



COMMONWEALTH of VIRGINIA

Department of Motor Vehicles
2300 West Broad Street

Richard D. Holcomb
Commissioner

Post Office Box 27412
Richmond, VA 23269-0001

October 25, 2019

VIA Federal eRulemaking Portal:
www.regulations.gov

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue, SE,
West Building, Ground Floor, Room W12-140
Washington, DC 20590-0001

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

Dear Sir or Madam:

The Virginia Department of Motor Vehicles (Virginia DMV) appreciates the opportunity to provide comments in response to the National Highway Traffic Safety Administration (NHTSA) request for comments in the Federal Register Vol. 84, No. 188, Friday, September 27, 2019. While Virginia DMV understands that the final rule is in place for odometer disclosure requirement, Wednesday October 2, 2019 Volume 84 No. 191 Docket 2019-0089, there are concerns that a national standard using a program such as the National Motor Vehicle Title Information System (NMVITS) was not implemented.

The final rule does not provide for a national standard that promotes interoperability of systems. Virginia DMV believes NHTSA should go further than what is in the final rule to prevent, or limit variation among the various state systems. Currently, there are national standards for paper odometer disclosures. There are national standards for driver's licenses implemented using the National Driver Register (NDR) and there are national standards for commercial driver's licenses through the Commercial Driver's License Information System (CDLIS). There is also a State to State Verification System (S2S). Although the NDR and CDLIS are federal programs and the S2S is not, the S2S will serve the same purpose as CDLIS and once completed, participation in the program will be required by the Department of Homeland Security for Real ID compliance.

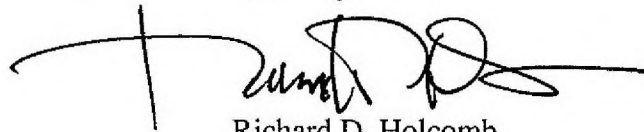
NHTSA has asked how it can support the interoperability of multiple state electronic titling systems? There should be a national standard for e-odometer disclosures. NHTSA's requirements for electronic odometer disclosures should focus on establishing rules that states must adhere to in

order to ensure consistency in state systems. Rules must address creating uniformity in state systems with consistent security standards that will seamlessly interface with each other to ensure that consumers do not experience difficulties conducting vehicle transactions from one state to the next state. There is concern that the Virginia DMV will have an issue distinguishing electronic states from non-electronic states requiring continued use of paper systems. Virginia DMV supports continuing to recognize that e-titling and e-odometer disclosures will be a mixture of electronic and paper documents and processes, and that a paper power of attorney will be needed for some time as electronic processes are phased into use.

NHTSA also requests comment on the ways that adopting purely paperless transaction systems may reduce vehicle transaction costs for States, consumers, and other stakeholders. As we move closer to implementation, Virginia DMV will conduct a thorough cost analysis including reviewing potential savings from staffing efficiencies, storage, and other efficiencies with the electronic transmission of data.

If you have any concerns or need additional information regarding these comments, please contact Melissa Velazquez, Director of Legislative Services at (804) 367-1844 or by e-mail at melissa.velazquez@dmv.virginia.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard D. Holcomb', with a long horizontal flourish extending to the left.

Richard D. Holcomb