Unconventional Vehicles Working Group
Meeting Minutes
September 24-25, 2009

Call to Order/Opening Comments

Acting Chair Mark Francis called the meeting to order and reviewed the agenda and purpose for the meeting. Keith Kiser reviewed the expense forms and other administrative issues for the meeting. Chair Francis introduced AAMVA President and CEO Neil Schuster, and thanked him for his attendance, participation, and support.

Kiser announced that Craig Root (CA) had been appointed to replace Janice Mulanix (CA), who resigned from the working group because of a change in her work responsibilities.

Kiser announced that Betty Johnson had resigned her appointment to the working group because of other pressing responsibilities in her jurisdiction. Mark Francis has volunteered to serve as acting chair for this meeting, but a new Working Group Chair will need to be identified and appointed. Kiser reminded members that the Vehicle Committee Chair is responsible for appointing working group chairs, and asked all members to let him know if they were interested in seeking appointment as the working group chair.

Roll Call

Working group members present were:

Cindy Gerber (SD)
Lori Bowman (OR)
Monica Blackwell (TX)
Rob Termuende (BC)
Craig Root (CA)
Harold Blaney (QE)
Paul Nilsen (WI)
Mark Francis (BC)
Neil Schuster (AAMVA)
Keith Kiser (AAMVA)

Members Absent:

Douglas Hooper (GA)
Kevin Park (UT)
Scott Clapper (DE)
Board Report

Kevin Park (UT) provided an update on the recently complete AAMVA Board of Directors meeting, including the Board’s action to approve the Motorcycle Best Practice document developed by the Working Group. He also discussed the Board’s efforts to conduct an environmental scan of AAMVA operations, search for a new AAMVA President and CEO, review the AAMVA strategic plan, and work to further define where AAMVA should concentrate its efforts and resources in the future.

Summary

The Unconventional Vehicles Working Group met in person in Salt Lake City, UT April 24-25, 2007 to discuss results and potential next steps related to several types of unconventional vehicles. Specifically, the working group discussed the following priority vehicle types and developed future action plans:

- Kit Cars and other homemade vehicles
- Trucks converted to motorhomes
- Hot shot rigs
- Japanese mini-trucks

Action Items

1. Keith Kiser will prepare and distribute minutes from the meeting
2. Keith Kiser and Betty Johnson will develop a strategy to publicize the final approval of the Motorcycle Best Practice Document.
3. Keith Kiser will draft a best practice document for review by the Kit Car subcommittee

Update on Status of Best Practice Document
Betty informed members the Best Practice document was discussed and approved at the recent meeting of the AAMVA Board of Directors. Betty and Keith will develop a strategy to inform the AAMVA membership and interested stakeholders about the finalized document.

**Subcommittee Discussions of Priority Vehicle Types**

The previously assigned subcommittees met individually to review their previous efforts and discuss possible future activities. Each subcommittee was asked to be prepared to report on their discussions to the full Unconventional Vehicles Working Group. A summary of those discussions follow.

**Kit Car/Homemade Vehicles Subcommittee**

Subcommittee members are Steve Beeuwsaert (Chair), Lori Bowman, Doug Hooper, and Keith Kiser (AAMVA staff liaison). Other working group members attending were Ron Covello and Harold Blaney.

The subcommittee discussed the results of the AAMVA survey on kit cars they had created and sent to the AAMVA membership. At the time of the meeting, 16 AAMVA jurisdictions had responded. Overall, the survey responses seem to indicate that most responding jurisdictions have procedures for titling and/or registering kit cars. Most responding jurisdictions require some type of physical inspection but do not require kit cars to meet applicable US or Canadian federal equipment requirements. Additionally, most responding jurisdictions do not require kit cars to have a conforming 17-character VIN.

During their discussion, the subcommittee identified that kit cars can create safety issues for operators, and that additional education regarding the use of kit cars would be helpful. The subcommittee also discussed safety issues related to who does the final assembly of the vehicle, the level of expertise of the person completing the assembly, and the use of used frames and other parts, and their level of expertise of the final assembly. Additionally, the group discussed the need for NHTSA to take a more active interest in kit cars and other types of unconventional vehicles.

After an extensive discussion, the subcommittee suggested, and the working group agreed, the next step should be the development of a draft best practice document related to kit cars and other homemade vehicles. Key elements of the proposed best practice should include:

1. Physical and/or mechanical inspection prior to registration
2. Development of minimum equipment standards for each type of vehicle (kit car, homemade motorcycle, homemade trailer, etc.)
3. Require US or Canadian certification labels showing compliance with applicable equipment and environmental requirements for vehicles made from manufactured kits
4. Homemade vehicles must be assembled with components from more than one supplier
5. A clear method to determine the year model of the vehicle
6. An appropriate brand on the vehicle title

**Trucks Converted to Motor Homes Sub-Committee Meeting**

Subcommittee members are Cindy Gerber (Chair), Paul Nilsen, and Mark Francis (not present). Other working group members attending were Betty Johnson, Monica Blackwell, Kevin Park, Rob Termuende, and Skip Dodd.

The sub-committee met to discuss the issues surrounding trucks that are converted to motor homes. The discussion focused on many of the safety concerns and issues related to titling and registering these vehicles as well as the concerns of the qualifications or lack of such qualifications of the drivers of these vehicles. There was a lot of discussion on the lack of requirements for training to operate these large recreational vehicles.

The discussion moved to a general discussion on the need for some sort of formal training for folks who purchase or rent large recreation vehicles focusing on how unsafe it is to have someone with out any training or experience behind the wheel of a vehicle that is over 40 feet long in some cases. After a lengthy discussion on this topic we focused back on the issue that the sub-committee is charged with, the trucks that have been converted to a motor home.

The sub-committee met via conference call back in early April and composed a survey to gather information on practices in the jurisdictions, seeking input on how these vehicles are titled and registered, etc. At the time of the meeting, we only had 8 responses, so the sub-committee decided to send out the survey again and ask the AAMVA Regional VP’s to help us solicit more input from the membership.

Next steps for the sub-committee include:

1. Resend the survey out to membership
2. Seek out any crash data that might be available on such vehicles
3. Begin draft of possible “Best Practices” once more input is received from membership
4. Focus on safety aspect
5. Gather pictures and examples of vehicles that have been converted
6. Talk with NHTSA to see where they stand on these type of vehicles
The sub-committee had a productive meeting and feel we are on the right track to try to address concerns with the issues. Additionally, the sub-committee identified some issues that should be addressed by other disciplines areas or committees and will forward these to the proper people for consideration.

**Japanese Mini-Trucks Subcommittee**

Subcommittee members are Monica Blackwell (Chair), Rob Termuende, Harold Blaney, and Keith Kiser (AAMVA staff liaison). Other working group members attending were Cindy Gerber, Lori Bowman, and Betty Johnson.

The subcommittee discussed the results of the AAMVA survey on mini-trucks they had created and sent to the AAMVA membership. At the time of the meeting, only 14 AAMVA jurisdictions had responded. Overall, most respondents indicated they did not title and/or register these types of vehicles. Those jurisdictions that do register mini-trucks indicated they generally require an inspection prior to registration, but do not confirm if the vehicle meets current US or Canadian equipment or environmental standards.

Monica Blackwell indicated that Texas would title these vehicles as a “slow-moving vehicle” but does not brand or otherwise indicate on the title what type of vehicle it is. Rob Termuende indicated they are seeing a lot of these vehicles in British Columbia and, because they are more than 15 years old, they are generally exempt from Canadian equipment standards. In the US, vehicles more than 25 years old are generally exempt from US equipment standards. Rob indicated the Canadian provinces are asking Transport Canada to extend their exemption to 25 years.

The group discussed concerns about the fact these vehicles are almost always right-hand drive. As such, the vehicles create safety concerns regarding driver training issues. Also of concern is a safety issue because, when driven on the left-hand side of the road, the headlight shines into the oncoming traffic. The group also discussed the fact that, besides Japanese vehicles, they were also beginning to get mini-vehicles with left-hand drive from Europe and right-hand drive from Australia.

The subcommittee discussed the possibility of creating a best practice related to the titling of Japanese mini-trucks and other similar vehicles. The group suggested that, at a minimum, a best practice should require:

1. The vehicle import papers must show the vehicle was imported as a motor vehicle
2. The vehicle to display a certification label indicating the vehicle complies with applicable US or Canadian safety and environmental standards
3. Title and registration documents should clearly describe the vehicle so that it does not get improperly registered in another jurisdiction

After the subcommittee discussed their concerns and suggestions with the full working group, it was decided that, before moving forward with the suggested best practice, the subcommittee should:

1. Check with Rob Termuende to determine, based on British Columbia’s experience, what specific safety requirements these types of vehicles do not meet
2. Send a second notice to the AAMVA membership regarding the survey in order to get additional responses

**Hot Shot Rigs Sub-Committee Meeting**

Subcommittee members are Skip Dodd (Chair), Kevin Park, and Ron Covello. Other working group members present were Monica Blackwell and Rob Termuende

The sub-committee met to discuss the issues surrounding Hot Shot Rigs. For clarification, the sub-committee recognizes that there are vehicles that are called Hot Shot Rigs by the motor carrier industry that do meet the requirements and have the proper capacities to operate at the weights they are operating. However, the vehicles we are focusing on are those that do not meet the requirements and are being operated way beyond their manufactured purpose.

The sub-committee started out by identifying the type of vehicles we are focusing on, which are primarily small ¾ ton to 1 ½ ton vehicles that are being registered and operated at weights that far exceed their Gross Combined Weight Rating (GCWR). There was a lot a discussion on the Gross Vehicle Weight Rating (GVWR) and how the manufacturer identifies that on the vehicle. This rating, as best we can determine, is established by the manufacture to state that based on the weight, suspension and braking capacity of the vehicle, the rated weight is the highest weight the vehicle can be operated safely while hauling/towing. The GCWR is the GVWR plus the capacity of any towed unit (trailer). So for example, a vehicle with a GCWR of 24,000 pounds should not be operating at weights in excess of that.

The sub-committee discussed licensing practices, jurisdictional law and administrative regulations that deal with GVWR or GCWR and the believe is that in most jurisdictions there is nothing to authorize a jurisdiction to refuse to issue a registration for whatever weight the registrant requests, regardless of the vehicle GVWR or GCWR. Additionally, there was discussion about involving FMCSA or FHWA to determine if there is some sort of federal guidance on this issue, but the general belief is that someone other than the federal agencies will have to prompt a rule or regulation.
The sub-committee discussed incentives for registrants to register vehicles in excess of their recommended capacity and in general it comes down to economics (less operating cost, lower registration cost, possible tax exemptions, etc.) and in many cases they do not feel it is unsafe to operate the vehicle as they choose. There are also cases where the driver either can’t or doesn’t want to worry about qualifying for a CDL.

Some areas identified as revenue concerns are:

1. Loss of revenue from other CMV motor carriers
2. Loss of revenue by jurisdictions due to improper licensing and tax status
3. Fuel tax issues
4. Infrastructure issues due to increased damage from a smaller vehicle hauling heavy weights

Next Steps:

1. Draft proposed Federal Rule on regulating registration of vehicle over the GCWR, and a weight cap (Need to determine AAMVA position on doing such and talk with Federal agencies)
2. Contact ATA and other organizations to develop support
3. Obtain information on criteria, if any, for establishing the GVWR and GCWR
4. Propose that the GCWR be posted on the vehicle VIN plate (talk with NHTSA)
5. Draft possible model legislation limiting registration weight of vehicles to their GCWR
6. Outreach to enforcement agencies to promote increased enforcement on unsafe vehicles operating on the highways
7. Look at jurisdictions that have unsafe vehicle laws

The sub-committee had a good discussion of the issues surrounding Hot Shot rigs and will continue to work on identifying possible solutions. At this time, we are not ready to do any sort of survey of the membership but that may be something that is done later this year as we move forward.

**Other Vehicles**

At the conclusion of the meeting, the working group had a general discussion of other issues/concerns regarding other vehicles and other vehicle-types. Vehicle issues discussed included concerns about farm truck and farm equipment, the impact of Segways, electric motor-driven cycles, and the growing number of three-wheeled
vehicles that, while they may meet the definition of a motorcycle, are radically different in design than traditional motorcycles. Rob Termuende discussed the efforts that Transport Canada has made to create distinct classifications for these “new” vehicles and agreed to provide a copy of Transport Canada’s classifications to the working group members.

Next Conference Call

The subcommittees will continue their efforts and will meet by conference call at the request of the subcommittee chair.

Next Meeting

Keith Kiser informed the group that they had enough money left in their budget to hold another face-to-face meeting if it was needed. If needed, the meeting would most likely take place in September.