

American Association of Motor Vehicle Administrators



Neil D. Schuster
President and CEO

Jennifer Cohan, Chair of the Board
Director
Delaware Division of Motor Vehicles

September 7, 2013

The Honorable David Strickland
Administrator, National Highway Traffic Safety Administration
Docket Management Facility M-30
1200 New Jersey Avenue, S.E.
West Building, Ground Floor, Room W12-140
Washington, DC 20590

Re: Docket # NHTSA-2011-0052, RIN 2127-AL41 Federal Motor Vehicle Safety Standards; Lamps, Reflective Devices, and Associated Equipment

Dear Administrator Strickland:

On behalf of its membership, AAMVA appreciates the opportunity to comment on the NHTSA notice of proposed rulemaking regarding the safety standards of lamps, reflective devices and associated equipment. As an association dedicated to preserving safety on the nation's roadways, AAMVA understands the significant impact vehicle fitness and equipment can have on bolstering the quality of America's transportation system.

AAMVA notes that the notice of proposed rulemaking would essentially authorize the vertical display of license plates on motorcycles. AAMVA notes that plates that are displayed in such a fashion are difficult to read by both human eye and by Automated License Plate Readers (ALPRs) and other law enforcement safety mechanisms. This inability to read vehicle plates could have implications for tolling systems, traffic citation systems, and the ability for sworn law enforcement officers to tie suspect vehicles to traffic violations and other criminal activities. It could also enable traffic scofflaws to avoid detection over extended periods of time. AAMVA endorses a uniform design and display of vehicle license plates that are unobstructed by coverings or other materials per its policy regarding such:

"License plates serve one common purpose; to identify motor vehicles. Across jurisdictions, they also identify vehicle registrants and demonstrate compliance with motor vehicle registration laws. Through the use of bright, reflective surfaces, license plates contribute to highway safety and law enforcement efforts by making the vehicle more visible.

AAMVA supports the horizontal display of a front and rear plate and the uniform manufacture and design of plates, to increase the effective and efficient identification of license plates. Jurisdictions are encouraged to adopt the best practices identified in AAMVA's Best Practices Guide for Improving Automated License Plate Reader Effectiveness through Uniform License Plate Design and Manufacture.

The use of common characteristics and predictable designs on license plates will enhance readability, usability, and connections to vehicle registration records. It will also support law enforcement efforts and highway safety, and may increase certain revenue collection which is dependent upon license plate identification, such as toll collection and parking regulations."

On behalf of our jurisdictional members, AAMVA thanks NHTSA for the opportunity to comment on the vehicle safety standards. We hope the information provided is beneficial to NHTSA as you continue to develop the rule. Should you have any questions, feel free to contact Cian Cashin, AAMVA's Senior Manager of Government Affairs at (703) 522-4200.

Sincerely,

A handwritten signature in blue ink, appearing to read "Neil D. Schuster", is written over a light blue horizontal line.

Neil D. Schuster
AAMVA President and CEO