

March 30, 2023

The Honorable Kumar P. Barve
Chair, House Environment and Transportation Committee
Room 251, House Office Building
Annapolis MD 21401

***RE: Letter of Information – Senate Bill 748 – Vehicle Laws - Military Vehicles -
Registration and Operation***

Dear Chair Barve and Committee Members:

The Maryland Department of Transportation (MDOT) takes no position on Senate Bill 748 but offers the following information for the Committee's consideration.

Senate Bill 748 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 MDOT 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 748 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 avoid these challenges and match 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 748 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, it does not ban use on other recommended roadways per AAMVA best practices.

Senate Bill 748 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

The Honorable Kumar P. Barve
Page Two

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.

Further, it is suggested that the vehicle class being created, "MV-C," be altered so as to remove the hyphen and circumvent MVA's need to reprogram its system to accommodate a four-character vehicle class.

The Maryland Department of Transportation respectfully requests that the Committee consider this information when deliberating Senate Bill 748.

Respectfully submitted,

Christine E. Nizer
Administrator
Maryland Motor Vehicle Administration
410-787-7830

Pilar Helm
Director of Government Affairs
Maryland Department of Transportation
410-865-1090