



American Association of
Motor Vehicle Administrators

AUTHENTICITY
security
SIGNATURE
vehicle record
management
TECHNOLOGY
electronic



Guidance for the Acceptance of Signatures on Physical Odometer Disclosure Statements



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VEHICLE STANDING COMMITTEE

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Chapter 1 Introduction

Since the early 1970s, federal law has required the use of odometer disclosure statements for the buying and selling of many motor vehicles to deter odometer fraud. These statements were required to be completed on secure paper documents and signed by the transferor and transferee with the use of handwritten, wet ink, printed names, and signatures. This was intended to provide a secure mechanism for acknowledging this disclosure and provide the opportunity for investigators to examine the signature at a later date for authenticity in cases of alleged forgery or fraud.

Technological advances with the use of electronic signatures and the ability to digitally scan physical documents have allowed for more efficient and secure methods to move documents, information, and data. These advances in technology have also provided the ability for electronic titling and electronic vehicle record management, which many motor vehicle agencies (MVAs) have taken advantage of in some form or another.

In 2019, the National Highway Traffic Safety Administration (NHTSA) issued a final rule allowing for the use of electronic signatures on electronic odometer statements incorporated within an electronic title record or power of attorney (POA). Although

this rule allows for MVAs to move forward with fully electronic processes, it is understood that it will take time and resources for most MVAs to develop and fully implement these processes. It could be many years before the majority of MVAs have these fully electronic titling and vehicle record management processes in place. This transition from manual paper document processing to electronic digital processing has brought about hybrid vehicle titling approaches such as the ability to apply electronic signatures to physical odometer disclosure statements. Because of the ability exists to sign documents in this manner, MVAs are questioning their role and responsibility in reviewing these statements for compliance with federal and jurisdictional laws and rules.

These concerns and questions were brought forward by the AAMVA Vehicle Standing Committee in October 2022 with a request for guidance on acceptance of electronically or digitally affixed signatures on physical odometer disclosure statements. A subgroup of committee members was assembled that researched and reviewed applicable federal laws, rules, acts, and interpretations. The following is the result of this work, which is a compilation of guidelines for jurisdictions to aid them in their decision making for acceptance of physical odometer disclosure statements.

Chapter 2 Odometer Disclosure Statement Background

In March 2018, AAMVA published the “Roadmap to Electronic Odometer Disclosure: Guidance Document from the E-Odometer Task Force.” This document provides a timeline of events describing updates and changes to federal regulated odometer disclosure statements dating back to 1972 when Congress passed the Motor Vehicle and Cost Savings Act. This act required a handwritten, wet ink signature on the odometer disclosure statement whereby the transferor provides a disclosure to the transferee at the time vehicle ownership is transferred. This was an attempt to curb odometer fraud and provide accountability for both the vehicle’s buyer and seller in acknowledging the vehicles miles. This requirement was for a handwritten, wet ink signature on the paper odometer disclosure statement because it was believed to be the most secure method in documenting this acknowledgment. These written signatures provided physical evidence for investigators to examine later if there was suspicion of the signatures being forged. Also, there was no other readily available and acceptable option at the time for parties to acknowledge this odometer information.

Significant advancements in technology occurred since the passing of the 1972 act with one major change being the use of electronic communication and digital media to transmit and store information. Several years before the 2018 guidance document work began, AAMVA had been working on ideas to develop electronic titles to move title information and vehicle records with digital data instead of with physical documents. This work found the requirement for a handwritten, wet ink signature on secure physical odometer statements was a hinderance to fully electronic titling processes.¹ The 2015 FAST Act allowed for the use of electronic odometer disclosures statements as long as certain stipulations were met. The 2018 guidance document set out to provide direction to help jurisdictions develop an electronic odometer disclosure that could be used in electronic titling process.

In 2019, NHTSA issued the final rule on odometer disclosure requirements.² This provided details and legal authority for jurisdictions to create fully electronic odometer disclosure statements containing electronic signatures in an electronic title environment. For only these specific transactions, the rule calls for National Institute of Standards and Technology (NIST) Level 2 requirements to be met in identifying the identity and person behind the electronic signature on the odometer disclosure.

Since the 2019 NHTSA final rule, some jurisdictions have implemented portions of electronic titling and electronic odometer disclosure processes, but the use of physical odometer statements still remains the common method for the transferor and transferee to acknowledge this statement. Because technology exists today for electronic methods of signing a name

This guidance document is the result of the work of this committee and provides resources and information to help MVAs make informed decisions on what is acceptable for signatures on physical odometer disclosure statements. This is not intended to be all inclusive of considerations that should be given but provides a strong foundation for such.

¹ 49 USC 32705 (1972)

² 49 CFR 580 (2019)

and affixing the signature to physical documents, more efficient processes are available to anyone transferring ownership to a vehicle. As technology allows for more efficient processes of signing and transferring physical documents, MVAs have been receiving increasing numbers of odometer statements scanned and submitted electronically to the MVA or containing signatures when the method of application is not readily apparent.

Because of these technological advancements, the AAMVA Vehicle Standing Committee asked for

guidance in helping MVAs understand what is acceptable for signatures on physical odometer disclosure statements. A sub-group of Committee members was created to research and construct this guidance. This guidance document is the result of the work of this committee and provides resources and information to help MVAs make informed decisions on what is acceptable for signatures on physical odometer disclosure statements. This is not intended to be all inclusive of considerations that should be given but provides a strong foundation for such.

Chapter 3 The Issue

MVAs need to understand their role in accepting a signature applied to a physical odometer disclosure statement. MVA customer service representatives (CSRs) are provided title documents and odometer disclosure statements through a variety of methods such as mail, bulk hand delivery, third-party document processors, and over-the-counter transactions. In most cases, these odometer disclosure statements are not completed in front of the CSR, leaving them unaware of precisely how the signature was applied to the

statement. MVAs also need to understand what new technologies and processes can be used to facilitate the transfer of vehicles while still complying with federal odometer disclosure requirements. Advances in technology allow for high-resolution scanning of documents that can be electronically transferred to a MVA for processing. Likewise, these advances also allow for an electronically captured signature to be printed on a physical odometer disclosure statement. To streamline processes and perform more efficiently, MVAs often turn to technology as a solution but only if the use of the technology complies with applicable laws and regulations. The issue to be resolved is how MVAs can take advantage of these technical advances and streamline their processes while complying with federal odometer disclosure laws.

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Chapter 4 Emerging Technologies and System Modernization

4.1 Introduction

During its tenure, AAMVA's E-Title Working Group met with numerous stakeholders involved in the titling process to gain a firm understanding of what role each stakeholder played in the process, challenges they have encountered in the process, and suggestions regarding processes that they have experienced that allow them to effectively and efficiently complete their part in the titling process. They also learned about the pain points for some of the stakeholders and their need to leverage technology to allow the titling process to move more efficiently and quickly. One of the recurring themes during the stakeholder meetings was the need for stakeholders to be able to move documents quickly from one point to another in the process to meet customer needs and expectations while complying with jurisdiction legal constraints in the time allowed to do so.

4.2 MVA Perspective

Traditionally, motor vehicle transfers and many other MVA transactions have been conducted in person at an MVA office where the new owner is present and provides the CSR with paperwork that has been filled out and signed in ink by the previous owner and the new owner. This scenario would likely involve a casual sale, which is a sale of a vehicle between private individuals. Although the specific documents that are required may vary from one jurisdiction to another, MVAs may require a completed bill of sale and a completed title, which includes the odometer disclosure statement. CSRs review the forms to ensure that all sections are completed.

When reviewing the odometer disclosure, the CSR ensures both the seller and buyer sections contain printed names and signatures. In many cases, the

previous owner does not accompany the new owner to the MVA. Because of this, the signature of the previous owner is often already affixed to the odometer disclosure statement at the time of the transaction. Unless the odometer disclosure statement was signed in view of the CSR, the CSR does not know who signed the document or how the signature itself was applied to the paper. Outside of jurisdiction laws, rules, or policies, there is no federal requirement for the CSR to verify a signature or determine how the signature was applied to an odometer disclosure statement. Also, it would be outside the normal course of business practice and impractical for a CSR to obtain an exemplar signature for comparison.

Another common vehicle transfer is referred to as a dealer sale for when the vehicle is purchased through a motor vehicle dealer. For many reasons, paperwork to transfer vehicles from dealers to purchasers is often mailed or dropped off in bulk, meaning neither the seller nor the purchaser is present before the CSR when the paperwork is reviewed. This may occur because the vehicle purchase is being financed and the finance companies require the dealer to record their security interest by handling the transaction. Many dealers also offer to take care of their customers' transactions as a courtesy, and third-party businesses offer similar services in exchange for compensation. In these scenarios, the buyer and seller do not sign the odometer disclosure statement in the presence of the CSR.

As MVAs look to technology as a tool to improve transaction efficiencies, many licensed businesses engaged in selling or transferring vehicles have worked with MVAs to create programs allowing the businesses to scan and electronically send the transaction

With improved software and hardware, MVAs are better suited to leverage technology and updated processes to improve the titling process from start to finish.

documents, including the odometer disclosure statement, to the MVA. This eliminates delays with mailing paperwork back and forth and provides the business and the MVA with documentation of when the transaction was received by the MVA. By collecting only scanned documents, MVAs may save money for storage and retrieval of physical documents.

4.3 Motor Vehicle Dealer Perspective

A vehicle transfer transaction is the result of a successful negotiation and sale of a motor vehicle by a dealer. Being able to have the vehicle transfer transaction completed in a timely manner (and in most cases provide registration, license plates, and/or title to the customer) is of importance to the dealer because it generates a registration and plates that the customer needs to legally operate the vehicle. In some jurisdictions, there are time limits on how soon after the sale the transfer transaction paperwork must be submitted to the MVA. The dealer process for completing the transaction may be delayed for reasons outside the dealer's control. Vehicle loan confirmations, clearance of customers' MVA holds, and vehicle documentation requirements could all cause delays in the dealer's transferring the paperwork to the MVA. Because of the need to provide good customer service and comply with any legally required time limits, dealers have a vested interest in finding ways to speed up the transfer transaction.

Because it provides efficiencies to the MVA, allowing businesses to scan documents and instantly transmit them to the MVA provides similar efficiencies for the businesses. Another tool to streamline the process is the practice of authorizing specified third parties to conduct the review of the documentation and completion of the transfer transaction themselves.

Jurisdictions that allow such systems generally provide the business with license plates and any tools needed to complete the transaction. Completed paperwork is scanned and transmitted to the MVA, and the physical documents may or may not be sent to the MVA. The registration forms, validation stickers, and license plates are provided to the customer at the business location, and the fees that are owed can be electronically transferred if authorized.

Dealer sales often require the purchaser to sign numerous forms, including tax forms, financing applications, registration forms, and titles. Some dealers have used technological tools such as a stylus or signature pad to electronically capture the signature and then apply it to physical documents. Based on the resolutions of the scanned image and the image as applied to the physical document, it would be difficult for anyone to know if it is truly a handwritten inked signature or an image printed on a document.

4.4 Other Stakeholder Perspectives

The process of transferring ownership of a vehicle from one entity to another can be quite complex and can involve many different stakeholders. Financing companies, insurance companies, salvage yards, and auctions are just some of the many stakeholders involved in the process. Although each plays a different role and has different priorities, all stakeholders would agree that finding ways to streamline the process and shorten the time needed to complete the title transaction are priorities. Many of these stakeholders themselves use technology in their own businesses and would like to be able to use it to improve transfer transactions.

Another reason to address the issue of technology now is that many MVAs are undertaking projects to move away from legacy computer systems to newer technology systems that allow MVAs to be more nimble and able to customize programs to their needs. With improved software and hardware, MVAs are better suited to leverage technology and updated processes to improve the titling process from start to finish.

Chapter 5 Legal Authorities Reviewed and Explanation of Each

- **Motor Vehicle and Cost Savings Act**, now codified at 49 USC 32705 (1972)

Often called the Cost Savings Act, this law first set forth the requirement that a transferor provide a mileage statement of the vehicle's odometer reading. Throughout the following years, requirements around odometer disclosures have been adopted, repealed, and amended. One such amendment allowed jurisdictions to petition NHTSA for approval of electronic odometer disclosure programs. If jurisdictions wished to use electronic odometer disclosure statement systems, they were required to apply for and obtain a rule waiver by petitioning NHTSA for approval of an alternate disclosure process. Several jurisdictions applied for and obtained approval for these systems.

- **Truth in Mileage Act**, Public Law 99-579 (1986)

The Truth in Mileage Act (TIMA) is a federal law that further refines the odometer disclosure process requiring the transferor whose name is on the title of a motor vehicle to provide an odometer disclosure statement to the transferee upon transfer of ownership. The transferee must sign the title acknowledging the mileage disclosed. It also set forth additional requirements for titling and registering vehicles, such as use of secure printing. These measures were adopted as means to protect consumers in vehicle transactions.

- **Electronic Records and Signatures in Commerce** (commonly known as the "E-Sign Act"), Public Law 106-229 (2000)

In 2000, the passage of the E-Sign Act paved the way for electronic signatures to be used in many

situations. This law states that signatures, contracts, and other records involving transactions impacting interstate commerce cannot be denied legal effect just because they are an electronic form or use electronic signatures. The E-Sign Act does not dictate how an e-signature is applied or analyzed, nor does it place a burden on the part of anyone accepting the electronic signature to review or analyze it. Although this law does provide for some specific exemptions from its provisions, federal odometer disclosure requirements are not included in the exemptions.

- **Moving Ahead for Progress in the 21st Century Act** (commonly known as "MAP-21"), Public Law 112-141 (2012)

This law directed NHTSA to promulgate regulations permitting any federally required disclosures or notices to be made electronically.

- **Fixing America's Surface Transportation Act** (commonly known as the "FAST Act"), Public Law 114-94 (2015)

This law allowed jurisdictions to adopt electronic odometer disclosure systems without prior approval from the Secretary of the Department of Transportation until promulgation of the final rule from NHTSA on odometer disclosures. Jurisdictions could adopt electronic odometer disclosure systems without prior approval under the FAST Act but then ran the risk of having to make changes to such systems after promulgation of a final rule from NHTSA.

- **49 CFR Sec. 580 “Odometer Disclosure Requirements,”** as amended (2019) (referred to as “Rule” within this document)

The rule, proposed in 2016 and promulgated in 2019, amended various provisions to set requirements for electronic odometer disclosures in an electronic title or POA. In an electronic

odometer disclosure incorporated in an electronic title or POA, a signature may be an electronic sound, symbol, or process. If such an electronic signature is used, identity verification is required using NIST Level 2 standards, or the signature must be completed in the presence of a MVA employee or designated agent.

Chapter 6 NHTSA Position Prior to the 2019 Final Rule

The following summaries describe NHTSA's position to questions posed to them in reference to acceptance of signatures for physical odometer disclosure statements.

6.1 Hertz Letter³

As far back as 1995, NHTSA was presented with a request for an opinion regarding what is now referred to as a hybrid odometer disclosure statement. In 1995, the Hertz Corporation sent a letter to NHTSA outlining its hybrid approach, which consisted of digitally scanning the signatures and printed name and then using a laser printer to affix the signatures and printed names to the odometer disclosure statement. In reviewing samples of the scanned images and the resulting completed odometer disclosure statements, NHTSA concluded that the process did comply with the requirements of the federal odometer disclosure laws. NHTSA stated that the approval was based on the quality of the scanners and laser printers that were used by Hertz, which produced a sufficiently clear exemplar of the signature to compare if needed. Although this interpretation is almost 30 years old and the quality of hardware such as scanners and laser printers have greatly improved since then, this type of hybrid approach is currently used by stakeholders in the titling process.

6.2 Virginia Letter⁴

In 2002, NHTSA responded to an inquiry from the commissioner of the Virginia Department of Motor Vehicles. In the letter, the commissioner asked if it was permissible to capture scanned images of odometer

³ NHTSA Interpretation Letter nht 95-5.14 (1995)

⁴ NHTSA Letter to Commissioner, State of Virginia Department of Motor Vehicles, dated 04/03/2002

disclosure statements in the MVA database instead of using microfilm. The response pointed out that there was no requirement that the MVA keep odometer disclosure statements after a transfer has been completed and suggested that keeping the images in the database instead of on microfilm might aid in ease of investigations.

The second question posed to NHTSA was whether electronic signatures, "digital or digitized," were permissible for odometer disclosure statements. NHTSA pointed out that the E-Sign Act did not exempt odometer disclosure statements, and therefore electronic signatures were not prohibited as long as the other requirements were met. These requirements included the ability to authenticate the signatures, provide a level of security equal to that provided with a physical title, and be available to the transferee at the time of the transfer.

6.3 Florida Letter⁵

NHTSA again cited that federal odometer disclosures were not exempted by the E-Sign Act in a 2002 response to an inquiry from the State of Florida Department of Highway Safety and Motor Vehicles. The inquiry was whether manual signatures were required on odometer disclosure statements or if they could be applied electronically or by facsimile. NHTSA again cited the E-Sign Act in its response, affirming that federal odometer disclosure statements were not exempted from the E-Sign Act. NHTSA reiterated that an electronic signature could be used if it complied with the same requirements outlined earlier in NHTSA's response to Virginia.

⁵ NHTSA Letter to General Counsel, State of Florida Department of Highway Safety and Motor Vehicles, dated 06/20/2003

Chapter 7 NHTSA 2019 Final Rule

Although MAP-21 required NHTSA to adopt regulations permitting any federally required disclosures or notices to be made electronically, the agency did not finally promulgate such regulations until 2019.

7.1 Acknowledgment of the Hybrid Process

Although technology seems to advance daily, many businesses and MVAs do not yet have all the needed hardware, software, or processes in place to provide for a fully electronic odometer disclosure statement in an electronic title record or POA as described in the Rule. As MVAs look to modernize their systems and improve customer service, they are identifying what are considered “hybrid” approaches to completing titling transactions. These are called hybrid because they do not fall squarely within the traditional paper-based transaction or the fully electronic system outlined in the Rule.

Specifically, NHTSA recognized “hybrid” systems in which an electronic means such as a signature pad may be used with paper documents while paper documents themselves may be the basis for the creation of an electronic title.

Although the Rule does not explicitly address the hybrid approach, NHTSA has made it clear in their Notice of Proposed Rulemaking (NPRM), “Background and Summary of Final Rule,” and “Final Rule and Response to Comments” its understanding that there will be a period of time when MVAs will be moving toward fully electronic titling systems, and during that time, these hybrid approaches may be used.

At the time the NPRM was announced, NHTSA made it clear that the intention behind the rules was

to allow jurisdictions to slowly transfer from a paper-based world to an electronic one. The NPRM made numerous references to the fact that the intention was not to be so prescriptive as to prevent jurisdictions from using emerging technologies. It also recognized the reality that it will take time for jurisdictions to fully switch to electronic processes, and therefore paper documents, in one way or another, will continue to exist in parallel with electronic records. Specifically, NHTSA recognized “hybrid” systems in which an electronic means such as a signature pad may be used with paper documents while paper documents themselves may be the basis for the creation of an electronic title.

The Rule recognizes that “electronic titles and odometer disclosures may take many forms, from scanned copies of paper documents to database entries.”⁶ NHTSA recognized the need to be flexible enough to accommodate differing systems. NHTSA’s approach was to “provide as much flexibility as possible while protecting the integrity of mileage disclosures. . . (to) allow states to adopt and develop means for addressing different transactions in what will certainly be an evolutionary process.”⁷ NHTSA also asserted that the Rule was “sufficiently flexible” and would not require jurisdictions that had implemented electronic systems to make significant changes.⁸ Similarly, NHTSA stated that “the provisions of the final rule are sufficiently flexible to minimize potential conflicts with terms of our prior approvals of alternative odometer schemes.”⁹

6 49 CFR 580 (2019) Rule Summary page 52665

7 49 CFR 580 (2019) Rule Summary page 52684

8 49 CFR 580 (2019) Rule Summary page 52665

9 49 CFR 580 (2019) Rule Summary page 52670

7.2 NHTSA 2019 Final Rule Text

Although NHTSA has made it clear in their NPRM, “Background and Summary of Final Rule,” and “Final Rule and Response to Comments” that a hybrid system was contemplated and would likely be in use for a period of time before MVAs and stakeholders are able to make the changes needed to implement a fully electronic titling system, the actual language contained within the Rule does not. The applicable part of the Rule for purposes of signing an odometer disclosure statement is found within the definition of “Sign or signature.”¹⁰ The definition is split between two scenarios. The first involves a paper document. The second involves “an electronic odometer disclosure incorporated in an electronic title or power of attorney. . . .”¹¹

Only the second scenario has additional requirements set forth in the Rule requiring that the signature is done using a NIST Level 2 secure authentication system or the signature is completed in person in front of a jurisdiction employee or authorized agent.

¹⁰ 49 CFR 580.3 (2019)

¹¹ 49 CFR 580.3 (2019)

The plain text of the Rule indicates that the NIST Level 2 security requirements are only applicable to electronic odometer disclosures in an electronic title or POA. Nothing within the text of the Rule requires such a level of security in the event a jurisdiction or stakeholder wishes to use technology to capture and apply a signature to a physical document.

The Rule did not make any changes to require additional levels of security or verification when using anything other than “an electronic odometer disclosure incorporated in an electronic title or power of attorney. . . .” Any scenario other than that would be subject to the existing NHTSA positions outlined earlier, the E-Sign Act, and the remaining parts of the Rule.

Identity validation, in the form of compliance with NIST Level 2 or appearing in front of a MVA employee or agent, is required only if the transaction involves an electronic odometer disclosure statement on an electronic title or electronic POA. To comply with federal requirements, a physical odometer statement must be signed in accordance with 580.3 and the E-Sign Act or with the state equivalent. There is no requirement for verification of the signature or any investigation of how the signature was applied when an odometer disclosure is submitted to the MVA.

Chapter 8 Conclusions and Next Steps

Based upon the research and information reviewed by the Vehicle Standing Committee, which is described in this guidance document, the following conclusions were reached.

Conclusions

1. NIST Level 2 only applies to an electronic signature incorporated in an electronic title or POA.
2. TIMA does not specifically address how the signature is affixed to a paper title.
3. Per prior interpretations, the E-Sign Act applies to odometer disclosure statements. The E-Sign Act does not specifically address identity verification.

Next Steps

The hybrid approach to vehicle titling has become more common as jurisdictions and stakeholders continue progress to electronically and digitally moving title and vehicle record information. Physical title and vehicle records will continue to be used during this transition. How jurisdictions interact with these hybrid titling approaches is why the AAMVA Vehicle Standing Committee conducted this research and information gathering, results of which are contained in this guidance document.

Although not considered fully electronic vehicle titling or fully electronic odometer statements, the process of applying signatures to physical odometer statements via an electronic method allows for more efficient transfer of information and documents. The question posed by the AAMVA Vehicle Standing

MVAs should leverage available technology and resources to ensure the integrity of vehicle records are maintained and fraud is deterred and to prevent the transfer of encumbered vehicles and trafficking in stolen vehicles.

Committee was if the use of electronically applied signatures was acceptable for compliance with federal odometer laws. Jurisdictions also want to make sure security of the titling process is not compromised and fraud prevention measures are sufficient.

Since the passage of the Federal Motor Vehicle and Cost Savings Act in 1972, additional laws, rules, and interpretations have allowed alternative methods to complying with the federal odometer laws as it relates to signatures. Advancements in technology has allowed for improved processes when interacting with title and vehicle records, including the use of electronic means to sign and affix signatures on these documents.

This guidance document provides background information and facts to inform MVAs of viable process options. After review of this guidance document, MVAs are encouraged to consult with their legal counsel for recommendations as to applicability within their jurisdiction when interacting with documents submitted to them. MVAs should leverage available technology and resources to ensure the integrity of vehicle records are maintained and fraud is deterred and to prevent the transfer of encumbered vehicles and trafficking in stolen vehicles.

Appendix A Vehicle Standing Committee Roster

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4401 Wilson Blvd, Suite 700
Arlington, Virginia 22203
703.522.4200 | aamva.org