

January 22, 2025

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

RE: Letter of Information – Senate Bill 14 – Vehicle Laws - Electric Bicycles - Certificate of Title, Registration, and Insurance

Dear Chair Smith and Committee Members:

The Maryland Department of Transportation (MDOT) takes no position on Senate Bill 14 but offers the following information for the Committee’s consideration.

SB 14 would require the Motor Vehicle Administration (MVA) to title and register electric bicycles (e-bikes) as well as mandate insurance policies. It further requires biennial registration renewals with fees collected by the MVA.

Alternatives to automobiles such as e-bikes offer a less expensive, climate-friendly option for transportation, and they are prioritized in MDOT’s long-range plans and annual investment programs. E-bikes have become increasingly popular and present an opportunity to meet MDOT’s mode share and climate goals. E-bikes, particularly Class 3 e-bikes¹, are able to travel at speeds exceeding other human powered options like biking and walking; as such, MDOT appreciates the sponsor’s interests in introducing this legislation.

The MVA has met with the bill sponsor and understands this bill is meant to protect drivers and pedestrians that may be involved in crashes with drivers of e-bikes by requiring the titling, registering, and insuring of the vehicles. Many e-bikes are sold online from an out-of-state manufacturer or at large retail box stores, which limits the ability to assist customers in understanding titling and registration requirements and corresponding fees in the purchaser’s home state (in this case, Maryland). Further, e-bikes lack a clear and uniform serial number similar to a vehicle identification number (VIN) that would allow the MVA to issue a title for the e-bike.

¹ Under Maryland law, e-bikes are organized into three classes – Class 1, Class 2, and Class 3. Class 1 and Class 2 e-bikes are those vehicles that provide assistance up to 20 miles per hour, with the difference being whether a driver must pedal the e-bike in order to receive the assistance of the electric motor. A Class 3 e-bike provides assistance up to 28 miles per hour. In Maryland, Class 3 e-bikes require safety and monitoring equipment for injury prevention and speed management, and users must be at least 16 years old.

The Honorable William C. Smith, Jr.
Page Two

To accomplish the goals of SB 14, the MVA would need to design and manufacture a decal or sticker for each e-bike and promulgate the manner by which that decal or sticker is displayed on the vehicle as its unique registration number to be renewed every two years. The MVA has consistently maintained that vehicles should not be registered if they do not meet established vehicle safety standards. Further, the MVA must create a new classification in its internal programming for this type of vehicle as it does not currently possess one. Finally, in its current language, the titling and registration must be done via an electronic registration and titling (ERT) service only, requiring the customer to utilize a private tag and title service, rather than any MVA service, whether online, in-person, or by mail. This adds external fees to the process and cost to the purchase and use of an e-bike.

Given the differences among classes of e-bikes, the MVA would recommend that any titling and registration requirements be focused on Class 3 e-bikes, which in their operation and speed most resemble other vehicles requiring registration. In addition, alternative strategies based on the Safe System Approach² such as data collection and analysis, speed management, maintenance, and redesigning the transportation network where appropriate and feasible, could offer many of the benefits sought by the sponsor in this bill while making our roads safer and more accessible for all road users.

The Maryland Department of Transportation respectfully requests that the Committee consider this information when deliberating Senate Bill 14.

Respectfully submitted,

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

Matthew Mickler
Director of Government Affairs
Maryland Department of Transportation
410-865-1090

² <https://www.transportation.gov/safe-system-approach>.