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February 13, 2024

The Honorable William C. Smith, Jr.  
Chair, Senate Judicial Proceedings Committee  
2 East, Miller Senate Office Building  
Annapolis MD 21401

***RE: Letter of Information – Senate Bill 397 – Vehicle Laws - Military Vehicles -  
Registration and Operation***

Dear Chair Smith and Committee Members:

The Maryland Department of Transportation (MDOT) offers the following information on Senate Bill 397 for the Committee’s consideration.

Senate Bill 397 would establish a new registration class for vehicles meeting certain standards that would allow operation of military vehicles sold to civilians. The bill would allow the Motor Vehicle Administration (MVA) to issue a title and registration plates so long as the vehicles meet set safety standards, and vehicle owners provide relevant documentation along with certain attestations of vehicle use limitations.

Senate Bill 397 requires the MVA to accept either a Vehicle Identification Number (VIN) or a unique serial number as assigned by the manufacturer. A military vehicle repurposed for civilian use is unlikely to have a unique VIN, if any, and could have any number of components containing a serial number. Further, the shorter character limit of a serial number could cause an issue with checks run through the National Motor Vehicle Title Information System (NMVTIS), resulting in an issue or match with another vehicle in other jurisdictions. Requiring a jurisdictional issued VIN will ensure a vehicle avoids these challenges and matches recommended America Association of Motor Vehicle Administrators (AAMVA) best practices for titling such vehicles.

AAMVA guidelines also recommend that military vehicles repurposed for civilian purchase should be barred from operation on all limited-access highways, and that they only be allowed to operate on roads with a maximum speed limit of 35 miles per hour. Senate Bill 397 does provide limits on use, such as banning everyday use and for purposes such as transporting passengers or being used to drive to and from work or school, but does not ban use on other recommended roadways per AAMVA best practices.

Senate Bill 397 requires a military vehicle meet Federal Motor Vehicle Safety Standards (FMVSS). As vehicles manufactured for a unique purpose of being used in combat or near armed conflict zones, these vehicles lack many basic requirements otherwise mandated by the FMVSS. For example, a High Mobility Multipurpose Wheeled Vehicle (HMMWV) lacks features such as U.S. Safety labels and a model year. As a result, many military vehicles would be prohibited from registration, guaranteeing the safety for all Maryland roadway users.

The Honorable William C. Smith, Jr.  
Page Two

Further, the MVA is requesting at a minimum that the vehicle class being created, "MV-C," be altered so as to remove the hyphen. This minor change will result in an outsized reprogramming benefit for the MVA as its system is not currently established to accommodate a four-character vehicle class and would require substantial reprogramming as a result.

The Maryland Department of Transportation respectfully requests the Committee consider this information during its deliberations of Senate Bill 397.

Respectfully submitted,

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