

Final Rule
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[Docket No. NHSTA-2019-0089]
RIN 2127-AL39

Odometer Disclosure Requirements
Pennsylvania's Comments to Final Rule

NHSTA requested hearing from states that have a general interest in electronic systems, even if specific plans do not exist yet. Pennsylvania acknowledges the goal of deploying electronic odometer disclosure to assist in the full realization of electronic titling in jurisdictions and across jurisdictional lines. Pennsylvania supports the use of electronic odometer disclosure as a part of a secure electronic titling process. Pennsylvania has been a participant in discussions held on this subject since 2012, going back to AAMVA's e-titling proof of concept to its more recent AAMVA e-odometer disclosure work group.

Pennsylvania has not developed its own solution (although had preliminary plans under the AAMVA e-title proof of concept). With the release of NHSTA's Final Rule, Pennsylvania plans to evaluate its requirements as part of a broader study and analyze options for future deployment.

Sec. 580.17 Exemptions.

This section expands the mileage disclosure exemption to vehicles that are 20 years old or older from the previous exemption for vehicles ten years or older. This part of the final rule affects Pennsylvania as well as all jurisdictions regardless of the deployment of electronic odometer disclosure. The impact of the requirement are system changes, which means dedicated resources will need to be committed to the project. (This is while the state is undergoing system modernization at the same time.) The final rule was released October 2, 2019 leaving little time for Pennsylvania and other jurisdictions to react to the December 31, 2019 effective date.

Pennsylvania thanks NHSTA for the opportunity to provide this response.