

October 25, 2019

Jonathan Charles Morrison, Chief Counsel  
U.S. Department of Transportation  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue SE., West Building  
Washington, DC 20590-0001

Subject: Docket No. NHTSA-2019-0092, Electronic Motor Vehicle Transactions Systems, Request for Comment

Dear Mr. Morrison:

In the Federal Register on September 27, 2019 (Docket No. NHTSA-2019-0092), the National Highway Traffic Safety Administration (NHTSA) requested comments regarding electronic motor vehicle transactions systems. The Arizona Department of Transportation Motor Vehicle Division (ADOT MVD) is writing in response to this request for comments.

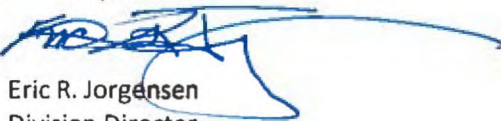
ADOT MVD has created electronic title transaction systems for private party vehicle sales, abandoned vehicle transfers and for dealer reassignments. It is ADOT MVD's intention to expand these electronic title transfer systems and to ultimately eliminate the need to print paper titles. The primary benefit for moving toward electronic titling is the reduction and elimination of fraud in the paper titling process. The paper title is only a point in time record. The electronic vehicle record that is maintained by the state is the real-time source of ownership and vehicle condition information. Accessing title information electronically is more secure and also a convenience and cost savings for the public, industry stakeholders and state titling agencies.

In the request for comments, NHTSA asked what can be done to support the general development of electronic odometer disclosures and electronic titling systems. One way NHTSA can support this development is to maintain the states' flexibility to move forward with the technology and processes that best fit the states', public's and industry's needs. Technology is constantly changing, and states and industry need the flexibility to utilize new advances. With that said, there is a need to create standards that would enable the consistent sharing of information and allow for the interoperability of electronic titling systems.

States and industry currently work to share title and vehicle information through the National Motor Vehicle Title Information System (NMVTIS) that is overseen by the U.S. Department of Justice and operated by the American Association of Motor Vehicle Administrators (AAMVA). AAMVA through NMVTIS has made great strides in compiling title and vehicle information from across the country and continues to increase the amount and quality of data that is available. Supporting AAMVA in its efforts to continue to improve NMVTIS is an important way to assist in the implementation of electronic titling nationwide.

Thank you for inviting comments regarding electronic titling and electronic odometer disclosure.

Sincerely,



Eric R. Jorgensen  
Division Director