payoff or electronic notification of satisfaction. This addresses the current delay of weeks between acquiring and retailing a vehicle due to paper title processing, which leads to daily depreciation of \$10-\$25 per vehicle.

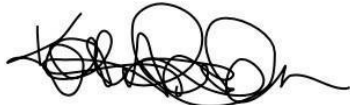
These bills increase convenience for dealers and consumers and decrease burdens on the RMV. Crucially, they enable dealers to offer motor vehicles more quickly for retail resulting in **increased sales tax collections** attributable to decreases in vehicle depreciation.

These bills are supported by numerous stakeholders, including the Massachusetts State Automobile Dealers Association (MSADA), Massachusetts Independent Automobile Dealers Association (MIADA), and many others from across the automotive and technology industries, totaling 22 organizations. Most of these entities are also members of the eSTART Coalition, which aims to modernize and streamline automotive title and registration processes through technology solutions. Carvana, MSADA, and MIADA have collaborated with the Governor's administration and RMV on this issue for two years.

In conclusion, H.3676 and S.2371 are essential for modernizing RMV processes through expanded EVR access, electronic titling, and expedited vehicle transfers, offering substantial benefits and potential sales tax revenue increase.

We respectfully urge the Joint Committee on Transportation to report H.3676 and S.2371 favorably out of committee. Thank you for your time and consideration.

Sincerely,



Kathi Reinstein
Head of Government Affairs, Northeast Region

May 13, 2025

The Honorable James Arciero, Chair
The Honorable Brendan Crighton, Chair
Joint Committee on Transportation
Massachusetts State House
24 Beacon Street
Boston, MA 02133

RE: H.3676/S.2371, H.3677/S.2374, and H.3659 & S.2402

Dear Chair Arciero, Chair Crighton, and Esteemed Members of the Joint Committee:

On behalf of the Massachusetts Association of Insurance Agents (MAIA) and our nearly 900 independent insurance member agencies across the Commonwealth, I am writing to express our position on the following bills before your committee:

MAIA is **in OPPOSITION** to H.3677 & S.2374 and asks that you **do not report them favorably** out of Committee:

- **H.3677 – An Act relative to the authorization for electronic signatures with motor vehicle title and registration transactions & S.2374 – An Act authorizing electronic signatures with motor vehicle title and registration transactions**

While MAIA supports the concept of ELT, it must be designed in a manner that prevents automobile theft and fraud and ensures compliance with the Commonwealth's insurance, title and registration laws. As the Committee is aware, the House, Senate, and Governor's office have all included provisions relative to ELT in their respective versions of the FY26 budget. **MAIA supports the language passed by the House, which ensures that adequate safeguards are included to protect our long-standing insurance, title and registration process.**

In general, H.3677 and S.2374 are far broader in scope and application than the ELT provisions proposed through this year's budget process. These bills provide few, if any, safeguards against potential fraud and abuse. They also do nothing to address our agents' primary concern, which is ensuring title is assigned to a new buyer at the time of delivery of the vehicle in order to provide insurance on that vehicle (in compliance with MGL C.90D s.15(a) and MGL C. 90 §§1, 2 & 34A). These bills also raise a host of questions regarding out-of-state sales, most notably around who is actually processing those forms, which forms they are actually processing (Massachusetts or state of purchase) and the implications of this on sales tax collection in Massachusetts on those purchases.

Here are our initial concerns:

- In order for an agent to stamp an RTA form, they must see the assignment of title on the back of the title document, along with the price paid, odometer statement, date of purchase, and address of the purchaser. The purchaser then typically signs the back of the title when the vehicle is delivered. In the case of an out-of-state purchase, the P&S must also be provided for sales tax purposes (more on this below). The online transactions that this bill is purported to facilitate must ensure that all of this is provided to the Registry, insurance agent, or direct writer in order to proceed with the insurance and registration process. The bill is silent on this.
- This bill would include not only dealer transactions, but casual sales as well. This has safety and security implications as casual sellers do not have access to the types of software or systems that would ensure a safe and secure e-title process. (Section 2A)
- This bill would require the Registrar to accept e-signed documents from “**any** [emphasis added] process or system available” with no ability for the Registry to vet those systems or processes for 1) safety and security or 2) the ability to integrate or conform with existing Registry or insurance agent/company technology. This would extend far-beyond the state’s EVR system- which is the system that Massachusetts’ has developed to integrate the Registry with car dealers, insurance agents, and companies in the Commonwealth. (Section 2C)
- This bill would prohibit the Registrar from requiring that an electronic signature process or vendor be certified by the Registrar before accepting e-signed documents from that process or vendor. This again raises significant concerns around safety, security, consumer protection, and practical usage and systems integrations issues. There are countless e-signature platforms in the marketplace, all with varying levels of quality. For this reason, the Registry limits e-signatures to AdobeSign or DocuSign because they have confidence in the efficacy of those products. (Section 3A)
- The bill would require the Registrar to accept any document or form with an electronic signature, presumably this would include vehicle purchase and sale agreements, and anything else that requires an e-signature. It would presumably require the Registrar to accept out of state sales and registration forms that do not comport with the documents required for in-state registration. This also raises questions for agents around which forms they are actually authorized to stamp (particularly if they are coming from another state) and who is filling out the paperwork (out-of-state dealer or agent, etc.). (Section 2C)
- The bill would prohibit the Registry from requiring a document which has been “executed with an electronic signature to be converted to physical format by printing for any purpose, except when submission by physical means is necessary and required.” Notwithstanding the complex wording (the RMV can’t require a document be printed unless it’s required to be printed), there are no safeguards included for the Registry to require printing in the event of (for instance) a technology issue or the request of a consumer. (Section 3A)

- Particularly as it relates to out-of-state transactions, sales tax in Massachusetts is calculated differently depending on whether the purchase was made at a dealership (based on purchase price) or via a casual sale (the higher of the blue book value or purchase price). In addition, Massachusetts allows for trade-ins to be credited towards the purchase price in some states and not in others (New Hampshire is a prime example). Again, by allowing for acceptance of a broad array of e-signatures and forms, this can create significant confusion and is ripe for fraud and abuse.
- Lastly, the bill only requires retention of e-signature documents/records for a period of five years. This is far too short a time. (Section 3B(iii)).
- **H.3676 – An Act relative to modernizing and expanding availability of motor vehicle titling and registration services & S.2371 – An Act modernizing and expanding availability of motor vehicle titling and registration services)**

Again, MAIA supports the ELT language included the House version of the FY26 budget, which ensures that adequate safeguards are included to protect our long-standing insurance, title and registration process. Any ELT system adopted in Massachusetts must ensure that a valid title is provided and assigned to the purchaser at the point of vehicle delivery before the issuance of an insurance certificate or registration. It must also ensure proof of title is provided and assigned to the purchaser prior to the issuance of a certificate of insurance for registration.

Please also accept testimony on the following bills. While MAIA is taking a neutral position on their passage, we have identified and outlined specific concerns below.

- **H.3659 & S.2402 – An Act relative to peer to peer car sharing**

MAIA supports the Legislature adopting the recent NCOIL model legislation on this issue. There is a gap in the insurance market for a product covering peer to peer vehicle owners. If H.3659/S.2402 is passed as written, it is not clear that the market would respond to address this gap or if CAR would ultimately need to step in to offer coverage.

On behalf of our members, we thank you for your consideration. Please feel free to reach out with any questions you may have.

Sincerely,



Nicholas A. Fyntrilakis
President & CEO



May 13, 2025

Senator Brendan Crighton
Senate Chair, Joint Committee
on Transportation
State House, Room 109-C
Boston, MA 02133

Representative James Arciero
House Chair, Joint Committee
on Transportation
State House, Room 134
Boston, MA 02133

Re: Support of H.3677 and S.2374

Dear Chair Crighton and Chair Arciero,

On behalf of Carvana, I am writing to express strong support for H.3677 and S.2374, companion bills related to authorizing electronic signatures with motor vehicle title and registration transactions. These bills represent a critical opportunity to modernize processes at the Registry of Motor Vehicles (RMV).

Founded in 2012, Carvana is a Fortune 500 e-commerce platform that provides customers alternatives to the traditional vehicle purchasing process. By providing customers with the option of purchasing a vehicle online, Carvana allows customers to select, purchase, and have their vehicle delivered directly to their door. To date, over 36,000 Massachusetts residents have chosen to take advantage of the Carvana experience.

The RMV's current Signature Policy (rev 09/16/2020) permits e-signatures on most vehicle-related documents but prohibits them for certificates of title and limits their use to RMV's Electronic Vehicle Registration (EVR) program participants. This impedes complete electronic title and registration processing for EVR-participants and prevents the use of e-signatures for all non-EVR participants, including dealers, lenders, and insurers.

H.3677 and S.2374, which are based on model language developed by the Electronic Signature and Records Association (ESRA), directly addresses these limitations. They establish a clear legal framework requiring the RMV to accept e-signatures on all documents necessary for motor vehicle title and registration. Crucially, these bills include "physical odometer documents," such as certificates of title, allowing them to be made electronic by imaging or scanning for the purpose of capturing an e-signature, and mandating their acceptance by the RMV. These bills ensure e-signatures are available to all users, not just those in specific RMV programs. They also permit use of commercially available e-signature products while not restricting the RMV from offering its own systems.

Adopting H.3677 and S.2374 offer significant benefits:

- **Standardization and Clarity:** Establish a legal framework consistent with prevalent features in existing laws and eliminate current ambiguity. They provide clarity between the RMV, businesses, and consumers.
- **Efficiency and Cost Savings:** Lead to hard cost reductions (estimates up to \$8.65 per transaction, or 56% on average reported by DocuSign) and faster transaction times (79% of documents e-signed within 24 hours reported by DocuSign).

- **Convenience and Flexibility:** Ensure market-based competitiveness for providers while not impeding the RMV's ability to provide its own systems. Enable the ability to meet consumer expectations for electronic transactions, thereby enhancing convenience and customer satisfaction.
- **Safety and Security:** Facilitate automating steps to ensure accuracy and confidentiality. Require important safeguards, including identity verification through the e-signature system, secure maintenance, and retention of user information, IP address, date, and timestamp for five years, which must be available to regulatory agencies upon request. Data encryption, validation, certifications, and authentication measures reduce risk with transmission and execution. E-signatures are linked to records to ensure they cannot be improperly transferred unless authorized by the signer.
- **No Fiscal Impact:** These bills require no funding. They allow businesses and other end-users to utilize their own commercially available systems, requiring the RMV only to accept documents electronically or physically through its existing processes.

These bills authorize the registrar to require an indication that a document is e-signed or a certification/audit trail, but prohibits requiring certification of a specific e-signature vendor or requiring document printing unless necessary for submission. They also prohibit imposing additional requirements not authorized by the chapter.

These bills are supported by numerous stakeholders, including the Massachusetts State Automobile Dealers Association (MSADA), Massachusetts Independent Automobile Dealers Association (MIADA), and many others from across the automotive and technology industries, totaling 26 organizations. Most of these entities are also members of the eSTART Coalition, which aims to modernize and streamline automotive title and registration processes through technology solutions. Carvana, MSADA, and MIADA have collaborated with the Governor's administration and RMV on this issue for two years.

In conclusion, H.3677 and S.2374 provide a necessary legal framework to modernize the RMV's processes by broadly authorizing e-signatures for all motor vehicle title and registration documents and making it available to all interested users. It offers substantial benefits in efficiency, cost reduction, convenience, and security for businesses and consumers, all without imposing a fiscal burden on the Commonwealth.

We respectfully urge the Joint Committee on Transportation to report H.3677 and S.2374 favorably out of committee. Thank you for your time and consideration.

Sincerely,



Kathi Reinstein
Head of Government Affairs, Northeast Region



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE BOSTON, MA 02133-1020

STEVEN S. HOWITT
STATE REPRESENTATIVE
4th Bristol District

Room 237, State House
Tel: (617) 722-2305
Steven.Howitt@mahouse.gov

May 13, 2025

Representative James Arciero, House Chair
Senator Brendan P. Crighton, Senate Chair
Joint Committee on Transportation
State House, Room 134
Boston, MA 02133

Dear Chair Arciero and Chair Crighton,

I write to testify in support of House Bill 3690, *An Act limiting motor vehicle dealer documentation fees*, of which I am the sponsor. I respectfully request that you report this bill out favorably.

House Bill 3690 will amend the Massachusetts General Laws to establish limit of \$400 for the fee which a motor vehicle dealer can charge for the preparation of various paperwork associated with the sale, leasing and financing of a vehicle for transactions over \$2,500. Further, dealers who charge a fee for a transaction under \$2,500 will be fined for disobeying this provision.

This legislation will protect consumers across the Commonwealth by ensuring that they are not charged exorbitant and unnecessary fees for the preparation of paperwork when buying, leasing, or financing a vehicle. Today, consumers are charged numerous fees during the buying, leasing, and financing process. Establishing a reasonable limit of \$400 for paperwork preparation ensures that individuals are treated fairly by motor vehicle dealers, which will encourage increased car sales in Massachusetts.

I thank you for your consideration of House Bill 3690 and again express my support for a favorable report.

Best regards,

A handwritten signature in blue ink that reads "Steven S. Howitt".

Steven S. Howitt
State Representative
4th Bristol District

Andrew Zinc
128 West Spruce Street
Milford, MA 01757

May 13, 2025

Chair James Arciero
Joint Committee on Transportation
Attention: Siobhán Morrissey
24 Beacon Street, Room 134
Boston, MA 02133

RE: Written Testimony in Strong Support of Bill H.3698 (Registration of Kei-class Vehicles)

Dear Chair Arciero and Members of the Joint Committee on Transportation,

I am writing to express my strong support for Bill H.3698, scheduled for discussion on Tuesday, May 13, 2025, concerning the registration of legally imported vehicles, specifically Kei-class vehicles, in compliance with the Federal Motor Vehicle Safety Standards (FMVSS) under the federal 25-year exemption rule.

I own a 1995 Subaru Sambar truck, which I purchased and imported in March of last year. Initially, I successfully titled and registered my truck. However, shortly afterward, the Massachusetts RMV abruptly changed their policy, threatening to revoke existing registrations and titles or declare these vehicles as off-road-only. For me, this vehicle is ideally sized for my daily needs—efficient, practical, and safe for myself, other motorists, and pedestrians alike.

Comprehensive research of publicly available Massachusetts crash data shows no recorded accidents involving Kei-class vehicles from 2016 to the present. This absence of evidence strongly refutes claims that these vehicles are inherently unsafe, highlighting the arbitrary nature of the recent restrictions.

Bill H.3698 directly addresses these concerns by mandating that the Massachusetts RMV honor federal regulations and appropriately register Kei-class vehicles. This legislation ensures fairness, transparency, and consistency in RMV practices, upholds federally established vehicle import regulations, and protects the rights of Massachusetts residents like myself to lawfully own and operate vehicles best suited to our needs. Moreover, it promotes broader community benefits, including reducing road congestion, enhancing fuel efficiency, and supporting local businesses and dealerships that rely on the import and sale of these specialized vehicles.

I respectfully urge you and the Committee to support and advance Bill H.3698. Your favorable consideration will significantly benefit our community, automotive enthusiasts, local businesses, and individuals like myself, ensuring we can continue using our vehicles without the fear of sudden policy changes restricting our access to transportation.

Thank you for your attention to this matter and your commitment to fairness and sensible transportation policy in Massachusetts.

Sincerely,

Andrew Zinc

From: Sor ChiChi <[REDACTED]>
Sent: Monday, May 12, 2025 9:20 PM
To: Morrissey, Siobhan (HOU)
Subject: Written Testimony for H.3698

You don't often get email from [REDACTED]. Learn why this is important

Hello Siobhan,

I am writing in support for H.3698. Last year we ran into a fiasco of finding out my 30 year old imported Japanese truck was subject to an arbitrary ban from a secret decision from the RMV that was ill guided with incorrect information. People gathered together and were able to argue for the trucks at the MassDOT Board of Directors meetings, contacting state representatives and senators, the media to try to figure out what was happening and why. They did end up reversing course and bringing us back to the status quo however I want to make sure this doesn't happen again by having it codified into Massachusetts law that any 25 year or older grey market imported vehicle that was imported legally under the federal rules of vehicle importation meeting the appropriate exemptions should be allowed to be on the road as intended.

Thank you for your time and consideration of my message.

Chi Wu
Quincy, MA

From: Dan Albert <[REDACTED]>
Sent: Sunday, May 11, 2025 12:29 PM
To: Morrissey, Siobhan (HOU)
Subject: Testimony May 13, Joint Committee on Transportation HB3698, Kei Vehicles

You don't often get email from [REDACTED]. Learn why this is important

Dear Ms. Morrissey,
I will be on a work trip during this hearing though I may be able to break away to provide virtual testimony. Please accept the following written testimony in any case.

My name is Dan Albert, [REDACTED]. I am a member of the Boston Region Metropolitan Planning Organization's Vision Zero Task Force and have sponsored and secured passage of a road safety ordinance in Marblehead. I am also the citizen behind House Bill 3609, "An Act to Promote Safe Bicycle Yielding." It is in my capacity as a road safety advocate that I come before you as you consider House Bill H.3698, "An Act relative to federal motor vehicle safety standards compliance."

The bill seeks to ensure that the Massachusetts RMV properly registers and titles kei trucks. In fact, this body should go further and look for ways to encourage the purchase and use of kei vehicles to replace larger, more dangerous vehicles wherever possible. There are roughly 600 Japanese Domestic Vehicles (including about 400 keis) on Massachusetts roads and about 600 Tesla Cybertrucks. The state RMV allows the titling and registering of Cybertrucks, which are banned in Europe and the United Kingdom because they do not meet standards for protecting Vulnerable Road Users. Meanwhile, a growing body of research reveals that our streets would be safer if we had more kei trucks and fewer full-sized pickup trucks on state roads.

This bill came about because in the summer of 2024 the state RMV began refusing to register and title certain imported vehicles that it defined as "kei trucks." The ban originated with a misguided 2011 policy paper put out by the American Association of Motor Vehicle Administrators. "Best Practices Regarding Registration and Titling of Mini-Trucks." In fact, that policy paper was about low-speed vehicles, which included certain kei trucks imported with speed governors. It had nothing to do with the street legal and highway capable keidoshi-class vehicles from Japan. Also, it was written before researchers identified the "massive hazard" created by full-sized American light trucks and SUVs. In this context, keis are one antidote to the epidemic of road violence being committed against Vulnerable Road Users.

I spoke to RMV officials shortly after the state ban was reversed, but they declined to make Registrar Colleen Olgilvey available for an interview and offered only a boilerplate response when I asked why they had reversed their ban. To date, they have not acknowledged that kei trucks are safer for Vulnerable Road Users than full-sized pickup trucks.

I also spoke to Representative Howitt about his bill for my articles in StreetsblogMass (about the ban) and Bloomberg Citylab (about the kei truck phenomenon nationally). He comes at this from the perspective of a car guy. I'm a car guy too: I own a 1966 Buick Electra as well as a 1999 Honda Acty kei truck. And from my reporting I know that a big part of the constituency for the kei trucks is car guys, or more precisely, old-car hobbyists.

But I want this committee and everyone listening to understand that this is not a car guy issue. As of the 1999 model year, kei trucks are now available with air bags, crumple zones, and electronic fuel injection. In other words, they are less like collector cars like my old Buick and more like sensible, cheap, practical transportation better suited to Massachusetts traffic than their monster truck American-made peers. So, it is a road safety and environmental issue: kei trucks are safer for Vulnerable Road Users (as a recent study by the USDOT Volpe Center confirms) and are better for the environment. In fact, they are already available in battery electric versions in Japan.

I am glad the bill is filed as it puts the RMV on notice. And, subject to certain corrections, it would do no harm. But frankly I would rather the RMV follow its own existing rules and ensure that all of its staff are aware of those rules and procedures. I wish the RMV would encourage rather than object to kei registrations. And, I wish this committee would look for ways to encourage the displacement of dangerously large vehicles with these cheerful little machines from Japan.

Links:

“Best Practices Regarding Registration and Titling of Mini-Trucks.

“After a Short Lived Ban, Kei Trucks Get the OK in Massachusetts.” - Dan Albert

“Why Did the Government Declare War on my Adorable Tiny Truck?” - Dan Albert

“Kei Vehicles Demand Signals for Smaller Format E-Mobility Options” Volpe Center

“Direct Vision Study” The Lab @ MassDOT (VRUs and frontover crashes)

“Massive Hazards: How Bigger, Heavier Trucks Endanger Lives on American Roads”

Road to Zero Coalition, NSC, 2024

Dan Albert

he/him



Now out in paperback: Are we there yet?

From: Luke Driscoll <[REDACTED]>
Sent: Monday, May 12, 2025 6:39 PM
To: Morrissey, Siobhan (HOU)
Subject: Support of H.3698

You don't often get email from [REDACTED]. [Learn why this is important](#)

I would like to add my support for H.3698. I would also like to add some details.

Last year I was fortunate enough to acquire a 1994 Honda Acty truck. It is one of the most useful tools I have, the fact that the bed is low makes it much easier for me to load and unload. Unfortunately after about a month, I got a call from the RMV in Brockton, and was told that my registration had been revoked, and that I would no longer be able to use the truck. I believe that I may be the only person in MA that had their registration actually revoked. This meant that my incredibly useful tool became a very expensive lawn ornament. As you are aware the RMV changed their mind, and re-registered my truck a few weeks later; I had to pay the registration and tax fees again, and it took a few months for my original fees to be returned to me. I support this bill as I don't believe that the RMV should be able to, at a whim, decide that it won't register 25+ year old vehicles, and leave people in the lurch like this again. Please pass this bill so that all buyers of older vehicles can continue to use them.

Thanks in advance

Luke Driscoll.



The Commonwealth of Massachusetts

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4th Bristol District

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Steven.Howitt@mahouse.gov

May 13, 2025

Representative James Arciero, House Chair
Senator Brendan P. Crighton, Senate Chair
Joint Committee on Transportation
State House, Room 134
Boston, MA 02133

Dear Chair Arciero and Chair Crighton,

I write to testify in support of House Bill 3698, *An Act relative to federal motor vehicle safety standards*, of which I am the sponsor. I respectfully request that you report this bill out favorably.

In June 2024, the Massachusetts Registry of Motor Vehicles (RMV) abruptly issued a statement notifying residents of the Commonwealth that Kei Vehicles will no longer be registered or titled by the RMV. The RMV cited safety concerns as a primary issue regarding their decision, despite Kei cards undergoing various types of safety tests.

In September 2024, after facing immense pressure from both legislators and consumers, the Massachusetts RMV reversed its July 2024 decision and allowed Kei Vehicles to be registered and driven on state roads again. Though the original ban was reversed, this policy has not yet been codified into the Massachusetts General Laws, leaving it susceptible to sudden changes in the future, similar to the situation that occurred in July 2024.

H.3698 will codify a definition of these Kei Vehicles in the Massachusetts General Laws. The proposed amendment to Chapter 90 included in this bill will add a new section clarifying that vehicles 25 years or older as of the date of manufacture, including Kei cars, shall be registered in Massachusetts if they were imported in compliance with 49 CFR Part 591. Furthermore, it requires the Massachusetts Registry of Motor Vehicles to honor these standards, update its policy for Kei cars, and recognize inspection stickers for compliant vehicles. Following the events that transpired in 2024, there has emerged an evident need for this policy regarding Kei Vehicles to become law in the Commonwealth to protect both current and future Kei Vehicle owners.

I thank you for your consideration of House Bill 3698 and again express my support for a favorable report.

Best regards,

A handwritten signature in blue ink that reads "Steven S. Howitt".

Steven S. Howitt
State Representative
4th Bristol District

From: Robert Lord <[REDACTED]>
Sent: Monday, May 12, 2025 1:07 PM
To: Morrissey, Siobhan (HOU)
Subject: Bill H.3698

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I am writing in support of Bill H 3698.

I have driven this type vehicle for years. The Kei Truck is a remarkably useful and safe vehicle. I currently own a 1991 Suzuki Carry dump truck.

I am a land owner in western Massachusetts. I managed my forest through the Stewardship program. This truck matches the needs here on the farm from moving cord wood to taking hay to customers; It is highly efficient. This dump truck works well for a need not being met in the American market. America is starved for these trucks. Mass should be the leader in recognizing that small is better and statistically just as safe. Massachusetts leads in so many areas and this should be one of them. We should be promoting and encouraging their use. The benefits are huge. Oversized beasts that suck up fuel and are not utilitarian should never be the norm. An intelligent utility truck is the right future.

I strongly urge the passage of Bill H3698. It just makes sense in so many ways

Robert Lord
33 South Cemetery Rd
Buckland, MA 01330
413 695 2119

From: Wade Burch <[REDACTED]>
Sent: Monday, May 12, 2025 11:35 PM
To: Morrissey, Siobhan (HOU); Rubin, Natalie (HOU); Howitt, Steven - Rep. (HOU); Mike Minneman
Subject: Testimony for H.3698 An Act relative to federal motor vehicle safety standards compliance

Ladies and Gentlemen of the Joint Committee on Transportation,

I am unable to join you in person today but write to express my support for bill H.3698. As a car enthusiast in the Worcester area and owner of a Japanese-imported Kei truck, I was impacted last year by a capricious policy change which temporarily denied registration for Kei trucks and vans. The policy was ultimately reversed in response to community and legislative pressure led by our advocacy group. However, the experience highlighted an overwhelming need to codify in law the RMV's handling of these legally obtained classic foreign cars. This bill is important not just to protect the rights of Kei vehicle owners but also to send a clear message to the RMV to avoid similar shortsighted policies in the future.

As many of you know, Kei vehicles are the smallest size category of Japanese, expressway-legal vehicles. They are smaller than vehicles typically found in the US but are incredibly popular worldwide – accounting for 7 of the 10 top-selling models in Japan. Like other classic foreign cars, Kei vehicles are imported under the National Highway Traffic Safety Administration's "25 year" rule, Regulation 49 part 591.5i. This regulation specifically allows the importation of vehicles that are at least 25 years old without regard to their compliance with Federal Motor Vehicle Safety Standards.

On June 18, 2024 the RMV issued an internal training memo to deny registration and renewal of imported Kei-class trucks and vans specifically stating these vehicles were not intended for on road use and lacked safety features such as airbags, bumpers, roll bars, and tempered glass. Furthermore, it stated that these vehicles should not be registered because they did not meet Federal Motor Vehicle Safety Standards – despite the NHTSA's specific exemption for 25 year old vehicles. Unfortunately, the public, including import dealers and Kei owners such as myself, were not given an opportunity to engage with the RMV on this topic despite the urging of enthusiasts groups and of legislators across Massachusetts. Had they done so, the RMV may have better understood insurance industry proposals which have led to confusion around Kei vehicles.

At issue is the distinction between Kei vehicles and similarly sized low speed vehicles and Chinese minitruck. While the latter are intended only for off-road use and lack even basic safety features, Kei vehicles are designed and engineered for on-road use by major manufacturers such as Honda, Suzuki, and Subaru. Contrary to the RMV's position, Kei truck and vans universally include standard safety equipment such as seat belts, safety rated glass, roll bars, lights, signals, bumpers, wipers, and even air bags on later model vehicles.

While we were pleased the RMV chose to reverse their policy change in September of 2024, they did not admit their shortsightedness and instead chose to leave the door open to future bans - stating only that they would continue to evaluate Kei vehicle registration policies. There is nothing to evaluate here. The RMV was simply wrong to ban these legally imported and roadworthy vehicles. They should not be allowed the opportunity to make such a decision again and this bill ensures classic and foreign vehicle owners will be protected moving forward.

We appreciate your consideration and support.

Best regards
Wade Burch
Grafton, MA

My name is Max Anavian, a software engineer at National Grid and resident of Somerville MA. I am also a Japanese American, who has spent significant time in Japan. I am writing in support of the legalization of Kei trucks and cars in the Commonwealth of Massachusetts.

I strongly believe that motor vehicles should be safe for both drivers, pedestrians and the cyclists we share the road with. I also believe that reducing our emissions is important for our future. That being said, Kei cars and trucks are as safe, if not safer, while being more fuel efficient than some of the vehicles that are currently allowed to be registered in our state. Their small size offers better visibility to pedestrians, especially families and small children compared to similarly bedded full sized trucks. In a large city where we need to be vigilant about pedestrians, bike lanes, and other drivers, Kei trucks and cars offer a safer, more practical alternative to large inefficient full sized trucks. Another large benefit to the size of these vehicles is reducing the strain on our state's infrastructure. Their small size and lower weight have a reduced impact on our roads and allow for more flexibility for those who street park in areas such as Somerville, Cambridge, and Boston.

As someone who has spent significant time in Japan and has driven Kei cars regularly, I can attest to their safety and efficiency. They are often used in Japan as family vehicles, especially those with young children, as they offer safety, efficiency, and exceptional functionality. Kei vans for instance are a fantastic car for the elderly, as they are easier to get in and out of compared to normal sedans and SUVs, offering sliding doors and lower ride heights. My grandmother prefers Kei vans for this reason. Their popularity in Japan is no doubt due to all of the reasons I've listed above, as well as their reliability and low cost of ownership.

To ban Kei vehicles would take away the ability for our citizens to choose more practical, fuel efficient, and reliable options for their day to day lives. This is why I support H3698 and H4053.



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE BOSTON, MA 02133-1020

STEVEN S. HOWITT
STATE REPRESENTATIVE
4th Bristol District

Room 237, State House
Tel: (617) 722-2305
Steven.Howitt@mahouse.gov

May 13, 2025

Representative James Arciero, House Chair
Senator Brendan P. Crighton, Senate Chair
Joint Committee on Transportation
State House, Room 134
Boston, MA 02133

Dear Chair Arciero and Chair Crighton,

I write to testify in support of House Bill 3701, *An Act ensuring the timely release of a vehicle title*, of which I am the sponsor. I respectfully request that you report this bill out favorably.

House Bill 3701 will amend the Massachusetts General Laws to establish a requirement for any lienholder in possession of a motor vehicle title to provide a purchaser or lessee of a vehicle with the vehicle's title within 7 days of payment of the vehicle's purchase price, lease buyout, or financing agreement. Under this bill, any lienholder who does not comply with this provision will be assessed a fine of \$500 for each day they are not in compliance.

This legislation aims to protect consumers across the Commonwealth by ensuring that there are not unnecessary and extended delays associated with the purchase or financing of a vehicle. The creation of a 7-day timeline requirement for the transfer of a title from a lienholder to an individual will hold lienholders accountable and will allow consumers to have access to the vehicle they have bought or financed in a timely manner.

I thank you for your consideration of House Bill 3701 and again express my support for a favorable report.

Best regards,

A handwritten signature in blue ink that reads "Steven S. Howitt".

Steven S. Howitt
State Representative
4th Bristol District

July 1, 2025

Representative James Arciero, Chair Joint Committee on Transportation
Massachusetts State House
24 Beacon Street, Room 134
Boston, Massachusetts, 02133

Senator Brendan P. Crighton, Chair Joint Committee on Transportation
Massachusetts State House
24 Beacon Street, Room 109-C
Boston, Massachusetts, 02133

**SCAS Testimony in Support of H.3745: An Act Relative to Private Sale Requirements for
Used Vehicles**

Dear Chair Arciero and Chair Crighton,

The Small Claims Advisory Service (SCAS) endorses the passage of H.3745: An Act Relative to Private Sale Requirements for Used Vehicles. This bill provides essential consumer protections in private car sales by requiring full disclosure of known defects that affect a vehicle's safety or functionality. Based on our experience interacting with clients who have dealt with issues purchasing faulty vehicles from private sellers, we believe that this bill will help prevent serious physical and financial harm to the many Massachusetts residents who unknowingly purchase unsafe or defective vehicles.

SCAS is a student-run organization based at Harvard College that provides free legal information and assistance to individuals navigating the Massachusetts Small Claims Court system who have limited access to affordable legal information. While we are not attorneys, our volunteers are trained in small claims law and help people understand their rights and pursue justice in small claims court.

Furthermore, as issues related to purchasing vehicles are incredibly common both in small claims law as well as in our interactions with people across the Commonwealth, we believe that we can provide some valuable insight to help your committee in its deliberations with this bill.

In our work with individuals across Massachusetts, we have encountered numerous cases where buyers of used vehicles were misled by private sellers. For example, one individual purchased a vehicle that had a valid inspection sticker, only to later discover that the undercarriage was severely rusted and would require over \$13,000 in repairs. Another buyer was assured that a car purchased online had no issues,

but soon found the vehicle's frame was rotted beyond repair. In a third instance, a buyer learned that the vehicle's brake components had been installed incorrectly, creating a serious safety risk and requiring thousands of dollars of work.

Overall, SCAS has received over a dozen emails in the past year alone from people like these who purchase vehicles from private sellers, only to later find that they contained major defects that had the potential to significantly impair their operational safety. Each of these cases involved a lack of transparency and accountability from private sellers, leaving buyers with high repair costs and the potential for dangerous physical consequences. If H.3745 had been in effect, sellers would have been required to disclose known defects through a standardized Motor Vehicle Bill of Sale Form. Failure to do so would be considered an unfair or deceptive act, giving buyers clearer legal grounds for recourse.

We believe this legislation would significantly improve fairness in the used vehicle market and help reduce the number of disputes that arise from undisclosed defects as well as protect operators and pedestrians from potentially catastrophic accidents. By establishing clear expectations for private sellers, H.3745 empowers consumers to make informed decisions, strengthens the integrity of private sales, and creates safer roads.

We respectfully urge the committee to report H.3745 favorably. Thank you for your time and consideration.

Sincerely,

The Small Claims Advisory Service

Harvard College, Phillips Brooks House

1 Harvard Yard, Cambridge, MA 02138

smallclaimslegalresearch@gmail.com

The logo for the Small Claims Advisory Service (SCAS) features the letters "SCAS" in a stylized, red, serif font. The letters are closely spaced and have a classic, elegant appearance.

From: Matthew Blackham <[REDACTED]>
Sent: Monday, May 12, 2025 6:02 PM
To: Joint Committee on Transportation (LEG); Morrissey, Siobhan (HOU)
Subject: House Bill No 3747

You don't often get email from [REDACTED]. Learn why this is important

Dear Joint Committee & Siobhan,

I am a Concord resident and learned today about House Bill No. 3747, an act relative to duplicate license plates, and am writing to you to request that you vote “NO” - against the Bill.

As you may know, low number licenses plates are often “passed down” from generation to generation – or “won” in the annual license plate lottery. Specialty plates, such as Breast Cancer Awareness, are often auctioned to raise money for Charitable organizations. In many cases a standard issue number may also exist as a specialty plate or as a commercial plate. In other words, license plate #12564 could exist as a standard issue plate and as a commercial plate, or as a special plate such as Breast Cancer Awareness, Cape & Islands plate, or one of the many alternatives.

The license plate number that I have has tremendous sentimental value to me and I know many other Massachusetts residents that cherish the “family” license plate that has been passed down from generation to generation. In my case, my plate was passed down to my grandmother and now to me – and I have hopes of passing it along to my daughter. Please consider the connection that people have to their plates and the impact that having one of these coveted plates revoked will have on those that cherish them.

Matthew Blackham
[REDACTED]



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1054

BRIAN W. MURRAY
STATE REPRESENTATIVE
10TH WORCESTER DISTRICT
HOPEDALE, MENDON, MILFORD

CHAIR
HOUSE COMMITTEE ON HUMAN RESOURCES
AND EMPLOYEE ENGAGEMENT

STATE HOUSE, ROOM 238
TEL: (617) 722-2380
BRIAN.MURRAY@MAHOUSE.GOV

March 13th, 2025

Joint Committee on Transportation
Rep. James Arciero, House Chair
Sen. Brendan P. Crighton, Senate Chair
State House, Room 1134
Boston MA 02133

Re: H.3747 An Act relative to duplicate license plates

Honorable Chairs,

I am writing in support of the above-referenced bill, H.3747 An Act relative to duplicate license plates which will prohibit the registrar from assigning a new license plate if the registration sequence to be displayed horizontally on the new plate is the same as an existing plate. Further, it directs the registrar to issue, free of charge, a new registration number and plate to a registrant with a duplicate plate, if the registrant chooses to obtain a new unique plate.

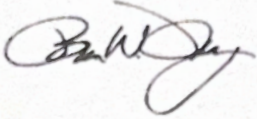
It also mandates that the registrar identify all registrants with duplicate plates and inform them of their ability to receive a new registration number and plate.

Lastly, it requires that any government entity documenting a license plate, for tolls, fines, surcharges, fees, or assessing violations, document the entirety of the sequence on the plate, including vertically stacked characters, and note if the plate is a specialty, distinctive, or commercial plate for the purpose of assessing a fine or violation.

The need for this bill was brought to my attention from constituents who received toll payment violations, particularly from another state, for a vehicle that was not theirs, but shared the same horizontal sequence on their license plate. This can occur with the issuance of specialty plates. Video enforcement often does not pick up the logo of a specialty plate which then results in the issuance of an inaccurate toll violation assessment.

I therefore request a favorable report on this bill. Thank you for your consideration and please advise if further information is required.

Sincerely,

A handwritten signature in dark ink, appearing to read "Brian W. Murray", with a stylized, cursive script.

Brian W. Murray
Chair, House Committee on Human Resources and Employee Engagement
State Representative
10th Worcester District

BWM/jkc



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1020

JOHN H. ROGERS
REPRESENTATIVE
12TH NORFOLK DISTRICT

STATE HOUSE, ROOM 155
TEL: (617) 722-2450
John.Rogers@MAhouse.gov

VICE CHAIR
Bonding, Capital Expenditures
and State Assets

COMMITTEES:
Joint Committee on:
Labor and Workforce
Development

May 13th, 2025

Joint Committee on Transportation
Massachusetts General Court
24 Beacon Street
Boston, MA 02133

Re: Testimony in Support of H.3770 and H.3771

Dear Chairs Crighton and Arciero, Vice Chairs Philips and Mark, and Honorable Members of the Committee,

I respectfully submit this testimony in support of House Bills H.3770 and H.3771, two targeted measures that address pressing infrastructure and regulatory modernization needs within the Commonwealth.

H.3770 authorizes the Massachusetts Department of Highways to immediately take by eminent domain a section of Brook Street in the Town of Norwood—including the Willett Pond Dam and its attendant structures—for the purpose of emergency rehabilitation and public safety improvements. This legislation allows necessary repairs to proceed without delays from permitting processes and provides the Department with the flexibility needed to act quickly. The dam and street are vital components of both transportation and public safety infrastructure. The bill also designates the restored structure as the Honorable Gregory W. Sullivan Dam, in recognition of his distinguished service to the Commonwealth as both a Representative and Inspector General.

H.3771 addresses an important administrative concern affecting Class 1 auto dealers. The bill amends Section 62 of Chapter 140 to allow licensed dealers to maintain required vehicle transaction records electronically, through systems approved by the Registrar of Motor Vehicles, rather than duplicating those records in hard copy logbooks. This change allows dealers to meet legal requirements more efficiently by keeping records electronically, without the need for duplicate entries.

Together, these bills promote efficiency, public safety, and responsible governance. I respectfully urge the Committee to issue favorable reports on both H.3770 and H.3771.

Thank you for your time and thoughtful consideration.

Sincerely,

Representative John H. Rogers
12th Norfolk District

Joseph Lavallee
66 Main St
PO Box 412
Hatfield, MA 01038

May 12, 2025

Chair Brendan P. Crighton & Chair James Arciero
24 Beacon St.
Boston, MA, 02133

Re: H.3775, An Act relative to the town of Hatfield to permit the use of golf carts on the public ways of the town

Dear Chair Crighton, Chair Arciero, and Honorable Members of the Joint Committee on Transportation,

Hatfield is a small town with approx. 3200 residents and 16 square miles in Western Mass along the beautiful Ct river. Our town is over 350 years old and farming continues to this day since our inception, many being the same families all these generations.

With rt 91 and rt 5 being the only non town roads, there is plenty of space for enjoyment and being outdoors. As well as having so little traffic that is the envy of most on wide roads with few curbs. This will be limited to town roads only with many rules and restrictions. The idea of crossing the one road (rt5) would be no different than a lawnmower, a snowmobile, or a tractor going straight across the road to get to town center quite similar to a golf course where they are already allowed to cross roads.

Over the years, many of these small farms started to use what we used to call golf carts yet today, they are used for utility, a bit of pleasure, and as a wonderful means for seniors and those with limited abilities to access the Ct. river dike system or go to the town park in the town center or to get around parts of our town to visit our many farm stands and others or just to use as another form of electric and slow moving vehicles (as they are also referred to) in a safe way. However, due to the absence of rules and safety considerations, it has been suspended until we started the effort to see how we could accomplish this legally and safely as a Town.

Imagine if you will, the smiles on some of the "Grandparents" or those with such limited abilities to get out of their wheelchairs and feel the wind and enjoy the safe slow ride around their neighborhood. As well, we invite you to visit this special place to see the wonderful town we have.

Too often, we think of these as "golf only" carts yet, they are just another form of local transportation that as a town are asking for your support to allow our town to implement the much thought out by-laws put together by our Police Department that was overwhelmingly approved at our Annual Town meeting on May 14th 2024.

As the writer of our first ADA compliance program many years ago and recently serving again on this board, the true Spirit and Intent of the ADA, fits this idea so supportively.

The by-laws that were put together with the help of our town Police Department to cover so much in the way of safety, safe zones, safety inspection, seat belts, horns, lights, blinkers, reflectors, brake lights, flashers, town registration fees, and insurance coverage as well as age restrictions that mirror all of the driving rules of the roads as they currently exist. The RMV issues are such that there are no titles or bills of sale on these available, Which is why the Police Chief is willing to do the town inspections and town registration at the PD offices in town center. Also, this reduces our so-called greenhouse emissions or footprint as just one more way to help our environment as most of these now are electric.

Approving this for our one town as a first in the State could readily be used as a template for consideration for other towns that might consider such but, on their own accord. Today, we are asking for Hatfield to have your approval as a first of its kind test case of this very positive proposal that was overwhelmingly voted in favor by our Townspeople. We're a small town but we're like the Little Engine that could make a difference with your help today.

Massachusetts has always been creative, inventive, and willing to try new ideas. We are asking for this to get a positive approval from your Committee after so much help, direction, and work by our elected Officials, Sen. Jo Commorford, Rep Lindsay Sabidos, our Board of Selectpersons, our Police Chief Mike Dekoshak, and others that understand the true meaning of what this means to a small town here in Massachusetts.

We are a very small town asking your Committee that has much more important issues to work on every single day to take a moment in time to help us see something so positive get approved. Please give us a chance to do something so positive in some very challenging times.

With all respect, we thank you for letting us have your time on this.

Joseph Lavallee

Former Town Moderator of Hatfield, 22 years

From: Nancy Shea <[REDACTED]>
Sent: Thursday, May 15, 2025 2:26 PM
To: Morrissey, Siobhan (HOU)
Subject: Hatfield Golf Cart Bill comments

You don't often get email from [REDACTED]. Learn why this is important

I am writing to offer my support for the Hatfield Golf Cart Bill discussed at the Transportation Board Hearing on May 13, 2025.

My husband, William Shea is a 5th generation resident of Hatfield, our two sons, 6th generation homeowners also live in town. I've only lived here for 45 years. We've owned our home on Main St since 1980. Throughout these years we've had the honor of living in one of the most beautiful small towns. The commuter traffic past our home primarily consists of a parade of tractors and about a dozen cars, some potato trucks, and lots of walkers. We are accustomed to being stuck behind tractors towing wagons full of tobacco, or hay bales, so slow moving vehicles aren't an issue for us. And neither would be a golf cart. Quite unique for a main street in any town. No traffic lights, no blinking yellow lights, or blinking stop signs.

Hatfield is basically an island, situated between the Connecticut River and Interstate 91/Route 5. There are seldom many cars, unless folks are on a drive through to avoid the highway while sightseeing. We have occasional motorcycle clubs driving through on weekends, and some bicycle clubs enjoy riding on a road with minimal traffic.

Many of us became interested in using golf carts to go into the center of town to our new gazebo to attend concerts on summer nights as a fun way to bring along your seating, and ease of parking. Not to mention, it feels foolish for us to drive 1/4 mile only to park half way to get a spot. We also have events at the Lions Club Pavillion, 1/2 mile away for us. In addition, there are many roads through the fields, and in a town with a long tradition of farming, it's always a pleasant ride along the dike to check out the progress of the crops. We're pretty simple folks. A summer drive in the evening along the river watching the corn, tobacco, and other crops maturing is very relaxing. Meeting friends in their golf carts doing the same thing is pretty nice, too. Especially in these times people just don't see much of their neighbors.

We stand in full agreement with the guidelines Chief Michael Dekoschak has proposed. His support is greatly appreciated. We are happy to comply with all of the rules, which would allow us resume our pleasurable pursuits with our golf carts.

We thank you for your consideration of this bill.

Sincerely,

Nancy and William Shea
97 Main St
Hatfield, MA



COMMONWEALTH OF MASSACHUSETTS
THE GENERAL COURT
STATE HOUSE, BOSTON 02133-1053

May 12, 2025

Chair Brendan P. Crighton
24 Beacon St., Room 109-C
Boston, MA, 02133

Chair James Arciero
24 Beacon St., Room 134
Boston, MA, 02133

Dear Chair Crighton, Chair Arciero, and Honorable Members of the Joint Committee on Transportation,

We are writing in strong support of **H.3775, *An Act relative to the town of Hatfield to permit the use of golf carts on the public ways of the town.*** This bill would allow residents to use golf carts on public roads while establishing stringent guidelines to ensure the safety of all road users. This would address the increasing popularity of driving golf carts on public roads in Hatfield, which has raised questions about what conduct is permitted and prohibited by residents, town officials, and law enforcement. By setting clear rules and regulations, this bill will create a safer and more orderly environment on the roads of Hatfield.

The bill would establish licensing and registration requirements for golf carts driven on public roads. Golf carts would have to be registered with the town clerk and display a registration decal. Additionally, operators would need to hold a valid driver's license and all golf carts would need to be insured.

The bill also outlines specific conduct requirements. It would mandate that seat belts be worn at all times and would prohibit both the consumption and possession of alcohol while operating the vehicle. Speed restrictions would be set, with drivers not being allowed to exceed 20 miles per hour and forbidden from accessing areas where the speed limit surpasses 40 miles per hour, including state highways. Additionally, any modifications to increase a golf cart's speed would be strictly prohibited.

The bill would require operators to keep to the right side of the road as much as possible to ensure they do not disrupt the regular flow of traffic. Furthermore, the operation of golf carts is restricted during nighttime hours, defined as 30 minutes after sunset to 30 minutes before sunrise, except in cases where the select board grants special exemptions for events.

Finally, the bill grants the Town of Hatfield the authority to establish fines and enables local law enforcement to apply regular traffic laws to golf cart users. This will ensure that golf cart operators adhere to the same standards of road safety as other motorists.

We thank the committee for its diligence in examining this bill, and we hope that the Committee will report this legislation favorably.

Respectfully,

A handwritten signature in cursive script, appearing to read "Lindsay N. Sabadosa".

Lindsay N. Sabadosa
State Representative
1st Hampshire district

A handwritten signature in cursive script, appearing to read "Jo Comerford".

Jo Comerford
State Senator
Hampshire, Franklin, Worcester district



The Commonwealth of Massachusetts

House of Representatives

State House, Boston 02133-1054

AARON SAUNDERS
STATE REPRESENTATIVE
7TH HAMPDEN DISTRICT

STATE HOUSE, ROOM 34
TEL. (617) 722-2320
Aaron.Saunders@MAhouse.gov

Dear Chair Arciero and Chair Crighton,

Thank you for the opportunity to provide testimony and support of H.3779 *An Act Relative to Motor Vehicle Leasing Parity*. This bill would address the current gap in rights and consumer protections for Massachusetts residents who purchase a vehicle and those who lease. As it pertains to defective vehicles, just financing and unfair repossession tactics, Massachusetts consumer law is firmly behind buyers.

However, those legal protections rarely extend to consumers who lease. As a result, if a leased vehicle fails inspection the consumer would then be stuck with a defective vehicle and any damages incurred prior to the date of sale. The lack of protections for lessees poses a threat to the financial security of hardworking individuals and families in the Commonwealth for which leasing their vehicle is a responsible financial decision.

H.3779 proposes a simple fix to this issue. This bill adds language to include lessees into the existing laws protecting buyers and establishes a universal standard for all motor vehicle transactions. There would be no new regulations or obligations for dealerships of finance companies. Further, this bill would allow Massachusetts to join the ranks of 25 other states, including the rest of New England, in extending consumer protections to lessees.

An Act Relative to Motor Vehicle Leasing Parity would ensure consistent consumer protections when it comes to motor vehicles in Massachusetts. I urge the committee to report this matter favorably and look forward to working with you on this important bill. Thank you again for the opportunity to testify. I am available to discuss further or answer any questions that may arise.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Saunders', written over a horizontal line.

Representative Aaron Saunders
7th Hampden district



ADAM J. SCANLON
STATE REPRESENTATIVE
14th BRISTOL DISTRICT

STATE HOUSE, ROOM 127
TEL. (617) 722-2680
Adam.Scanlon@MAhouse.gov

The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1054

VICE-CHAIR
House Committee on
Post Audit and Oversight

Committees:
Joint Committee on
Economic Development
and Emerging Technologies
Joint Committee on
Emergency Preparedness
and Management
House Committee on
Federal Funding, Policy
and Accountability

May 27th, 2025

The Honorable Brendan P. Crighton, Senate Chair
Joint Committee on Transportation
24 Beacon Street, Room 109-C
Boston, MA 02133

The Honorable James Arciero, House Chair
Joint Committee on Transportation
24 Beacon Street, Room 134
Boston, MA 02133

H.3781 An Act clarifying the vehicle transfer and registration laws

Dear Senate Chair Crighton and House Chair Arciero,

I write to you as the lead sponsor of **H.3781**, An Act clarifying the vehicle transfer and registration laws, which has been referred to the Joint Committee on Transportation for review. I respectfully request a favorable report of this legislation to make a small but helpful change to our vehicle transfer and registration laws in order to make compliance simpler for our residents.

This legislation was reported favorably last session as H.3422 by the Committee and then ordered to a third reading. It would clarify and make simpler the timeline of requirements for our residents to transfer registration of vehicles and to apply for certificate of title, making the timelines for both these tasks consistent with each other.

Specifically, this legislation would amend Section 2 of Chapter 90 to extend the grace period for registration transfers to 10 business days from the seven calendar days allowed under current law. The grace period is the length of time the state gives an individual to transfer their valid registration from an old vehicle to a new vehicle, provided that the old vehicle is no longer in their possession, that the two vehicles are of the same type, that the plates associated with the registration are attached to the new vehicle, and that the individual carries the transfer documents

in the new vehicle and is at least 18 years of age. Under this legislation, these conditions of the grace period would be unchanged from current law.

This legislation would also amend Section 4 of Chapter 90D to clarify the language regarding the length of time one has to apply for the certificate of title upon newly acquiring a vehicle. Under this legislation, Section 4 would prescribe that application for title must be made by “close of business of the tenth business day following the” acquisition of the vehicle, instead of “within ten days” as the law currently reads. This makes the law clearer regarding the difference between calendar days and business days, and gives residents more time to comply by not counting non-business days.

In summary, **H.3781** would make consistent the requirements for transferring registration to a new vehicle and applying for the certificate of title, giving people up to 10 business days for both tasks and expressing the time frame for each requirement in identical language. This would simplify and make more clear to our residents their legal responsibilities with regard to vehicle acquisition, lessening the burden on residents who are just trying to uphold their responsibilities and do the right thing.

Again, I respectfully request a favorable report for **H.3781**. Thank you for your time and consideration, and please do not hesitate to contact my office should you like to discuss this legislation any further.

Respectfully,

A handwritten signature in black ink, appearing to read "Adam Scanlon". The signature is fluid and cursive, with the first name "Adam" and last name "Scanlon" clearly distinguishable.

Adam J. Scanlon
State Representative
14th Bristol District



1st Norfolk District
Quincy – Randolph

Bruce J. Ayers
State Representative

45 Williams Street, N. Quincy, MA 02171
(617) 472-9877
brucej.ayers@yahoo.com



Chairman James Arciero
House Committee on Transportation

Dear Chairman Arciero,

Thank you for your continued leadership on the Joint Committee on Transportation and for your continued commitment to public safety on our roads.

I recently testified before the Committee in support of my bill, H.4029, *An Act relative to banning the use of tinted license plate covers*. In an effort to advocate for this legislation, I wanted to send you some additional information on the bill for your review and consideration.

This bill was filed in response to concerns raised by both constituents and public safety officials regarding the growing use of tinted or “smoked” license plate covers. While some of these covers may appear harmless, they often obscure the visibility of plate numbers, registration decals, and state identifiers, particularly in poor lighting or adverse weather conditions.

This creates risk and uncertainty for toll enforcement, accident investigations, and law enforcement operations. States like New York, Virginia, and Pennsylvania have already banned tinted license plate covers, leading to measurable results. Notably, New York recovered over \$19 million in lost toll revenue in just one year following stricter enforcement.

Here in Massachusetts, the shift to electronic tolling has made it critical that license plates remain fully legible at all times. The passage of this legislation will align Massachusetts with best practices nationwide, ensure accurate toll collection, and support law enforcement’s ability to keep our roads safe.

Thank you for your time and consideration.

Sincerely,

Bruce J. Ayers
State Representative

From: Robert Kearns <[REDACTED]>
Sent: Thursday, May 8, 2025 8:00 AM
To: Morrissey, Siobhan (HOU)
Cc: Vitolo, Tommy - Rep. (HOU); Ayers, Bruce - Rep. (HOU); Keenan, John (SEN)
Subject: Testimony support of support of H4029 An Act relative to banning the use of tinted license plate covers

Dear Chairs Arciero and Crighton and Members of the Committee,

I am writing in strong support of H4029 An Act relative to banning the use of tinted license plate covers.

As a Massachusetts taxpayer and everyday driver, I see vehicles with obscured license plates multiple times a day while driving around. Whether it's tinted covers, or plastic shields, these covers make it nearly impossible to read the plates—both for fellow drivers and for the systems our Commonwealth relies on. To illustrate the scope of the problem, I've been documenting what I see and compiled a Google Photos album of license plate covers encountered across the state.

Photo Album:
<https://photos.app.goo.gl/wCzF3jDhdX3Vq63Q6>

It's frustrating to know that while I pay my tolls and parking fees as required, others are using these covers to avoid doing the same. It's not just unfair—it's costly. It shifts the burden onto compliant drivers and undermines the systems we all depend on.

License plate readers are critical for toll collection on the Mass Pike, the Tobin Bridge, and the Sumner, Callahan, and Ted Williams tunnels. They're also used by the MBTA and UMass to collect parking fees, and by law enforcement to monitor traffic and investigate crimes. Obscured license plates compromise all of these functions.

Furthermore, in emergencies, accidents, or criminal incidents, first responders and witnesses need to be able to identify vehicles quickly and accurately. Plate covers directly obstruct this and can pose a serious risk to public safety.

For the sake of fairness, accountability, and public safety, I urge you to give H4029 a favorable report. This legislation is a reasonable and necessary step to ensure our systems work as intended—and that everyone plays by the same rules.

Thank you for your attention to this important issue.

Best,
Robert Kearns
Quincy, MA

Best,
Robert

www.robertvkearns.com

Sent from my mobile device

Mobile phone: [REDACTED]

Email: [REDACTED]



The General Court of Massachusetts

State House, 24 Beacon Street,

Boston 02133-1053

The Honorable Representative James Arciero, House Chair

Joint Committee on Transportation

State House, Room 134

Boston, MA 02133

H.4053 Written Testimony in Support of Legislation Clarifying the Legal Status of Kei Trucks in the Commonwealth

To the Honorable Chair Arciero and Members of the Committee:

Thank you for the opportunity to submit testimony in support of the bill to clarify the registration and operation of Kei trucks in the Commonwealth.

As you may know, Kei trucks—lightweight, compact vehicles imported from Japan—have become increasingly popular across the United States due to their affordability, efficiency, and utility. They are especially valuable for individuals and small businesses in agriculture, landscaping, property maintenance, and similar fields. These trucks offer a practical solution for transporting tools, materials, and equipment, while being far more fuel-efficient and environmentally friendly than larger, conventional trucks.

Unfortunately, despite their benefits, there has been some confusion around the legal status of Kei trucks in the Commonwealth. Until recently, owners and dealers were often told that these vehicles could not be registered or operated on public roads. This uncertainty created unnecessary barriers for lawful ownership and use.

After meeting with the Registrar of Motor Vehicles last year and presenting evidence regarding the federal import standards and practical use of these vehicles, a formal notice was issued clarifying that Kei trucks will indeed be legally registered, sold, and driven in the Commonwealth once more.

This bill seeks to codify that clarification, ensuring consistency and transparency in state policy. By doing so, it protects consumers, provides clear guidance for law enforcement and RMV personnel, and supports small business owners who depend on these vehicles to operate efficiently and affordably.

Importantly, this legislation does not create any new rights or exemptions. It simply affirms the current, correct interpretation of existing law and formalizes the position already taken by the Registry. Kei trucks meet federal import and safety standards, and they are successfully registered and used in numerous other states across the country.

Clarifying their legal status in statute ensures that our regulations are fair, consistent, and accessible. It also helps to avoid confusion and ensure compliance by all parties involved in vehicle ownership and regulation.

I respectfully urge the committee to pass this bill and reaffirm the Commonwealth's support for practical, sustainable, and economically accessible transportation solutions.

Thank you for your time and consideration.

Respectfully,

Shirley Arriaga

State Representative



Dear Chair Arciero, Chair Keenan, and Members of the Joint Committee on Transportation:

I write to express my strong support for **SB 2367**, which would correct Massachusetts's outdated insurance law by designating a renter's personal auto policy as the **primary source of liability coverage** when operating a rental vehicle.

I represent Jay Harland Corp DBA Black Mobility / ACE Rent a car, which provides rental vehicles to residents, non-profit organizations, businesses and visitors of the greater Springfield, MA area. We are delighted to call ourselves a Massachusetts corporation. We are proud to contribute to the state's transportation infrastructure and economy.

Today, Massachusetts requires rental car companies to provide primary liability insurance coverage—even when a renter already carries a policy that covers them in a rental. This practice is inconsistent with insurance norms across the country and unfairly shifts financial responsibility from insurers (who have been paid to assume that risk) to rental providers. Being a **small local business established in 1991**, this has become a great financial burden on our business. With increasing medial costs and risk exposure, a few claims could easily put a small business **such as ourselves out of business**.

With the state's **minimum financial responsibility standards increasing on July 1, 2025**, the urgency of this issue cannot be overstated. Absent reform, rental operators will face significantly higher liability exposure—costs that will ultimately be borne by consumers and small businesses alike.

SB 2367 restores fairness and aligns Massachusetts with the majority of other states.

If a renter holds valid insurance, their policy should cover third-party claims—just as it would if they were driving their own car.

I respectfully urge the Committee to support SB 2367 and ensure that Massachusetts adopts a more equitable and modern insurance framework.

Thank you for your time and consideration.

Sincerely,

Aaron Black

Jay Harland Corp.

Springfield, MA

ablackblacmobility.net 413-386-7001



5/12/25

Dear Chair Arciero, Chair Keena, and Members of the Joint Committee on Transportation: I wrote to express my strong support for **SB 2367**, which would correct Massachusetts Outdated insurance law by designating a renter's personal auto policy as the **primary source of liability coverage** when operating a rental vehicle.

I represent Carretela Inc which we rent vehicles throughout Massachusetts, serves local residents and travelers, partners with dealerships, and we work with insurances. We employ 4 people across the Worcester county in Massachusetts and are proud to contribute to the state's transportation infrastructure and economy.

Today, Massachusetts requires rental car companies to provide primary liability insurance coverage—even when a renter already carries a policy that covers them in a rental. This practice is inconsistent with insurance norms across the country and unfairly shifts financial responsibility from insurers (who have been paid to assume that risk) to rental providers.

With the state's **minimum financial responsibility standards increasing on July 1, 2025**, the urgency of this issue cannot be overstated. Absent reform, rental operators will face significantly higher liability exposure—costs that will ultimately be borne by consumers and small businesses alike.

SB 2367 restores fairness and aligns Massachusetts with the majority of other states. If a renter holds valid insurance, their policy should cover third-party claims—just as it would if they were driving their own car.

I respectfully urge the Committee to support SB 2367 and ensure that Massachusetts adopts a more equitable and modern insurance framework.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Edwin Hilario". The signature is fluid and cursive, with a large loop at the end.

Edwin Hilario

A Matter of Affordability & Fairness-House Bill S 2367

Good afternoon, Chairman Arciero and Chairman Crieghton and members of the Joint Transportation Committee. My name is Thomas Doyle, and I am the Regional Liability Manager for Enterprise Mobility northeast claims operations. Enterprise Mobility provides Massachusetts consumers and businesses with mobility solutions including car rental, truck rental, fleet management, car sharing, vanpooling, car sales, and more.

Enterprise is a family-owned company of over 65 years, currently operating the Enterprise, National, and Alamo car rental brands. I'm here today to speak on behalf of the importance and benefits of S-2367. And, while I am here as an Enterprise employee, I think it's fair to say that I am speaking on behalf of an issue very important to the car rental industry as a whole and, more broadly, for the good of consumers, local businesses, and the State of Massachusetts.

Enterprise has been in the business of renting cars in Massachusetts since 1989. We and all companies within the industry are proud of our local operations and the neighborhood communities we serve. The car rental industry employs thousands of employees who work in various areas across the state. It is important to note that the rental industry is not just companies like Enterprise. The industry consists of larger companies and small, independent, family-run car rental agencies. The current law serves as a barrier to newer companies entering the market or trying to grow their existing business, which results in less competition, higher costs and fewer renting options for consumers. Regardless of size, these companies directly and indirectly employ thousands of residents. The economic impact our industry has is significant. There are the costs associated with titling and registering those vehicles; the payroll and business taxes paid, and the sales taxes paid by our customers. There is the impact and benefit of working with body shops, auto dealers, and service shops. Finally, the industry's role in accommodating the residents and tourists to our state cannot be overstated.

We feel that this proposed bill would bring Massachusetts in line with nearly every other state in the country. This bill would require an insurance company to be primary for the losses caused by their insured drivers. The basic premise being the insured negligent party should be primarily responsible for the damage he or she causes. Based on existing law, Enterprise takes a voluntary primary liability position in just three states along with the District of Columbia. This makes Massachusetts an outlier on this issue. We feel this bill would be the most equitable approach for all car rental customers and for all insurance policy holders.

We have lobbied for this change for the past several years and the urgency to remedy this has become even greater, as the Minimum Financial Requirement or MFR are set to increase in July. This will further disadvantage all MA car rental companies with higher operating costs. That impacts car rental affordability for MA residents, businesses, and government contracts. Whatever the unintended consequences of the increase, residents who obtain MFR policies will experience increased costs in obtaining a policy and will also see less affordability in the car rental market.

Some key points to consider.

- No immunity is granted to a rental car company under this law.
- Rental car companies will still be liable for issues relating to their cars and maintenance
- Rental car companies will still be liable for the acts of their own employees.
- Rental car companies will continue to extend the state's MFR limit of liability to cover damages to innocent vehicles in the event the rental driver has no other available insurance to respond to their negligent acts.
 - The new limit will be \$50,000 for all persons injured in an accident, up to a limit of \$25,000 per individual and \$30,000 for all property damage.
- It is very important to note that there will be no "uninsured" rental vehicles on Massachusetts roads.

Auto claims involving rental cars represent a very small percentage of all auto claims. In states where this same order of coverage has been adopted in recent years there is no evidence to show that those changes resulted in an increase of auto premiums. From a regional standpoint, it is important to note that rental car companies are not primary in any other New England state, and it has not had any negative impact on the consumers in those states.

We believe this act would provide peace of mind to the public. Most people with insurance policies believe their policy will cover them for any vehicle they operate. The reality in Massachusetts is that carriers collect the premium, but do not cover their insureds in the event of a loss with a rental car. That is an inequitable approach. This act would simply make it so that renters would be protected by the insurance company to whom they have chosen to pay their premium and chosen to be their advocate. It would also help control costs in the rental car industry, allowing rental car companies to keep rates competitive for local consumers and tourists. In short, it would make MA in line with the rest of the country, which would lead to industry growth, generating revenue for the state all while benefiting the residents.

Thank you for your time and consideration. We ask for your support to help align MA with the rest of the country by passing this bill.



P.O. Box 584
Long Lake, NY 12847

sfaulkner@acraorg.com www.acraorg.com

A Matter of Fairness – S2367 / H1301

Shouldn't negligent drivers be held responsible for the damages they cause?

Legislation has been introduced that requires an insurance company, whose insured driver causes an accident while driving a rental car, to provide primary coverage for the accident. The basic premise of the proposed change is to require that an insured at fault party in an accident should be responsible for the damages they cause. It is a matter of fairness. Let's take this long overdue step to align Massachusetts with the rest of New England and the National standards set by 95% of the other States in our country. Most recently, the Maryland legislature changed the law in 2020.

Only three states and the District of Columbia require rental car companies to provide primary liability (without any exceptions or indemnity rights), making Massachusetts a clear outlier.

Continued responsibility - No immunity is granted to a rental car company.

Rental car companies will still be financially responsible for their own negligence, that of their employees, and as a guarantor of the Minimum Financial Responsibility limits, should their operators not have other valid insurance coverage that satisfies the MFR. **The proposed change will not add "un-insured rental vehicles to MA roads" as Rental Car companies will extend up the State's MFR if there is no other valid or collectible insurance available on behalf of the renter.**

No impact on insurance - Rental claims represent approximately one half of one percent of all claims.

Auto claims resulting from the operation of a rental car represent approximately one half of one percent of all auto claims. In states where this same order of coverage has been adopted in the last decade, there is no evidence to show the change resulted in an increase in auto premiums.

Impact on rental car drivers - Security and peace of mind

Most people who purchase personal auto insurance policies believe that their insurance will cover them when they operate any vehicle. And in fact, under many personal auto policies, insurance companies collect premiums that include coverage for "non-owned, temporary or substitute vehicles", including rental vehicles. This means that some insurers may be collecting policy premiums in anticipation of covering their insured when they operate a rental vehicle; but in fact, never paying for those claims when they occur in Massachusetts.

Because renters of vehicles assume contractual responsibility for their actions while operating a rental vehicle, rental companies could seek recovery of the amounts they are forced to pay out on behalf of their negligent customers. **This law would make it clear - renters are entitled to be protected by the insurance company to whom they have chosen to pay their insurance premiums.**

¹ Majority of this document references the proposed amendment to Chapter 90 Section 32E. There are also minor proposed changes to Chapter 90 Sections 32C and 34M to harmonize the proposed amendments across sections and to clarify the types of rental systems and that those companies are only required to visually inspect a driver's license for facial validity prior to a rental. See Nunez v. A & M Rentals, Inc., 63 Mass. App. Ct. 20, 25 (2005).

² What is minimum financial responsibility (MFR): Massachusetts law requires every vehicle owner to maintain a minimum level of financial responsibility for the negligent operation of the vehicle. Those minimum limits are \$40,000 for all persons injured in an auto accident, subject to a limit of \$20,000 for one individual, and \$5,000 for all property damage – commonly expressed as an MFR limit of 20/40/5. Limits set to increase 7/1/2025 to 25/50/30





Solutions That Move the World Forward

Enterprise Mobility™ has been moving mobility forward for more than 65 years. We have always been inspired by a bold idea—to create better experiences for how the world moves. From a fleet of seven cars, more than six decades ago, to a global network serving consumers, businesses and governments, Enterprise Mobility is a leading provider of mobility solutions including car rental, fleet management, flexible vehicle hire, carsharing, vanpooling, car sales, truck rental, vehicle subscription, luxury rental, technology solutions and more, to help make travel easier and more convenient.

SUPPORTING LOCAL COMMUNITIES

Investing in local communities and supporting social welfare is core to Enterprise Mobility's values. Today, we are able to broaden the organization's impact through programs that support both people and the planet. We also encourage a culture of volunteerism and empower team members to support the charitable organizations and causes most important to them.

FY24 Global Philanthropy Highlights

- Over \$85 million donated to charitable organizations worldwide by Enterprise Mobility through its operating groups and the Enterprise Mobility Foundation—90%+ of the grants awarded were identified by global team members.
- Over \$1.8 million awarded to community nonprofits on behalf of outstanding Enterprise Mobility operating groups as part of the Jack Taylor Founding Values Award.
- Enterprise Mobility distributed \$1M + \$525,000 additional through its operating groups and the Enterprise Mobility Foundation to support disaster relief efforts worldwide as communities grappled with unprecedented floods, wildfires and earthquakes.

Learn more at enterprisemobility.com

COLLABORATING TO EMBRACE THE EV TRANSITION

Electrification is important to the advancement of more sustainable mobility. Enterprise Mobility is embracing the electric vehicle (EV) transition through a strategy focused on supporting customers and team members, expanding power, and charging infrastructure and helping make EV mobility equitable and accessible for underserved communities.

- **Delivering An Outstanding EV Experience**

Enterprise Mobility was built upon a commitment to deliver positive customer experiences, which is why the organization is focused on supporting EV education and awareness among customers and team members, addressing major concerns such as range anxiety and leveraging the business's diverse mobility portfolio to offer a wide variety of vehicles and cutting-edge technologies.

- **Supporting An Equitable Electric Future**

Equitable access to electric mobility across all communities is key to the long-term viability of EVs. This requires addressing structural barriers and engaging with local governments to meet the mobility needs of underserved communities. The Equitable Electric Mobility Playbook study in 2022 found three actions were critical to moving local electric mobility initiatives toward more equitable outcomes: bridging the charging gap, partnering with utility companies to remove grid barriers and plan communities' power needs, and teaming up with government agencies at the state and national levels to secure funding and create programs for EVs.

- **Investing In Infrastructure**

Reliability and accessibility of power and charging are critical to supporting widespread EV adoption. We are building key collaborations in this space to help improve infrastructure and ensure long-term EV viability. The 2023 Electrifying Airport Ecosystems study, published in collaboration with Xcel Energy* and Jacobs* explored the future electric power needs of U.S. airports and the industries that contribute to their ecosystems, and findings underscored the need for collaboration and partnership now across the airport ecosystem and with utilities, regulators, and policy leaders.

APPROACH TO SUSTAINABILITY

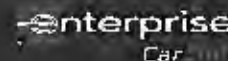
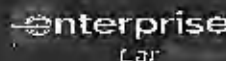
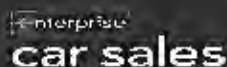
Enterprise Mobility strives to operate with future generations in mind. This forward-looking approach guides how the organization supports its customers and workforce, cultivates partnerships, grows the business and gives back to local communities. We work collaboratively across the globe to address topics that enable us to foster innovation, manage the organization's environmental footprint, build strong communities and create sustainable partnerships.

For example, in 2022, Enterprise Mobility aligned its sustainability efforts with five of the 17 United Nations Sustainable Development Goals (SDGs) where the business's operations have the most potential to drive significant progress and impact global communities.

Enterprise Mobility continues to grow and diversify its range of mobility solutions and is working to find new and more efficient ways to embed more sustainable practices into the organization's operations and value chain.



Enterprise Mobility™



Enterprise Mobility and its affiliate Enterprise Fleet Management generated more than \$38 billion* in fiscal year 2024 and have a significant presence through its operating groups in Massachusetts, including:

25K

LOCAL FLEET SIZE**

\$42M

LOCAL ANNUAL SPEND WITH COLLISION
REPAIR CENTERS, DEALERSHIPS AND
VEHICLE MAINTENANCE FACILITIES**

\$102M

ANNUALLY IN STATE AND
LOCAL TAX REVENUES**

\$634K

IN ANNUAL DONATIONS TO
LOCAL CHARITIES***

94

LOCATIONS**

1110

TEAM MEMBERS

*Includes Operating Groups and Enterprise Fleet Management

**Includes Massachusetts Operating Groups

***Through Enterprise Mobility Foundation on behalf of Massachusetts Operating Groups





YOUR TRADE ASSOCIATION

**For all who work in the
P2P Car Sharing
And
Independent Car Rental Industry**

May 12, 2025

Hello, Massachusetts, Joint Committee on Transportation, Chair James Arciero.

On behalf of the Independent Car Rental Association (ICRA), representing both the Peer-to-Peer (P2P) car sharing and small rental car businesses across Massachusetts, I write to express our strong support in keeping car rental and P2P car sharing affordable in your state referring to S 2367 and referencing H 3659.

While I understand that any such bill is likely to help define state policies and reinforce expectations and messaging about how our industry protects the consumer and general public from any such liability issues due to an accident in a rental or car sharing vehicle, the current systems for car rental and car sharing have multiple forms of insurance coverage already in place as does the renter. In fact, much of this is being defined in H 3659 in which the car sharing renter has insurance coverage from the P2P car sharing platform provider and the car sharing host (person that owns the car sharing vehicle) also is required to have insurance coverage protecting the vehicle and public from any accident claims while the vehicle is “off-rent” or driven by the owner of the car sharing vehicle. The P2P platform companies also sell add-on coverage for renters who do not meet minimum requirements.

The same holds true for the private rental side of our industry in which these private rental companies not only carry business liability insurance for their businesses but also fleet insurance on every vehicle they rent. But this side of the business also sells rental policies to their renters if, and when those renters are not covered by their own personal insurance policies for what we call “rental car coverage”. Some renters even have a level coverage through their credit card providers used for booking the rental. We know this because there is now technology that checks for such coverage as well as driver’s license verifications at the time of the booking. However, not every private rental company has adopted this technology yet because it is new within the past 3 years and because of the cost to verify for each renter.

As prices continually seem to rise in this industry, many of the smaller operators find themselves in positions of needing such technology but simply cannot afford them. However, these technologies provide fast and very accurate data back to the rental operators about the coverage that their renters have or do not have at the time of their booking. If the renter does not have coverage, they will then “sell” the renter a supplement coverage package to meet the needs of

the state and to guarantee that each vehicle while on rent is covered for damage and liability to not only protect the rental car company and their asset, but also the renter.

Currently, in the state of Massachusetts however, our industry is more burdened by increasing Minimum Financial Requirements (MFR's) than nearly every other state. In July these MFR's are set to increase which will again increase costs to our industry which again attack the profitability of the industry which is then passed on to the end consumer/renter.

In my view, I do not think it makes sense for the Private Rental companies or P2P car owners to be listed as first or primary insured when any such accident liability occurs. Since the renters themselves have this coverage does it not make sense to list the renter in the primary position of liability and damage responsibility and the rental car companies and P2P platform and car owners in a second level position?

The ICRA believes that the driver of the vehicle should be responsible for any damages they cause through their own negligence or driver errors as it is not the cars fault and should not be the primary responsibility of the car owner who is simply providing the asset being rented. The insured driver should be listed as primary and the responsible party in such accident liability claims.

However, the rental car companies as well as P2P platform companies and their car owners (Hosts) who provide these vehicles for rent should also be held in a position of liability "if and when" they were negligent should their renters not be fully vetted via the technologies available to them today of a vehicle failure of some sort which could be due to faulty vehicle maintenance. This keeps the rental car companies and P2P platform companies responsible for making sure their renters have the minimum coverage to satisfy MFR requirements in the state as well as proper vehicle maintenance. But as mentioned, the technology exists now to "vet" these renters and the big rental companies use them as does the P2P platform companies.

It is our hope that more of the smaller rental companies can also afford to adopt this technology as well. But as costs go up, these are the types of programs that get set aside just to stay competitive in the marketplace.

Since all renters both private rental and P2P car sharing have their rental booked and under contractual obligations by both parties and in strict accordance with the state laws, each is contractually responsible for their actions and obligations under the rental agreement. Both parties in such a rental agreement are covered for such liability claims caused by actions or negligence and this is why these vehicles have multiple policies covering them as well as business liability insurance for the business itself.

Therefore, a clear law which takes these things into account and places the driver and their insurance as primary and the rental car or P2P company as secondary makes a clear distinction of the differences in such liability cases but also is much clearer for the renter and gives them the

protections they need as well. The outside public which could be harmed in such an accident for example is also covered under such rental policies and internal business or fleet coverage. But it also is a clear and set level of responsibility for the rental car coverage to “own” their processes of vetting their renters and documenting such insurance coverage or selling them a policy at the time of the rental and maintaining good fleet maintenance policies and documentation as well.

For all the above reasons, we support any and all proposed legislation such as S 2367 to help keep our industry affordable for everyone and our smaller members remain profitable so they can begin to use such technology which also helps protect the renter and the public against any such liability in case of an accident. I welcome an opportunity to discuss appropriate ways to support these small businesses while also making sure that the industry, our workers, renters, and the public remain protected within your state. The last thing we would want to see is that more of our smaller companies decide to leave the industry because they continually get priced out.

Another area you may want to consider is the impact this bill would have on the cost of vehicle rentals in your state. As the P2P Hosts and all private rental companies will be forced to push these costs onto their clients. If so, this will have a negative impact on travel, tourism, and convention business to your state. It would also impact local renters who simply want to rent a car while their vehicle is being fixed, or to enjoy a special purpose or exotic vehicle for a special occasion.

If you would like to contact me, please feel free to reach out as my contact information is below.

Thank you.

Respectfully,



Trent Gifford, CEO
World Independent Car Rental & P2P Association
www.worldICRA.com

[\(218\) 270-8240](tel:(218)270-8240) | trent@worldicra.com

Personal Website: <https://www.hellophello.com/hi/trentgifford>



Commonwealth of Massachusetts
OFFICE OF SENATOR JULIAN CYR
STATE HOUSE, ROOM 111, BOSTON 02133

May 13, 2025

The Honorable Brendan P. Crighton, Senate Chair
Joint Committee on Transportation
24 Beacon Street, Room 109-C
Boston, MA 02133

The Honorable James Arciero, House Chair
Joint Committee on Transportation
24 Beacon Street, Room 134
Boston, MA 02133

Re: S.2367, *An Act relative to affordable car rentals*

Dear Chairs Crighton and Arciero:

Please accept this letter as written testimony in support of S.2367, *An Act relative to affordable car rentals*, currently before the Joint Committee on Transportation. This legislation seeks to modernize Massachusetts law governing financial responsibility in rental car agreements and align the Commonwealth with the prevailing national approach.

Under current law, Massachusetts is one of the few states that requires rental car companies to provide primary financial responsibility in the event of an accident involving a rental vehicle - regardless of fault. This longstanding requirement has imposed a unique and increasing burden on rental car companies operating in our state. The recent increase in Massachusetts' Minimum Financial Responsibility (MFR) limits, as adopted in the FY2024 economic development legislation, has only exacerbated this burden - leading to increased costs for rental companies and, in turn, higher rental prices for consumers.

S.2367 adopts a more equitable and widely accepted standard. It holds that the at-fault insured party should be responsible for the damages they cause, rather than imposing that responsibility on the rental car provider, except in circumstances where the rental company or its employees are negligent. Importantly, this bill maintains protections for the public by ensuring rental companies remain financially responsible for their own negligence and for guaranteeing the statutory MFR limits when necessary.

At a time when the cost of car rentals continues to rise and transportation access remains a barrier for many Massachusetts residents and visitors, particularly in rural, seasonal, or underserved communities, this legislation is a timely and pragmatic reform. It reflects a balanced approach to liability, cost responsibility, and consumer protection.

For these reasons, I respectfully request that the Committee give S.2367 a favorable report. Thank you for your consideration.

Respectfully,

A handwritten signature in blue ink that reads "Julian Cyr". The signature is written in a cursive style with a long vertical line extending from the bottom of the "y" in "Cyr".

Julian Cyr
State Senator
Cape & Islands District



CHAIR JAMES ARCIERO
Joint Committee on Transportation
Attn: Siobhán Morrissey
24 Beacon Street, Room 134
Boston, MA 02133

Subject: Support for SB 2367 – Insurance Fairness for Rental Vehicles

Dear Chair Arciero, Chair Keenan, and Members of the Joint Committee on Transportation:

I write to express my strong support for **SB 2367**, which would correct Massachusetts' outdated insurance law by designating a renter's personal auto policy as the **primary source of liability coverage** when operating a rental vehicle.

I represent Sixt Rent A Car, LLC (Sixt). Sixt is a global car rental company known for providing a premium car rental service at major airports worldwide. Sixt began operations in 1912 and is the largest car rental company in Europe and fourth largest in the US. Sixt began operations in Massachusetts at Logan Airport in July of 2020. Now Sixt operates in Logan Airport and two other locations which serve local residents and travelers. We employ 50 people within the State of Massachusetts and are proud to contribute to the state's transportation infrastructure and economy.

Today, Massachusetts requires rental car companies to provide primary liability insurance coverage—even when a renter already carries a policy that covers them in a rental. This practice is inconsistent with insurance norms across the country and unfairly shifts financial responsibility from insurers (who have been paid to assume that risk) to rental providers.

With the state's **minimum financial responsibility standards increasing on July 1, 2025**, the urgency of this issue cannot be overstated. Absent reform, rental operators will face significantly higher liability exposure—costs that will ultimately be borne by consumers and small businesses alike.

SB 2367 restores fairness and aligns Massachusetts with the majority of other states. If a renter holds valid insurance, their policy should cover third-party claims—just as it would if they were driving their own car.

I respectfully urge the Committee to support SB 2367 and ensure that Massachusetts adopts a more equitable and modern insurance framework.

Thank you for your time and consideration.

Sincerely,

Elbert Sheppard
Director, Government Relations
Sixt Rent A Car, LLC
Elbert.Sheppard-Jr@sixt.com
954-864-4456



The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

SENATOR SAL DiDOMENICO
ASSISTANT MAJORITY LEADER
Middlesex and Suffolk District

STATE HOUSE, ROOM 405
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TEL. (617) 722-1650
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WWW.MASENATE.GOV

Chair
BILLS IN THE THIRD READING
Vice Chair
ETHICS

EDUCATION
LABOR AND WORKFORCE DEVELOPMENT
STATE ADMINISTRATION AND
REGULATORY OVERSIGHT
PERSONNEL AND ADMINISTRATION

June 17, 2025

The Honorable Brendan P. Crighton, Senate Chair
Joint Committee on Transportation
State House, Room 109-C
Boston, MA 02133

The Honorable James Arciero, House Chair
Joint Committee on Transportation
State House, Room 134
Boston, MA 02133

Dear Chair Crighton and Chair Arciero,

I am writing to voice my strong support for my bills S.2374, *An Act authorizing electronic signatures with motor vehicle title and registration transactions*, and S.2371, *An Act modernizing and expanding availability of motor vehicle titling and registration services*. It is my hope that these pieces of legislation be reported out of your committee favorably.

Currently, the signature policy at the Registry of Motor Vehicles (RMV) allows for e-signatures, or digital signatures, on most vehicle-related documents but does not allow e-signatures on certificates of title. The current policy also limits the use of e-signatures to those participating in the RMV Electronic Vehicle Registration (EVR) program. While that program is helpful, the exclusionary nature of it impedes on the accessibility of electronic titling and registration for all non-EVR participants such as lenders, insurers and car dealers.

S.2374 addresses this problem by requiring the RMV to accept e-signatures on all documents that are needed in the process of titling and registering motor vehicles and ensuring e-signatures are available to all users, not only those participating in the EVR program. The bill would also ensure that physical odometer documents, such as the title of a vehicle, are to be accepted by the RMV in digital form and it would expand the list of commercially available e-signature products that can be used. This legislation is needed to modernize and improve the titling and registering

processes at the RMV and increase the accessibility of those interested in participating in a more streamlined process.

In addition, I filed S.2371 as a compliment to the legislation mentioned above. This bill also aims to modernize particular processes at the RMV, and it does so by proposing to expand access to the EVR system, offer electronic titling, and ensure the process of transferring vehicle ownership after electronic lien satisfaction by a motor vehicle dealer is as quick and smooth as possible.

More specifically, S.2371 would require the RMV to create a reciprocal cross-border electronic vehicle titling and registration program, which would allow purchases of out-of-state vehicles to be titled and registered electronically in the buyer's state of residence. The bill would also expand the EVR to all motor vehicle dealers, allow the RMV to waive printing paper titles upon lien satisfaction, and require the RMV to establish a process that would allow vehicle dealers to sell vehicles as soon as lien payoff or electronic notification of satisfaction is received. This bill would alleviate the RMV by decreasing some of their administrative tasks, and it would also make the process of selling and buying more streamlined and convenient.

S.2374 and S.2371 work together to improve the current motor vehicle retail processes under the RMV, and if passed, would ensure that the buying and selling of motor vehicles is more accessible, convenient and straightforward. Some of the benefits of passing this legislation include increased sales tax due to increased retail and less depreciation of vehicles, faster transaction times which lead to cost reductions, ensured market-based competitiveness for providers while allowing the RMV to continue to provide their own services, and ensuring accuracy and confidentiality for buyers. Most notably, these bills do not require any funding but rather allow businesses to utilize their own available systems due to knowing the RMV will accept their electronic documents or physical ones through existing processes.

Thank you for your consideration of these pieces of legislation and I hope the committee will give them a favorable report.

Sincerely,

A handwritten signature in black ink, appearing to read "Sal DiDomenico", with a stylized, flowing script.

Senator Sal DiDomenico
Middlesex and Suffolk District



The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

Senator Jason M. Lewis
Fifth Middlesex District

State House, Room 511B
Boston, MA 02133

(617) 722-1206
Jason.Lewis@MASenate.gov

Chair
Joint Committee on Education

Chair
Senate Committee on Ethics

Vice Chair
Joint Committee on Labor and Workforce Development

5/14/2025

Senator Brendan P. Crighton, Senate Chair
Joint Committee on Transportation
Massachusetts State House, Room 109-C
Boston, MA 02133

Representative James Arciero, House Chair
Joint Committee on Transportation
Massachusetts State House, Room 134
Boston, MA 02133

Dear Honorable Chairs Crighton and Arciero,

I write today in support of Senate Bill 2402, *An Act relative to peer to peer car sharing*, and ask that it be reported favorably out the Joint Committee on Transportation.

The increasingly widespread use of app-based car sharing services has enabled easier, cheaper, and more environmentally conscious use of personal vehicles. However, this new technology remains largely unregulated, potentially exposing many individuals to physical and financial harm without adequate means of redress. Therefore, to balance the competing interests of consumer safety and industry innovation, basic regulatory requirements should be developed for peer-to-peer car sharing programs.

This bill would establish a clear definition of a peer-to-peer car sharing program, establish a basic regulatory framework, and enable the Department of Public Utilities to promulgate further regulatory rules as necessary.

I ask that the committee vote favorably on this bill. Please do not hesitate to contact our office if you have any questions. Thank you for your consideration.

Yours sincerely,

A handwritten signature in blue ink that reads "Jason Lewis". The signature is written in a cursive style with a large initial "J" and a stylized "L".

Jason Lewis
State Senator
5th Middlesex

Tom Tucker

Assistant Vice President Legislative Affairs
Legal Department
(614) 798-2684
tom.tucker@safelite.com

The Honorable Brendan Crighton and James Arciero
Co-Chairs, Joint Committee on Transportation
Commonwealth of Massachusetts
24 Beacon Street
Boston, MA 02113

SUBJECT: SB 2426 Safety Glass Standards – Oppose

Chairman Crighton and Arciero:

Safelite is the leading provider of automotive glass repair, replacement, and recalibrations services, along with insurance claims management in the United States. Safelite operates in all fifty states and is part of Belron International, the world's largest vehicle glass repair, replacement and recalibration company operating across thirty-eight countries worldwide and employing more than 25,000 people.

Safelite stands in opposition to the SB 242 Safety Glass Standards. This bill would require the registrar to adopt regulations establishing standards and requirements for aftermarket safety glass replacement, which meet or exceed the standards and requirements of the Automotive Glass Replacement Safety Standard, developed by the Auto Glass Safety Council.

First, the Auto Glass Safety Council is a membership-based organization seeking to codify guidelines for aftermarket auto glass installation. While well-intentioned, this organization's positions do not always align with the broader glass industry. In order to participate in the AGSC's standards committee or vote on proposals, you must be a dues paying member of the organization. If this organization genuinely wanted to promote the best practices, outside industry voices would be needed.

Second, the proposal would confer authority over the installation of aftermarket safety glass to the Registry of Motor Vehicles. The department does not have the requisite knowledge, skills, or abilities to become the de facto regulator of auto glass installation. Additional personnel would be needed to learn and understand the types of glass, adhesive, urethane and curing time necessary for a safe installation. Additionally, the annual vehicle safety inspection in Massachusetts reviews millions of vehicles. This registration delay could cost consumers millions of dollars in fines and a private organization could change the law and elected officials would have no say in the changes.

Finally, the legislature would be ceding its authority to a membership-based organization whose main goal is to raise money. Any change to its standards would automatically update the law and could prevent the registration of thousands of vehicles. AGSC does not have public comment or review requirements like public entities and would be costly to consumers.

For these reasons, Safelite respectfully opposes this legislation and urges the committee to reject the proposal. If you have any questions, feel free to contact me directly. Thank you.



The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

SENATOR PATRICK M. O'CONNOR

First Plymouth and Norfolk District

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May 13, 2025

The Honorable Brendan P. Crighton, Chair
Joint Committee on Transportation
State House
Room 109-C
Boston, MA 02133

The Honorable James Arciero, Chair
Joint Committee on Transportation
State House
Room 134
Boston, MA 02133

Dear Chair Crighton and Chair Arciero:

I write in support of **S2426 - An Act relative to safety glass standards**, which rests before the Joint Committee on Transportation.

This legislation would create state auto glass standards that meet or exceed the industry installation standard, the Auto Glass Replacement Safety Standards (AGRSS Standard). The AGRSS Standard was developed over twenty years ago under the auspices of the American National Standards Institute (ANSI), a leading standard-setting organization.

This standard is continuously developed by the consensus committee process involving a broad segment of the auto glass industry, such as auto glass companies, technicians, suppliers, insurance companies, consumers, and safety advocates. The most recent update, in 2022, was made to address technological changes in the industry; specifically, to ensure that the cameras embedded in the windshields that direct the vehicle's Automated Driver Assistance Systems (ADAS), are calibrated correctly so that the vehicle can be safely returned to the road.

Presently, the AGRSS Standard is a voluntary industry standard. Absent the state's involvement there is no government regulation of installation of aftermarket glass. Federal agencies such as the National Highway Transportation Safety Administration have declined to regulate in this space. With no requirement for auto glass companies to operate under AGSC guidelines, consumers are left lacking significant protection. It's time for Massachusetts to act.

Massachusetts requires the registration of auto glass companies for consumer protection purposes, but it does not ensure that the aftermarket windshield is installed in a safe manner by properly qualified technicians. This legislation would bridge that gap by implementing a state safety standard to ensure that windshield replacements are performed by well-trained and

qualified technicians who follow proper safety procedures, as promulgated by the Registrar of Motor Vehicles.

Recent developments in the aftermarket auto glass replacement industry have only become more complex; namely due to the number of ADAS on newer model vehicles that are dependent on the camera embedded in the windshield. Technicians must be properly familiar with and trained in the glass installation and calibration of these cameras to ensure that the vehicle is returned to its owner in safe working conditions.

It is for these reasons that I respectfully request that the Joint Committee on Transportation issue a favorable ruling on this bill. Thank you for your attention to this matter. Please feel free to contact my office with any questions or concerns regarding this legislation.

Sincerely,

A handwritten signature in blue ink, appearing to read "P. O'Connor", with a long horizontal stroke extending to the right.

Patrick M. O'Connor

State Senator

First Plymouth & Norfolk District

Why do we need EZ-ID?

**70% of all crime involves the usage of a motor vehicle,
...yet far less than 1% are identified.**



The Massachusetts District Attorneys say:

Across the state, our 720 prosecutors work every day to address motor vehicle-related offenses. We have no doubt that, if the Commonwealth were to implement EZ-ID, it would have a dramatic impact on getting impaired drivers off the road, identifying vehicles involved in crimes, and – most importantly – help with the rapid detection of vehicles involved in child abductions, where literally every second counts.



Mass, Chiefs & Major City Chiefs say:

While this legislation was proposed to improve the safety of children, the truth is that it will assist law enforcement in all criminal investigations by the allowing of the quick identification of suspect vehicles while eliminating non suspect vehicles.



The Fraternal Order of Police say:

Clearly, from a law enforcement prospective, the Massachusetts FOP believes this concept is long overdue for our state and would be a God-send to police investigations. It would provide dramatic enhancement for the recognition and recall of registration numbers of vehicles that may be used in the commission of a crime. More importantly utilization of this concept can reduce vehicle searches from 1 in 4,300 for standard 6 character plates to 1 in 123 for the new designed plates.



The New England Association of Chiefs of Police, Inc.

that deserves the support of Law Enforcement. It not only serves the need for vehicle identification in cases of child abduction, but also serves as a tool for vehicle identification when a motor vehicle is used for any criminal activity.



RHODE ISLAND POLICE CHIEFS' ASSOCIATION

As you are aware, a license plate is the most common identifier used by police when trying to identify a vehicle and its owner. Our organization believes any assistance in performing this critical task especially when seconds count should be considered in the design of vehicle registration plates.

**If you, or a loved one, were in trouble and needed to identify a vehicle...
which system would you want in place?**



**Officer Bob Barry, former President of the Mass Safety Officers
League, says... "EZ-ID Is a blessing!"**

CEZ-ID Executive Summary

EZ-ID is an innovative license plate system designed to enhance general issue plates by incorporating universally recognized symbols, such as stars, hearts, or circles. These symbols simplify the process of reporting vehicle registrations to law enforcement, improving accuracy and efficiency. Our mission is to bolster public safety by streamlining vehicle identification, enabling faster and more reliable law enforcement responses. Our vision is to foster safer communities where vehicle identification is intuitive, reducing the time and effort required to address vehicle-related incidents.

The EZ-ID system modifies standard license plates by adding simple, universally recognizable symbols that are easily identified by individuals of all ages and backgrounds. Unlike vanity or specialty plates, which may include complex designs, EZ-ID focuses on clarity and functionality for general issue plates used by the majority of drivers. Developed in close partnership with law enforcement agencies, the system reflects their operational needs through extensive consultations, workshops, and iterative design adjustments. This collaborative approach ensures that the enhanced plates are practical and effective in real-world scenarios.

EZ-ID benefits both law enforcement and the public. Agencies' experience improved accuracy in vehicle identification, leading to faster response times and reduced errors during incidents. For the public, the symbols make it easier to recall and report license plates accurately, even in high-stress situations. Prominent organizations, including the Massachusetts District Attorney's Association, the Fraternal Order of Police, and the Massachusetts Chiefs & Major City Chiefs, have endorsed EZ-ID, recognizing its potential to transform vehicle identification processes.

Babson College, a Massachusetts-based institution and the number 1-ranked school for entrepreneurship, is leveraging its community (students, faculty, and staff) to help advance EZ-ID. By harnessing artificial intelligence, Babson crafts tailored value propositions that resonate with key stakeholders, ensuring robust support for the initiative. Babson's vast network of entrepreneurial leaders and industry partners will help amplify EZ-ID's reach, facilitating opportunities to foster critical strategic partnerships and community engagement.

As a global leader in entrepreneurship education, Babson, as part of its social mission, fosters collaboration across sectors, uniting diverse voices to advance public safety. Its unwavering commitment ensures EZ-ID's vision thrives, creating a lasting impact. With Babson's visionary support, EZ-ID is poised to set a new standard for vehicle identification, embodying the college's dedication to transformative, socially driven change that inspires safer, stronger communities. With Babson's support, EZ-ID is poised to set the standard for vehicle identification, reinforcing Babson's enduring commitment to positive social impact.



Frequently Asked Questions ©

What is EZ-ID? EZ-ID, is a new license plate format which uses universally recognizable symbols, such as a star, heart, diamond, square, circle, tri-angle, etc., along with alpha numeric characters, to give a graphic that even young children can recognize, remember, and report. Each **general issue** plate would have **one** randomly assigned symbol, along with other numbers and letters, making up the individual's plate registration number. EZ-ID would **not** displace specialty plates, low number plates, or vanity plates, as these are already more recognizable.

Who Started EZ-ID? Massachusetts resident, business founder, and inventor, Gary Paul Richard, created the Program after the abductions of Molly Bish and Elizabeth Smart.



FYI: Massachusetts was the first state in the country to issue license plates in 1903

Is there legislation for EZ-ID? Yes it is Massachusetts Legislative Bill S.2451.

The key to child abduction is the private vehicle- The motor vehicle is the key to abduction; the bad guys do not take the bus to abduct a child. The key to identifying any motor vehicle is the license plate. The problem is...that random numbers and letters are too abstract to remember, even for an adult, especially in a time of crisis. A young child has virtually no chance at all, to recall such random alphanumeric characters.

Critical timing in the recovery of a child, and help with other crimes- Every second is critical in the recovery of a child. Statistics show that if abduction leads to the death of a child, **44% will be dead in the first hour, 74% within 3 hours, and 91% within 24 hours.** In actuality, 70% of all crime involves the usage of a motor vehicle, yet less than 1% can be identified. Amber Alert signs are of no value if we cannot identify the suspect vehicle, EZ-ID is the 1-2 punch with Amber Alert.



The new EZ-ID format would also help with hit and runs, general crime, road rage incidents, stolen vehicles, drunk drivers, and homeland security, etc., as well as for reporting vehicles in accidents.

Why the usage of symbols? Any adult is challenged to remember abstract, random numbers and letters, in fact...the overwhelming majority of people surveyed did not know their own license plate registration on the vehicle, which they use every day, and typically for many years, so what chance does a child have? This clearly demonstrates **that the current system needs**

improvement. The good news...is that cognitive studies show that even a 2 ½ year old child can re-call a symbol...even a week later.

Kindergarten eye charts even use symbols, because children learn symbols before they learn numbers and letters, and these eye charts are also used for people who are illiterate. Symbols are used everywhere in our daily lives, especially on the roads...to quickly identify information signs, such as for fuel, food, lodging, hospitals, airports, road hazards, etc., and to do so from distances, while in moving vehicles.

**Eye charts for
children, and
illiterate adults
use symbols**



Studies show that it takes about 7 seconds to read an Amber Alert sign, which is a challenge while driving, and even more challenging to remember. Posting the color of the vehicle, with a symbol, would allow people with cell phones to respond more quickly.

The New England College of Optometry, Independent Study of symbol effectiveness- (NECO) conducted a pilot study on symbol identification, which won national recognition by the American Academy of Optometry. **The study yielded 96% identification of the symbols and their locations on the 6 character test plates.** "Conclusion: the inclusion of symbols in a 6 character plate increases recall of a complete license number. Symbols are significantly more apt to be recalled than letters or numbers." NECO is seeking funding, to conduct a study on which symbols would be most identifiable.

Babson College, Independent Study, of the Multiple benefits of EZ-ID to each Massachusetts District: In 2025 Babson College Completed a 60 page study, as to the specific multiple benefits of the EZ-ID Program for each Massachusetts District.

Do symbols offer any other advantages? - Yes, a large segment of the population is dyslexic, which makes numbers and letters difficult to read when reversed, whereas symbols are mirror images of themselves...for example, a star is still a star when reversed. This also allows people to identify symbols when looking in their rear view mirrors.

Symbols also add significantly to the number of mathematical combinations, almost as if the alphabet had more characters. As a result...license plates can be issued with fewer characters than the current 6, 7, or 8 character USA license plate format, making them easier to remember. (10 characters are often used in other countries).



Fonts could even be made larger, making the characters easier to see from greater distances. 5 of the 6 New England states, and the majority of Massachusetts plates, would only need to have 4 characters, including the symbol, on plate registrations. The other plates could use Double Character Formatting (DCF), whereby one of the alphanumeric characters is doubled, in effect making it like a 4 character plate for identification purposes.



Plate registration would be read as **D34D5**

It is even easier to identify plates which spell words, or create highly identifiable letter/number combinations, even if not real words. Combining them with symbols allows the highly identifiable words, and non-words, to be used multiple times with the various symbols.



H4BIG



H5BIGG

How would we teach children, and even adults, to identify vehicles? Police Officers in the Safety Officer's League currently go into the schools to teach students about public safety issues. With EZ-ID...they would use educational posters, and games like "Car Bingo," flash cards, and memory association techniques, to educate and train kids of all ages. Ideally, we would try to teach the public to identify the color and style of the vehicle, the symbol and its position on the plate, and one other character. Example: (with a 4 character plate, or one with the Double Character Formatting)...if the suspect vehicle was a blue (9% of the vehicles are blue), SUV (12.5% of the vehicles are SUV's), and there was a diamond (whatever the symbol was for that plate) in the 3rd position (whichever position it is in for that plate), plus one other character...in Massachusetts **that would narrow the search to about 1 of 12 vehicles, which is 1,000 times easier to locate.** With the search narrowed to about 1 in 12 vehicles, **the driver could be identified in a matter of minutes.** This would be a very strong deterrent to abductors, and any other criminals.

License plate theft- Some have said that these bad guys will just steal other license plates, but in trying to do so, there is a greater risk of getting caught. Also, not all abductions are planned out, some are spur of the moment, and by the time an abductor would try to steal and install two license plates, the potential victim may no longer be vulnerable. Stiffer penalties for stealing license plates could also be legislated, which would take more criminals off of the streets. People would not be stealing license plates for hit and runs, road rage, drunk driving, accidents, and many other crimes.

Have there been any changes to license plates over the years? - Yes the fonts on license plates have gotten *smaller*. States have done this to make room for more characters, plus for advertising graphics and slogans, in order to promote tourism interest. Many states also have various background images, which diminish the overall contrast visibility of the characters. An article in USA Today (<http://usat.ly/Xu2xnW>) laments how license plates have become more difficult to read.



Does EZ-ID align with AAMVA's Best Practices Guide- AAMVA is the association for all North American RMV Registrars. Yes EZ-ID aligns, please see excerpt from AAMVA letter of support below:

American Association of Motor Vehicle Administrators



In terms of how the recommendations within our Best Practices Guide relate to the EZ-ID license plate, I support the business rule behind the stacked characters on the EZ-ID plate (the letter representing the symbol and the number representing the symbol position on the plate), cross validating the stacked alpha-numeric with the symbol itself.

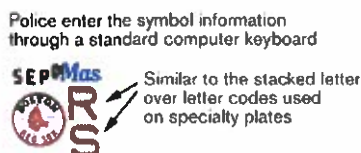
Therefore, the EZ-ID plate is **not** in conflict with our Best Practices Guide recommendations

How would the Police and Registry input a symbol into the system using a standard computer keyboard, as these do not have keys for a star, heart, diamond, etc.?- The EZ-ID format utilizes "stacked characters" ... a small *letter over number code*, to the left of the individual's main plate registration number; this is similar to the *letter over letter code* used on current specialty plates like the Boston Red Sox plates, which have an "R" over an "S"

*** See plate registration examples on page (8)**

On EZ-ID plates, the letter designates the symbol code, such as an S for star, D for diamond, H for a heart, etc., over a number which is the position of the symbol in the plate's registration. An "S" over a "3" would mean that there is a star in the 3rd position on the individual's license plate registration. The Registry and Police can input the EZ-ID code through any standard computer keyboard, just as they would for the Red Sox plates, or any other specialty plates.

Entering the symbol information into computers:



EZ-ID plates have a letter designating the symbol

Number represents the location of the symbol



How will other states handle these plates, when Massachusetts drivers travel out of state?

As explained above, the EZ-ID plates are handled just like all other specialty plates, which utilize stacked characters. If a Massachusetts driver with a Red Sox plate, or with any other Massachusetts specialty plate, is pulled over in another state, the R over S stacked characters are entered along with the other plate registration characters, the EZ-ID plates would be entered the exact same way.

Most people do not realize that when a driver's has been pulled over for a traffic violation, or for some other reason, the plate registration information is not sent to the local police headquarters, it is sent to CJIS, the Criminal Justice Information System Division of the FBI. CJIS is the country's oversight authority on license plate, and they process the driver's registration information, to review the individual's driving record. The information is also linked to NCIC to determine if the driver is a wanted felon. The information is then sent back to the law enforcement officer, who initiated the driver pull over.

CJIS is already aware of the EZ-ID plates, as they are with the specialty plates from Massachusetts and the other states. CJIS was consulted several years ago when EZ-ID was created, to determine whether this new formatting would be viable for all states and countries. The CJIS representative reviewed the EZ-ID formatting and confirmed that the plates would work seamlessly everywhere. His words were that "the new formatting would work across the country, and it is a good idea."

What do the Police and Registry think about the new format?- Regular meetings were held at the Massachusetts State House with members of local law enforcement, Massachusetts State Police, the Registry, legislators, citizens, and others, with all parties helping to refine the current system, prior to submitting it to CJIS for review. The formatting was validated by CJIS as being fully functional and compatible with all the other states. We thank each individual for their valuable contributions to the Program. Endorsements include:



**New England Chiefs of Police
President Robert Campbell**



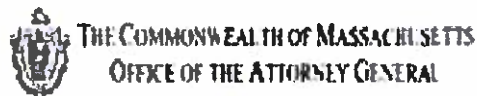
**Mass Chiefs of Police
President, Mark Leahy**



**Worcester County Sheriff
Low Evangelidis**



DA's Association



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

EZ-ID has received the unanimous endorsements of the following law enforcement groups:

- The Massachusetts Chiefs of Police Association
- The Massachusetts Major City Chiefs of Police
- The Massachusetts Fraternal Order of Police
- The Massachusetts Police Association (21,000+ members)
- The New England Association of Chiefs of Police (800+ members)
- The Rhode Island Police Chief's Association

The law enforcements endorsements also include:

- Former Attorney General, Martha Coakley
- The Massachusetts District Attorney's Association

In the words of Weymouth Police Officer, Bob Barry, then current President of the Massachusetts Safety Officer's League, when he spoke at the State House press conference for EZ-ID...he passionately stated:



"We need programs like this...this is a blessing"

What other support does EZ-ID have? - There has been great support for the Program by families such as the Molly Bish Family, The Elizabeth Smart family, and many other victim families. There was a **unanimous vote by the entire Massachusetts legislature, to form the EZ-ID Task Force.**



Lois and Ed Smart



Magi Bish

Several groups such as the MSPCC, Protect Mass Children are also supporting EZ-ID. The Molly Bish Center and Ana Maria College have embraced the program and have committed to making EZ-ID a reality.



Businesses are also supporting EZ-ID:



Major cities are endorsing EZ-ID:

 **Boston City Council**



 **Worcester City Coun.**

 **Springfield City Coun.**

EZ-ID won an Honorable Mention in the Pioneer Institute Better Government Competition, and the Institute has written a letter of endorsement to the Transportation Committee.



PIONEER INSTITUTE
PUBLIC POLICY RESEARCH

***EZ-ID wins Honorable Mention
in Better Government Competition***

What about the cost of changing the current alpha-numeric system? - After meeting with the Walpole Correctional Institute staff where the license plates are currently made, it was determined that about \$30,000 in new tooling would be needed. The current plan, which can be amended, is written to have the plates changed out over a 5 year period, as registrations come up for renewal. Approximately 10% of the plates are turned in for new plates each year; therefore approximately 50% of the plates would be changed out in due course. The balance of the cost would be \$10.8M over 5 years, which can be offset via new vanity plates, low number plates, and through specialty symbols. A 1% increase in new vanity plates, which can use the symbols creatively, would create approximately \$20M in new incremental revenue over the next 10 years, which would pay for any additional rollout costs, plus create surplus revenue for the state.

Examples of new vanity plates:



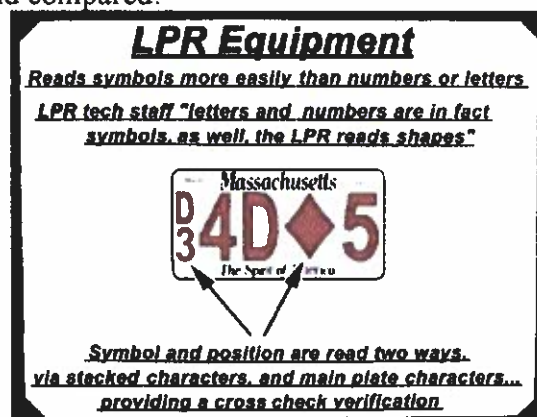
D1GIRL



S5ROCK

Massachusetts is seeking to have the large number of old green and white plates turned in anyway, as many have deteriorated to point where they cannot even be read anymore. This would be a very opportune time to issue new EZ-ID plates, when the green and white plates are being changed out anyways. The state has the oldest plates in the country and much of the reflectivity has been lost, which increases losses at the tolls. Many states change out their license plates every 8-10 year.

Toll losses can be reduced with EZ-ID, as the symbol is easier for the License Plate Reading (LPR) equipment to read and report. The stacked characters also cross validate the visible symbol, both being read and compared:



What about current specialty plates, low number plates, and vanity plates that are already out there, would these need to be replaced also? - No, these plates would not be replaced, as they are already more identifiable. Having a Red Sox Symbol, for example, gives the public a graphic to identify and report. New specialty plates always include some sort of symbol or graphic, which is easier to identify. There is even a lottery for low number license plates, as they are in such demand...EZ-ID would create many new low number plate options with symbols.

Plate Registration examples:



What other states are interested in the Program? - Due to a lack of funding and time, EZ-ID has not been widely promoted. Two years ago the EZ-ID Bill advanced significantly in the Connecticut legislature; unfortunately we have not had the resources to continue the initiative there. Legislation is currently filed in Pennsylvania; Pennsylvania was the first state to issue vanity plates



Most other states are looking to follow Massachusetts' lead. We feel that when one state adopts EZ-ID, all the others will follow suit, and this could eventually be adopted around the world.

For further information, please see web site www.ez-id.org and also posted on Facebook, under "EZ-ID"

To contact:

Jay Gardiner, Executive Director jggardiner100@gmail.com Cell (508) 277-2562

Gary Richard, President: email garyrichard4u@gmail.com. Cell (978) 852-7776.

The greatest responsibility of the legislature and for all citizens...is public safety, especially for children. EZ-ID is a highly effective tool, which can truly make a difference.

Please ask yourself the question...if you, or a loved one needs help, which system do you want in place?

Document and information is copywrite protected.

From: Heather Bish <[REDACTED]>
Sent: Tuesday, May 13, 2025 2:35 PM
To: Morrissey, Siobhan (HOU)
Subject: S.2451 Testimony from Heather Bish

You don't often get email from [REDACTED]. Learn why this is important

Testimony to the Joint Committee on Transportation
In Support of S.2451 – An Act Relative to EZ-ID

Heather Bish
Yarmouth Port,, Massachusetts
May 13, 2025

Dear Chairs and Members of the Joint Committee on Transportation,
Thank you for the opportunity to submit testimony in support of S.2451, An Act Relative to EZ-ID.

My name is Heather Bish. I am a lifelong advocate for safety, equity, and justice in Massachusetts, but more importantly, I am the sister of Molly Bish. Since the tragic loss of my sister, I have committed my life to advocating for vulnerable populations and for legislation that helps protect and empower individuals who are too often overlooked.

S.2451 is one such bill. It may seem simple—streamlining the process of identifying a license plate in Massachusetts, particularly when these vehicles are used in crimes. As a Special Education Teacher, I know that people encode symbols more easily than a series of letters and numbers. Providing a symbol on each license plate greatly increases law enforcements ability to track and recover a vehicle used in a crime.

Since Gary introduced this idea to my family, we have always wondered would it have helped us find the mysterious man in the white car that sat at the beach the day before my sister disappeared? Could we have saved her? Recovered her faster? These questions will forever live in the back of our minds, as we look to support other families in never experiencing an event like this in their lives.

Molly was only sixteen years old when she was taken from us, while she was serving her community as a life guard.

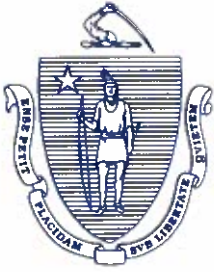
Every child, every family, every person in Massachusetts deserves to be protected and to feel safe. Sometimes we need to make extraordinary changes to our systems to do that. I am here today to ask you to take on that challenge.

As someone who has seen firsthand the consequences of systems that fail to protect and include vulnerable individuals, I strongly believe in the necessity of proactive legislation like S.2451. It is a measure of who we are as a Commonwealth—

I urge the Committee to give this bill a favorable report. The passage of S.2451 would be a meaningful step toward a more proactive and protective Massachusetts. Thank you for your time, your commitment, and your service to our communities.

With sincere gratitude,

Heather Bish
[REDACTED]



The Commonwealth of Massachusetts
SENATE MINORITY LEADER
MASSACHUSETTS SENATE

SENATOR BRUCE E. TARR
First Essex and Middlesex

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BRUCE.TARR@MASENATE.GOV
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May 12th, 2025

The Honorable Brendan P. Crighton, Senate Chair
Joint Committee on Transportation
State House, Room 109-C
Boston, MA 02133

The Honorable James Arciero, House Chair
Joint Committee on Transportation
State House, Room 134
Boston, MA 02133

Dear Chairs Crighton and Arciero,


I write in support of S2451 *An Act to Enhance the License Plate System of the Commonwealth*. This bill moves for the creation and execution of a new motor vehicle license plate system in Massachusetts, focusing on improved visibility and recognition. The bill does so by introducing the use of recognizable symbols on plates, each tied to an alpha-numeric code to increase the variety of possible plate identifiers. The new design will incorporate technology to support character identification under poor visibility conditions. In order to make this process move forward the bill seeks to create an implementation board to establish not only the plates but the training protocols for public safety officers regarding the new plates.

By creating a new system this bill seeks to help alleviate the confusion of jotting down license plate information with regard to identifying vehicles for issues related to penalties and other criminal actions involving motor vehicles. Doing so will help to make sure that proper identification of the vehicles involved, whether it be something as simple as a parking ticket, or something as complicated as a car accident, is completed in a succinct and direct manner.

Thank you for your consideration on this matter, and respectfully request S2451 be reported out favorably.

Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bruce Tarr', with a stylized, cursive script.

Bruce Tarr
State Senator