



***Fleet Solutions
for Fleet Professionals***

October 28, 2019

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

RE: Docket No. NHSTA-2019-0092 – Electronic Motor Vehicle Transactions Systems

Dear Mr. Morrison,

Thank you for the opportunity to submit these comments on behalf of the professional fleet managers who are members of NAFA Fleet Management Association.

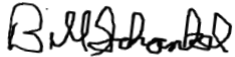
NAFA has more than 2,000 individual fleet manager Members who are employed by corporations, universities, governments agencies (federal, state, municipal, provincial), utilities, and any other entity that uses vehicles in its normal conduct of business. NAFA Members are in control of more than 4.2 million vehicles and manage assets in excess of \$92 billion. These vehicles travel more than 84-billion miles each year. The fleets managed by NAFA's Members run the gamut from light- to heavy-duty vehicles, and depending on the employer's mission, these fleets may be contained to one specific geographic area, dispersed among multiple regions or states, or be in multiple countries.

Although specific plans do not exist yet, NAFA acknowledges that the goal of deploying electronic odometer disclosure will assist in the full realization of electronic titling in jurisdictions and across jurisdictional lines. NAFA supports the use of electronic odometer disclosure if it results in a secure electronic titling process. Odometer disclosure alone should not be the objective.

An electronic titling process would result in savings for corporate and government vehicle fleets. The time savings could come with an e-signature capability and avoid costs of handling and storing of paper titles. E-titles could eventually be more secure than storing paper titles in a fireproof file cabinet. E-titles could also eliminate the cost incurred for lost titles and applying for duplicates from the DMV along with the time it takes for the DMV to process duplicates and mail them out to fleets.

Should you or your staff have any questions about NAFA or our policy positions, please do not hesitate to contact me or Patrick O'Connor, NAFA's U.S. Legislative Counsel, at (703) 351-6222 or patoconnor@kentoconnor.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Schankel". The signature is written in a cursive, slightly stylized font.

Bill Schankel
Interim Chief Executive Officer