



American Association of  
Motor Vehicle Administrators

# Requirements LIABILITY *Vehicle Title* *Importation* Guidance REGISTRATION



## Imported Vehicles

*Guidance on Establishing Jurisdictional Policy*



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IMPORTED VEHICLES WORKING GROUP

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# Introduction

Vehicles are imported into the United States (U.S.) by individuals, dealers, and other entities for various reasons. Many vehicles are manufactured in another country for use in the U.S. and are imported by manufacturers. However, some vehicle models, not available in a version built for the U.S. market, are imported by individuals, dealers, or others who find them attractive. Sometimes it may be less expensive to acquire a foreign model and have it modified to conform to U.S. standards than to purchase an equivalent model originally built to U.S. standards. Individuals may import vehicles after they purchased and used them in another country while on vacation, while on assignment in the military, or in the country for other purposes. Exchange rates can also be a factor for importation of vehicles.

Any vehicle being imported into the U.S. must meet requirements established by the federal government. Individual jurisdictions are responsible for titling and/or registering motor vehicles for operation on public roadways. The federal requirements and the associated documentation add complexity and create challenges for jurisdictions when determining if the vehicle is eligible for title and/or registration. Understanding the differing federal requirements and restrictions that are dependent on the importation category and unfamiliar documentation (often in a foreign language) that accompany these vehicles make it difficult to know if or how to appropriately title and register them.

The Working Group was established to review the federal requirements, documents, and the associated processes and publish a Guidance Document for the jurisdictions. This Guidance Document will assist jurisdictions by providing information and

recommendations for consideration when establishing policy to determine eligibility for vehicles to be titled and/or registered for on-road use. It is important to note this Guidance Document does not cover every exception to the rules. The goal for the Working Group was to provide information and guidance on the transactions that make up the majority of the vehicles imported into the U.S.

The Working Group held both in-person meetings and virtual meetings in which representatives from the federal agencies were invited to participate as technical advisors. As part of the Working Group's research, they visited the Port of Buffalo and met with U.S. Customs and Border Protection (CBP) representatives and observed the importation process in real time.

Although this Guidance Document provides recommendations for the jurisdictions to consider when establishing their jurisdictional policy, the Working Group included background information for reference and context. The Working Group encourages the jurisdictions to refer to the source documents and websites for additional resources and the most up-to-date information from the federal agencies. The role for the jurisdiction is to title and/or register eligible imported vehicles for on-road use and investigate further if an application for title and/or registration is presented with information when fraud is suspected. It is not the jurisdiction's responsibility to determine if a vehicle was lawfully imported; this is the responsibility of the federal agencies. Even in the event a vehicle is properly imported, jurisdictions make the final decision with respect to titling and/or registering a vehicle.\* To assist the jurisdictions in making these eligibility decisions, the Working Group developed

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\* <https://www.nhtsa.gov/importing-vehicle/importation-and-certification-faqs-8>

the following information about the federal process and how it impacts the supporting documentation that should be submitted at the time of application for title and/or registration.

Most of this guidance document is specific to vehicles imported into the U.S. However, the Working Group worked with Canadian Council of Motor Transport

Administrators (CCMTA) and provincial government officials to include a chapter focused on vehicles imported into Canada from the U.S.

This document also contacts resources and contact information in Appendix A. These resources and contacts were valid at the time this document was published.

# Glossary of Acronyms, Definitions, Terms, and Forms

For the purposes of this guidance document, the following terms and acronyms will apply.

## Acronyms and Definitions

<b>AAMVA</b>	<b>American Association of Motor Vehicle Administrators:</b> A tax-exempt nonprofit organization that develops model programs in motor vehicle administration, law enforcement, and highway safety. Founded in 1933, AAMVA represents the jurisdictional officials in the U.S. and Canada who administer and enforce motor vehicle laws. AAMVA's programs encourage uniformity and reciprocity among the jurisdictions.
<b>ABI</b>	<b>Automated Broker Interface:</b> A key component previously of the ACS and now of the ACE that allows qualified participants to electronically file required import data with Customs. ABI is a voluntary program available to brokers, importers, carriers, port authorities, and independent service centers. ABI expedites the release of merchandise for the trade community. Entry summaries are electronically transmitted, validated, confirmed, corrected, and paid. Administrative messages keep participants informed of all current information and issues. Participants can query quota status, visa requirements, manufacturer information, and entry or entry summary processing status.
<b>ACE</b>	<b>Automated Commercial Environment:</b> The system through which the trade community reports imports and exports and the government determines admissibility. ACE provides a single, centralized access point for the trade community to connect with CBP and its Partner Government Agencies (PGAs). It is the system of record by which electronic trade transactions are conducted and recorded by CBP ( <a href="https://www.cbp.gov/trade/automated">https://www.cbp.gov/trade/automated</a> ).
<b>ACS</b>	<b>Automated Commercial System:</b> A system previously used by U.S. Customs and Border Protection (CBP) to track, control, and process all goods imported into the U.S. It has been replaced by ACE.
<b>AES</b>	<b>Automated Export System:</b> A system maintained by the U.S. Census Bureau to collect data relating to exports from the U.S. to foreign entities. It is used by U.S. exporters to electronically declare their international exports, known as Electronic Export Information (EEI), to the Census Bureau to help compile U.S. export and trade statistics. The Legacy AES system migrated to the ACE platform in 2014.

<b>CBP</b>	<b>U.S. Customs and Border Protection:</b> The largest federal law enforcement agency of the U.S. Department of Homeland Security and the country's primary border control organization. It is charged with regulating and facilitating international trade, collecting import duties, and enforcing U.S. regulations, including trade, customs, and immigration.
<b>CCMTA</b>	<b>Canadian Council of Motor Transport Administrators:</b> The Canadian association that coordinates all matters dealing with the administration, regulation, and control of motor vehicle transportation and highway safety. Membership includes representation from provincial and territorial governments as well as the federal government of Canada. CCMTA is the custodian of the National Safety Code for its Motor Carriers and provides collaborative leadership through its three Program Committees in the areas of Road Safety Research and Policy, Drivers and Vehicles, and Compliance and Regulatory Affairs.
<b>CBSA</b>	<b>Canada Border Services Agency:</b> The Agency that facilitates the flow of legitimate travelers and trade into Canada. It assists TC with the administration of the Motor Vehicle Safety Act and the Motor Vehicle safety regulations by administering and enforcing the conditions under which new and used vehicles may be imported at CBSA points of entry.
<b>CFIA</b>	<b>Canadian Food Inspection Agency:</b> The Canadian agency dedicated to safeguarding food, animals and plants, which enhances the health and well-being of Canada's people, environment, and economy.
<b>CMVSS</b>	<b>Canada Motor Vehicle Safety Standards:</b> Prescribed in the Canadian Motor Vehicle Safety Act (S.C. 1993, c. 16), which was enacted to regulate the manufacture and importation of motor vehicles and motor vehicle equipment to reduce the risk of death, injury, and damage to property and the environment. The Act applies to prescribed classes of vehicles, tires, and equipment for use in the restraint of children and disabled persons.
<b>FMVSS</b>	<b>Federal Motor Vehicle Safety Standards:</b> U.S. federal regulations found in 49 CFR 571 that specify design, construction, and performance requirements for motor vehicles or items of motor vehicle equipment to protect occupants against unreasonable risk of injury or death and prevent and reduce vehicle crashes
<b>IACP</b>	<b>International Association of Chiefs of Police:</b> A professional association for police leaders committed to advancing the safety of communities worldwide. The IACP is dedicated to advancing the policing profession through advocacy, research, outreach, and education to provide for safer communities worldwide.
<b>ICI</b>	<b>Independent Commercial Importer:</b> An entity that has obtained Environmental Protection Agency (EPA) credentials to legally import vehicles into the U.S.
<b>LEAT</b>	<b>Law Enforcement Access Tool:</b> Federated search for law enforcement that allows access to NMVTIS data and other pertinent vehicle information.

<b>MCO</b>	<b>Manufacturer's Certificate of Origin:</b> The original document required to be executed and delivered by the manufacturer to the first dealer or private individual that takes possession of the vehicle, certifying the origin of the vehicle.
<b>MVA</b>	<b>Motor Vehicle Agency:</b> In the U.S., a Motor Vehicle Administration (MVA) is a state- or territory-level government agency that administers vehicle and driver license laws, regulations, and policies. Similar departments exist in the provinces and territories of Canada. May also be known as Department of Motor Vehicles (DMV).
<b>NAFTA</b>	<b>North America Free Trade Agreement:</b> An agreement among the U.S., Canada, and Mexico designed to remove tariff barriers between the three countries; replaced by the USMCA (US-Mexico-Canada Agreement) in July 2020, although U.S. federal form numbers still use "NAFTA."
<b>NCIC</b>	<b>National Crime Information Center:</b> An electronic index of criminal justice information (e.g., criminal record history information, fugitives, stolen properties, missing persons).
<b>NHTSA</b>	<b>National Highway Traffic Safety Administration:</b> An agency of the U.S. Department of Transportation whose mission is to save lives, prevent injuries, and reduce economic costs due to road traffic crashes, through education, research, safety standards, and enforcement.
<b>NICB</b>	<b>National Insurance Crime Bureau:</b> A not-for-profit organization dedicated exclusively to fighting insurance fraud and crime. NICB maintains a record of all active stolen vehicles in the NCIC Vehicle Theft file and vehicles with a purged stolen vehicle status. This is the source of the NMVTIS theft data.
<b>NMVTIS</b>	<b>National Motor Vehicle Title Information System:</b> An electronic system that provides consumers with valuable information about vehicles' condition and history. The NMVTIS is designed to protect consumers from fraud and unsafe vehicles and to keep stolen vehicles from being resold. NMVTIS is designed to collect information from jurisdictions but not to change the nomenclature used in or standards created by jurisdictional motor vehicle laws or by jurisdictional motor vehicle titling agencies. NMVTIS is also a tool that assists jurisdictions and law enforcement in deterring and preventing title fraud and other crimes.
<b>POE</b>	<b>Port of Entry:</b> U.S. CBP has a complex mission at ports of entry with broad law enforcement authorities tied to screening all foreign visitors, returning American citizens, and imported cargo that enters the U.S. at more than 300 land, air, and seaports.
<b>RI</b>	<b>Registered Importers:</b> A category of importers established under 49 U.S.C. § 30141 approved by NHTSA to import nonconforming or gray market vehicles (i.e., vehicles that are not certified by their original manufacturer as complying with FMVSS) and to perform the necessary modifications on those vehicles so that they conform to all applicable FMVSS.



<b>RIV</b>	<b>Registrar of Imported Vehicles Program:</b> A national certification program in Canada established by TC to establish and maintain a system of registration, inspection, and certification to Canadian standards of vehicles originally manufactured for distribution in the U.S. market that are being permanently imported into Canada.
<b>TC</b>	<b>Transport Canada:</b> The federal department within the Government of Canada responsible for developing regulations, policies and services of road, rail, marine, and air transportation in Canada. It administers the Motor Vehicle Safety Act (1993, c. 16) that regulates the importation of vehicles into Canada.
<b>U.S. DOT</b>	<b>United States Department of Transportation:</b> A federal Cabinet department of the U.S. government concerned with transportation.
<b>U.S. EPA</b>	<b>United States Environmental Protection Agency:</b> An independent agency of the U.S. federal government concerned with environmental protection.
<b>VIN</b>	<b>Vehicle Identification Number:</b> The unique series of Arabic numbers and Roman letters that is assigned to a motor vehicle for identification purposes in accordance with FMVSS 49 CFR § 565 and CMVSS s. 115. In 1980, the VIN format was standardized to 17 characters.

## Additional Terms

<b>Bill of Lading</b>	A document issued by a carrier that lists goods being shipped and specifies the terms of their transport.
<b>Carrier</b>	The business that transports the vehicle to the receiving country.
<b>Consignee</b>	The party taking receipt of the vehicle, who may be the buyer but often is an agent for the buyer.
<b>Conformity Package</b>	A collection of forms and photos assembled by an RI to document a non-conforming vehicle that has been modified to meet FMVSS. The package is submitted to NHTSA for approval.
<b>Consignor</b>	The owner of the vehicle who sends the vehicle to the U.S. and retains ownership until paid by the consignee.
<b>Curbstoning</b>	When a licensed or unlicensed dealer posing as a private seller, sells a vehicle. The term is also used to describe when a private party who is not licensed as a vehicle dealer, regularly engages in the business of selling or offering to sell vehicles which were not originally procured for personal use. Also known as curbsider. This would include an employee of a dealership importing a vehicle with the intent to sell.

<b>Customs Broker</b>	A party licensed and regulated by CBP that is hired by an importer, consignee, or buyer to prepare the documentation and make arrangements to satisfy requirements for entry.
<b>Vehicle Emissions Standards</b>	Canadian and U.S. federal emission standards for various classes of on-road and off-road vehicle and engines.
<b>Exporter or Shipper</b>	The party that sends the vehicle out of the country of origin. The exporter or shipper obtains an original bill of lading signed by the carrier after goods are transferred for transport.
<b>Freight Forwarder</b>	A business that is sometimes but not always used for importing vehicles that is connected within the supply chain and concentrates on the logistics and physical transportation of cargo. The freight forwarder prepares the documentation, suggests shipping methods, navigates trade regulations, and assists with details such as packing and labeling. At the foreign port, the freight forwarder arranges to have the exported goods clear customs and be shipped to the buyer. The freight forwarder then sends the documentation to the seller, buyer, or intermediary, such as a bank. A freight forwarder can be viewed as a “travel agent for cargo,” a third-party entity that sets a trip up, and then, for a sum of money, will facilitate that entire trip, including paperwork and documentation.
<b>Gray Market Vehicle</b>	A vehicle being imported into the U.S. that was manufactured for use outside of the U.S. and did not meet U.S. FMVSS or EPA requirements at the time of manufacture. This does not include vehicles manufactured to meet CMVSS. This does not include Canadian vehicles listed in 49 CFR Part 593, Appendix A as admissible.
<b>Importer</b>	The person primarily liable for the payment of any duties on the merchandise or an authorized agent acting on their behalf. The importer may be (1) the consignee, or (2) the importer of record, or (3) the actual owner of the merchandise if an actual owner’s declaration and superseding bond has been filed in accordance with 19 CFR § 141.20, or (4) the transferee of the merchandise if the right to withdraw merchandise in a bonded warehouse has been transferred in accordance with Subpart C of part 144 of 19 CFR § 101.1.
<b>Jurisdiction</b>	Any state, district, territory, or province of the U.S. or Canada.
<b>Pro Forma Invoice</b>	A preliminary bill of sale sent to the buyer prior to shipment of a vehicle. This invoice generally lists the sales price and includes an estimate of any commission and associated fees, providing information necessary for CBP to determine duties.
<b>Registration</b>	Documentary proof of authority to operate a motor vehicle on a public road or the process of issuing such proof.

<b>Salvage</b>	A status or title brand that indicates the vehicle has been deemed a total loss by an insurance company that paid a claim on it or was damaged to the extent that its fair salvage value plus the cost of repairing the automobile for legal operation on public streets, roads, and roadways would be more than the fair market value of the automobile immediately before the event that caused the damage.
<b>Specially Constructed Vehicle</b>	A new motor vehicle constructed from any combination of new, used, or homemade parts from other vehicles and may include a manufacturer's kit. The vehicle does not resemble a specific manufacturer make or model, past or present. This category may include "kitcar" or assembled-type vehicles. A specially constructed vehicle does not include a vehicle that is built to resemble a specific manufacturer's make or model, past or present, such as a replica or a "replikit."
<b>Title</b>	Documentary proof of motor vehicle ownership.

## U.S. Importation Forms

<b>EPA Form 3520-1</b>	Declaration form for Importation of Motor Vehicles and Motor Vehicle Engines Subject to Federal Air Pollution Regulations.
<b>Form CBP 7501</b>	Entry Summary form produced by U.S. Customs and Border Protection. A Form CBP 7501 signed and stamped by CBP is the only acceptable form to indicate lawful entry into the U.S. for any vehicle listed.
<b>NHTSA HS-7</b>	Declaration Form—Importation of Motor Vehicles and Motor Vehicle Equipment Subject to Federal
<b>Declaration</b>	Motor Vehicle Safety, Bumper, and Theft Prevention Standards, produced by U.S. Department of
<b>Form</b>	Transportation, NHTSA. The NHTSA HS-7 Declaration Form provides check off boxes for 14 different allowable categories of entry.

## Chapter 1 The U.S. Federal Process

There are three U.S. federal agencies that oversee the U.S. importation process: Customs and Border Protection (CBP), the National Highway Traffic Safety Administration (NHTSA), and the U.S. Environmental Protection Agency (EPA). Each has a role in the vehicle importation process and has requirements that must be met before a vehicle can be lawfully imported into the U.S.

Jurisdictions will find detailed information in the upcoming chapters. Understanding the different roles of the federal agencies is helpful to establish the foundation of the process. The importation process described in this document applies to most vehicles, but there may be additional federal requirements for some vehicles, especially commercial vehicles.

### U.S. Customs and Border Protection

#### *Background*

CBP reviews all entry documentation for motor vehicles being imported into the U.S. to ensure the appropriate forms have been properly completed for the vehicle to be lawfully imported. CBP ensures that proper vehicle requirements are met and that imported vehicles are in compliance with all federal regulations applicable at the time of entry. CBP is the first stop for imported vehicles.

Primarily, motor vehicles being imported into the U.S. must clear CBP at their first U.S. port of arrival. A signed and stamped CBP Form 7501 is evidence that a vehicle has been lawfully imported. There are minor variations of the form itself. However, the form number is always the CBP Form 7501, and if there are concerns on the authenticity of the CBP Form 7501, jurisdictions are encouraged to contact the Port of Entry where the CBP Form 7501 was originally filed

and stamped. Contact information for ports of entry can be found on CBP's website.\*

For a vehicle to successfully be cleared through the CBP process at the port, the vehicle must be physically presented for examination, and the following documentation is needed:

- **Document requirements for a personal vehicle importation filed on an informal CBP Form 7501 by an individual at a U.S. Customs Port of Entry (POE)**

1. Informal paper CBP Form 7501 (U.S. Customs Entry Summary) for personal vehicle importation (Provided from CBP)
2. NHTSA HS-7 Declaration Form
3. EPA 3520-1 Form
4. "Bill of sale" or "gift of sale" (allowed to be handwritten, and does not need to be notarized)
5. Foreign registration or title
6. Proof the vehicle meets U.S. Department of Transportation (DOT) and U.S. EPA requirements: either a letter of compliance from original manufacturer or U.S. DOT/ EPA labeling physically on vehicle or vehicle is 25 or more years old

- **Document requirements for a vehicle importation filed on a CBP Form 7501 in Automated Commercial Environment (ACE) by a U.S. Customs Broker**

1. CBP Form 7501 (U.S. Customs Entry Summary)

\* <https://www.cbp.gov/contact/ports>

2. NHTSA HS-7 Declaration Form (This form may be filed electronically, usually by a customs broker)
3. EPA 3520-1 Form
4. Documents covering the vehicle: bill of lading, invoice, bill of sale, foreign registration or title, foreign export certificate etc.
5. In some cases, a contract with a Registered Importer (RI) or Independent Commercial Importer (ICI)

The CBP Form 7501 is signed and stamped by the CBP when all the necessary documentation is received and the vehicle meets all applicable requirements at the time of importation. This document identifies that the importation process was successful. However, this form does not necessarily demonstrate all DOT Federal Motor Vehicle Safety Standards (FMVSS) and EPA requirements have been satisfied because some importations require an RI and/or ICI to complete modifications and receive approval after importation. CBP uses the ACE, a modernized, electronic processing system designed to consolidate and automate vehicle processing at the border. Jurisdictions do not currently have access to this system.

## U.S. National Highway Traffic Safety Administration

### Background

NHTSA is responsible for keeping people safe on U.S. roadways. Through enforcing vehicle performance standards and partnerships with state and local governments, NHTSA reduces deaths, injuries, and economic losses from motor vehicle crashes.\* NHTSA has a legislative mandate to issue the FMVSS that prescribe the minimum safety performance requirements for motor vehicles and for certain motor vehicle equipment. NHTSA defines a motor vehicle† as a vehicle driven or drawn by mechanical power

and manufactured primarily for use on public streets, roads, and highways but does not include a vehicle operated only on a rail line. It should be noted that this encompasses trailers as well as self-propelled vehicles.

### Federal Requirements Related to Imported Vehicles

To ensure that imported vehicles meet FMVSS, NHTSA has statutory authority under 49 U.S.C. § 30112(a) and 49 U.S.C. § 30141 to establish regulations governing the importation of motor vehicles and motor vehicle equipment. Several regulations were promulgated to implement 49 U.S.C. § 30141 and are as follows:

- **49 CFR § 591** – establishes procedures governing the importation of vehicles and equipment subject to federal motor vehicle safety, bumper, and theft prevention standards
- **49 CFR § 592** – establishes requirements for persons wishing to be RIs of vehicles not originally manufactured to conform to the FMVSS
- **49 CFR § 593** – establishes procedures for making determinations that a vehicle not originally manufactured to conform to the FMVSS is eligible for importation
- **49 CFR § 594** – establishes fees, authorized by 49 U.S.C. § 30141, associated with the importation program

Some vehicles, determined by the category in which they are eligible to be imported, are required to be imported via a (RI), but others can be imported personally by the vehicle owner.

### Registered Importers

An RI is a category of importers established under 49 U.S.C. § 30141 and approved by NHTSA for processing nonconforming vehicles. The majority of RIs are importing vehicles from Canada, but a few RIs import vehicles from other countries. NHTSA

\* <https://www.nhtsa.gov/about-nhtsa>

† <https://www.nhtsa.gov/interpretations/07-007541as>

provides a list of RIs on its website. The current list can be found [here](#).

Vehicles manufactured to the Canadian Motor Vehicle Safety Standards (CMVSS) are already built with some compliance with U.S. FMVSS but require modifications to bring them to into full compliance with U.S. FMVSS. Gray market vehicles require more significant modifications to be FMVSS compliant and fewer RIs are able to complete these requirements. Therefore, the majority of RIs import vehicles exclusively from Canada.

Before an RI imports a vehicle, NHTSA must have determined that the vehicle is eligible for importation based on its capability of being modified to be in compliance with the FMVSS. If no determination has been made for a particular vehicle, the RI can petition NHTSA to determine eligibility to import. A list of eligible nonconforming vehicles can be found [here](#).

When importing a nonconforming vehicle, the duties of an RI include but may not be limited to:

- a. Provide a bond to ensure that the vehicle is brought into compliance with FMVSS or will be exported at no cost to the U.S.
- b. Electronically file a declaration with CBP (NHTSA HS-7 Declaration Form) for each vehicle identifying the correct category for importation.
- c. Modify the vehicle to conform to applicable FMVSS.
- d. Ensure all outstanding recalls have been performed on the vehicles.
- e. Submit the conformity package to NHTSA for review and approval. The RI is required to maintain copies of the conformity information onsite.
- f. Maintain possession of the vehicle while it is being brought into conformance with FMVSS and while NHTSA completes the review of the conformity package. The vehicle cannot be

released until either NHTSA has approved the conformity package and the RI is in receipt of the bond release letter or when 30 days have passed since the conformity package was received by NHTSA. If in doubt, jurisdictions should contact NHTSA for verification the vehicle's conformity package has been approved and is eligible for titled and/or registration. The contact information provided in Appendix A can be used to verify questions related to a vehicle's conformity package.

- g. Bring the vehicle into compliance with FMVSS within 120 days from the date of entry or it must be exported if not brought into compliance within the 120 days.

## U.S. Environmental Protection Agency

### *Background*

The EPA is the federal agency responsible for developing and enforcing regulations regarding environmental issues. The EPA regulates vehicles that are manufactured for use in the U.S. and vehicles being imported into the U.S. to verify they meet EPA emission standards and requirements. These requirements apply to on-road vehicles, off-road vehicles, and other non-road engines such as marine and all-terrain vehicle engines.

If a vehicle does not comply with EPA standards, the customer may also need to work with an ICI to bring it into conformity. Some businesses are licensed as both an RI and an ICI.

### *Federal Requirements Related to Imported Vehicles*

Vehicles that are manufactured to conform to EPA emission requirements will bear the manufacturer's label, written in English, affixed within the engine compartment stating the vehicles complies with all EPA regulations.

A Canadian vehicle that that was manufactured to meet the EPA standards will have one of the following:

- an emission label stating it is certified to U.S. EPA federal emission standards or
- a written statement from the manufacturer's U.S. representative stating the vehicle complies with all U.S. EPA regulations.

Nonconforming gray market vehicles that do not meet the EPA requirements may only be imported under the following circumstances:

- If the vehicle qualifies for an exemption and receives pre-approval from EPA (exemptions include testing, display, repair or alteration, nonresident, and for competition or racing)
- If the vehicle is excluded from the requirement because it is over 21 years old
- If the vehicle is modified, tested, and certified by an ICI to have met EPA standards

### *Independent Commercial Importer*

ICIs are entities that have obtained EPA credentials to legally import nonconforming vehicles into the U.S. Vehicles that do not qualify for an exclusion or exemption, as previously mentioned, must be imported by an ICI to modify, test, and certify the vehicle complies with EPA emission requirements. The ICI must retain the vehicle until it has met all EPA requirements, including a 15-day holding period after the ICI informs EPA that all work and testing has been completed. EPA will carefully review the emission test documents and determine if the vehicle meets EPA requirements under import regulations.

### *Jurisdictional Challenges Related to the Federal Process*

Because the authority, regulation, and oversight for the importation of vehicles and equipment is divided among three federal agencies, it does add additional challenges to the process because information

exchanged among the federal agencies is not accessible by the jurisdictions. As a result, verifying the vehicle has met the approval of all agencies requirements prior to title and registration is an overall challenge. More specifically the following are other examples of challenges related to the federal process:

- Navigating, understanding, and processing the federal importation forms is complex.
- These three federal processes produce unsecured paper documentation that includes slight inconsistencies. The inability to electronically exchange or verify this information results in jurisdictions being unable to efficiently verify the legitimacy of these documents. As a result, the jurisdictions must accept documents on their face value.
- The CBP Form 7501 may vary slightly in appearance. The formal version of the CBP Form 7501 filed electronically by a U.S. Customs broker in ACE can differ marginally based on the type of software the broker uses. The informal version of the CBP Form 7501 filed in person at a U.S. Customs POE has slight variations between different Ports of Entry to include different stamps.
- Jurisdictions may need to impose or waive penalties if they have a statutory or regulatory requirement for vehicles to be titled within a specified time frame from the date of purchase and a customer has not been able to fulfill the importation requirements within that time frame.
- The 21-year exemption for EPA and 25-year exemption for NHTSA can cause confusion when vehicles are exempt from specific requirements for importation purposes. Jurisdictions may mistakenly believe that they must register and/or title a vehicle that has legally been imported under one of these two exemptions.



## Chapter 2 Recommendations to Consider When Setting Jurisdictional Policy for Imported Vehicles

### Background

It is the role and responsibility of each state to ensure that vehicles are appropriately titled and/or registered after being imported into the U.S. This includes ensuring valid documents with correct information are submitted to the titling and/or registration issuing jurisdiction to support ownership and demonstrate compliance with CBP, EPA, and NHTSA requirements, as well as any specific jurisdictional requirements. In addition to the documentation, a physical inspection of the vehicle is also an important and significant procedure and process to address consumer safety and environmental concerns and to detect and deter fraud.

CBP requires the following documentation for import:

1. U.S Customs Entry Summary (CBP Form 7501)
2. U.S. EPA Declaration Form (EPA 3520-1 Form) (not required for all imports)
3. NHTSA Declaration (HS-7 Form)
4. Other documents may also be required such as a bill of lading, invoices, bill of sale, foreign ownership document, and, in some cases, a contract with an RI or ICI.

If a jurisdiction has concerns related to the validity of supporting documents, it is important they contact the federal agency responsible for each component of the requirements to be properly imported into the U.S.

### CBP Form 7501 – U.S. Customs Entry Summary

The CBP Form 7501 is the proper form to evidence that the vehicle has been lawfully imported. There is no exception to this form number. There are minor variations of the form itself; however, the form number is always the CBP Form 7501. For a commercial import (motor vehicles being imported for resale, including dealer trade-ins) this form will be slightly different than the informal CBP Form 7501 used for a vehicle that was declared as a personal vehicle for import. Jurisdictions may also notice that the ACE electronic equivalent of the CBP Form 7501 is slightly different than the paper CBP Form 7501.

The form must be stamped and signed by CBP to show evidence of proper import. CBP stamps may vary slightly between different ports of entry. If there are concerns on the authenticity of the CBP Form 7501, jurisdictions are authorized to contact the POE where the CBP Form 7501 was originally filed and stamped.

CBP issued guidance to jurisdictions in 2003 that informed jurisdictions that CBP's signed and stamped CBP Form 7501 is the *only* form that should be accepted as verification of a vehicle importation. There has been confusion that the CBP stamp signifies compliance with other government agency statutes and regulations. It does not. The CBP stamp and signature only mean that the importer completed the CBP import process and provided proof of ownership by presenting the original ownership document, or certified copy of the original. Jurisdictions must make the determination of whether or not to register and/or title the vehicle for use on the road.



## **Jurisdiction Recommendations 2.1 Related to CBP Form 7501**

The Working Group recommends always requiring an original copy of the CBP 7501 with an original stamp and signature before titling and/or registering a vehicle that has entered from another country. Furthermore, it is recommended for jurisdictions to familiarize themselves with ports located close to their offices to become familiar with the forms and stamps used by the POE.

## **U.S. EPA Declaration Form (EPA Form 3520-1)**

EPA Standard Form 3520-1 must be submitted to the CBP when requested to import passenger vehicles, light-weight trucks, roadway motorcycles, and the corresponding engines into the U.S. Importers are required to verify the nonconforming vehicle is in compliance with EPA standards.

## **Jurisdiction Recommendation 2.2 Related to EPA Form 3520-1**

Because the importer submits EPA Form 3520-1, when required, and CBP does not stamp and sign CBP Form 7501 unless this has occurred, it is recommended that jurisdictions not require Form 3520-1 and accept the CBP Form 7501 as evidence it was provided when required.

### *Interpreting the NHTSA HS-7 Declaration Form*

49 U.S.C. § 30112(a) states that “no person shall manufacture for sale, sell, offer for sale, introduce or deliver for introduction in interstate commerce, or import into the U.S. any motor vehicle or motor vehicle equipment manufactured on or after the date an applicable FMVSS takes effect unless the vehicle or equipment complies with the standard and is so certified by its manufacturer.” The Declaration (NHTSA HS-7 Form) identifies the importation category for which the vehicle is being declared by the importer. The purpose of this form is to identify a lawful means for importing the vehicle or equipment items into the U.S. that are

subject to the federal motor vehicle safety, bumper, and theft prevention standards.

The Working Group reviewed each of the 14 qualifying categories for importation on the NHTSA HS-7 Declaration Form and the related federal requirements and have provided an explanation of each category and made recommendations for jurisdictions to consider when establishing policies and procedures related to titling and registering an imported vehicle. The importer must complete the NHTSA HS-7 Declaration Form and declare the category under which the vehicle is being imported before the vehicle can legally enter the U.S. Each category determines whether the vehicle should be titled and/or registered and if so

- the type of registration that should be allowed,
- possible brands that should appear on the title, and
- any additional documents required to demonstrate compliance with the NHTSA requirements.

The NHTSA HS-7 Declaration Form is necessary for titling and/or registration because some categories have additional documentation requirements that would not be known if a jurisdiction is only examining the Entry Summary (CBP Form-7501).

The NHTSA HS-7 Declaration Form has 14 boxes representing the 14 different importation categories specified by federal regulations, which are described as follows. Each box or category has specific conditions and restrictions that correspond 49 CFR § 591.5. A quick reference chart deciphering documents that should accompany the NHTSA HS-7 Declaration Form can be found in Appendix B.

### **BOX 1: AGE EXEMPT VEHICLE [591.5(I)]**

Any vehicle 25 years old or more, from the date of manufacture, at the time of importation is exempt from FMVSS requirements for purposes of importation only and is not regulated by NHTSA

or EPA at import. The age determination of the vehicle is based on the vehicle's date of manufacture, provided that no other parts on the vehicle are younger than 25 years and the vehicle has not had significant modification that will affect the manufacture date. The manufacture date will be located on the manufacturer's label on the vehicle. If there is no such label, the age should be determined from documentation indicating the date first sold or a registration document indicating the vehicle was registered at least 25 years ago.

*Note: It should be noted that vehicles imported under other NHTSA HS-7 Declaration Form categories that become 25 years old can qualify for this exemption. The vehicles must not have been significantly modified. If the vehicles are to be resold, it is not necessary for these vehicles to leave the country and reenter through CBP process to claim this exemption.*

### **Jurisdiction Recommendation 2.3 Related to NHTSA HS-7 Declaration Form Box 1**

Vehicles entering under Box 1 that are age exempt because it has been at least 25 years since the date of manufacture are recommended not to be registered and/or titled for use on the road unless they are brought into compliance with FMVSS and meet the jurisdiction's inspection standards. Refer to AAMVA's [Regulation of Off-Road Vehicle Best Practices](#) for information regarding vehicles that are not recommended for on road use. If the owner provides evidence the vehicle has been modified to meet FMVSS, such as a DOT bond release letter, it is recommended the title be issued with the brand, "Gray Market – In Compliance" or if CMVSS certified, "Prior Canadian – In Compliance."

### **BOX 2A: VEHICLE MANUFACTURED TO U.S. SAFETY STANDARDS [591.5(B)]**

Vehicles entering under Box 2A include any new motor vehicle with a manufacturer's certificate of origin that was manufactured to comply with all applicable FMVSS and bears a label certifying such compliance that was permanently affixed by its original manufacturer. There

is no need for NHTSA's approval before the vehicle is imported. Millions of vehicles are imported into the U.S. each year under this category. Jurisdictions rarely see a CBP Form-7501 or NHTSA HS-7 Declaration Form for vehicles entering under Box 2A. They are typically presented with an Manufacturers Statement of Origin as the ownership document.

Used vehicles, originally manufactured to meet FMVSS, may also enter under a Box 2A.

### **Jurisdiction Recommendation 2.4 Related to NHTSA HS-7 Declaration Form Box 2A**

Vehicles entering under Box 2A were originally certified by the manufacture to meet FMVSS for use in the U.S., and it is recommended jurisdictions title and issue renewable registrations for these vehicles without any branding.

### **BOX 2B: CANADIAN VERSION VEHICLE - PERSONAL USE [591.5(G)]**

Vehicles entering under Box 2B include vehicles that were originally manufactured according to Canadian Motor Vehicle Safety Standards (CMVSS) and are imported into the U.S. for *personal use only and not for resale*. If the intent for importing the vehicle is to resell, the vehicle should be imported using an RI entering under Box 3.

The person importing the vehicle under this category must present a manufacturer's letter from the vehicle's original manufacturer on the manufacturer's letterhead (and not that of a franchise dealer's) identifying the Vehicle Identification Number (VIN) and confirming it conforms to all applicable FMVSS, Bumper and Theft Prevention standards, except

- Labeling requirements of Standards Nos. 101 *Controls and Displays* and 110 *Tire Selection and Rims* or 120 *Tire Selection and Rims for Motor Vehicles other than Passenger Cars* and/or the specifications of Standard No. 108 *Lamps, Reflective Devices, and Associated Equipment*, relating to daytime running lamps

If the manufacturer's letter states the vehicle is compliant, except for automatic restraint requirements of the occupant crash protection standard, the vehicle cannot be imported under Box 2B and can only be imported on a permanent basis by an RI as a Box 3 if NHTSA has determined it is eligible for importation.\*

The vehicle cannot be salvage, repaired salvage, or a reconstructed vehicle.

*Fraud Alert:* The Working Group identified vehicles imported as a Canadian Version Vehicle for Personal Use (Box 2B) as vehicles for which curbstoning can easily occur. This is because these vehicles may be sold to buyers who are unaware the vehicle was imported *for personal use and not for the intent to resell*. As a result, buyers purchase these vehicles and are unable to provide the appropriate documentation to apply for title and/or registration if they are not provided proper ownership documentation. The seller in many cases is selling the vehicle with a Canadian registration as they did not obtain a U.S. title, and then there is the potential for the buyer to lose the money used to pay for the vehicle or the buyer will have to expend considerable time and resources to have the vehicle exported and reimported as a Box 3 nonconforming vehicle and modified through an RI. Consumer education is important to avoid these consequences. (For additional information regarding consumer education, please refer to Chapter 7.)

### **Jurisdiction Recommendation 2.5 Related to NHTSA HS-7 Declaration Form Box 2B**

Vehicles entering the U.S. under Box 2B that were originally certified by the manufacturers to meet CMVSS can be imported for personal use only and not for resale. When an importer selects Box 2B as the importation category, they acknowledge that knowingly making a false declaration is subject to a fine of not more than \$10,000 or imprisonment for

not more than 5 years or both (18 U.S.C. § 1001).

It is recommended jurisdictions only title and/or register if the applicant can provide the original stamped CBP Form 7501 and accompanying NHTSA HS-7 Declaration Form. The applicant for title and/or registration should also be the importer. If the applicant for title and/or registration is not the importer, this could be an indication the vehicle was not imported for personal use but imported with the intent to be resold. Jurisdictions may want to consider putting a designation on the title and the title record the vehicle was imported as a "Canadian vehicle."

Because it is a known issue that vehicles are imported by individuals under a Box 2B with the intent to sell, and some dealers are sending employees to Canada to bring vehicles into the U.S. under Box 2B with the intent to resell, under their personal name, jurisdictions should be aware of opportunities to track vehicles titled under this category and subsequently sold not long after being imported. It is recommended that suspected fraud regarding vehicles imported under Box 2B be forwarded to the staff within your agency responsible for suspected fraud referrals to conduct a follow-up review. This review would involve examining the transaction to determine if an application for title may be fraudulent based on information provided. To aid in this review, it is recommended to obtain a report of all vehicle transactions conducted by the purchasing and selling party, specifically information about imported vehicle transactions. This information will show the quantity, time of ownership, and potential pattern of imported vehicle transactions that will help in determining intent. Being able to query the vehicle seller's information will be valuable for this research.

When examining an imported vehicle transaction involving Box 2B vehicles, the length of time the seller owned the vehicle is important because it may indicate the vehicle was not purchased for personal use but rather for resale. The buyer of the vehicle could be an innocent purchaser, not realizing he or she purchased a vehicle that was not imported properly. The quantity of imported vehicles the buyer has purchased and

\* This is from NHTSA's Vehicle Importation Guidelines (Imported from Canada) at [https://www.nhtsa.gov/sites/nhtsa.dot.gov/files/documents/vig\\_canada09122017.pdf](https://www.nhtsa.gov/sites/nhtsa.dot.gov/files/documents/vig_canada09122017.pdf)

titled is important because it may indicate the buyer is purchasing imported vehicles to quickly resell and that do not qualify to be imported under Box 2B. This could occur even if the jurisdiction does not show the vehicles being sold in that jurisdiction as the buyer may be selling the vehicles outside that jurisdiction.

If an imported vehicle Box 2B transaction appears to not be for personal use or if a pattern is found with imported vehicle transactions occurring at frequent intervals of time by a particular seller or buyer, it is recommended for the jurisdiction to refer the questionable transaction to NHTSA at [importcertification@dot.gov](mailto:importcertification@dot.gov) for non-urgent referrals and for urgent referrals to call (202) 366-5291.

If a vehicle that entered as Box 2B reaches 25 years since the date of manufacture, the jurisdiction may consider issuing a negotiable title with the brand “Prior Canadian – Exempt from Compliance.”

### **BOX 3: NON-CONFORMING VEHICLE [591.5(F)]**

Vehicles entering under Box 3 include vehicles manufactured for use outside of the U.S. The majority of imported vehicles in this category are vehicles made to conform to CMVSS and are imported from Canada. At the time this document was updated, the number of vehicles imported under this category was approximately 225,000 to 250,000 each year. These vehicles must be imported by an RI or by a person who has a contract with an RI to bring the vehicle into compliance with all applicable FMVSS following importation.

NHTSA must determine a vehicle is eligible for importation before it can enter under this category. These eligibility decisions are based on a vehicle’s capability of being modified to conform to all applicable FMVSS. Blanket eligibility has been granted for many Canadian vehicles manufactured to meet both CMVSS and FMVSS. For other vehicles, NHTSA makes import eligibility decisions on a make, model, and model year basis. This eligibility determination is only for importation purposes.

Jurisdictions must make the final decision whether or not to register and/or title a vehicle for use on the road. NHTSA has a (<https://www.nhtsa.gov/sites/nhtsa.gov/files/elig120115.pdf>) list of nonconforming vehicles eligible for importation on its website.

At the time that NHTSA determines a vehicle of a particular make, model, and model year to be eligible for importation, NHTSA assigns the vehicle a unique vehicle eligibility number. That number is entered on the appropriate block of the NHTSA HS-7 Declaration Form provided to CBP at the time of importation. The number signals to CBP that the vehicle can be lawfully imported by an RI or by a person who has a contract with an RI to modify the vehicle, even though the vehicle was not originally manufactured to comply with all applicable FMVSS. This category includes vehicles that were originally manufactured to meet CMVSS but may not meet all FMVSS and are entering the U.S. for purposes other than personal use (Box 2B).

- The RI has 120 days from the vehicle’s date of entry to make modifications bringing it into conformity with FMVSS, and for their conformity package to be approved by the NHTSA import certification department.
- After NHTSA receives the conformity package, they have 30 days to review it and send a bond release letter to the RI. During this period, the vehicle must remain in the custody of the RI. If NHTSA does not issue a bond release letter within 30 days from the date the RI submits the statement of conformity for an imported nonconforming vehicle, the RI is free to release custody of the vehicle. However, NHTSA has the authority to recall a vehicle and declare it must be exported even if it was released by the RI.
- The vehicle cannot be a salvage or a reconstructed vehicle.

### **Jurisdiction Recommendation 2.6 Related to NHTSA HS-7 Declaration Form Box 3**

Box 3 vehicles that were not originally manufactured to meet FMVSS, including gray market vehicles built for use in a country other than the U.S., including Canada, should not be issued a negotiable title and renewable registration unless a DOT bond release letter has been issued and the vehicle meets FMVSS and the jurisdiction's inspection standards.

When a bond release letter is issued, the title should carry the brand "Gray Market – In Compliance" unless the vehicle was CMVSS certified in which case it should be issued with the brand "Prior Canadian – In Compliance."

If NHTSA does not issue a bond release letter within 30 days from the date the RI submits the statement of conformity for an imported nonconforming vehicle, the RI is free to release custody of the vehicle. However, NHTSA has the authority to recall a vehicle and declare it must be exported even if it was released by the RI. If a jurisdiction is titling a vehicle based on the passing of the 30 days from the date the RI has submitted the statement of conformity, it is recommended to contact NHTSA Import Certification (contact information can be found in Appendix A) to check on the status of the conformity package to ensure it has not been rejected. One risk associated with titling these vehicles prior to the issuance of the bond release letter is if NHTSA denies a conformity package and declares a vehicle to be exported, the jurisdiction will not receive notification. As a result, if a jurisdiction issues a title under these circumstances, the working group recommends the title be issued with the brand "Gray Market – Pending NHTSA Compliance."

#### **BOX 4: EXPORT ONLY VEHICLE [591.5(C)]**

A vehicle or equipment entering under Box 4 is a vehicle or equipment that does not conform to all applicable FMVSS, Bumper, and Theft Prevention

Standards but is intended solely for export and is labeled for export on the vehicle or equipment. The outside of any container of the vehicle or equipment must also bear a label or tag indicating the contents are intended solely for export. As such, these vehicles are only passing through the U.S. to be exported outside of the U.S.

### **Jurisdiction Recommendation 2.7 Related to NHTSA HS-7 Declaration Form Box 4**

Vehicles entering under Box 4 are entering the U.S. for export only and should not be issued any type of title or registration.

#### **BOX 5: NON-RESIDENT (E.G., TOURIST) EXEMPTION [591.5(D)]**

Nonresidents of the U.S. (including U.S. citizens living abroad) may temporarily import nonconforming motor vehicles into the U.S. for personal use for a period not to exceed one year from the date of entry. For a person to import the vehicle and meet this exemption, the following declaration must be made to NHTSA by the nonresident and all must apply:

- a. I am a nonresident of the U.S., and the vehicle is registered in a country other than the U.S.
- b. I am temporarily importing the vehicle for personal use for a period not to exceed 1 year and will not sell it during that time; and
- c. I will export it not later than the end of 1 year after entry, and the declaration contains my passport number and country of issue.

The person must also include her or his passport number and country of issuance.

The 1949 Geneva Convention on Road Traffic, Chapter 1 Article 1, allows for nonresidents to operate a motor vehicle in a foreign country for a period of up to one year.\*

\* United Nations Convention on Road Traffic, 1949 ([https://treaties.un.org/doc/Treaties/1952/03/19520326%2003-36%20PM/Ch\\_XI\\_B\\_1\\_2\\_3.pdf](https://treaties.un.org/doc/Treaties/1952/03/19520326%2003-36%20PM/Ch_XI_B_1_2_3.pdf))



### **Jurisdiction Recommendation 2.8 Related to NHTSA HS-7 Declaration Form Box 5**

The Working Group recommends vehicles entering under Box 5 should not be issued a negotiable title or registration. If the jurisdiction issues a registration, it is recommended the registration should expire no later than one year from the date of entry.

#### **BOX 6: FOREIGN GOVERNMENT OR INTERNATIONAL ORGANIZATION [591.5(H)(1)]**

This category includes vehicles for which the owner states he or she

- a. Is a member of the personnel of a foreign government on assignment in the U.S. or a member of the Secretariat of a public international organization so designated under the International Organization Immunities Act, and within the class of persons for whom free entry of motor vehicles has been authorized by the Department of State;
- b. Is importing the motor vehicle on a temporary basis for the personal use of the importer and will register it through the Office of Foreign Missions of the Department of State;
- c. Will not sell the vehicle to any person in the U.S., other than a person eligible to import a vehicle under this paragraph; and
- d. Will obtain from the Office of Foreign Missions of the Department of State, before departing the U.S. at the conclusion of a tour of duty, a title to the vehicle good for export only.

Jurisdictions should not see these types of importations because the Department of State, Office of Foreign Missions is responsible for registering these vehicles under 49 CFR § 591.5(h)(ii).

### **Jurisdiction Recommendation 2.9 Related to NHTSA HS-7 Declaration Form Box 6**

It is recommended vehicles entering under Box 6 owned by a foreign government or international

organization should not be titled or registered by jurisdictions. The customer should be directed to the Department of State, Office of Foreign Missions who is responsible for registering these vehicles.

#### **BOX 7: "TEST" OR RACE VEHICLES [591.5(A)(1), 591.5(J), AND 591.6(F)(3)]**

NHTSA allows vehicles to be imported on a temporary basis for the purpose of research, demonstrations, investigations, or competitive racing events. If NHTSA grants permission to be imported, two types of permission letters (in detail) will be issued.

##### **1. *Permission Granted – Non Road Use***

This letter grants the customer or RI permission to import the vehicle into the U.S. but under special condition. Jurisdictions need to ensure they have read the letter in detail to determine what options to give the customer.

##### **2. *Permission Granted – On Road Use***

NHTSA has granted the customer or RI to import the vehicle into the U.S. where the RI declares the vehicle is for on road use. The RI must state why and for how long the vehicle needs to be on public roads and when it will complete public road use. NHTSA gives specific instructions such as where the vehicle can be operated on public roads, certain weather conditions, at certain speeds, who can drive the vehicle, autonomous vehicles, GPS coordinates, and so on. If a jurisdiction registration is requested, jurisdictions need to ensure they have read the letter in detail to determine what options to give the customer.

For more information on vehicles imported under Box 7, please visit the NHTSA's website reflecting [temporary importation](#) guidelines and the application.

### **Jurisdiction Recommendation 2.10 Related to NHTSA HS-7 Declaration Form Box 7**

It is recommended that vehicles imported under Box 7 solely for research, investigations, demos, training, or competitive racing should not be issued negotiable titles.

If the importer was not the original manufacturer and NHTSA has provided a letter granting permission for use on public roads, it is recommended that jurisdictions issue a temporary registration or permit up to the length of time permission from NHTSA was granted or extended.

If the letter from NHTSA indicates on-road use is not permitted, it is recommended jurisdictions do not issue a registration or permit.

If the importer was the original manufacturer of FMVSS-compliant vehicles, it is recommended jurisdictions issue a temporary registration up to the estimated period of time stated in the required manufacturer's letter, which also must describe the vehicle's intended use, which if on public roads must also state why this is necessary and the intended means of final disposition.

### **BOX 8: OFF-ROAD VEHICLES [591.5(A)]**

Vehicles entered as a Box 8 were not primarily manufactured for on-road use. NHTSA does allow this type of vehicle to be imported into the U.S. provided the vehicle is not driven on public roads. According to NHTSA, the vehicle is not considered a motor vehicle that would be required to comply with FMVSS. This vehicle would not bear a manufacturer's label certifying compliance.

### **Jurisdiction Recommendation 2.11 Related to NHTSA HS-7 Declaration Form Box 8**

It is recommended that vehicles entered under Box 8 that are manufactured for off-road use only be issued a title if the jurisdiction's statutes allow for ownership purposes. It is recommended jurisdictions not issue a registration for use on public roads.

### **BOX: 9 INCOMPLETE VEHICLES [591.5(E)]**

A disassembled vehicle that is shipped without an engine and transmission is treated for importation purposes not as a motor vehicle but instead as an assemblage of motor vehicle equipment items. Such an assemblage can lawfully be imported into the U.S., provided any equipment included in the assemblage that is subject to FMVSS, but was not originally manufactured to comply with that FMVSS or was not so certified by its original manufacturer, is removed from the assemblage prior to entry into the U.S. Equipment items that are subject to the FMVSS include tires, rims, brake hoses, brake fluid, seat belt assemblies, glazing materials, and lamps, reflective devices, and associated equipment.

If the assemblage is shipped with an engine and power train (even if those components are not installed), it would be regarded for importation purposes as a motor vehicle and would have to be either manufactured to comply with all applicable FMVSS and be so certified by its original manufacturer, in the form of a label permanently affixed to the vehicle, or be determined eligible for importation by NHTSA and be imported by an RI or by a person who has a contract with an RI to bring the vehicle into compliance with all applicable FMVSS after importation.

It should be noted that Canada does allow incomplete vehicles to be registered. Therefore, the Working Group recommends jurisdictions pay particularly close attention to vehicles with Canadian registrations prior to titling. Before an incomplete vehicle can be titled and registered in the U.S., it must bear an FMVSS incomplete vehicle label and a final stage manufacture label.

### **Jurisdiction Recommendation 2.12 Related to NHTSA HS-7 Declaration Form Box 9**

It is recommended Box 9 vehicles that are incomplete at the time of importation (e.g., motor home chassis) only be titled and registered if they have been completed by a second or final stage manufacturer that has certified it to meet FMVSS.

#### **BOX 10: VEHICLES FOR SHOW OR CONCEPT CARS [591.5(J) AND 591.7D]**

Vehicles can be imported under this category when they have been deemed to be of unusual historical or technological significance. When a vehicle is imported for purposes of show or display, it cannot be driven more than 2,500 miles per year.

Generally, a motor vehicle will not be determined eligible for importation for purposes of show or display if

- a. More than 500 vehicles of the same model were produced
- b. A version of the vehicle was originally manufactured for sale in the U.S. and certified as complying with all applicable FMVSS
- c. The vehicle is currently in production
- d. The vehicle is a kit car, replica, or special construction vehicle
- e. The vehicle has been determined eligible for importation based on its capability of being modified to comply with all applicable FMVSS.

Vehicles in this category are often high-end. They cannot be resold unless NHTSA grants permission and the buyer has applied for and received a new show or display exemption from NHTSA. If not resold under these conditions, the vehicle must be exported or destroyed when the user no longer wishes to use it for show or display.

#### **Jurisdiction Recommendation 2.13 Related to NHTSA HS-7 Declaration Form Box 10**

The Working Group recommends jurisdictions not to issue a negotiable title for vehicles entered under Box 10 for show or display only (e.g., concept cars). It is recommended the jurisdiction require the latest permission letter with the applicant's name on it to verify ownership and NHTSA's approval. The Working Group recommends the vehicle be issued a registration for up to three years or if an extension letter has been provided for up to a total of five years.

#### **BOX 11: EQUIPMENT [591.5(K)]**

Equipment being imported under Box 11 is equipment subject to the theft prevention standard and must be marked in accordance with the requirements of 49 CFR § 541. NHTSA has determined there are 18 equipment items for replacement that must be marked with a VIN.

#### **Jurisdiction Recommendation 2.14 Related to NHTSA HS-7 Declaration Form Box 11**

Box 11 entrants are considered "equipment" not "vehicles." Therefore, the Working Group recommends not to issue any type of title or registration for this equipment that may have a VIN affixed to it.

#### **BOX 12: FOREIGN MILITARY [591.5(H)(2)]**

A vehicle entering under Box 12 does not require a formal entry, and EPA and NHTSA regulations are waived for vehicles in this category. The person importing the vehicle is NOT a member of the U.S. military and declares all the following to NHTSA:

- a. Is a member of the armed forces of a foreign country on assignment in the U.S.;
- b. Is importing the vehicle on a temporary basis, and for the personal use of the importer;
- c. Will not sell the vehicle to any person in the U.S., other than to a person eligible to import a vehicle under this category; and
- d. Will export the vehicle upon departing the U.S. at the conclusion of a tour of duty.

Members of the foreign military may be eligible to register vehicles with the Secretary of State's Office of Foreign Missions and if so, must register with that office. If ineligible, they will be issued a non-eligibility letter.

#### **Jurisdiction Recommendation 2.15 Related to NHTSA HS-7 Declaration Form Box 12**

Box 12 vehicles owned by members of a foreign military should not be registered unless the



Department of State, Office of Foreign Missions has determined the individual is not eligible to obtain motor vehicle services from the U.S. Department of State's Office of Foreign Missions (OFM). If the individual presents a non-eligibility letter from OFM, the Working Group recommends jurisdictions should not issue a negotiable title but may issue a registration or permit up to the length of the individual's assignment in the U.S. and should provide motor vehicle services in accordance with the jurisdiction laws. A sample OFM non-eligibility letter is provided in Appendix C.

#### **BOX 13: NHTSA PETITION PROCESS FOR VEHICLES NOT ELIGIBLE FOR IMPORTATION [49 CFR 592]**

If the vehicle is less than 25 years old and was not originally manufactured to comply with all applicable FMVSS, and/or was not so certified by its original manufacturer, it cannot be lawfully imported into the U.S. on a permanent basis unless NHTSA determines it is eligible for importation. For the RI to import the vehicle, the RI must petition NHTSA for permission to import it. This petitioning process can take months if not years to complete. This is a costly process that could exceed hundreds of thousands of dollars.

The petitions must specify that the vehicle is substantially similar to a vehicle that was certified by its original manufacturer as conforming to all applicable FMVSS and is capable of being readily altered to conform to those standards, or, if there is no substantially similar U.S.-certified vehicle, that the vehicle has safety features that comply with, or are capable of being altered to comply with the FMVSS based on destructive test information or other evidence the agency deems adequate.

An RI is allowed to bring in a non-conforming vehicle under a temporary Customs bond if they have a permission letter from NHTSA and must petition NHTSA for eligibility to import on a permanent basis within 180 days of entry. If petition is granted, the RI has 15 days to reenter the vehicle under Box 3, and

then has 120 days to bring it into conformance from the date the petition was granted.

#### **Jurisdiction Recommendation 2.16 Related to NHTSA HS-7 Declaration Form Box 13**

It is recommended not to issue any type of title or registration for vehicles entering under Box 13 which are not on NHTSA's list of vehicles eligible to be imported and for which NHTSA has been petitioned for eligibility. Jurisdictions should not see any Box 13 vehicles until they have been reimported as a Box 3 vehicle. It is recommended jurisdictions should follow Box 3 importation guidelines at that time.

If a jurisdiction encounters a customer that presents an NHTSA HS-7 Declaration Form with Box 13 checked, report this activity to NHTSA Import Certification Department immediately by sending email to [importcertification@dot.gov](mailto:importcertification@dot.gov) or calling (202) 366-5291. The Working Group recommends jurisdictions DO NOT under any circumstance title and/or register this vehicle.

#### *Jurisdiction Specific Documentation Requirements for Consideration*

In addition to documents supporting ownership, evidencing proper entry into the U.S., and documentation indicating a proper physical inspection has occurred, states may have statutes or administrative rules imposing other requirements for the titling and/or registration of motor vehicles in general, nonconforming, or gray market vehicles specifically. For example, states may require a safety inspection or evidence the vehicle has passed an emissions test. Each state is responsible for ensuring applicable requirements have been satisfied.

#### *Non-U.S. Ownership Documents*

Any motor vehicle title and/or registration transaction should be accompanied by ownership document(s) in the name of the applicant(s). The type of ownership document a vehicle may have will vary depending on

the country because many countries do not issue a traditional “title.” For example:

- Canada does not issue a title as an ownership document; therefore, many jurisdictions accept the registration as the ownership document.
- Germany had a manufacturer-issued ownership document called a Fahrzeugbrief that also served as a registration that was issued up until 2005 and now has a two-part document called a Zulassungsbescheinigung.
- Mexico has an ownership document issued by the dealer when sold new called a Factura.
- Vehicles built for use in Japan will often have an export certificate as the ownership document.

For additional examples, please refer to the resources included in Appendix A such as the [European Union Vehicle Registration Documents](#).

Also, if the vehicle was owned by a member of the U.S. Armed Forces, a military title/registration certificate is issued as the ownership document. A common example of this document is identified as U.S. Forces POV Registration/Title Certificate (AE Form 190-1A) as shown in Appendix D.

The vehicle registration is the only credential issued by many countries that indicates ownership. Jurisdictions may see the statement “This document is not proof of ownership” on some foreign registrations such as the United Kingdom’s. This statement may appear because lienholders and legal owners do not appear on this document, and mere possession of the registration does not necessarily prove ownership. A new vehicle manufactured for sale in Canada by a dealer has a New Vehicle Information Statement (NVIS) or Partial Electronic New Vehicle Information Statement.\* An NVIS is created by the vehicle’s manufacturer and is either printed (NVIS) and accompanies the vehicle to the dealer or is transmitted electronically (eNVIS)

\* Per CCMTA, <https://ccmta.ca/en/reports-publications/item/new-vehicle-information-statement-nvis-and-partial-electronic-new-vehicle-information-statement-envis-policy-manual>

to the dealer where it is completed and signed by the dealer at the time of sale. Although technically not an ownership document, the NVIS is required to register a new vehicle in Canada.

### **Recommendations for Jurisdictions 2.17 Related to Non-U.S. Ownership Documents**

- It is recommended that any allowable registration or title should not be issued unless the applicant can provide sufficient proof of ownership.
- It is recommended whenever a registration is accepted as the ownership document, evidence of no liens should be required because registrations typically do not display liens.
- Because it may be difficult to obtain such a report in some provinces or countries, jurisdictions may consider accepting an affidavit from the applicant stating there are no liens on the vehicle other than what is represented on the application for title. If the jurisdiction proceeds in this manner, it is recommended the affidavit should have a clause holding the jurisdiction harmless. When a foreign registration is issued with a Part 1 and a Part 2, jurisdictions should capture both parts. At a minimum, Part 2 must be surrendered.
- It is recommended that if the ownership document is in a foreign language the jurisdiction should ensure they understand key fields including the vehicle description (year, make, VIN, odometer and status), owner names, and any liens and brands. If the jurisdiction does not already have a translation of the form’s preprinted content in its office resources, it is recommended they require an English translation.
- It is recommended, if the applicant is not the current owner on the ownership document a bill of sale should be required from the owner to the applicant or if the ownership document was

assigned to another party, a bill of sale should be required from that party. It is recommended bills of sale establishing a chain of ownership should be requested, but in the event the applicant is unable to produce this, releases of interest from any interested party shown on the ownership document and any other document submitted are recommended to be required at a minimum.

In the event that an applicant is unable to satisfy ownership requirements but other requirements have been met, the applicant may obtain a title through bonding where authorized by the applicant's jurisdiction, or the applicant may petition the court for a declaration of ownership.

### **Recommendation for Jurisdictions 2.18 Related to Physical Inspection of Vehicle**

The Working Group recommends imported vehicles and supporting documentation to be inspected prior to title and/or registration issuance to ensure the vehicle has been legally imported and is authorized to be operated on the roadway. For specific recommendations regarding these inspections, please see Chapter 4: Investigative and Examination Considerations.

### **Recommendation for Jurisdictions 2.19 Related to State Specific Documents**

Each jurisdiction may have statutes or administrative rules imposing other requirements for the titling, registration, and inspection of motor vehicles in general or for Canadian or gray market vehicles specifically. For example, jurisdictions may require a safety inspection or evidence the vehicle has passed an emissions test. Each jurisdiction is responsible for ensuring applicable requirements have been satisfied.

### *Benefits of Implementing the Recommendations*

Implementing these recommendations ensures proper titling and registration of vehicles in conjunction with improved compliance with CBP entry requirements,

*Jurisdictions that do not implement the recommendations outlined in this guidance document become more vulnerable for title fraud because applicants may seek jurisdiction with the most relaxed requirements to get a negotiable U.S. vehicle ownership document.*

NHTSA safety requirements, and EPA emission requirements. This will improve safety, reduce pollution and increase collection of taxes and fees due to the federal government.

### *Risks of Not Implementing the Recommendations*

If a jurisdiction does not require a copy of the original CBP 7501, the risk of titling and registering a vehicle that has not been properly imported increases significantly. In addition, many recommendations regarding whether a vehicle should be issued a title and/or registration is dependent on the category of entry indicated on the NHTSA HS-7 Declaration Form. As such, a jurisdiction that does not require the NHTSA HS-7 Declaration Form increases its risk of titling and/or registering a vehicle for use on its roadways that was not the intended allowable purpose by NHTSA, as well as increasing the risk for vehicles brought in for one purpose to be sold to a new purchaser without being properly imported and increases the chance for these vehicles to be curbstoned.

Jurisdictions that do not implement the recommendations outlined in this guidance document become more vulnerable for title fraud because applicants are known for seeking out the jurisdiction with the most relaxed requirements to get a negotiable U.S. ownership document.

Failure to require the recommended documentation may increase the chances for a jurisdiction to issue title and registration for a vehicle that does not meet the required safety and EPA standards, thereby increasing the safety risk for vehicles on their roadways, pollution, and potentially reduced revenue to the federal government.

Vehicles that have been recommended to be titled and/or registered by a jurisdiction also have recommendations to apply brands to the vehicle record and title. Failure to brand these vehicles will decrease consumer awareness regarding the history of the vehicle in the future.

### *Challenges to Implementing Recommendations*

- Jurisdictions may need to increase the resources and time allocated for processing applications for title and/or registrations for imported vehicle.
- When titles are issued displaying the recommended brands, it may impact the vehicles' perceived value. Therefore, dealers, auctions, and some consumers may be opposed to these brands. This should not deter jurisdictions from issuing titles with the recommended brands because they do provide relevant information for consumers, dealers, and lenders that may affect the value of the vehicle and warn of potential safety concerns.
- Inconsistent title and/or registration requirements and issuance for imported vehicles among jurisdictions causes challenges when the imported vehicle is being titled. Each jurisdiction may have differing statute(s) allowing or requiring certain categories of vehicles to be titled and/or registered, but others may not. This can create confusion and frustration for customers when bringing these vehicles from one jurisdiction to another.
- Inability to authenticate federal forms required for the importation process including electronic access and ability to verify.

## Chapter 3 Confirmed Noncompliant Vehicles

### Background

Some vehicles are deemed noncompliant and therefore not eligible for importation into the U.S. A vehicle is considered noncompliant if it is less than 25 years old and does not have an FMVSS certification label applied by the manufacturer. It also must either be deemed by NHTSA to be ineligible for importation due to its inability to be modified to conform to applicable FMVSS or has not met the requirements or has violated the conditions of its category of importation on the NHTSA HS-7 Declaration Form. A vehicle temporarily imported that becomes salvage is also considered to be noncompliant.

If a noncompliant vehicle is found to have entered the U.S., it must be either exported or surrendered. In some cases, if the vehicle is exported, it may be reimported under certain categories if it meets the specified conditions.

There is a path for certain noncompliant vehicles to be modified and made compliant with FMVSS. NHTSA maintains a list of these vehicles that are eligible for importation, and RIs are responsible for securing the necessary vehicle modifications.

Examples of vehicles that are noncompliant because they did not meet the requirements or conditions of a category of importation on the NHTSA HS-7 Declaration Form include but are not limited to

- A vehicle that was imported under Box 3, but NHTSA did not receive and approve a conformity package within 120 days from the date of entry (or within 120 days of the granted eligibility date after a Box 13 petition)

- A vehicle imported under Box 2B but was not imported for personal use, without the intent to resell. An example of this would be a vehicle imported under Box 2B to be curbstoned or sold
- A vehicle has been imported under Box 5 and is still here more than a year after entry

### Recognizing a Noncompliant Vehicle

If a vehicle title application contains a foreign ownership document, follow the recommendations in Chapter 2 to determine if the vehicle is noncompliant. If a vehicle and its documents do not comply with the conditions and requirements of the box declared on the NHTSA HS-7 Declaration Form, the vehicle is likely noncompliant. For example:

- A Box 3 vehicle if more than 120 days has passed since the date of entry shown on the CBP 7501 and there is no DOT bond release letter
- A vehicle brought in under Box 2B or 3 that has evidence it had previously been declared salvage

### Recommendations for Jurisdictions

#### Recommendation for Jurisdictions 3.1 Related to Stopping Title and/or Registration Transaction

A noncompliant vehicle should not be titled and/or registered until it is brought into compliance. Customers may be referred to the proper federal agency or back to the originating RI for assistance.

### **Recommendation for Jurisdictions 3.2 Related to Cancelling Prior Transactions**

If a jurisdiction has titled and/or registered a noncompliant vehicle, any issued credentials should be cancelled per the jurisdiction's laws, rules, and policies. NHTSA may be notified of this fact.

### **Recommendation for Jurisdictions 3.3 Related to Transactions with Suspected Fraud**

If a jurisdiction receives an application for title and/or registration and there is suspected fraud with the vehicle or transaction, the jurisdiction is recommended to follow its normal fraud protocols. For suspected fraud on transactions related to imported vehicles, additional information may need to be collected such as the number of vehicles they have bought and sold during a specific timeframe, the length of time they had possession of the vehicle, any data elements that may indicate a pattern, or fraudulent activity discovered during the inspection process.

Questionable transactions can be referred to NHTSA at [importcertification@dot.gov](mailto:importcertification@dot.gov) for non-urgent referrals and for urgent referrals jurisdictions are urged to call (202) 366-5291.

## **Recommendations for AAMVA**

### **Recommendation for AAMVA 3.1 Related to Including Automated Commercial Environment (ACE) Information within NMVTIS**

Include ACE information in NMVTIS, allowing jurisdictions to validate the importation process for a particular vehicle and to assist in determining vehicle conformity.

### **Recommendation for AAMVA 3.2 Related to Communication between NMVTIS and NHTSA**

Establish communication between NMVTIS and NHTSA to determine the status of a conformity package submitted to NHTSA for imported vehicles. This would enable jurisdictions to see whether a

conformity package has been rejected, approved, or is currently in the backlog to be reviewed by NHTSA and determine if the DOT bond release letter for a Box 3 vehicle has been issued, allowing jurisdictions the ability to make an informed title and/or registration issuance decision.

### **Recommendation for AAMVA 3.3 Related to NHTSA's Ability to Locate Noncompliant Vehicles**

Provide NHTSA with NMVTIS access to locate noncompliant vehicles that have been titled and/or registered to require exportation or surrender of vehicle.

### **Recommendation for AAMVA 3.4 Related to Creating Noncompliant Vehicle Records**

For a noncompliant vehicle that is known to be in a jurisdiction but not titled or registered, allow NMVTIS to create a vehicle record with a stop entered to prohibit the vehicle from being titled and/or registered. NHTSA may be notified of this fact.

## **Benefits of Implementing the Recommendations**

These recommendations provide protection for consumers, dealers, and lenders from accessing vehicles that may pose safety risks and be required to be exported or surrendered. By more effectively recognizing these vehicles, jurisdictions will avoid registering and/or titling them.

This will aid to prevent fraudulent consumer and dealer purchases of a noncompliant vehicle while protecting lenders from extending credit for the purchase.

Jurisdictions will be more efficient in their ability to accurately review and appropriately process imported vehicle registration and/or title applications.

Noncompliant vehicles that are in the U.S. will be more easily recognizable allowing for swifter removal or surrender.



## **Risks of Not Implementing the Recommendations**

Noncompliant vehicles may not comply with FMVSS and the titling and/or registering of them allows for increased risk to the public with their operation on roadways. These vehicles are subject to exportation or surrender anyone who purchases one expecting to operate it on the roadway may suffer financial loss. Lenders extending credit for the purchase of a noncompliant vehicle may also suffer financial loss as the owner may stop payments on the vehicle loan because the vehicle is no longer in their possession or useable by them.

## **Challenges to Implementing Recommendations**

Recognizing a noncompliant vehicle can be challenging, and frontline motor vehicle administration (MVA) staff need to have proper training to process imported vehicle title applications.

This training may take time and resources away from normal duties, possibly causing a backlog in processing title applications.

The purchasing of a vehicle is a complicated process, and purchasing an imported vehicle is even more involved. Educating the public and dealers regarding imported vehicles may take time and resources. Working with customers who have purchased a noncompliant vehicle and explaining that the vehicle is not eligible to be legally operated on the roadway may be difficult.

Jurisdictions may require legislative authority to implement some of these recommendations.

Updates and enhancements to NMVTIS use and application may require resources that may not be immediately available. These updates may also require jurisdiction system updates, which may require additional development resources to enable.

## Chapter 4 Investigative and Examination Considerations

### *Investigations, Inspections, and Examinations by Law Enforcement Personnel or Non-sworn Investigators*

#### Background

The importing of vehicles provides opportunity for criminal activity in the concealing of a vehicle's true identity and in the committing of various fraudulent activities related to the vehicle. It is important to involve law enforcement and/or non-sworn investigators in the development of vehicle importation processes and procedures and in the conducting of vehicle inspections to detect and deter these criminal activities.

One such example of criminal activity is the disguising of a complete nonconforming vehicle that is brought into the U.S. as parts and assembled after the fact. This occurs when a vehicle manufactured outside the U.S. that is nonconforming is imported as parts only. After arriving in the U.S., the vehicle is reassembled to be a complete vehicle. The vehicle owner may attempt to title the vehicle through the MVA's bond title process, abandoned vehicle process, or specially constructed vehicle process or claim it to be an imported vehicle. This is an example of when vehicle inspections can be valuable in detecting the fact the vehicle is a manufactured, complete vehicle but not in compliance with FMVSS and not imported properly.

#### Fraud

The importation of vehicles into the U.S. may allow criminal elements to perpetuate fraud. When developing policy for vehicle titling and/or registration of imported vehicles, it is important to address potential fraud vulnerabilities. The following are examples of fraud types that may occur during the vehicle importation process and provides the reason

for engaging law enforcement and/or non-sworn investigators in process planning.

#### *Finance Fraud*

Late-model and collector-imported vehicles may be of significant value and contain active security interests. Unlike U.S. jurisdictions, foreign jurisdictions may not record vehicle security interests on any official vehicle ownership document, making such interest difficult to detect. Fraudulent financial gain by concealing vehicle security interests may be a motivating factor for vehicle importation. Consumers may become victims of this fraud when purchasing an imported vehicle with an undisclosed security interest, resulting in legal challenges to maintain ownership. The use of investigative resources described later in this chapter may provide opportunities to discover this undisclosed security interest.

#### *Internal Fraud*

Anyone who is able to bring a noncompliant vehicle into the U.S. and wishes to sell the vehicle has a need to obtain a vehicle title and/or registration. Because it is not recommended to title and/or register noncompliant vehicles, jurisdiction staff may be vulnerable to bribery, being asked to circumvent jurisdictional laws and procedures to allow the noncompliant vehicle to be titled and/or registered, thus making it appear to be legitimately imported and capable of being operated in the U.S. Processes to analyze and detect anomalies in vehicle transactions may allow for the detection of such fraud attempts.



### *Odometer Fraud*

Mileage recorded on a vehicle has significant impact on its value. With newer technology, the rolling back of vehicle mileage on both mechanical and digital odometers has become more common. Imported vehicles may have little, if any, documented odometer history, making them vulnerable to odometer rollback. Some imported vehicles display mileage in kilometers. When vehicles go through an odometer conversion process to miles, this conversion process may also allow fraud to occur. These imported vehicles are sold in the U.S. to an unsuspecting consumer who is unable to verify true vehicle mileage because of the lack of or improper documented mileage. This type of fraud impacts roadway safety because the vehicle owner is unaware the vehicle could have significantly more miles and may need mechanical repair sooner than expected.

### *Vehicle Importation Fraud*

Intentional attempts to evade federal importation requirements may not be detected during the cross-border review process. These vehicles may not contain necessary U.S. safety equipment, may not meet definitions of a vehicle eligible for importation or operation in the U.S., may fraudulently use the 25-year exemption for a vehicle altered from its original construction, or may not have been properly taxed by the U.S. Government. RIs may also inappropriately request title issuance before requirements are met. These fraud attempts may be discovered during the vehicle inspection process as described later in this chapter.

Vehicles may be intentionally brought into the U.S. under the 2B importation category for personal use only, with the intent of the vehicle being sold or disposed of in the U.S. This same situation may occur without fraudulent intent by someone visiting the U.S., such as a student or vacationer, who decides to sell the vehicle she or he brought into the U.S. For these situations, the title and/or registration applicant (vehicle purchaser) may have no idea the vehicle was not legally imported into the U.S. and lacks proper documentation.

### *Vehicle Title Brand Fraud*

Imported vehicles may contain damage or history of damage that is not disclosed or recognizable. Because of a lack of sufficient vehicle history available on imported vehicles, the ability to conceal vehicle damage and damage history is possible. This may result in the vehicle's value being artificially inflated along with vehicle and roadway safety being compromised.

### *VIN Cloning and Vehicle Theft*

Vehicle theft remains prevalent across the world, and importing vehicles into the U.S. may allow opportunity to conceal a stolen vehicle's true identity. Imported vehicles contain VINs that may have little, if any, information in U.S. vehicle databases, and vehicle registration and theft records from outside the U.S. may not be easily accessible. A stolen vehicle being imported to the U.S. may be cloned by displaying the false VIN of a legitimate vehicle that shows no theft record. When the VIN is checked at time of importation, it may pass undetected. VIN cloning also occurs without a vehicle physically being imported by using a VIN on a vehicle in another country being applied on a stolen vehicle in the U.S. The vehicle VIN inspection discussed next provides details on how to detect VIN cloning.

#### **Recommendation 4.1 for Jurisdiction Relating to Fraud Investigation Practices Related to Imported Vehicles**

Review and develop, if necessary, investigation practices to identify fraud related to imported vehicles. Provide training to staff on investigative procedures and processes.

#### **Recommendation 4.2 for Jurisdiction Relating to Stopping Fraudulent Transactions**

Ensure an imported vehicle title and/or registration transaction that is suspected to be fraudulent is immediately stopped and the information provided

by the customer is turned over to the appropriate investigative agency or office.

#### **Recommendation 4.3 for Jurisdiction Relating to Use of Analytical Tools and Internal Audits Related to Imported Vehicles**

Conduct internal audits of the application process related to imported vehicles to ensure compliance with jurisdiction laws, rules, and policies. Review documents necessary to properly import a vehicle and questionable documents or procedures should be referred for investigation. The use of data analytical tools is recommended to aid in the efficiency and effectiveness of finding transaction anomalies.

#### **Recommendation 4.4 for Jurisdiction Relating to External Audits Related to Imported Vehicles**

Conduct external audits of businesses and personnel responsible for imported vehicles within your jurisdiction to ensure compliance with laws, rules, and policies. Review current laws and rules to determine if adequate authority exists to conduct such audits and, if needed, pursue enhancements.

### **Vehicle Inspections**

There is a need for imported vehicles and supporting documentation to be inspected prior to title and/or registration issuance to ensure the vehicle has been legally imported and is authorized to be operated on the roadway. Some jurisdictions conduct vehicle inspections to verify VINs and/or perform combination vehicle identification and odometer (ID/OD) inspections. However, these inspections may not adequately capture the needs to protect the public from purchasing a fraudulent, stolen, or unsafe vehicle that has been illegally imported into the U.S.

The imported vehicle inspection is completed in the same jurisdiction and by the proper authority where the vehicle has been requested to be titled and/or

registered. The imported vehicle inspection should include an examination of the following items:

1. VINs
  - a. Public
  - b. Confidential
  - c. Motor
  - d. Transmission
  - e. Other VIN labels
2. Odometer: Validate mileage displayed with that shown on documentation provided by customer and from resources used from the list below. If miles were converted from kilometers, determine the conversion is correct and documentation appears genuine with no alterations.
3. Verification of FMVSS decal or verification the vehicle has a decal from an RI stating the vehicle has been converted to meet FMVSS standards
4. Verification of EPA emission standards with proper labeling
5. Vehicle ownership documents are sufficient and genuine with no alterations
6. Importation documents (NHTSA HS-7 Declaration Form and CBP 7501) appear genuine with no alterations

#### **Recommendation 4.5 for Jurisdictions Related to Imported Vehicle and Document Inspection Program**

Jurisdictions should consider developing a specific imported vehicle inspection program prior to titling and/or registering an imported vehicle. Training should be provided to appropriate staff on the use of resources to inspect the vehicle, vehicle history, and supporting documentation.

### **Recommendation 4.6 for Jurisdictions Related to How to Conduct the Inspection**

To provide for a thorough and consistent inspection, jurisdictions should develop an inspection report outlining the above listed items and subsequent results. Any follow-up needed as a result of the inspection should be noted. This information can be included in an overall vehicle report for future review and reference.

#### *Vehicle Labels*

When conducting inspections for imported vehicles, labels should be closely examined to look for authenticity and evidence of tampering. Below are areas to examine:

1. Grammar, font, spelling, and style of label characters to look for mistakes
2. The manner in which the label is adhered to the vehicle, such as loose edging or not positioned properly
3. For passenger cars, trucks, and buses, the label should be in the area of the driver's door.
4. For motorcycles, the label should be affixed to a permanent part of the vehicle, as close as possible to an intersection of the steering post and the handlebar so it can be easily read.
5. For trailers, the label should be affixed to the forward half of the vehicle, on the left side.

Incomplete U.S. vehicles (truck cabs and chassis) sometimes may be exported out of the U.S. to receive fabrication and final body configuration. This may include installing such items as a dump box or fire apparatus. When these vehicles are imported back into the U.S., fabricators may fail to affix proper certification and VIN labels to these vehicles.

### **Recommendation 4.7 for Jurisdiction Related to VIN Labeling for Imported Vehicles**

Jurisdictions should follow normal VIN replacement procedures for any imported vehicle that is missing

a public VIN. This should include affixing a new jurisdiction assigned public VIN.

\*For more information or training on vehicle labeling, contact an [NICB Field Agent in your area](#) or call (800) 447-6282 ext. 7002.

Note: If a vehicle that was originally FMVSS certified by the manufacturer, later goes to Canada and is modified to meet CMVSS, and then is brought back to the U.S, the vehicle will have three labels after the RI's modifications: the original FMVSS label, a CMVSS label, and an RI label.

#### *Law Enforcement Interaction with Out-of-Country Vehicles*

Nonresidents visiting the U.S. typically operate vehicles brought with them by use of their country's license plates and registration. U.S. jurisdictions have laws defining when a vehicle being operated in that jurisdiction may be required to display that jurisdiction's license plates and registration. This may include if the vehicle operator becomes subject to jurisdiction residency requirements because of the nature or length of their stay. Law enforcement may also encounter a nonresident whose foreign registration and license plates have expired while traveling in the U.S.

### **Recommendation 4.8 for Jurisdictions Related to Registration for Out-of-Country Vehicles**

Law enforcement should familiarize themselves with jurisdiction laws for when a vehicle must display that jurisdiction's license plates and registration. In situations when the vehicle is required to display these license plates and registration, the vehicle owner and/or operator should be instructed to contact his or her local MVA to determine procedures to qualify for and obtain such.

#### *Potential Resources for Conducting Inspections*

When conducting inspections on imported vehicles, the following resources may be used. Although this list is not all inclusive of available resources,

law enforcement and non-sworn investigators are encouraged to research resources most beneficial to them. Some of these resources may not be available to non-sworn investigators. Below is a list of potential resources for conducting inspections and/or investigations. For more information about these and other resources, you may refer to the International Association of Chiefs of Police (IACP)'s [Educational Tool Kit for Vehicle Crimes](#).

- Canadian Stolen Vehicle Database
- Carfax and Carfax for Police
- Carfax for Canadian Vehicles
- ISO Claimsearch
- Insurance Bureau of Canada
- Internet browser search by VIN, attempting to locate the VIN being advertised or utilized elsewhere in the U.S. or Internationally
- NMVTIS Law Enforcement Access Tool (LEAT)
- National Crime Information Center (NCIC)
- National Insurance Crime Bureau (NICB)
- [Salvage Bid](#)
- [Auto Bid Master](#)

### *Recommendations for AAMVA*

#### **Recommendation for 4.1 AAMVA Relating to Canadian Records within NMVTIS**

Include Canadian vehicle information within NMVTIS to inform both countries of the possibility of the use of cloned VINs and to ensure only one active vehicle record exists.

#### **Recommendation for 4.2 AAMVA Relating to NMVTIS Checks**

Both U.S. and Canadian vehicle title and registration agencies should check NMVTIS prior to titling and/or registering the vehicle. Any suspected fraud should

be provided to the appropriate investigative agency or office and the transaction denied pending outcome of the investigation.

### *Benefits of Implementing the Recommendations*

The issuing of titles and/or registrations to vehicles that have been imported fraudulently would be greatly reduced. Consumer protection and roadway safety would be enhanced by diminishing the ability to sell a fraudulently imported vehicle to an unsuspecting purchaser who would operate the vehicle on the roadway. Law enforcement and non-sworn investigators would have enhanced ability to detect potential fraud and other crimes with increased tools, knowledge, and awareness.

### *Risks of Not Implementing the Recommendations*

Consumer protection and roadway safety may be impacted as fraudulently imported vehicles may be allowed to be titled and/or registered in the U.S., thereby allowing the vehicles to be operated and sold to unsuspecting buyers. These vehicles may not meet FMVSS requirements, putting the public at an increased risk of danger when the vehicles are traveling on the roadway. Additionally, criminal enterprises are able to capitalize on importing vehicles into the U.S., enhancing their illegal profits.

### *Challenges to Implementing Recommendations*

The following challenges could be associated with the implementation of the above recommendations:

- Funding: additional costs due to an increase of staffing resources as well as equipment, facilities, and technology purchases
- Laws, rules, and policies: adoption or changes in laws, rules, and policies, which may take resources and could be met with opposition
- Industry or political resistance: resistance to the changes in regard to outside entities not agreeing with the recommendations which are intended to reduce fraud

## Chapter 5 Implementing Guidance

### Background

The following recommendations have been developed to assist jurisdictions in implementing the guidance in this report. They should be considered within the jurisdiction's current regulatory structure because the adoption of some of the recommendations may require law, policy, or procedure changes. A collaborative effort with stakeholders within the jurisdictions will assist in understanding the federal importation process and the current jurisdictional laws and policies and assist with developing a strategy for updating their approach to titling and registering imported vehicles. As outlined in this report, there are many issues to consider when addressing vehicle safety, improving consumer protection, and reducing opportunities for fraud.

These recommendations provide a platform for cross-department collaboration within the MVA to form partnerships and supportive relationships, align efforts, reduce duplication of efforts, fill gaps within the current process, and improve investigations. The recommendations also support the training of jurisdiction employees and the education of consumers and other stakeholders to ensure appropriate titling and registration of imported vehicles.

### General Recommendations

#### Recommendation 5.1 for Jurisdictions to Identify Stakeholders and Establish a Working Group

Identify stakeholders and establish a working group to review the recommendations in this report. Stakeholders to consider including are

- MVA title and registration program manager(s)
- MVA title examiner or processor with expertise with imported vehicles

- Agency responsible for vehicle inspection
- Agencies that investigate vehicle fraud
- Third party agents that process title or registration applications for imported vehicles
- Vehicle dealers and auctions
- Lenders
- Insurers
- RIs with input from NHTSA as the regulating agency overseeing RIs
- Executive champion for the MVA
- Legislative champion
- Consumer education on resources to check vehicle history (*See Chapter 4 for list of resources*)
- Others determined relevant to your jurisdiction.

#### Recommendation 5.2 for Jurisdictions to Understand the Background Information

The working group should conduct research and educate themselves on the following information:

- The federal process and how it impacts the jurisdiction's responsibilities which are described in this report
- The issues and recommendations discussed in this report
- The jurisdiction's current laws, policies, and procedures
- Any issues and trends that have emerged in the jurisdiction

### **Recommendation 5.3 for Jurisdiction to Determine which Recommendations Should be Pursued Specific to the Jurisdiction**

The Working Group should determine if, and when, it wants to pursue implementing some or all of the recommendations in this report. The Working Group may also determine there are additional considerations specific to the jurisdiction that need to be addressed.

### **Recommendation 5.4 for Jurisdiction Related to Identifying Laws, Policies, and Procedures**

The Working Group should identify laws, policies, and/or procedures that should be updated, draft the updates, and identify the resources needed to implement the updates. For statutory changes, the group develop a plan to gain the support of interested parties and guide the proposed changes through the legislative process.

## **Recommendations for Implementing Updated Jurisdictional Laws, Policies, and Procedures**

### **Recommendation 5.5 for Jurisdiction Related to Form a Team of MVA Imported Vehicle Experts**

Form a small team of MVA import vehicle experts to update and maintain procedures manuals, procedural handbooks, and other learning aids such as quick reference guides.

### **Recommendation 5.6 for Jurisdiction Related to Develop Procedures and Handbooks**

Include imported vehicle procedures and requirements in titling handbooks or manuals developed for staff.

### **Recommendation 5.7 for Jurisdiction Related to Develop and Implement a Communications Plan**

Develop, implement, and maintain a communication plan to advise the identified stakeholders of any changes to statutes and procedures in advance of the effective date of the changes.

### **Recommendation 5.8 for Jurisdiction Related to Require Staff Training**

Require all appropriate staff to receive updated and on-going training from the team of imported vehicle experts. The public and other stakeholders rely on jurisdictional employees as their first contact for any information related to vehicle registration and titling, and they often expect to be able to receive guidance. It is therefore critical that all jurisdictional employees interacting with the public receive training necessary to answer common questions. Other staff processing vehicle transactions away from the public must also receive similar training.

### **Recommendation 5.9 for Jurisdiction Related to Develop Training for Stakeholders**

Develop training specifically for identified stakeholders. Though the format for delivery may depend on resources. Jurisdictions, at a minimum, should design informative web information customized for each stakeholder audience. Videos and computer-based training (CBT) may be developed for these groups.

### **Recommendation 5.10 for Jurisdiction Related to Collaborate with Partners**

Collaboration with city, county, state, and federal law enforcement agencies will help identify and stop imported vehicles that should not be operated on public roadways and any fraudulent or other criminal activity is identified and addressed.

### **Recommendation 5.11 for Jurisdiction Related to Provide Specialized Training for Enforcement Personnel**

Develop, deliver, and maintain specialized training for enforcement personnel using the jurisdiction's investigative staff or others involved with enforcement both internal and external. If resources or circumstances do not allow for in-person training,



online training supplemented with CBTs designed specifically for this audience should be provided. Ongoing updates should be provided as new developments occur.

#### **Recommendation 5.12 for Jurisdiction Related to Information Available for the General Public**

Make information available to the public to enable them to make informed decisions when considering the acquisition of a nonconforming or gray market vehicle. Jurisdictions may need to consider consumer education on resources to check vehicle history. (*See Chapter 4 for a list of resources.*) Jurisdictions may use their websites to provide links to DOT, EPA, and CBP sites and to provide specific information pertinent to the jurisdiction. Information should also be made available in field office lobbies for the public. Phone numbers and email addresses should be provided.

#### *Benefits of Implementing the Recommendations*

A collaborative effort with well-informed stakeholders will assist in understanding the federal importation process and the current jurisdictional laws and policies, as well as assist with developing a plan for updating

the jurisdiction's approach to titling and registering imported vehicles. Stakeholder buy-in will support the process of updating laws and procedures.

A cross-department collaborative effort supports partnerships and relationships, aligns efforts, reduces duplication of efforts, improves investigations, and will help to gain efficiencies in time, resources, and funding.

#### *Risks of Not Implementing the Recommendations*

Outdated or inconsistent laws and procedures within the jurisdiction and across jurisdictions for titling and registering imported vehicles may cause financial harm to individuals or businesses or may provide opportunities for unlawful or criminal activities.

#### *Challenges to Implementing Recommendations*

Resources may need to be identified to optimize the value of updating jurisdictional regulations of imported vehicles to protect consumers and to combat fraudulent or criminal activities.

Statutes may need to be updated, drafted, and codified, which requires the support of interested parties and must be guided through the legislative process.

## Chapter 6 Vehicles Imported into Canada from the United States

The guidance in Chapters 1 to 4 in this document pertains to vehicles imported into the U.S. However, this chapter is focused on providing high-level information on vehicles imported into Canada from the U.S. The following information was developed in consultation with representatives from Canadian jurisdictions, the CCMTA, Transport Canada (TC), and the Registrar of Imported Vehicles (RIV) as well as the information available on their websites, which is included in the resources in Appendix A. Although the importation process is different from the U.S. process, the Canadian jurisdictions face similar challenges.

### Background

The Canada Motor Vehicle Safety Act (CMVSA) (1993, c. 16) regulates the importation of vehicles into Canada. This act regulates the manufacture and importation of motor vehicles and motor vehicle equipment to reduce the risk of death, injury, and damage to property and the environment. This act is administered by the Minister of TC.

### Vehicles Eligible for Importation

To be eligible for importation, vehicles must qualify for entry under one of the following two principles:

- a. Vehicles that are required to be registered in the RIV Program, a national certification program established by TC that ensures qualifying U.S. certified vehicles purchased at the retail level in the U.S. are modified, inspected, and recertified to comply with CMVSS. For the purposes of this document, these vehicles are discussed below as **RIV vehicles**.

- b. Vehicles that are not required to be registered in the RIV Program, which applies to all other vehicle entries including any CMVSS vehicles, age-exempt vehicles, nonregulated vehicles, and vehicles imported temporarily. For the purposes of this document, these vehicles are discussed below as **RIV exempt vehicles**.

Vehicles that do not qualify for importation under one of the two preceding options are considered inadmissible and cannot be imported into Canada.

### Federal Agencies

Similar to the U.S. importation process, the process for importing vehicles into Canada is complex, with several agencies involved. The Canadian importation requirements for vehicles involve:

- Canada Border Services Agency
- Transport Canada
- Canadian Food Inspection Agency
- Environment and Climate Change Canada

### Overview of the Importation Process

#### RIV Vehicles

The RIV is an agency contracted by TC to administer a national program to ensure that U.S. certified vehicles purchased at the retail level in the U.S. are brought into compliance with Canada's safety standards. The RIV established and maintains a user pay system of registration, inspection, and recertification to CMVSS for vehicles originally



manufactured to U.S. safety standards that are being permanently imported into Canada.

To be considered eligible for registration in the RIV Program, a vehicle must meet all the following conditions:

- a. belong to a prescribed class of regulated vehicles;
- b. be less than 15 years old or, in the case of a bus, manufactured on or after January 1, 1971;
- c. purchased or originally sold in the U.S.;
- d. is identified as admissible on the Vehicle Import Compatibility List;
- e. is certified by the original manufacturer to comply with all U.S. FMVSS as demonstrated by a Statement of Compliance (SoC) label affixed to the unit or in the absence of the FMVSS SoC label, by a letter from the manufacturer (not a retailer) containing the information normally found on the SoC label, which includes, among other things, the following statement:
  - i. this vehicle conforms to the applicable FMVSS, bumper and theft prevention standards in effect on the date of manufacture shown above, or
  - ii. this vehicle conforms to all applicable U.S. FMVSS in effect on the date of manufacture shown above;
- f. in the case of a vehicle manufactured in stages, evidence of FMVSS certification by the end (final stage) manufacturer as described above;
- g. in the case of a snowmobile, the snowmobile is certified by the original manufacturer (demonstrated by a SoC label affixed to the unit) to comply with the Snowmobile Safety Certification Committee or with CMVSS;
- h. bear a valid 17-digit alphanumeric VIN (satisfies CMVSS 115 requirements) issued by the Original Equipment Manufacturer (OEM);
- i. has not been modified in any way that compromises the OEM certification;
- j. In the case of a vehicle imported into Canada for parts only, a Vehicle Imported for Parts Form (Form 3) must be provided to the Canada Border Services Agency (CBSA) and bear the words “disassembly for parts” or “to be dismantled for parts.” The use of the vehicle for parts is determined using the existing vehicle’s U.S. title or by the importer’s declaration. Using Form 3, the RIV assigns a nonrepairable status to the vehicle in the Interprovincial Records Exchange (IRE) to prevent registration or licensing of the vehicle in Canada.

Other requirements outside the scope of the CMVSA also apply. These include valid proof of ownership documents, vehicle branding status, and possible foreign export requirements.

### *Before Importing the Vehicle*

Prior to entry into Canada, the vehicle must be listed on Transport Canada’s [Vehicle Import Compatibility \(VIC\) List](#) or be an exempt vehicle. When a U.S. specification vehicle is listed as admissible, it may require modifications, which may be extensive. Vehicles that cannot be modified to comply must not remain in Canada and must be exported or destroyed.

- The vehicle must be clear of any recalls. A recall clearance letter from the vehicle manufacturer is required which states that any defects identified by the manufacturer as a potential safety risk to the vehicle’s operator, occupants, and the public at large have been corrected.
- The RIV will not release Form 2, Inspection Form for a Vehicle, until confirmation that there are no outstanding recalls has been received. Note: Additional information about Form 2 appears in the section on the RIV in the following pages.
- Recall clearance letters remain valid for 30 days prior to import.

## *At the Border*

To begin the process of importing a vehicle into Canada from the U.S., documentation must be submitted to U.S. CBP at least 72 hours prior to export from the U.S. At the time of exit from the U.S., the owner or agent of the vehicle must supply the vehicle and original documents to U.S. Customs at the port of export, in person. The following documents are required:

- Ownership documents: Original title for a used vehicle, Manufacturer's Statement of Origin or Certificate of Origin for a new vehicle, and bill of sale certifying in writing that the sale is a bona fide sale and that the vehicle is not stolen. If a used vehicle was not required to be titled, then a letter from the exporting state's Department of Motor Vehicles stating that no title is required for that type of vehicle must be provided.
- Effective October 2, 2014, the U.S. Census Bureau has added an export filing requirement on the U.S. Customs and Border Protection Automated Export System (AES), which must be filed giving the 72-hour notice of export. AES filing can be submitted by a resident U.S. domiciled company or, alternatively, a customs broker, freight forwarder, or U.S. Principal Party in Interest (USPPI) may file the AES declaration.
- After the AES is accepted, an Internal Transaction Number (ITN) will be issued. The ITN must accompany the documentation presented to U.S. Customs and Border Protection.

Additional documentation may be required for commercial vehicles.

## *Canada Border Services Agency Entry Requirements*

The CBSA assists TC with the administration of the CMVSA and the Motor Vehicle Safety Regulations by administering and enforcing the conditions under

which new and used vehicles may be imported into Canada at CBSA points of entry.

CBSA officers verify proof of ownership by reviewing the ownership documents. Ownership documents required are the original title for a used vehicle, Manufacturer's Statement of Origin or Certificate of Origin for a new vehicle, and a bill of sale certifying in writing that the sale is a bona fide sale and that the vehicle is not stolen. If no title is required, then a letter from the exporting state's Department of Motor Vehicles stating that no title is required for that type of vehicle must be provided.

CBSA will check the vehicle against TC's VIC List and verify the VIN and manufacturer's SoC label.

A TC Vehicle Import Form 1 or an RIV Vehicle Import e-Form 1 must be completed and stamped released by the CBSA. If using a customs broker, the entry may be submitted electronically via the CBSA Single Window Initiative (SWI) program, and the importer will receive an email from the RIV in place of the paper form.

A Form B3 (for commercial) or Form B15 (for personal use) is a CBSA accounting document for the importer to use to submit payment for any applicable duties or taxes.

The vehicle must meet Environment Canada Vehicle Emissions Requirements.

## *Environment Canada Vehicle Exhaust Emission Requirements*

Canadian and U.S. federal emission standards for various classes of on-road and off-road vehicles and engines, including passenger cars, trucks, motorcycles, gasoline-fueled engines found in lawn and garden maintenance equipment, and light-duty industrial machines and diesel-fueled engines found in construction, mining, farming, and forestry machines, are closely aligned. Consequently, vehicles and engines designed, built, and certified for sale in the U.S. should generally be eligible for importation into Canada.

### *Canadian Food Inspection Agency Requirements*

The following are subject to Canadian Food Inspection Agency import requirements and inspection procedures and fees to prevent the entry and establishment of injurious plant pests in Canada:

- used agricultural vehicles, equipment, implements, containers, and carriers;
- used earth-moving vehicles, equipment, implements, tools, carriers, and containers;
- used passenger and recreational vehicles; and
- used military equipment.

### *Registrar of Imported Vehicles*

The RIV administers the national certification program established by TC that ensures qualifying FMVSS vehicles purchased at the retail level in the U.S. and Mexico are modified, inspected, and recertified to comply with CMVSS. The RIV provides information on the recall clearance requirements, any vehicle modification requirements, and vehicle branding history and collects certain fees.

The RIV requires recall information from the original vehicle manufacturer or an electronic vehicle history report indicating that the vehicle has no outstanding recalls to be completed.

The importer must pay a fee to the RIV and will in turn be issued a Form 2 – Inspection Form. The original TC Vehicle Import Form 1 (if using a customs broker, then this is reported in CBSA’s Electronic Data Interchange [EDI]) and Form 2, along with the vehicle, must be modified and then taken to an approved inspection facility within 45 days from the date of import.

After the inspection is complete and the vehicle has been determined to meet CMVSS, Form 2 will be stamped, and the owner of the vehicle will be mailed a decal stating that the vehicle has been inspected and found to comply with CMVSS and instructions where

and how to apply the decal. The FMVSS compliance label is not to be removed.

### *Registering the Vehicle*

The stamped Form 2, original Bills of Sale, original title for a used vehicle, Manufacturer’s Statement of Origin or Certificate of Origin for a new vehicle, and B3 or B15 from CBSA are required to register the vehicle in a Canadian province or territory. The licensing office of the jurisdiction refers to RIV data on the IRE to ensure the vehicle has completed the RIV process. TC Form 1 normally exists as an electronic record in the IRE unless the importer chooses to use a paper copy.

### *Records*

All imported vehicle records must be kept on file with the importer for six years.

## **RIV Exempt Vehicles**

Vehicles are exempt from the RIV process if they are imported under one of the following conditions:

- Commercial importation of new CMVSS-compliant vehicles by a TC recognized Canadian commercial vehicle importer listed on TC’s preclearance listing (known as Appendix F companies)
- Commercial importation of new CMVSS-compliant vehicles by Canadian importers, from a foreign manufacturer recognized by TC (known as Appendix G companies)
- Case-by-case (CBC) importation. Must be validated by TC on a VIN-specific basis;
  - New Canadian vehicle bearing a valid Canadian compliance label
  - Used Canadian certified vehicle being returned to Canada by a non-original owner
- Canadian certified vehicle being returned to Canada by the original owner

- Age-exempt vehicles: any regulated class of vehicle more than 15 years old from the date of manufacture and buses manufactured prior to Jan 1, 1971
- Vehicles imported for exhibition, demonstration, testing, or evaluation (requires TC authorization)
- Vehicles brought in to Canada by a visitor, tourist, or a person holding a valid work permit or student visa
- Work vehicle (a work vehicle is defined as one used primarily to perform civil construction and maintenance work, that is not built on a truck or truck-type chassis; this does not include a tractor or any vehicle designed to be drawn behind another vehicle)

## Requirements for the Importation of Exempt Vehicles

If the vehicle meets TC's entry requirements, the CBSA officers at the border will

- verify the vehicle's nonregulated status;
- inspect for possible soil contaminants;
- examine the ownership documents; and
- collect taxes and/or duties if applicable.

## Importing Older Vehicles into Canada

Vehicles manufactured more than 15 years ago and buses manufactured before January 1, 1971, are not regulated for importation by the CMVSA. They are considered age exempt. The age of a vehicle is primarily determined by the month and year it was manufactured as noted on the vehicle's statement of compliance label affixed by the manufacturer. Vehicles that are built in stages, such as motorhomes, vocational trucks, limousines, and converted vans, are assessed using the date the final stage manufacturer completed the vehicle, as also affixed to the vehicle on a label.

It should be noted that successfully importing an older vehicle does not guarantee that the provincial or territorial government will be able to register and license it. For example, some Canadian jurisdictions will not license right-hand drive vehicles or certain salvage branded vehicles even after the vehicle is repaired.

For vintage replica vehicles, the age is assessed using the final date of completion of the replica, not the model year it replicates. If an importer is unable to provide valid proof of age to establish a vehicle's nonregulated status, CBSA officers will assess a vehicle for importation according to normal guidelines, which can result in its denial at the Canadian border if the vehicle does not comply.

## Importing All-Terrain Vehicles

All-terrain vehicles are assessed on an individual basis as to whether or not they are regulated as on-road vehicles.

## Salvage Vehicles

Salvage vehicles are vehicles that have been damaged beyond economical repair because of collision, natural disaster, or any other event requiring costly repair as determined by a licensing authority or licensed insurance provider.

The Canadian Salvage Vehicle Program allows for the importation of branded salvage-regulated vehicles provided

- the damage was not flood-related; and
- the vehicle is CMVSS or FMVSS compliant and less than 15 years old; or
- the vehicle is a CMVSS or FMVSS compliant bus manufactured on or after January 1, 1971.

Nonregulated vehicles, such as those older than 15 years, buses manufactured before January 1, 1971, and other types of nonregulated designs, do not have

to enter the Salvage Vehicle Program because they are exempt from having to comply with the CMVSA and its regulations.

A “salvage” brand on a vehicle’s title may severely limit the eligibility of the vehicle to be registered and insured in Canada.

Some manufacturers may not issue recall clearance documents for vehicles that were once declared salvaged.

## Imports from Outside the U.S. Into Canada

The following circumstances allow people to import vehicles from a country other than the U.S.:

- The vehicle is 15 years old or older, based on the month and year of its manufacture; it belongs to a regulated class of vehicle under the Motor Vehicle Safety Act (the Act); and it is not a bus.
- The vehicle is a bus manufactured before January 1, 1971.
- The vehicle is nonregulated, meaning it does not belong to a class of vehicle regulated under the Motor Vehicle Safety Regulations.
- The vehicle meets all Canadian standards and was bought new as part of a manufacturer’s foreign buyer program abroad. The importer must pre-authorize the vehicle’s entry with TC.
- The vehicle is a returning Canadian-specification vehicle (originally owned in Canada) and it still complies with Canadian standards. The importer can request pre-authorization from TC for the vehicle’s entry.
- The vehicle met all U.S. FMVSS when built (was bought new abroad as part of a U.S. specification foreign delivery program) or is returning after having been originally purchased or owned as a U.S. specification vehicle in the U.S. The importer must pre-authorize its entry

with TC to clear the border. The vehicle then has to successfully complete the RIV program in Canada before it can be presented for registration with the province or territory. This includes confirming the absence of any unresolved manufacturer recall(s) and inspecting it to ensure it has not been modified.

## Provincial Challenges with Imported Vehicles

Canadian jurisdictions face many of the same challenges as those in the U.S. when a vehicle is imported from another country. They include

- Ensuring the brands from other jurisdictions are understood, carried forward on new ownership documents, and recorded
- Attempting to import and register a vehicle in Canada before a U.S. brand can be applied to the vehicle
- Washing U.S. brands such as “flood vehicle” when the vehicle is imported
- A U.S. VIN applied to a stolen Canadian vehicle even though the vehicle has never been physically imported into Canada, then either re-sold into Canada or exported
- Attempt to register in Canada, a vehicle stolen in the U.S. by using fraudulent RIV forms and U.S. titles
- Odometer rollbacks
- Vehicles sold by curbsiders who misrepresent information about the vehicle to the purchaser, such as odometer reading or crash history. Many vehicles are previous write-offs or totaled vehicles (nonrepairable) with undisclosed crash repairs or the odometer has been rolled back. (Curbsiders, also called curbstoners in the U.S., not only misrepresent the vehicles but also misrepresent themselves. They are illegal, unlicensed vehicle dealers. They often pose as private sellers, though

some operate from small automotive businesses such as repair shops.)

■ Often the public does not understand that

- replica vehicles made in the past 15 years or vehicles not on the admissible list cannot be imported into Canada;

- modified, irreparable, or flooded vehicles can only be imported into Canada for parts; and
- most military vehicles over 15 years old imported, cannot be licensed because they do not or cannot meet the CMVSS.



## Appendix A Contact Information and Resources

### U.S. Resource Contact Information

#### CUSTOMS AND BORDER PROTECTION PORTS

Contact information for each port can be found on the U.S. Customs and Border Protection's [website](#). After you select the port of entry, the website will provide specific contact information for each port.

#### NHTSA IMPORT CERTIFICATION DEPARTMENT

Email: [importcertification@dot.gov](mailto:importcertification@dot.gov) (*preferred contact method*)

Phone: (202) 366-5291 (*for use, when an elevated concern has been raised*)

#### NICB FIELD AGENT

To contact and NICB field agent, please do so by:

Email: [IA@nicb.org](mailto:IA@nicb.org)

Phone: (800) 447-6282 ext. 7002

[Investigative Assistance Website](#)

### U.S. Resources

#### CUSTOMS AND BORDER PROTECTION

- [Importing a Motor Vehicle](#)

#### ENVIRONMENTAL PROTECTION AGENCY

- [Importing Vehicles in to the US](#)
- [Importing Canadian Vehicles](#)
- [Importing Vehicles and Engines](#)
- [Importing-vehicles-and-engines](#)
- [Emission Standards Reference Guide for On-road and Non-road Vehicles and Engines](#)
- [List of Independent Commercial Importers](#)

#### NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION

- [Vehicle Importation and Certification Requirements](#)
  - [Vehicle Importation Guidelines \(Canadian\)](#)
  - [Vehicle Importation Guidelines \(Non-Canadian\)](#)
  - [NHTSA HS-7 Declaration Form](#)
- [NHTSA Importation and Certification FAQs](#)

### Canadian Resource Contact Information

#### REGISTRAR OF IMPORTED VEHICLES (RIV)

Email: [info@riv.ca](mailto:info@riv.ca) or [support@support.riv.ca](mailto:support@support.riv.ca)

Phone: Within North America: (888) 848-8240 (English and French)

#### CANADIAN BORDER SERVICES AGENCY

Email: [contact@cbsa.gc.ca](mailto:contact@cbsa.gc.ca) (*will not open or respond to any emails containing attachments or links because of security measures*)

Phone: Within North America: (800) 461-999

### Canadian Resources

- [Transport Canada](#)
- [Importing a Vehicle into Canada](#)
- [The Motor Vehicle Safety Act \(1993, c. 16\)](#)
- [Canadian Border Services Agency \(CBSA\)](#)
- [Registrar of Imported Vehicles Importing a Vehicle](#)
- [RIV FAQ](#)
- [Provincial Contact Information](#)

## European Union Resources

This is a link to vehicles registration and roadworthiness documents in European member states that helps authorities with the re-registration of imported cars and also provides general information.

- [European Union Vehicle Registration Documents](#)

## Potential Resources for Conducting Inspections and Investigations

Below is a list of potential resources for conducting inspections and investigations. For contacts and more information about these and other resources, you may refer to the IACP's [Educational Tool Kit for Vehicle Crimes](#).

- Canadian Stolen Vehicle Database
- Carfax and Carfax for Police
- Carfax for Canadian Vehicles

- ISO Claimsearch
- Insurance Bureau of Canada
- Internet browser search by VIN, attempting to locate the VIN being advertised or use elsewhere in the U.S. or internationally
- NMVTIS Law Enforcement Access Tool (LEAT)
- National Crime Information Center (NCIC)
- National Insurance Crime Bureau (NICB)

In addition to what is included in the IACP's Educational Tool Kit for Vehicle Crimes, you might also consider using these resources:

- [Salvage Bid](#)
- [Auto Bid Master](#)

*Please note all of these resources may not be available to non-sworn investigators.*

## Appendix B Interpreting the NHTSA HS-7 Declaration Form Chart

The following chart has been included as a quick reference to interpret the NHTSA HS-7 Declaration Form. However, it is important to refer to Chapter 2 for a complete explanation of the information and recommendation from the Working Group.

Importation Type (Per Box Checked on NHTSA HS-7 Declaration Form)	Title and Registration Eligibility Recommendations	Documentation Needed In Addition to Ownership and DOT, EPA, and Customs Entry Documents
<b>Box 1: Age-Exempt [591.5(i)]</b>  Any vehicle 25 years old or more, from the date of manufacture, at the time of importation is exempt from FMVSS requirements for purposes of importation and is NOT regulated by NHTSA or EPA at import.	Do not issue a title and/or registration unless the vehicle complies with FMVSS and meets the jurisdiction's inspection standards..  Brand, "Gray Market – Exempt from Compliance" or if CMVSS certified, "Prior Canadian – Exempt from Compliance" unless evidence of modification to meet FMVSS (for more information, please refer to Chapter 2)	None
<b>Box 2A: Vehicle manufactured to U.S. Safety Standards [591.5(b)]</b>  New or used motor vehicles originally manufactured to meet FMVSS for use in the U.S.	Issue a title and renewable registration.	None
<b>Box 2B: Canadian Version Vehicle – Personal Use [591.5(g)]</b> <ul style="list-style-type: none"> <li>Vehicle originally manufactured to CMVSS</li> <li>Imported for <i>personal use without the intent to resell</i></li> <li>Cannot be salvage, repaired salvage, or reconstructed vehicle</li> <li>Less than 25 years since the date of manufacture (<i>if 25 years has passed, the vehicle should be considered exempt; follow Box 1: Age-Exempt Recommendations.</i>)</li> </ul> <p><i>Note: If the manufacturer's letter states vehicle complies except for automatic restraint requirements of occupant crash protection standard, the vehicle cannot be imported under Box 2B and can only be imported on a permanent basis under Box 3 by an RI.</i></p>	Title and/or register if the applicant can provide the original stamped CBP Form 7501 and accompanying NHTSA HS-7 Declaration Form. The applicant for title and/or registration should also be the importer. If the applicant for title and/or registration is not the importer, this could be an indication the vehicle was not imported for personal use but imported with the intent to be resold.  Jurisdictions may want to consider putting a designation on the title and the title record the vehicle was imported as a "Canadian Vehicle."	None

(continued)

Importation Type (Per Box Checked on NHTSA HS-7 Declaration Form)	Title and Registration Eligibility Recommendations	Documentation Needed In Addition to Ownership and DOT, EPA, and Customs Entry Documents
<b>Box 3: Non-Conforming Vehicle [591.5(f)]</b> <ul style="list-style-type: none"> <li>▪ Must be imported by an RI or their contractor</li> <li>▪ Cannot be a salvage or reconstructed vehicle</li> </ul>	<p>If the vehicle has been brought into FMVSS compliance, issue negotiable title branded "Gray Market -In Compliance" or if CMVSS-certified, "Prior Canadian - In Compliance" and renewable registration when bond release letter is received.</p> <p>If it has been 30 days after the submission of the conformity package, the vehicle is allowed to be imported into the U.S. but title and registration should not be issued until the conformity package has been approved and the vehicle complies with FMVSS and meets the jurisdictions inspection standards.</p>	<p>Jurisdictions should require a copy of the DOT bond release letter.</p>
<b>Box 4: Export Only Vehicle [591.5(c)]</b>  Vehicle or equipment entered U.S. solely for export	<p>Do not issue a title or any type or registration.</p>	<p>None</p>
<b>Box 5: Non-resident (e.g., Tourist) Exemption [591.5(d)]</b> <ul style="list-style-type: none"> <li>▪ For temporary, personal use not exceeding one year</li> <li>▪ Cannot be sold</li> <li>▪ Must export no later than one year from entry</li> </ul>	<p>Do not issue a negotiable title or registration. Vehicle is allowed to be operated with a foreign registration on U.S. roadways for up to one year.</p>	<p>None</p>
<b>Box 6: Foreign Government or International Organization [591.5(h)(1)]</b> <ul style="list-style-type: none"> <li>▪ For use by member of foreign government on assignment in U.S. or staff member of public international organization designated under International Organizations Immunities Act.</li> <li>▪ Title and Registration must be obtained from the Department of State, Office of Foreign Missions.</li> </ul>	<p>Do not issue a title or any type of registration.</p>	<p>N/A</p>
<b>Box 7: "Test" or Race Vehicles [591.5(a)(1), 591.5(j), and 591.6(f)(3)]</b>  Solely used for research, investigations, demos, training, or competitive racing. These vehicles are imported on a temporary basis.	<p>Do not issue a negotiable title.</p> <p>If the importer was not the original manufacturer and NHTSA granted permission for use on public roads, issue a temporary registration or permit up to the length of time permission from NHTSA was granted. If the importer was the manufacturer, may issue temporary registration up to the estimated period of use.</p>	<p>If the importer is not an original manufacturer of FMVSS-compliant vehicles, NHTSA permission letter specifically authorizing use on public roads.</p> <p>If the importer is an original manufacturer of FMVSS-compliant vehicles, the importer's statement describing vehicle's intended use, which if on public roads, must state why this is necessary and provide an estimated period of use and intended means of final disposition.</p>

(continued)

Importation Type (Per Box Checked on NHTSA HS-7 Declaration Form)	Title and Registration Eligibility Recommendations	Documentation Needed In Addition to Ownership and DOT, EPA, and Customs Entry Documents
<b>Box 8: Off-Road Vehicles [591.5(a)]</b>  Not built for use on public roads	Issue a title only if statute allows the issuance for ownership purposes. Registration and operation on public roadways not recommended.	If vehicle was originally manufactured for racing, a letter from the manufacturer must confirm this.
<b>Box: 9 Incomplete Vehicles [591.5(e)]</b>  Must be completed to meet FMVSS before title and registration; typically two-stage vehicles such as motor homes imported after the first stage and completed in the U.S. by the second stage manufacturer	Title and register only if the vehicle has been completed by a second or final stage manufacturer that has certified it to meet FMVSS.  <i>Note: Canada does allow for the registration of incomplete vehicles.</i>	Incomplete vehicle document issued by manufacturer, providing guidance for completing vehicle to meet FMVSS  Second stage manufacturer's MCO
<b>Box 10: Vehicles for Show or Concept Cars [591.5(j) and 591.7d]</b>  Vehicles deemed to be of unusual historical or technological significance for show or concept	Do not issue a negotiable title.  Issue registration or permit up to three years if NHTSA permission letter states on-road use is permitted, and up to five years if an extension letter is provided.	NHTSA permission letter in customer's name stating on-road use is permitted.  If letter states on-road use is not permitted, no on-road registration or permit should be issued.
<b>Box 11: Equipment [591.5(k)]</b>  This is not considered a motor vehicle	Do not issue a title or any type of registration.	None
<b>Box 12: Foreign Military [591.5(h)(2)]</b> <ul style="list-style-type: none"> <li>Title and registration must be obtained from the Department of State, OFM unless ineligible</li> <li>Only for members of the foreign military</li> <li>Temporary and for personal use only</li> <li>Cannot be sold in the U.S. except to another member of the foreign military</li> <li>Vehicle must be exported when the owner departs country upon completion of his or her tour of duty</li> </ul>	Do not issue any type of title or registration unless a non-eligibility letter is issued by OFM; may then issue non-negotiable title and registration or permit based on length of assignment.	Non-eligibility letter issued by OFM
<b>Box 13: NHTSA Petition Process for Vehicles Not Eligible for Importation [49 CFR 592]</b>  NHTSA has been petitioned for eligibility to be imported. If permission granted, the vehicle must be reimported by RI under Box 3.	Do not issue a title or registration.	If a jurisdiction encounters a customer that presents a NHTSA HS-7 Declaration Form with Box 13 checked, report this activity to the NHTSA Import Certification Department immediately by sending an email to <a href="mailto:importcert@dot.gov">importcert@dot.gov</a> or calling (202) 366-5291. The Working Groups recommends jurisdictions DO NOT under any circumstance title or register this vehicle.

## Appendix C Sample Office of Foreign Missions Non-eligibility Letter

May 2, 2019

Mr. or Ms. First Last Name  
Administrator  
Jurisdiction Division of Motor Vehicles  
Jurisdiction Agency Name 2  
Mailing Address  
City, State Zip Code

Dear Administrator:

This letter is in regard to the issuance of motor vehicle services, including driver's licenses, to individuals holding a valid "A" or "G" visa. The Office of Foreign Missions (OFM) wishes to thank your State Motor Vehicle Administration for your continued cooperation with the United States Department of State in ensuring that your Administration does not issue driver's licenses to persons holding a valid "A" or "G" visa without the applicant presenting the OFM-issued "Non-Eligibility Letter." This so-called "Non El Letter" informs Motor Vehicle Administrations in each state that the "A" or "G" visa holder before them does not have diplomatic or consular immunity and may seek motor vehicle services from their local DMV. By way of background, in 1988, the U.S. Department of State became the sole authority for the issuance of all motor vehicle services, including driver's licenses, for persons entitled to some levels of diplomatic or consular immunity in the United States. This authority was intended to enable the Department of State to protect the United States public from abuses of privileges and immunities by members of foreign missions and to handle incidents involving such personnel who incur motor vehicle violations but whose immunity shields them from the jurisdiction of U.S. courts. You may visit our website at [www.state.gov/ofm/dmv](http://www.state.gov/ofm/dmv) for more information.

You should be aware that all foreign mission members and their dependents who are required to be licensed by, and register their vehicles with, OFM are in the United States on either a diplomatic "A" or international organization "G" visa. However, there are individuals in the United States on an "A" or "G" visa but who do **not** enjoy immunities requiring them to obtain services from OFM. These individuals must instead seek these services from the states in which they reside. Because states are not able to determine whether an "A" or "G" visa holder is required to be under the OFM Program, we have requested, and States have agreed, not to issue services to these "A" and "G" visa holders unless they present the "Non-El Letter" referred to above.

I would appreciate if you would disseminate this letter to your DMV branches at your earliest convenience. I also include with this letter a current exemplar of the "Non-Eligibility Letter" for your awareness and reference. Your assistance in this matter is greatly appreciated. If you have any questions or concerns, you may contact me via email at [ofmdmvenforcement@state.gov](mailto:ofmdmvenforcement@state.gov) or (202) 895-3521.

Enclosure: As Stated  
Sincerely,

Joan C. Morningstar  
Assistant Director  
Diplomatic Motor Vehicles, Enforcement and Outreach





United States Department of State

*Office of Foreign Missions  
Washington, D.C. 20520*

00000000000000

August 15, 2016

Dear Sir or Madam:

**Name:** Jane Doe

**DOB:** 01/01/1980

**Address:** 123 Main Street, Any Town, NY 00000



This letter certifies that the individual named above is not obliged to obtain motor vehicle services from the U.S. Department of State's Office of Foreign Missions (OFM). As such, this individual is ineligible to be licensed to drive by the Department of State's Office of Foreign Missions, or to obtain a Department of State identification card. Therefore, these services may be obtained from the individual's jurisdiction of residence.

Please provide driver and motor vehicle services in accordance with the laws of your state. If this individual possesses a Department of State Driver License at the time of obtaining a license in your state, please return the license to the following address for cancellation:



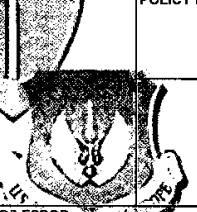
Diplomatic Motor Vehicle Office  
3507 International Place NW  
Washington, DC 20520

This letter is valid for 90 days from the date of issuance. If you have any further questions and are located in the Washington Metropolitan Area, please contact the OFM Customer Service Center at 202-895-3682 or [OFMDMVInfo@state.gov](mailto:OFMDMVInfo@state.gov). If you are located outside of the Washington Metropolitan Area, please contact the nearest OFM regional office. Contact details for OFM regional offices may be found on OFM's website at <http://www.state.gov/ofm/ro/index.htm>.



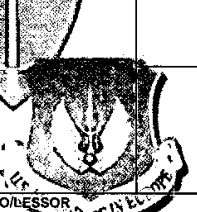
Sincerely,

Joan C. Morningstar  
Assistant Director  
Diplomatic Motor Vehicles and  
Enforcement

# Appendix D U.S. Forces POV Registration/Title Certificate (AE Form 190-1A)

COUNTRY/LAND PLATE NO/KENNZEICHEN		USA			U.S. FORCES POV REGISTRATION/TITLE/POL AUTHORIZATION ZULASSUNGSCHEIN/BESITZURKUNDE FÜR PRIVATKRAFTFAHRZEUGE (AE Reg 190-1/CNE-C6F Inst 11240.6X/USAFE Inst 31-202) Deutsches Kennzeichen zugelassen.		DATE ISSUED AUSGEST. AM	EXPIRES VERFÄLLT AM
						15JUN2017	15SEP2017	
YR MAKE/JAHR FABRIKAT	MODEL	BODY TYPE/AUFBAU	COLOR/FARBE	FUEL ALLOWANCE/CAT STATUS		CHASSIS NO/FAHRGESTELLNUMMER		
2017 VOLVO	XC 90	UTILLG	COP	600 LTRS CAT3 GAS				
GRADE/RANG		OWNER'S NAME/NOME DES EIGENTÜMERS		ID/KENN-NR.	INS. CO./VERSICHERUNG POLICY NO/POLICENUMMER		 <b>D741552</b>	
				 				
AUTHORIZED DRIVERS/BEFUGTER FAHRER		ID/KENN-NR.		LIEN CO/LESSOR		REG. CODE		
Not Applicable/Entfällt		*****		USAA FED SAV BNK		BE		
Not Applicable/Entfällt		* Fuel Card *		SIGNATURE/UNTERSCHRIFT		MVR02		
Not Applicable/Entfällt		* Use Only *				15JUN2017 10:59		
Not Applicable/Entfällt		*****						

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COUNTRY/LAND PLATE NO/KENNZEICHEN		USA			U.S. FORCES POV REGISTRATION/TITLE/POL AUTHORIZATION ZULASSUNGSCHEIN/BESITZURKUNDE FÜR PRIVATKRAFTFAHRZEUGE (AE Reg 190-1/CNE-C6F Inst 11240.6X/USAFE Inst 31-202) Deutsches Kennzeichen zugelassen.		DATE ISSUED AUSGEST. AM	EXPIRES VERFÄLLT AM
						15JUN2017	15SEP2017	
YR MAKE/JAHR FABRIKAT	MODEL	BODY TYPE/AUFBAU	COLOR/FARBE	FUEL ALLOWANCE/CAT STATUS		CHASSIS NO/FAHRGESTELLNUMMER		
2017 VOLVO	XC 90	UTIL_G	COP	600 LTRS CAT3 GAS				
GRADE/RANG		OWNER'S NAME/NOME DES EIGENTÜMERS		ID/KENN-NR.	INS. CO./VERSICHERUNG POLICY NO/POLICENUMMER		 <b>D741552</b>	
				 				
TRANSFER TITLE DOCUMENT				LIEN CO/LESSOR		REG. CODE		
				USAA FED SAV BNK		BE		
				SIGNATURE/UNTERSCHRIFT		MVR02		
						15JUN2017 10:59		

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## Appendix E Working Group Members

### CHAIR

#### **Alacia Moore**

*Program Manager, Vehicle Services Administration*  
Virginia Department of Motor Vehicles

### VICE CHAIR

#### **Megan Bergum**

*DOT Section Chief*  
Wisconsin Division of Motor Vehicles  
Division of Motor Vehicles

### MEMBERS

#### **Katie Bower**

*Division Director*  
Michigan Department of State  
Business Compliance and Regulation Division

#### **Don Burbank**

*NMVTIS Support Team*  
Washington Department of Licensing

#### **Lester D. Elder**

*Special Agent in Charge*  
Missouri Department of Revenue  
Criminal Investigations Bureau

#### **Darlea Johnson**

*Administrative Analyst I*  
Missouri Department of Revenue  
Motor Vehicle Bureau

#### **Joshua Kline**

*Manager of Research and Support Operations Section*  
Bureau of Motor Vehicles  
Pennsylvania Driver and Vehicle Services

#### **Tracey Poole**

*Title Examiner*  
Bureau of Title & Anti-Theft  
New Hampshire Department of Motor Vehicles –  
Department of Safety

#### **Rod Smith**

*Data Systems Administrator*  
Illinois Secretary of State

#### **Barry Takeuchi**

*Policy Program Specialist*  
DMV Policy and Program Management  
Idaho Transportation Department

### AAMVA STAFF

#### **Casey Garber**

*Project Manager*  
Manager, Vehicle Programs

#### **Cathie Curtis**

*Director, Vehicle Programs*

#### **Vivienne Cameron**

*Senior Director, Business Solutions*

#### **Paul Steier**

*Manager, Law Enforcement*

## **OUR VISION**

*Safe drivers*

*Safe vehicles*

*Secure identities*

*Saving lives!*



### **American Association of Motor Vehicle Administrators**

4401 Wilson Blvd, Suite 700  
Arlington, Virginia 22203  
703,522,4200 | [aamva.org](http://aamva.org)