

Moving
PennDOT
Forward

Driver and Vehicle Services Update

Bureau of Motor Vehicles - Research and Support Operations Section
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This bulletin may be downloaded by visiting the Driver and Vehicle Services
Web site at www.dmv.state.pa.us

BULLETIN NO. 09-03

March 2009

SPECIAL EDITION

Update/information for all dealers that sell certain two and three-wheeled motorcycles, motor-driven cycles, motor scooters and motorized pedal cycles with a vehicle identification number that begins with the letter "L".

Dear Dealer:

As you may be aware, Pennsylvania title applications for two and three-wheeled motorcycles, motor-driven cycles, motor scooters and motorized pedal cycles (Moped) with a vehicle identification number (VIN) that begins with the letter "L" came into question because of discrepancies discovered between the Manufacturers Certificate of Origin (MCO) and the approved data base of manufacturers maintained by the National Highway Traffic Safety Administration (NHTSA).

The data base maintained by NHTSA identifies authorized vehicle manufacturers and lists VIN decoding information submitted by those manufacturers importing vehicles into the United States for sale. In the fall of 2008, PennDOT discovered that many manufacturers listed on the MCO are not recognized by NHTSA and VIN decoding information was either incorrect or non-existent. This raised an important consumer protection issue since it would be very difficult to track the real manufacturer if a safety recall is necessary or a liability issue arises for the customer. Because this could have negative financial impacts on customers, PennDOT made the decision to verify the documentation before these vehicles are permitted on the road. The examination process began in mid-September 2008.

Upon receipt, applications for the vehicles in question are examined by our Special Services Unit and, if appropriate, processed. For those not eligible, PennDOT returns the application and provides a letter to the customer outlining the discrepancy(s) found (see attached sample rejection letter), and advises the customer to contact the seller regarding the discrepancy in the documentation being supplied with their vehicle. The examination typically takes one business day once received.

Between September and November 2008, PennDOT had rejected back to the customer 91 percent of the title applications received for these types of vehicles. From November 2008 through January 2009, 62 percent were rejected back to the customer. While the number of rejected applications is lower, the rejection rate has the potential to increase again with the spring sale of motorcycles.

Please be sure that the inventory you carry is accompanied by the proper documentation making it possible for your customers to title and register the vehicles they purchase from you. It is suggested that you ask your distributor for copies of the VIN decoding documents required to be on file with NHTSA, and to compare them against the MCOs you currently have (or plan to stock) for the products you offer for sale. To help you determine whether current MCOs in your possession are NHTSA compliant, we have attached instructions on how to access the NHTSA Web site for this information. You may also contact the staff in the Special Services Unit at 717-705-6991 for additional help.

I hope you find this information useful in helping you understand the need for this review process to continue into the next buying season.

**SAMPLE REJECTION
LETTER**



February 27, 2009

JOHN DOE
1101 S FRONT STREET
P O BOX 1
HARRISBURG, PA 17104

Dear Applicant:

The application submitted for the titling and registration of the vehicle you recently purchased cannot be processed.

Title applications for two and three-wheeled motorcycles, motor-driven cycles, motor scooters and motorized pedal cycles (Moped) with a vehicle identification number (VIN) that begins with the letter "L" came into question because of discrepancies discovered between the Manufacturers Certificate of Origin (MCO) and the "Manufacturers" data base maintained by the National Highway Traffic Safety Administration (NHTSA).

The data base maintained by NHTSA lists information, required by federal regulations, on each manufacturer including their "World Manufacturers Identification Number" (WMI) which is the first three characters of their Vehicle Identification Number (VIN) and a decoding of their required 17 digit VIN number.

A review of your MCO shows a discrepancy in the following area(s):

- ☐ The manufacturer name on the MCO is incorrect
- ☐ There is no VIN decoding letter on file with NHTSA
- ☐ The following VIN positions do not match the manufacturer's decoding documentation:
123 - 4 - 5 - 6 - 7 - 8 - 9 - 10 - 11
- ☐ The MCO indicates the vehicle is not for highway use
- ☐ The MCO is not printed on secure paper
- ☐ The MCO indicates the vehicle complies with Low Speed Vehicle standards; two- and three-wheeled vehicles do not qualify as Low Speed Vehicles

You are urged to contact the dealer or individual who sold you the vehicle to determine if they can assist you in obtaining a corrected MCO. If you were issued a temporary license plate, be advised that since no title or registration will be issued for the vehicle, it may not be driven. If you are unable to resolve this matter with the selling dealer you may file a consumer complaint with the Pennsylvania Office of Attorney General, Bureau of Consumer Protection. You can request a complaint form by calling the consumer protection hotline at 1-800-441-2555 or file with the Bureau of Consumer Protection online at www.attorneygeneral.gov.

Should you have questions, please call the Special Services Unit at (717) 705-6991.

Sincerely,
Special Services Unit
Bureau of Motor Vehicles

Instructions for Accessing and Looking Up VIN Decoding Information

Requires Adobe Reader and Microsoft Excel

Go to:

<http://www.nhtsa.dot.gov/cars/rules/manufacture/>

Put first 3 characters of VIN number (from the MCO) into "WMI" field

Click "Start Search"

Scroll down to "WMI Search Results" to find the name of the registered manufacturer. The proper WMI listing is usually the one listed at the bottom of the WMI result field. This can be confirmed by the date (most recent) listed.

Once you have the name, back out (one click) of the WMI listing and click on the "Go to FTP Page" link in the lower left portion of the screen. This will take you to: <ftp://ftp.nhtsa.dot.gov/manufacture/>. Once there, open the file "Directory 565.xls." Look up the exact name from the WMI search in column "B" and click on the link in column "C". If there are multiple names that are exactly the same, you will need to open each corresponding document to find the most recent by date on the decoding letter.

Once you have accessed the letter, take the MCO and match the first 11 VIN digits/characters (except the 9th position which is a calculation field) against the information in the decoding letter. If any fields do not match or the name of the manufacturer (found at the top of the MCO) does not match the name from the WMI search, the application will likely be rejected. If the most recent decoding document doesn't match your MCO, check it against the other documents on file for that manufacturer to see if you can find a match.