



American Association of  
Motor Vehicle Administrators

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## Regulation of Specific-Use License Plates **Best Practices**



March 2023

SPECIFIC-USE LICENSE PLATES WORKING GROUP  
VEHICLE STANDING COMMITTEE

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## Chapter 1 Introduction

Specific-use license plates are plates not assigned to a particular vehicle but rather are assigned to an entity to legally move unregistered vehicles on public roadways. Specific-use license plates serve an important function for businesses because it is not always feasible or practical for businesses to register vehicles for roadway use. However, because these plates are not assigned to specific vehicles and are only allowed for certain purposes, there are challenges for management, regulation, and enforcement of these plates. These license plates are also susceptible to fraud and other illegal activity because of the unique characteristics and authorized use of the plates.

Many different types of plates fall within the category of specific use, and the types and allowable uses of the plates vary among jurisdictions. The most common specific-use license plate is a vehicle dealer plate. Vehicle dealers are generally not required to obtain registration for vehicles in their inventory, so they use these plates to move vehicles and allow customers to conduct test drives or have transportation while their vehicles are being serviced.

Other types of specific-use plates vary among jurisdictions. For example, *repairer*, *bailee*, *in transit*, and *transporter* are all names of plates that are issued for the purpose of allowing vehicle repair shops to test drive or move unregistered vehicles that are being repaired. Other examples of specific-use license plates include farming, construction, vehicle repossession, and vehicle manufacturer. Regardless of the permitted use, all these plates have in common the fact they are not assigned to a specific vehicle and are displayed on a vehicle that is not otherwise registered. Even though jurisdictions may identify these specific-use license plates by different names, there are commonalities

associated with all these plates. Therefore, this Best Practice provides broad recommendations for all specific-use license plate programs.



The allowable and permitted use of specific-use license plates also varies among jurisdictions. For example, dealer plates may be restricted in some jurisdictions to test drives and movement of a vehicle for repair or sale, while other jurisdictions may allow the plate to be used for personal use by family members. The enforcement of this permitted use is normally the responsibility of law enforcement who may be challenged to know the types and permitted use of specific-use license plates within their own jurisdiction. When confronted with a specific-use license plate from outside their jurisdiction, law enforcement may have no idea and may lack resources to determine if the plate is being used properly. For example, in some jurisdictions, these license plates are not able to be queried by law enforcement from their mobile data terminal and require a phone call to the motor vehicle agency (MVA). The absence of understanding of permitted use by law enforcement may lend itself to improper or illegal use. This also demonstrates the importance of educating license plate users on allowable use for overall program compliance.

AAMVA established the Specific-Use License Plate Working Group to develop best practices in managing and administering a specific-use license plate program. Jurisdiction members with experience and expertise in managing license plate programs were selected to research and compile pertinent information. The result is this Best Practice containing more than 70 recommendations intended to equip jurisdictions with information related to program development and enhancement, education, compliance, and administration. Information for law enforcement and prosecutors is also included to aid in their interaction with specific-use license plates.

A theme throughout this Best Practice is that collaboration and communication between MVAs,

enforcement personnel, entities who use these license plates, and the general public are fundamental needs to ensure specific-use license programs contain integrity and accountability. Jurisdictions looking to develop or enhance a specific-use license plate program will find value in utilizing this document for optimal program efficiency and effectiveness.

It is recognized that jurisdictions may partially implement recommendations contained within this Best Practice based on their governing laws or regulations. Jurisdictions are encouraged to fully utilize this document within the boundaries of their authority and to share with AAMVA any new information or research that advances guidance on this topic.

## Chapter 2 Definitions and Acronyms

For the purposes of this document, the following definitions and acronyms apply.

### Definitions

<b>American Association of Motor Vehicle Administrators (AAMVA)</b>	A tax-exempt nonprofit organization that develops model programs in motor vehicle administration, law enforcement, and highway safety. Founded in 1933, AAMVA represents the jurisdictional officials in the United States and Canada who administer and enforce motor vehicle laws. AAMVA's programs encourage uniformity and reciprocity among the jurisdictions.
<b>bond</b>	A guarantee that terms and conditions will be met, and if they are not met, compensation will be provided to the impacted party.
<b>business</b>	Includes vehicle dealers, farm or construction companies, or any other entity requesting the use of a specific-use license plate. This includes businesses that may not be licensed.
<b>cloned vehicle</b>	Use of a vehicle's identity to conceal the true identity of another vehicle that is a similar make and model.
<b>internet sales</b>	Some portion of the vehicle sale activity that relies on the internet as a communication medium for the transaction between the buyer and the seller that goes beyond mere advertising.
<b>licensed dealer:</b>	A person or business that holds a valid, current vehicle dealer license or certificate issued by a licensing agency in the jurisdiction where the person or business engages in dealer activity.
<b>jurisdiction</b>	A state, territory, or province.
<b>International Public Safety and Justice Network (Nlets)</b>	A not-for-profit computer-based message switching system that links together and supports every state, local, and federal law enforcement, justice, and public safety agency for the purposes of sharing and exchanging critical information.
<b>personally identifiable information (PII)</b>	Information permitting the identity of an individual to whom the information applies to be reasonably inferred by direct or indirect means.

<b>specific-use license plate</b>	A plate not assigned to a specific vehicle such as, but not limited to, dealer, transporter, manufacturer, construction, and agriculture.
<b>stakeholder</b>	A person or entity that uses or is impacted using specific-use license plates.
<b>unlicensed vehicle dealer</b>	A person or business that engages in dealer activity without holding a current, valid license or certificate from the appropriate licensing agency in the jurisdiction where the activity occurs. This also includes a licensed dealer acting outside the scope of their license or from an unlicensed location.

## Acronyms

<b>FEIN</b>	Federal Employer Identification Number
<b>FMCSA</b>	Federal Motor Carrier Safety Administration
<b>LPR</b>	license plate reader
<b>MVA</b>	motor vehicle agency
<b>NADA</b>	National Automobile Dealers Association
<b>NCIC</b>	National Crime Information Center
<b>NIADA</b>	National Independent Automobile Dealers Association
<b>Nlets</b>	International Public Safety and Justice Network
<b>PII</b>	personally identifiable information
<b>RCMP</b>	Royal Canadian Mounted Police
<b>U.S. DOT</b>	U.S. Department of Transportation

## Chapter 3 Application and Eligibility Requirements

### 3.1 Introduction

The issuance processes and procedures of specific-use license plates vary from one jurisdiction to another. Thoroughly understanding jurisdiction laws and rules will aid in creating sound policies and procedures for eligibility and vetting applications. Although each jurisdiction's laws and rules may differ, there are similarities in application requirements and how specific license plates are used.

The type of specific-use license plate being requested may have different criteria for issuance. For example, a dealer license application may require a bond and insurance information because it includes privileges to buy and sell vehicles at retail. It is important for the application to specify the type of specific-use license plate the applicant is applying for so the MVA can determine if all requirements for the plate type are satisfied.

Eligibility requirements and application details for each plate type should be clearly specified. Providing information at the time of application about permitted use and penalties for unlawful use builds a foundation for understanding and compliance. Having trained MVA staff who understand the application process and details for use of these license plates is valuable to assist customers interested in obtaining a specific-use license plate.

MVAs should consider issuance from the MVA headquarters office only. This provides for consistency in the issuance process and makes auditing more efficient. It also allows for properly trained staff to interact with applications more frequently, increasing their skills and helping them become more aware of application anomalies or potential fraud.

**Recommendation 3.1.1: Applications for specific-use license plates should clearly articulate requirements, permitted use, and penalties.**

**Recommendation 3.1.2: Properly trained staff who understand the specific-use license plate program will aid in educating customers and the public about these plate types and enhance program integrity.**

**Recommendation 3.1.3: Provide issuance of specific-use license plates from the MVA headquarters only.**

### 3.2 Business Verification



Requiring verification and validation of a business, is important to deter and detect fraud. An applicant's business address and proof of physical existence validate the legitimacy of the business and should be done prior to approval of plate issuance. The verification may vary on the type of plate being requested. If an applicant is located outside the plate issuance jurisdiction, it is important to also verify the physical address and legitimacy in their home jurisdiction, including internet-based businesses. A verified physical location allows for a place to contact the business for questions, auditing, and compliance.

There are many ways to validate the legitimacy of a company such as contacting the Department of Corporation, Secretary of State, or other governing body where businesses are created. This may include confirming the Federal Employer Identification Number (FEIN), sales tax permit, corporate structure, Federal Motor Carrier Safety Administration (FMCSA) U.S. Department of Transportation (U.S. DOT) Number, and other licensing requirements.

Proper approval from the city, municipality, or county of the business location is important prior to application approval. This provides further evidence the business is properly located for the type of business it is conducting. This may include zoning approval or authorized exemption.

If a person is able to create a fictitious business and obtain specific-use license plates, significant criminal activity and risks to highway safety may follow. The North Carolina License and Theft Bureau investigated the misuse of North Carolina transporter license plates based on a complaint that the business that obtained the plates was fraudulent. The investigation revealed this business was purchasing transporter license plates in bulk and shipping them out of state, where they were sold to the public on the internet for an average of \$400 each. These transporter plates were used by individuals for a variety of criminal activities and for operating vehicles unsafe for the roadway. The investigation revealed false information contained on the transporter license plate application and resulted in the plates being revoked and MVA business processes enhanced to detect the use of false information on applications.

Additionally, MVAs need to determine if an online business would qualify for specific-use license plates. The allowance of these plates for an online business must be thoroughly reviewed to determine if an appropriate need exists and how accountability would occur. This includes businesses that are headquartered in another jurisdiction and only operate via online. [The AAMVA Best Practices for Regulation of Internet Vehicle Sales](#) provides information for MVAs when

considering authorization for a business to conduct vehicle sales solely online.

**Recommendation 3.2.1: Validation of business information contained on an application is important to confirm legitimacy of the company.**

**Recommendation 3.2.2: Requiring a business to have proper approval from the government authority where the business intends to operate provides another opportunity for business validation.**

**Recommendation 3.2.3: Jurisdictions should consider if they will allow a business with an online presence only to obtain specific-use license plates.**

### 3.3 Additional Information

Additional information on the application should include business name, owner(s), officer(s), contact name (if different than the owner or officer), prior business names and licenses, phone number, email address, and business hours.

This information provides more details to validate the legitimacy of the application. Trained staff reviewing applications should note discrepancies for follow-up, and jurisdictions should have authority to ask for additional information if needed. These requirements should be reviewed periodically to determine if more or different information is needed on the application.

The use of false information on an application for specific-use license plates may allow for fraudulent activity to take place. An investigation of an unlicensed vehicle repair facility conducted by the Michigan Secretary of State's Office revealed a fictional business. The business had been able to obtain in-transit and repair plates based on false business information provided to the Michigan Secretary of State. Upon completion of the investigation, the business license was revoked, license plates were recovered, and appropriate charges were filed.

*The business had been able to obtain in-transit and repair plates based on false business information provided to the Michigan Secretary of State.*

To streamline the application and eligibility process, jurisdictions may consider asking on the application if the individual or entity has other dealer license locations in that jurisdiction. This may help avoid redundancy and duplication of efforts in the application approval and review process.

**Recommendation 3.3.1: Application information should be sufficient to validate legitimacy of the application, and required information should be updated as needs for information change.**

**Recommendation 3.3.2: Thorough validation of application information by trained staff provides for deterrence and detect of fraud.**

**Recommendation 3.3.3: Provide opportunity for the applicant to list other dealer license locations in the jurisdiction to help in eliminating duplication of review efforts.**

### 3.4 Supplemental Licensing Requirements

The applicant may have to satisfy other jurisdiction requirements to be eligible for specific-use license plates. These licensing requirements add another layer of verification and validation for the legitimacy of the business and provide additional accountability for specific-use license plates. Some examples of additional information required to be eligible for a license include:



- An application for a transporter license requires information about contracts with manufacturers to support the need for a transporter plate.

- An application for a repair facility may require evidence of a contract with a dealer to perform vehicle repairs.

Verifying that these requirements have been met helps ensure compliance with all applicable laws or rules, over and above specific-use license plate requirements. If businesses are not in compliance with these other laws and rules, the potential for fraud and other criminal activity is increased. If these requirements are managed by another office or agency, MVAs should collaborate with them during application review to eliminate overlooking these requirements. The issuance of specific-use license plates to a business not in compliance with *all* jurisdiction laws or rules may result in misuse and fraud within and beyond the jurisdiction. It is important to articulate these requirements on the application to aid the customer in submitting a complete application and to inform them that complying with *all* jurisdiction laws and rules is required for issuance of specific-use license plates.

For example, the State of Maine requires a transporter dealer license before a business can be issued a transporter license plate.<sup>1</sup> This provides opportunity for government regulators to review the legitimacy of the business and need for the license plates.

**Recommendation 3.4.1: Determine that all jurisdiction laws and rule requirements are satisfied before approval of specific-use license plate issuance.**

**Recommendation 3.4.2: Establish appropriate business processes if requirements are managed by another office or agency to ensure compliance is met prior to approving an application.**

*The State of Maine requires a transporter dealer license before a business can be issued a transporter license plate.<sup>2</sup>*

<sup>1</sup> <https://legislature.maine.gov/statutes/29-A/title29-Asec954.html>

<sup>2</sup> <https://legislature.maine.gov/statutes/29-A/title29-Asec954.html>

## 3.5 Insurance

MVAs should ensure they are examining documents thoroughly to confirm proper liability insurance coverage is in effect and all plate volume restrictions applied by the insurance company are met. Some insurance companies may place a restriction on the number of plates that can be insured for a particular business for risk mitigation. Therefore, MVAs may not want to authorize the issuance of license plates beyond what is covered by the policy.

Additional insurance requirements should include listing the MVA as a certificate holder for the insurance and notifying the MVA if insurance is cancelled or lapsed. Automation with insurance verification can assist in validating current coverage as well as notification when coverage is cancelled. In the event coverage lapses or is cancelled, the MVA may take action to suspend, revoke, or cancel the license plates.

**Recommendation 3.5.1: Ask insurance companies to state if the policy limits the number of license plates allowed by the coverage and, if so, provide the number. If there is a limit, MVAs should only issue the number of license plates allowed by the insurance policy.**

**Recommendation 3.5.2: The MVA should be listed as a certificate holder on the insurance policy.**

**Recommendation 3.5.3: Require proof of insurance and cancellation directly from the insurance provider. Implementation of an insurance verification system to validate current insurance coverage may allow for a timelier notification of lapse or cancellation of coverage.**

## 3.6 Bond

A bond may be required for some business licenses, such as vehicle dealer sales, prior to obtaining specific-use license plates. A bond is required to protect the public from any financial or legal loss caused by

misconduct or neglect. Bond amounts vary among jurisdictions and are normally renewed annually. Bond requirements should include listing the MVA as a certificate holder and notification to the MVA if the bond is cancelled or lapsed.

If the bonding company decides the claim against the bond is valid, it will pay the claim to the consumer, not to exceed the amount of the bond. According to J.D. Power in December 2021, the average new-vehicle retail transaction price is expected to reach \$45,743<sup>3</sup>. Bond amounts should be sufficient to provide for adequate compensation to consumers with claims. Consumers in jurisdictions with low bond amounts may not have adequate protections for loss.

**Recommendation 3.6.1: MVAs should require that the issuing jurisdiction is a certificate holder for the bond, if required.**

**Recommendation 3.6.2: Bond amounts should be adequate to provide sufficient consumer protection. Consultation with bond underwriters and consumer protection stakeholders will assist in this research.**

## 3.7 Background Check

A criminal background check may be appropriate for business license applications for certain types of businesses that have direct consumer impact, such as vehicle sales. If not already in place, jurisdictions should consider requiring fingerprint-based background checks on applicants for these licenses, which may require statutory authority. These checks provide insight into a person's past criminal activity, which may reveal indicators of potential fraud, harm, or liability.

Employment history provides information about an applicant's past work activity and associations with other licensed businesses. In addition, asking applicants to disclose if they ever held a business license in any jurisdiction may provide MVAs insight

<sup>3</sup> <https://www.jdpower.com/business/press-releases/jd-power-lmc-automotive-forecast-december-2021>

into behavior needing additional investigation. This includes any history of a license being suspended, revoked, or canceled. Information provided should be verified as well as additional information sought to confirm validity of the application.

The foundation for background checks is having the true identity of the applicant. Therefore, identification presented to prove the applicant's identity should be government issued, examined by trained staff for authenticity, and validated with the issuance source.

Employees of these businesses may have been previously disqualified or had a business license revoked for improper activity. Because employees will have access to specific-use license plates, consideration should be given to complete background checks for all appropriate employees.

**Recommendation 3.7.1: Require fingerprint-based background checks for applicants involving a license to conduct business. Consultation with MVA legal counsel may assist in determining who the appropriate applicants are who should be required to complete a background check.**

**Recommendation 3.7.2: Jurisdictions should review their legal authority to conduct background checks for all employees having access to specific-use license plates.**

**Recommendation 3.7.3: Applicants should be required to provide employment history, including prior business licenses.**

**Recommendation 3.7.4: Convictions of fraud should be considered when determining eligibility for a new license.**

**Recommendation 3.7.5: Applications for business licenses that allow access to specific-use license plates should be supported by government-issued identification for proper identity verification and validation.**

**Recommendation 3.7.6: Trained staff should examine identification presented for authenticity and validate the identification with the issuance source.**

### 3.8 Accountability for Use



Specific-use license plates allow the legal movement of unregistered vehicles on the roadway; however, they can also be a means by which persons not eligible for a driver license or who do not have vehicle registration privileges can circumvent the law. Those responsible for assigned specific-use license plates may knowingly allow people to drive vehicles with these plates displayed who do not have valid driving or registration privileges. Having legal authority to take action against someone who knowingly allows use of these plates to circumvent the law is important to deter and stop this activity.

Requiring records for which vehicle a plate is being used on and the individual who is driving it at a given time is important for accountability. Jurisdiction regulators can check these records to determine if plates are accounted for and follow up on any complaints about a specific plate. One method to hold entities and users of specific-use license plates accountable is to have them certify information about the operator, vehicle, and plate information for each

use of the license plate. See Appendix F for examples of the Virginia Permission Certificate.

**Recommendation 3.8.1: Jurisdictions should review their legal authority to take action when someone knowingly allows use of specific-use license plates to violate the law.**

**Recommendation 3.8.2: Requiring records for which vehicles specific-use license plates are displayed on and who is driving the vehicle provides additional accountability.**

**Recommendation 3.8.3: Require a certificate of permission be completed for each use of a specific-use license plate.**

### 3.9 Determining the Number of Plates to Issue

MVAs should determine the appropriate number of plates to issue to a particular applicant, which is supported by rule or law. For all plate types, jurisdictions should require justification of the number of plates commensurate to business need. In the absence of plate limits, applicants may purchase quantities of plates exceeding their needs, leading to potential misuse and fraud. To determine the number of authorized specific-use license plates to be issued, jurisdictions are encouraged to consider:

- The number of vehicles sold
- The highest number of vehicles in inventory in the prior 12 months
- The number of vehicles in the fleet
- A specified number based on size or type of business
- Type of contracts
- Number of employees

Involving stakeholders when establishing criteria provides for improved support and publishing this information allows for transparency and better

understanding of the process. The goal is to prevent misuse while not hindering legitimate need for use of the license plates.

**Recommendation 3.9.1: Limit the number of license plates issued based on established criteria, supported by law or rule.**

**Recommendation 3.9.2: Include stakeholders in the process of establishing acceptable criteria for the number of plates allowed.**

### 3.10 License Application Renewals

Requiring an annual or periodic review of license eligibility requirements is important for validating the status of the current business operation. From the time the license was initially issued or renewed until the next renewal time, operation processes or ownership may have changed, and the MVA may not be aware. A review of license eligibility allows for information to be updated and any discrepancies addressed before the renewal license is granted.

Information to be confirmed includes:

- Business verification (see 3.2)
- Additional information (see 3.3)
- Insurance (see 3.5)
- Bond (see 3.6)
- Background check (see 3.7)
- Accountability for use (see 3.8)
- Qualification for the number of plates issued (see 3.9)

In Colorado, the MVA discovered transporter license plate applicants were not following the Code of Colorado Regulations by providing proper information. Colorado MVA administration reviewed the rule and subsequently made process revisions to provide a clearer understanding of the regulations for issuance of transporter plates. The rule requires

that applicants must submit appropriate information and supporting documentation depending on their business type upon initial application and at each annual renewal. As a result, MVA staff were provided training on the new rule and began requesting appropriate documentation from applicants. Any application lacking required documentation was rejected, and the applicant was provided information on the requirements and allowed to resubmit. The

MVA noticed a decline in the number of applicants because they could not provide the required documentation and therefore were not eligible for a specific-use license plate.

**Recommendation 3.10.1: Ensure proper authority is in place to conduct an annual or periodic review of all business license holders for compliance with licensing requirements.**

## Chapter 4 Laws, Rules, and Policies for Specific-Use License Plates

### 4.1 Introduction

The increase in movement of people and vehicles challenges the intent and purpose of many laws, rules, and policies intended to manage specific-use license plates. Sometimes the use of specific-use license plates is left to interpretation and leads to considerable confusion and inconsistency in use. For example, the original intent of a law could have been only for dealers to demonstrate vehicles, but the law was silent on using these vehicles for personal use. With the proliferation of internet sales, it is common to see specific-use license plates on vehicles hundreds or thousands of miles away from the issuing jurisdiction, which may or may not be allowed by the issuing jurisdiction.



Although these plates have defined purposes established by the issuing jurisdiction, regulating the use of these license plates presents many challenges. Law enforcement and other observers of these plates outside the issuing jurisdiction may have no idea if the plate is being used appropriately, may not know who to contact with questions, and therefore may not take action. This results in the vehicle's being allowed to be used for purposes that may be unauthorized and perpetuates the continued misuse. Because of this, the use of these plates to conceal the vehicle and its occupants to conduct criminal activity is prevalent.

### 4.2 Establishing Laws, Rules, and Policies

When permitted uses of license plates are not clearly defined by law or rules, MVAs sometimes create memoranda or internal policies defining proper use. These memoranda and internal policies may help MVA staff but often cause confusion for law enforcement, regulators, and operators of vehicles displaying these license plates. Without proper laws and rules defining permitted use, operators of vehicles displaying these plates may lack adequate information about the use of these plates. Law enforcement and regulators are not able to take action based on internal memoranda or internal policy because it lacks legal authority.

Flexible law and rule language allows jurisdictions to determine how license plate programs are implemented and managed. For example, a statute may provide authority to the MVA to limit the number of license plates issued, but the MVA can determine the actual method of plate allocation. This allows MVAs the authority to administer the program based on given needs without prescribing how it would be done.

**Recommendation 4.2.1: MVA administration of programs should be in alignment with law and rule.**

**Recommendation 4.2.2: Laws and rules should be written to allow MVAs the ability to make program changes based on operational needs without having to update the laws or rules.**

**Recommendation 4.2.3: Consider what other jurisdictions' laws and rules are for implementing a similar practice.**

### 4.3 Managing and Updating Laws, Rules, and Policies

Updating or creating new laws and rules can be a challenge for jurisdictions because it may impact the activity and operation of stakeholders. To demonstrate and articulate the need for changes, MVAs should document facts and situations when specific-use license plates have been misused. It is important that MVAs have data and statistics available to support program needs.

Stakeholder support is critical to effectuate change. Accurate and reliable information and engaging stakeholders will facilitate program integrity and support. MVAs are encouraged to engage stakeholders early in the process of the law and rule review to help them understand the goals, objectives, and reasons for the review. Stakeholders may have ideas or suggestions to streamline the effort that may not require law and rule changes but allow for process or procedure enhancements. This also provides stakeholders the opportunity to share law and rule changes they may be pursuing. A stakeholder survey is a way to gather this feedback and Appendixes D and E provide information on surveys conducted for this Best Practice.

Educating stakeholders on the proper use of specific-use license plates and encouraging them to report misuse enhances program integrity and compliance. Encouraging stakeholders to report misuse also helps the MVA maximize resources when there is a lack of staff to detect violations. Ideally, stakeholders prevent problems and abuse from occurring in the first place, so action is not needed. Encouraging legitimate users of these plates to be part of the solution and negotiating with them in other areas of stakeholder interest embolden support for these efforts.

When MVAs determine laws and rules are needed or require updating, it is important to garner support from legislators to facilitate these changes. A team effort of both government regulators and stakeholders

supporting and encouraging legislators to address issues is needed because presenting law and rule ideas with a unified presence will enhance the potential for success. Documenting how the changes may positively impact the consumer will provide significant justification to move the initiative forward.

**Recommendation 4.3.1: Conduct surveys of stakeholders and analyze results for program enhancements.**

**Recommendation 4.3.2: Review laws, rules, and policies periodically to make sure they are current and relevant.**

### 4.4 Maintaining Records

Effective license plate management by an entity using them is important for program integrity and accountability. Requiring the entity to maintain records of which employee has use of these plates and what vehicles the plates are displayed on, allows for law enforcement and regulators to find out quickly the status of each plate. These records should be open for inspection during normal business hours by the MVA and law enforcement. This information is valuable when following up on reports of lost or missing plates and when investigating complaints related to a particular plate. This also helps when determining future needs for specific-use license plates by the entity.

Entities using specific-use license plates should provide information to staff about appropriate use of these plates and document staff acknowledgment of receiving this information. Jurisdictions are encouraged to provide education and training to entities issued specific-use license plates so they are aware of permitted uses. Referencing jurisdiction laws and rules within this training helps provide a resource for future follow-up.

An example of training handouts and educational information is included in Appendix F.

**Recommendation 4.4.1: Require entities to maintain a record of what employees have specific-use license plates and what vehicles they are displayed on.**

**Recommendation 4.4.2: Require records to be open for inspection by MVAs and law enforcement.**

**Recommendation 4.4.3: Provide training and resource material to entities issued specific-use license plates. This may include a handout or reference sheet that includes references to applicable laws and rules.**

## 4.5 Inquiries and Complaints

Ideally, specific-use license plate owner information should be readily available at all times to law enforcement via communication with the issuing MVA through Nlets. This makes verifying information efficient and eliminates calls to the MVAs, which require staff and resources. Also, the MVA may only be available to provide this information during normal business hours, and information may be restricted over a phone call. The more effort and resources required by law enforcement to access specific-use license plate information may result in fewer enforcement efforts.



A documented process for reporting violations provides for more efficient and effective processing of complaints. Ideally, this is done with the assistance and support of a MVA investigative unit that collaborates with law enforcement and provides them training. Calls made to law enforcement agencies, state fusion, and intelligence centers regarding violations should be referred to the MVA investigative unit. The MVA should require proper documentation and supporting evidence for claims of violations of misuse of the license plates.

**Recommendation 4.5.1: Establish a formal process for reporting violations and taking administration action.**

**Recommendation 4.5.2: Provide specific-use license plate owner information to law enforcement via Nlets to allow for immediate results when queried.**

## 4.6 MVA Procedures

License plate programs involve a variety of plate types and are susceptible to fraud and other illegal activity because of the unique characteristics of the plates. Staff managing these programs may be tasked with issuing new plates, renewing existing plates, and providing replacements for lost or stolen plates. Attempts to commit fraud could be detected during any of these processes. Illegal activity noted by law enforcement and others should be forwarded to the MVA for review of administrative action and referred for criminal investigation and prosecution.

It is important that MVAs have dedicated and adequate staff managing this program who have proper training and knowledge in oversight of these programs. To detect irregularities and anomalies during these processes, staff need time and resources to review information and research any questionable information found. The auditing of activity and applications provide for additional oversight and program integrity. See Chapter 5 for more information.

**Recommendation 4.6.1: Dedicate and properly train staff to be responsible for management of license plate programs.**

**Recommendation 4.6.2: Include auditing components withing license plate programs to monitor applications, renewals, and replacements and to look for anomalies, both internally and externally.**

**Recommendation 4.6.3: Implement recommendations for license plate management contained in the AAMVA License Plate Standard.**

**Recommendation 4.6.4: Train and encourage law enforcement to report any suspected violations of a license plate.**

## 4.7 Interagency Coordination and Agreements

It is important for agencies responsible for oversight and management of specific-use plate programs to collaborate with agencies within the jurisdiction and across the U.S. and Canada. The use of these plates is common outside of the issuing MVA's jurisdiction. The issuing MVA may have restrictions on the use of the license plate within the jurisdiction. Staff should understand how administrative action can be taken when these license plates are misused outside the jurisdiction. This is particularly important for bordering jurisdictions that may see the majority of interstate license plate use. One example is in the State of Washington, which enacted legislation to prohibit the use of transporter plates outside their state (WA HSB 1269).<sup>4</sup>

Acting on reported violations is critical to stop illegal or improper activity, prevent future illegal or improper activity, and encourage reporting of violations. This begins with educating MVA staff, investigative staff, and jurisdiction law enforcement on the laws and rules of permitted use of license plates. Ideally, MVA investigative staff have established contacts with law enforcement across the jurisdiction as well as fusion center and intelligence analytical staff. If law enforcement outside the jurisdiction contacts any of these agencies, they should be encouraged to contact MVA investigative staff. If the MVA does not have investigative staff, they should provide resources within the MVA as a point of contact for law enforcement.

Staff managing license plate programs should be properly trained in how administrative action applies to both intrastate and interstate use of these plates so they can be a valuable resource for law enforcement in understanding permitted use and violations. This will help law enforcement to know when violations may have occurred, what evidence is needed to document the violation, and who to contact at the MVA.

**Recommendation 4.7.1: Establish agreements and share information with bordering states to describe permitted use and enforcement activity with regards to reporting violations to the plate issuing agency.**

**Recommendation 4.7.2: Train staff on administrative action that can be taken on license plate violations.**

**Recommendation 4.7.3: Utilize MVA investigators to assist with educating law enforcement about this information and agreements if applicable.**

**Recommendation 4.7.4: Train law enforcement to document and report license plate violations to the issuing MVA. See Appendix F for more information.**

## 4.8 Violations Out of Jurisdiction

How laws and rules apply regarding permitted use and violations observed outside



the issuing jurisdiction can be confusing for both law enforcement encountering a potential violation and for the issuing MVA. A common question relates to what laws and rules apply for permitted use beyond jurisdiction borders. For example, if jurisdiction A does not allow specific-use license plates to be used for personal use but jurisdiction B allows personal use of the plates, what laws apply if an entity from

*The State of Washington enacted legislation to prohibit the use of transporter plates outside their state (WA HSB 1269).*

<sup>4</sup> 2021 House Bill 1269: Addressing motor vehicle transporter license plates - Washington Votes

jurisdiction B is using these plates for personal use within jurisdiction A? This is an example of why proper training is needed for both law enforcement and MVA staff so they understand when a violation may be occurring and what action may be taken. (See Chapter 6 for information about training.)

If an MVA receives a violation notice from activity that occurred outside the issuing jurisdiction, the MVA needs to have adequate knowledge as to what action is allowed. Consultation with legal staff will help in understanding the authority they have and subsequent action that may be taken.

**Recommendation 4.8.1: Consult with legal staff to determine if jurisdiction laws or rules grant authority to take action on interstate violations.**

**Recommendation 4.8.2: Proper training for law enforcement and MVA staff will assist in knowing how to identify violations that may occur outside the issuing jurisdiction and what action can be taken.**

## 4.9 Reporting Lost or Stolen Specific-Use License Plates

Specific-use license plates are susceptible to being lost or stolen. Because these plates are not assigned to a specific vehicle, they are valuable for criminal activity, allowing opportunity for concealment of the vehicle and vehicle operator. Even if a license plate is found to be used improperly, it may take considerable time for action to be taken by the MVA because there may need to be opportunity for notice and hearing.

Lost or stolen specific-use license plates must be reported on a timely basis so information can be provided to law enforcement, license plate reader (LPR) systems, and anyone needing to determine validity. Requiring a police report from a business reporting a lost or stolen plate or requesting a replacement plate assists in making sure proper notification was done. This may encourage a business using these plates to carefully manage plate use and access to the plates. In jurisdictions where the cost of

the license plates is minimal, lack of accountability may be more prevalent.

When shipping license plates, the use of certified mail requiring signature upon delivery will allow for the tracking of the license plates and opportunity to recover them if believed to be lost or stolen.

**Recommendation 4.9.1: Require a police report for any license plate reported as lost or stolen.**

**Recommendation 4.9.2: Require a lost or stolen license plate be reported to the MVA regardless of whether a replacement plate is requested.**

**Recommendation 4.9.3: Train law enforcement on the importance of entering any reported lost or stolen license plate into NCIC.**

**Recommendation 4.9.4: Use certified mail with signature required to mail license plates to allow for plate tracking.**

## 4.10 Reissuance of Lost or Stolen Specific-Use License Plates

If a license plate is lost or stolen, the business using the plate may request to have the same plate number and plate sequence replaced. License plate characters and plate sequence may have personal meaning and value to the business using the license plate. If the plate number and sequence remain active in NCIC, law enforcement observing and conducting a query of the license plate will be notified of the lost or stolen status. Law enforcement would have probable cause to believe this is the lost or stolen plate and likely conduct a felony traffic stop putting themselves and the vehicle occupants in a potentially dangerous situation. Therefore, the reissuance of the exact license plate number and sequence should only occur after the plates are removed from NCIC.

**Recommendation 4.10.1: When a license plate is reported as lost or stolen, the plate number and sequence should not be repeated unless recovered and removed from NCIC.**

**Recommendation 4.10.2: MVAs should consult with law enforcement in their jurisdiction as to procedures for expired plate sequences that are no longer active in NCIC but not recovered.**

## 4.11 License Plate Readers and Specific-Use License Plates

Jurisdictions use LPRs to monitor vehicles moving in and out of the country, enforce speed limits, respond to public safety alerts, and collect tolls. The ability for LPRs to read license plates is important for proper identification of the vehicle and follow-up. License plates not complying with [AAMVA License Plate Standards](#) may not be properly read by LPRs. Therefore, it is important license plates are designed in accordance with this standard for readability and interoperability. The inability to properly read a license plate and bill the appropriate party will result in revenue loss to the jurisdiction. Jurisdictions are encouraged to have laws or rules that support compliance with these standards.

**Recommendation 4.11.1: Ensure license plate designs comply with the [AAMVA License Plate Standard, Edition 2](#).**

**Recommendation 4.11.2: Use the [AAMVA License Plate Verification Program](#) to determine if license plates meet the [AAMVA License Plate Standard](#).**

## 4.12 Cost of Specific-Use License Plates

The cost of the license plates varies among jurisdictions and may not accurately reflect the impact on the roadways. Vehicles operated on roadways displaying specific-use license plates incur the same impact to infrastructure as similar vehicle types displaying regular license plates if used in a comparable manner.



Low-cost specific-use license plates may contribute to misuse and lead to a lack of accountability. When the costs of additional license plates are minimal, entities may request unnecessary plates, which could lead to misuse and be involved in criminal activity. Determining fees for specific-use license plates commensurate with the average cost of vehicle registration for similar vehicle types in the issuing jurisdiction is an example of equalizing costs to recover revenue for roadway use and to discourage misuse. This should be taken in consideration with specific-use license plates that are being used in place of a regular license plated vehicle such as dealer plates on a service loaner vehicle.

Appendix D contains a jurisdiction survey in which questions were asked related to costs of specific-use license plates. Jurisdictions reported fees ranging from \$5 per plate to several hundred dollars per plate. These costs also vary with the type of specific-use license plate obtained. See Appendix D for more information.

**Recommendation 4.12.1: Establish fees for specific-use license plates that adequately represent the use of the vehicles impact on the roadway.**

## 4.13 Compliance

Compliance begins with proper education and training for those issued specific-use license plates and MVA staff interacting with these entities. Laws and rules should clearly state the permitted use, eligibility criteria, and agency responsibility for program administration and enforcement. In jurisdictions where multiple agencies are involved, coordination and communication among agencies is important. Ideally, compliance is achieved by properly informing those using specific-use license plates to prevent violations and problems from occurring. See Chapter 6 for education and training details.

Regular audits of entities using specific-use license plates provides opportunity to review compliance

with program requirements and allows for fraud deterrence and detection. The audit should consist of the following elements:

- Verifying information for accuracy provided on the initial or renewal application
- Examining and comparing records of specific-use license plates to make sure all plates issued are accounted for or reported properly to authorities if missing
- Review of vehicle sales numbers to determine if the number of specific-use license plates issued is in line with the number of vehicle transactions
- Determining the number of staff who have access to the use of specific-use license plates to determine if the number of plates issued is appropriate

MVAs with investigative units are at an advantage for compliance with specific-use license plate programs because they may already conduct audits and

*“Limiting the amounts of plates that dealers can have may help this, and audits to all companies that have plates, not just a selected few, may deter fraud and misuse.”* —Michelle Pettengill, CFO Rowe Auburn Rowe Westbrook

inspections for other purposes and are likely trained in detecting fraud activities. Conducting compliance checks and audits can be added as an additional responsibility for these staff.

Sometimes for compliance, administrative penalties will be issued, which may include probation, suspension, or revocation of specific-use license plates and subsequent licenses. These potential penalties should be clearly outlined during the application process and discussed during training and education programs. This information can also be included with information about specific-use license plates contained on the MVA website. See Chapter 5 for more information on enforcement and penalties.

# Chapter 5 Enforcement

## 5.1 Introduction

The misuse and fraudulent activity associated with specific-use license plates poses a variety of concerns involving highway and public safety and may cause poor public perception regarding the use of the plates. Because these license plates are not associated with a vehicle or person, they may be used to avoid paying required vehicle fees, evade inspections, and carry out criminal activity anonymously. For example, an analysis conducted by the Royal Canadian Mounted Police (RCMP) regarding Canadian dealer plate violations from 2021 indicated 35 violations across four Canadian Provinces. Although most of these violations were for motor vehicle infractions, five were linked to criminal activity.<sup>5</sup>

Enforcement efforts are challenged even more when the plates are used for interstate vehicle movement when law enforcement and regulators may not know if they are being used in compliance with issuing jurisdiction laws or rules. These combined issues complicate efforts to hold users of these plates accountable and prevent misuse.

A survey conducted by this Working Group for law enforcement and MVA investigators included a question of recommendations they had for

*Motorists who have their registration privileges suspended or revoked may be able to utilize these plates to circumvent the penalty.*

improvements to specific-use license plate programs to prevent unlawful use and criminal activity. See Appendix E for more information.

## 5.2 Misuse and Fraudulent Activity

### *Operating of Unsafe Vehicles*

One area of concern with specific-use plates is they can be misused to allow potentially unsafe vehicles on the roads. Some jurisdictions require vehicles to pass emissions or safety inspections (or both) to operate on the roadway. In the event the owner cannot or will not have the vehicle repaired, jurisdictions may suspend the registration associated with the vehicle to keep unsafe vehicles off the roadway. Because specific-use plates are not attached to a particular vehicle, if an owner of an unsafe vehicle was able to obtain a specific-use plate, they could use the plate and continue driving, potentially putting other motorists at safety or health risk.

### *Operating Vehicles when Registration Privileges are Suspended or Revoked*

Motorists who have their registration privileges suspended or revoked may be able to utilize these plates to circumvent the penalty. For example, one jurisdiction reported that a person's registration privileges had been suspended because of an alcohol infraction. However, because the person was a corporate officer of a business with access to specific-use license plates, they were able to display one of these license plates on their own personal vehicle and operate it on the highway, appearing to be legitimately registered.

<sup>5</sup> S. Davermann, RCMP, personal communication, August 3, 2022.

## *Evasion of Vehicle Fees and Taxes*

Fees and taxes paid for vehicles to be allowed issuance of a title and registration is important for maintaining highway infrastructure. These costs and fee structures vary across jurisdictions and provide for substantial government funding. The false use of specific-use license plates may allow a person to not properly title and register a vehicle and thereby evade these required fees. For trucks hauling loads, these fees normally increase depending on the total weight of the vehicle carrying the load. By deceptively using specific-use license plates, the vehicle may appear to be legally registered and not checked by law enforcement or regulatory personnel.

## *Concealing the Identity of the Vehicle and Operator*

Because of the nature of these plates not being associated with a particular vehicle, it is easier for those who partake in criminal endeavors to avoid detection and to move the license plate from vehicle to vehicle with little recognition. The operation of a stolen or cloned vehicle on the highway requires a license plate that avoids attention and does not appear in the NCIC stolen vehicle file. Specific-use license plates provide for the concealment of a vehicle's true identity and makes detection more difficult. Also, if the operator of the vehicle is a fugitive, the use of this license plate will not disclose the operator's identity when the plate is initially checked by law enforcement.

## *Public Perception*

Members of the public are typically not familiar with the permitted use of specific-use license plates and therefore may assume they can be used the same as a standard license plate. This could deter the public from reporting



unusual activity associated with these license plates. If members of the public are knowledgeable of the permitted use, observing it routinely used for unlawful means may cause them to assume the MVA and law enforcement are lacking in their responsibilities. Education and outreach to the public provides opportunity to inform them on the purpose and permitted use of these license plates and can provide them resources to notify authorities if suspected violations are observed.

The public can be misled by information available on the internet. The information provided by nongovernmental websites may not be accurate or up to date but is a source of information the public may accept as factual. Jurisdictions should be aware of this information and utilize website search engine optimization to provide higher priority search results directing the public to jurisdiction trusted websites. See Appendix G for more information about government and nongovernment websites.

**Recommendation 5.2.1: MVA websites and public service announcements provide valuable education to the public about types and permitted use of license plates.**

**Recommendation 5.2.2: Utilize website search engine optimization to provide higher priority search results to direct the public to jurisdiction websites.**

## **5.3 Challenges**

Law enforcement works in an environment of competing priorities and may have fewer resources available to address matters not directly related to traffic and public safety. With the numerous types of specific-use license plates in circulation and restricted uses of them, it can be a significant challenge for law enforcement to determine if a specific-use plate is being used in violation of law or rule. With these complications, law enforcement may lack interest in pursuing violations.



License plate violations could be the result of criminal intent or from those oblivious or uninformed of the regulations. Education and training are critical for law enforcement to understand the laws and rules in their own jurisdiction. When encountering license plates issued in other jurisdictions, readily available resources are essential. For example, some specific-use license plates are not eligible to be used outside the issuing jurisdiction. Law enforcement in another jurisdiction may not know this information but should know how to obtain information to verify permitted use. Simplifying roadside interactions and providing timely information are important to encouraging law enforcement to take an interest in proactive enforcement. The additional time required could negatively impact other law enforcement responsibilities.

Another enforcement challenge occurs in follow-up or reactive investigations. These investigations are not conducted roadside but as part of most other investigations involving a motor vehicle. When law enforcement investigates a hit and run collision, reckless driving, or other violation when a license plate is the only available vehicle information, holding a vehicle operator accountable may be difficult. The

technology challenge for both intra-jurisdiction and cross-jurisdiction use is that not all jurisdictions include specific-use plates in the electronic database that provides information to law enforcement. In these cases, law enforcement, within the issuing jurisdiction and outside the issuing jurisdiction, doesn't have access to the information needed to assess whether the plate on the vehicle is valid. If records of these plates are not included within MVA databases that are ultimately available through Nlets, law enforcement does not have the tools available to assess whether a vehicle is being used properly. In these situations, law enforcement would not even be able to determine what entity can use these plates. Law enforcement would also not be able to determine if the plates have been cancelled, suspended, or expired if this information is not made available through Nlets. This is a major reason why these types of plates are attractive to the criminal element.

Because license plates can be transferred between vehicles without notifying the MVA, MVAs and law enforcement must rely on the business that uses the license plates to keep records of to whom the plate has been assigned. This is especially important for law enforcement investigations.

**Recommendation 5.3.1: Provide education and training to law enforcement about permitted uses and available resources to encourage proactive enforcement.**

**Recommendation 5.3.2: Provide law enforcement direct contact information for the MVA to ask questions regarding specific-use license plates.**

**Recommendation 5.3.3: Maintain information about specific-use plates in its database and ensure that information is accessible to LE through Nlets.**

**Recommendation 5.3.4: Require entities using specific-use license plates to maintain records of what vehicles the license plates are on and who is assigned the plate.**

# Chapter 6 Education and Training

## 6.1 Introduction

Training and education are important aspects of program administration and compliance.

Consideration must be made for training MVA staff, business users,

law enforcement, prosecutors, and the public. Having an organized plan for training and education with consistent messaging ultimately improves the ability for successful compliance. Making training easy to disseminate, access, and understand is important to maximize the outreach and effectiveness.

Appendix G contains many links to MVA websites providing information about specific-use license plates providing educational and training material.

## 6.2 MVA Staff Training

Training and education materials must be provided to MVA staff to ensure applicants are eligible for a specific-use license plate and users of the license plates are properly informed of the permitted use of license plates. MVA interpretation of eligibility and use of license plates must be clear and easily understood. If more than one agency is involved in the administration of the program, coordination and communication must take place between the agencies. This will help avoid confusion if one agency takes administrative action and the other agency is not aware of such. For example, within a jurisdiction, one agency may issue the vehicle dealer license, while another agency administers the license plate program. Without proper communication, the vehicle dealer license could be revoked, but the license plates remain valid.



*If more than one agency is involved in the administration of the program, coordination and communication must take place between the agencies.*

MVAs should consider posting information on their websites regarding permitted use of license plates (see Appendix E for examples). This information would help inform and educate the public so they know what is allowed and who to contact if they believe violations are taking place. Sometimes members of the public see these license plates being used outside of business hours, for personal use, or by family members and assume the use is unauthorized. This can lead the public to believe MVAs and law enforcement are not diligent in overseeing the use of the plates, and program integrity can suffer. With an informed public comes more awareness to the license plates and potentially more accountability for those who use the plates. Public education on the agency website can also be useful when discussing potential violations with enforcement personnel both within and outside the jurisdiction.

**Recommendation 6.2.1: Provide proper training and resources to staff about permitted use of specific-use license plates.**

**Recommendation 6.2.2: Provided educational and reference material for staff to review and to provide to businesses about permitted use of license plates.**

**Recommendation 6.2.3: If applicable, collaborate with other agencies responsible for components of the dealer licensing program to enhance consistency in messaging and for proper violation follow-up.**

*“I think there is too much confusion on what plates can be used for what. I have had different counties tell me I was driving with the wrong plate before when in fact I was on the correct plate.”* —Timothy Gaylord, CEO Gaylord Sales & Leasing

### 6.3 Specific-Use License Plate User Training

Providing education to those who use specific-use license plates encourages positive compliance for proper use of



the plates. Offering educational programs either online or in-person at conferences and other training events provides opportunities for collaboration and avenues to provide useful information. Associations that support businesses who use these license plates such as the National Automobile Dealers Association (NADA) and the National Independent Automobile Dealers Association (NIADA) are valuable resources to promote and encourage training participation. These associations encourage members to stay current and compliant with rules and regulations because doing so reflects positively on the business and association.

Educational programs should provide content explaining laws, rules, and policies related to license plate use. Providing examples of permitted use and improper use helps attendees recall and retain material. Inviting MVA investigators and law enforcement to participate in the training provides attendees an opportunity to learn directly from them about misuse of license plates and the impact with criminal activity. Business staff attending the training may not initially understand why improper use of license plates is a problem, but hearing first-hand the impact on criminal activity may increase the likelihood for compliance.

Appendix F provides examples of educational material that can be provided to users of these license plates

and placed on MVA websites for reference. This information can also be used by entities using the plates to inform their staff of proper use.

**Recommendation 6.3.1: Require proper use of license plates to be included in licensing education programs and for anyone obtaining a specific-use plate. This could be done online or in person.**

**Recommendation 6.3.2: Develop applicable educational material that can be used as a handout and placed on the MVA website.**

**Recommendation 6.3.3: Network with associations whose membership includes businesses who use these license plates to promote educational opportunities.**

**Recommendation 6.3.4: Invite MVA investigators and law enforcement to business trainings to allow first-hand discussions of the impact with improper use of license plates.**

### 6.4 Law Enforcement and Prosecutor Training

Educating law enforcement about allowable use of license plates is important because they are on the highways observing license plates in use and may receive complaints regarding violations. They are likely to encounter violations and need to know what is acceptable or not. Because these license plates are not assigned to a specific vehicle and may be used outside the issuing jurisdiction, they can cause considerable confusion during traffic stops or when conducting investigations. Without a clear understanding of allowable use, law enforcement may be unlikely to investigate for improper use. Providing law enforcement with education, contacts, and resources for determining proper use of the license plate empowers them to be proactive in their investigations and research. See Appendix B for cases involving law enforcement and the challenges of understanding the permissible uses for specific-use license plates.

Prosecutors are responsible for pursuing charges filed by law enforcement for improper use of license plates. Educating and providing resources to prosecutors about proper use of license plates gives them confidence to move a case forward for prosecution or, if needed, to ask for more evidence and information. If prosecutors are unwilling to move charges forward, law enforcement may become discouraged and be reluctant to file charges in the future. Including prosecutors in law enforcement training encourages collaboration and provides opportunities to share experiences related to license plates and subsequent criminal activity. For more information about prosecutor partnerships, see AAMVA's [Whitepaper on Developing and Maintaining Successful Prosecutor Partnerships](#), which includes a handout for prosecutors and training slides.

*Posting information on MVA websites about proper use of license plates is also a valuable resource for law enforcement.*

MVA investigative unit members should be included with this training because they are the first line of contact for law enforcement and connect law enforcement, prosecutors, and the MVA. MVA investigators can be utilized by law enforcement to determine a proper course of action, including the potential for administrative action. MVA investigators should contact jurisdiction law enforcement and prosecutor associations, requesting time on agendas to provide training on license plates. This is a good opportunity for MVA investigators to establish themselves as points of contact for related questions. For more information on MVA investigator resources, see the [AAMVA MVA Investigative Unit Resource Guide Edition 2](#).

In addition to providing information to the public, posting information on MVA websites about proper use of license plates is also a valuable resource for law enforcement and prosecutors. Examples of these websites can be found in Appendix E. This information could also be incorporated into

*“General information such as a flier, bullet point lists, etc. of the types of registrations and their lawful uses would be helpful.” —Captain Jeff Short, Edwardsville Police Department*

MVA license plate guides that are used by law enforcement to validate license plate information. This information assists law enforcement in any jurisdiction to determine if a vehicle is operating in accordance with the issuing jurisdiction's permitted use. Likewise, MVAs can partner with neighboring jurisdictions to create joint educational programs or draft a memorandum outlining authorized uses for distribution to bordering jurisdictions.

A survey conducted by this Working Group for law enforcement and MVA investigators shows that 48% of respondents reported having no training on specific-use license plates. Of the 52% that received training, more than 80% indicated this training did not address the use of specific-use license plates outside of the issuing jurisdiction. See Appendix E for more survey information. The results of this survey are an indication of the potential lack of proper training and information for those who enforce specific-use license plate laws. As an additional resource, Appendix F provides examples of educational material that can be provided to law enforcement and prosecutors about these license plates. This information would supplement the training material and provide a takeaway for future reference.

**Recommendation 6.4.1: Develop training materials and provide training for law enforcement and prosecutors both in the jurisdiction and bordering jurisdictions.**

**Recommendation 6.4.2: Include MVA investigators (if applicable) with law enforcement and prosecutor trainings.**

**Recommendation 6.4.3: Utilize AAMVA's [Whitepaper on Developing and Maintaining Successful Prosecutor Partnerships](#) to establish connections with prosecutors.**

# Summary

This Working Group identified various areas in this Best Practice to review, research, and consider when implementing or enhancing a jurisdiction specific-use license plate program. Implementation or enhancement of a program may require new laws, rules, and policies along with the creation of training programs and intra-jurisdiction and cross-jurisdiction communication plans. The lack of a strong program may result in specific-use license plates being used unlawfully and used for the commission of other criminal activity, which allows a vehicle or perpetrator to be difficult to identify.

Engaging stakeholders early and often was identified in this Best Practice as an important element for program success and compliance. Ideally, a specific-use license plate program provides adequate information and education for entities using specific-use license plates to prevent and deter problems from occurring. For situations when this is not effective, providing training to law enforcement, MVA investigators, and prosecutors gives them knowledge of what action they may take. Communication with stakeholders is a key ingredient for success of the entire program.

The Best Practice Appendices are a valuable resource for detailed information that can be used to enhance jurisdiction laws, rules, and policies, educate stakeholders, and support reasons for program implementation and enhancement. Previous court cases, links to current jurisdiction-related information, survey results, and a sample handout are examples of Appendices that can be utilized or modified for jurisdiction use.

A program can become outdated and ineffective if not consistently monitored for updates as changes in society and within business practices occur. AAMVA and its members provide many ongoing resources to help program managers stay up to date such as conferences, webinars, town halls, best practices, and guidance documents. Having dedicated staff responsible for program operation that includes regular engagement with stakeholders helps ensure the program remains relevant and effective and prevents or stops unlawful and other criminal activity involving specific-use license plates.

## Appendix A Articles Related to Specific-Use License Plates

The following articles provide information about criminal activity related to specific-use license plates

### **Arizona DOT Targets Dealer License Plate Fraud and Unauthorized Sale**

[ADOT targeting dealer-plate fraud, unauthorized sales | The Daily Courier | Prescott, AZ \(dcourier.com\)](#)

The Arizona DOT's Office of Inspector General cracks down on vehicle dealers who are no longer actively engaged in the vehicle sales business but still have dealer licenses and access to dealer license plates. Detectives say they have cases of dealer plates being used on family members' vehicles when not allowed, which could mean vehicle registration and license taxes are avoided.

### **Washington Pushes for Tighter License Plate Rules**

[Criminal use of Washington license plates prompts push for tighter rules | king5.com](#)

Washington legislatures move to eliminate the ability for out-of-state criminals obtaining Washington state transporter license plates. Washington State Department of Licensing says these plates are used by people with suspended driver's licenses for purposes of theft and drug running. A Connecticut man was charged with leasing Washington transporter plates.

### **Connecticut Man Charged with Selling Washington Transporter License Plates**

[Windsor man charged in transporter plate scheme | Manchester | journalinquirer.com](#)

Police arrested and charged a man in Windsor, Connecticut, for selling Washington transporter license plates. The suspect falsely created businesses in Washington for the purposes of obtaining transporter license plates. Internet advertisements brought people to the suspect who charged up to \$3,000 for the plates.

### **How to Get Your Dealer License**

[Dealer License \\$299 – An Insider Exposes the Truth! \(dealer-license.com\)](#)

This is a video explaining how you can obtain a dealer license and avoid legal troubles. This video provides examples of people who violated dealer licensing laws and warns you about dealer licensing scams. The presenter provides five red flags to avoid legal problems.

### **Pennsylvania Busts License Plate Fraud Ring**

[Pennsylvania Busts License plate Fraud Ring \(claimsjournal.com\)](#)

The Pennsylvania attorney general's office charged a dozen people with fraud for allegedly renting license plates for up to \$400 per month. Although the story does not mention specific-use license plates were rented, it does highlight the value of valid license plates being distributed illegally and the Pennsylvania Department of Transportation's steps to limit the number of license plates issued to one business.

### **Offering to Sell Transporter License Plates**

[Dealer Plate vs. Transporter Plate \(what's the difference?\) | auto dealer license fast \(autodealerlicensenow.com\)](#)

This article explains the differences between dealer plates and transporter plates. It goes on to suggest if you want to move cars and don't have regular license plates, transporter plates are probably the best option. The author offers to help you set up a company to get access to up to 10 of these license plates for \$3,500 and a \$250 monthly service fee. If you just want individual transporter license plates, they can sell you one for \$1,700, good for one year of use.

## Appendix B Related Court Cases

### Case Summaries

**Lucas v. State Court of Appeal of Florida, First District June 10, 2021, Decided No. 1D19-3882 319 So. 3d 792 \*; 2021 Fla. App. LEXIS 8467 \*\*; 46 Fla. L. Weekly D 1346; 2021 WL 2373638**

This is an appeal of a denial of a motion to suppress drug evidence seized during a traffic stop. The court commented on the “unassigned” status of dealer plates in Florida and the ability of dealers to purchase any number of dealer plates, subject only to limitation by their insurer. The court also noted the very broad purposes for which dealer plates in Florida may be used. The decision included a detailed discussion of permissible uses of dealer plates in Florida. The court also compared dealer plates with transporter plates, noting that there is only one permitted use for a transporter plate in Florida. Although the court indicated that it did not agree with the findings that the stop was unconstitutional, the court was bound by a decision in the companion case and therefore was required to affirm the denial of the motion to suppress.

**United States v. Barnette United States District Court for the Northern District of Georgia, Rome Division June 1, 2017, Decided; June 1, 2017, Filed CRIMINAL ACTION FILE NO. 4:16-CR-00023-HLM-WEJ-1 Reporter 2017 U.S. Dist. LEXIS 102835 \***

The court recommended the denial of defendant’s motion to suppress evidence found as the result of a traffic stop. The vehicle stop involved a vehicle bearing dealer plates. This case outlines some of the difficulties for law enforcement in accessing vehicle information from electronic systems when dealer plates are used. The detective involved in the stop also reported to the court that he received training regarding dealer plates

after conducting the stop. During that training, he was made aware that dealer plates are not assigned to a vehicle and that dealerships are permitted to have fleet insurance policies that are not specific to a vehicle. Despite these facts, the court still found that there was probable cause for the stop because the detective did not initially recognize the plates as dealer plates and recommended denial of the motion to suppress.

**Bruce Walters Ford Lincoln Kia v. Ky. Motor, Vehicle Court of Appeals of Kentucky August 11, 2017, Rendered NO. 2016-CA-000873-MR Reporter 527 S.W.3d 825 \*; 2017 Ky. App. LEXIS 444 \*\***

The court reversed a lower court’s affirmation of the Kentucky Motor Vehicle Commission’s decision to fine the dealership for misuse of a dealer plate. The court discussed the various permitted uses of dealer plates within the jurisdiction. In that case, although the vehicle was used by dealership employees, it was part of the inventory for sale and therefore could properly display a dealer plate. The case was remanded to the lower court for entry of an order consistent with the reviewing court’s opinion.

**State v. Case Court of Appeals of Idaho December 9, 2015, Filed Docket Nos. 42363, 42364, 42365, & 42366, 2015 Opinion No. 82 Reporter 159 Idaho 546 \*; 363 P.3d 868 \*\*; 2015 Ida. App. LEXIS 127 \*\*\***

The court found that the district court erred in finding reasonable suspicion for a stop of a vehicle bearing dealer plates on Thanksgiving Day because of plain language of the dealer plate statute allowing for multiple permitted uses. Law enforcement testified that the vehicle was stopped because it had dealer plates, and it was a holiday. The officer also testified that he

routinely stopped vehicles with dealer plates outside of business hours to determine if the driver was aware of the proper use of the plates. The court discussed the relevant statutes and regulations finding that there were numerous scenarios in which dealer plates could be utilized outside of normal business hours. The court noted that a vehicle properly displaying a dealer plate is presumptively valid and cannot be the sole basis for reasonable suspicion for a traffic stop.

**Croom v. State Court of Appeals of Indiana**  
**October 16, 2013, Decided; October 16, 2013,**  
**Filed No. 49A05-1304-CR-144 Reporter 996**  
**N.E.2d 436 \*; 2013 Ind. App. LEXIS 507 \*\*; 2013**  
**WL 5630984**

The court upheld the defendant's conviction based on a traffic stop of a vehicle bearing dealer plates. The court found that the officer had reasonable suspicion to perform a vehicle stop after a search of the state's electronic database could not find registration information for the dealer plate displayed on the vehicle. The officer testified that the information could be missing from the database for a number of reasons, some nefarious and others simply caused by delays in processing paperwork. The court did note that at the time of the stop, Indiana dealer plate information was not provided to Nlets although a change was made to provide such information to Nlets as the defendant's case progressed.

**State v. Williams Court of Appeals of Ohio, Second**  
**Appellate District, Montgomery County November**  
**10, 2011, Rendered Appellate Case No. 24341**

**Reporter 2011-Ohio-5807 \*; 2011 Ohio App.**  
**LEXIS 4765 \*\*; 2011 WL 5451382**

The court overturned the defendant's conviction as it erred in denying the defendant's motion to suppress evidence found as a result of a vehicle stop. The operation of a vehicle bearing dealer plates at night in an area where there were no dealerships did not provide reasonable suspicion to justify a vehicle stop. The broad language allowing use of dealer plates any time when a vehicle is being used by the dealer (including employee, agent, or authorized third party) justified the defendant's use of the plate. When testifying, the officer only referenced knowing part of the statute regarding allowable uses for dealer plates.

**United States v. Pena-Montes United States Court**  
**of Appeals for the Tenth Circuit December 7, 2009,**  
**Filed No. 08-2169 Reporter 589 F.3d 1048 \*; 2009**  
**U.S. App. LEXIS 26567 \*\***

An officer stopped a vehicle in which the defendant was a passenger because the officer did not see a registration plate affixed to the vehicle. As the officer approached the vehicle, however, he noted that there was a dealer plate affixed to the inside of the rear window. The officer continued with the stop and arrested the defendant for concealing his identity. The court found that the officer improperly continued with the stop after seeing the dealer plate because he misunderstood the law regarding dealer plates and believed they had limited uses. The court deemed the traffic stop violated the Fourth Amendment and remanded the matter to the lower court.

## Appendix C AAMVA Jurisdiction Survey Results

An AAMVA jurisdiction survey was conducted in February 2022 and asked members to respond to several questions as to how jurisdictions administer license plate programs for plates not assigned to specific vehicles. A total of 35 jurisdictions responded with one jurisdiction stating their agency was not responsible for administering this program.

The survey results indicated costs per plate were shown to vary significantly among jurisdictions. The more common dealer license plates are more often restricted on the number of plates allowed compared with the less common license plates. Most jurisdictions reported requiring some type of annual review of the plates in inventory by the business.

Listed next is a summary of some of the responses; for complete survey results, jurisdiction members can visit the [AAMVA website](#).

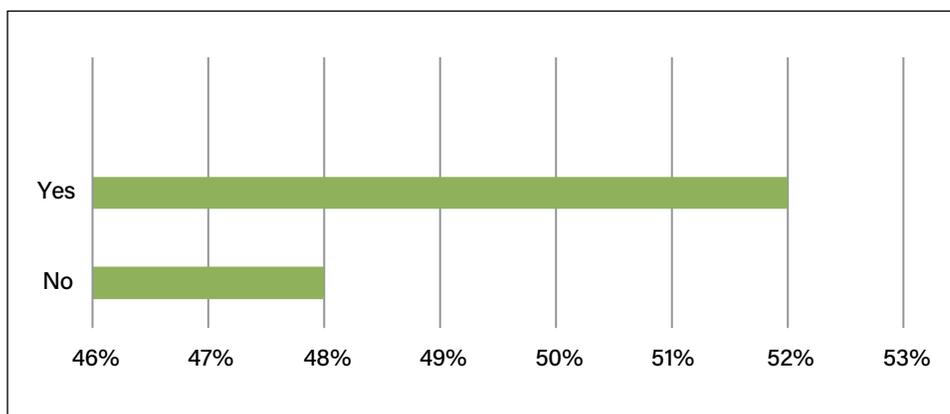
- Dealer plates with restricted use are defined as license plates issued to vehicle dealers only for the purpose of vehicle demonstration or test driving, not for personal use. Costs of these plates ranged from \$5 to \$125 each.*
  - 20% of jurisdictions do not issue this type of plate.
  - 52% restrict the number of plates allowed.
  - 70% require an annual review of plates.
- Dealer plates with unrestricted use are defined as license plates issued to vehicle dealers for the purposes of vehicle demonstration, for test driving, and for personal use. Costs of these plates ranged from \$10 to \$415 each.*
  - 29% of jurisdictions do not issue this type of plate.
  - 48% restrict the number of plates allowed.
  - 80% require an annual review of plates.
- Transporter license plates are defined as being issued for the purpose of move a vehicle from one location to another. Costs of these plates range from \$10 to \$185 each.*
  - 76% of jurisdictions issue this type of plate.
  - 23% restrict the number of plates allowed.
  - 77% require an annual review of plates.
- Manufacturer license plates are defined as being issued to a vehicle manufacturer for the purpose of demonstrating, testing, and delivery of new vehicles. Costs of these plates range from \$12 to \$1,070 each.*
  - 62% of jurisdictions issue this type of plate.
  - 33% restrict the number of plates allowed.
  - 67% require an annual review of plates.
- Agriculture license plates are defined as being used for the purpose of moving agricultural vehicles and equipment. Costs of these plates range from \$7.50 to \$20 each.*
  - 43% of jurisdictions issue this type of plate.
  - 13% restrict the number of plates allowed.
  - 60% require an annual review of plates.
- Construction license plates are defined as being used for the purpose of moving construction vehicles and equipment. Costs of these plates range from \$25 to \$62.50 each.*
  - 26% of jurisdictions issue this type of plate.
  - 22% restrict the number of plates allowed.
  - 56% require an annual review of plates.
- Describe other specific-use license plates issued by your jurisdiction and costs.*
  - Vehicle repairer plate: \$100 initial plate, \$20 per plate
  - Vehicle repossession and boat trailer plates: \$10 plus fees
  - Vehicle converter plates: \$40 and \$257 (five plates)
  - Driver education plates: \$4

## Appendix D Law Enforcement and MVA Investigator Survey

The Working Group conducted a survey in June 2022 with law enforcement and MVA investigators. The Working Group was interested in learning what these stakeholders observed and experienced with specific-use license plates. Questions related to training received and what their interaction was with specific-use license plates and asked for feedback related to program improvements and enhancements. The focus was on deterring and detecting unlawful and other criminal activity associated with the use of specific-use license plates.

The survey was conducted using a Microsoft survey tool and a total of 271 responses were received. The following is a summary of the survey questions and results.

1. Briefly describe the training you received regarding the purpose and permitted use of license plates that are not assigned to a specific vehicle.
  - 48% of respondents said they had not received any formal training.

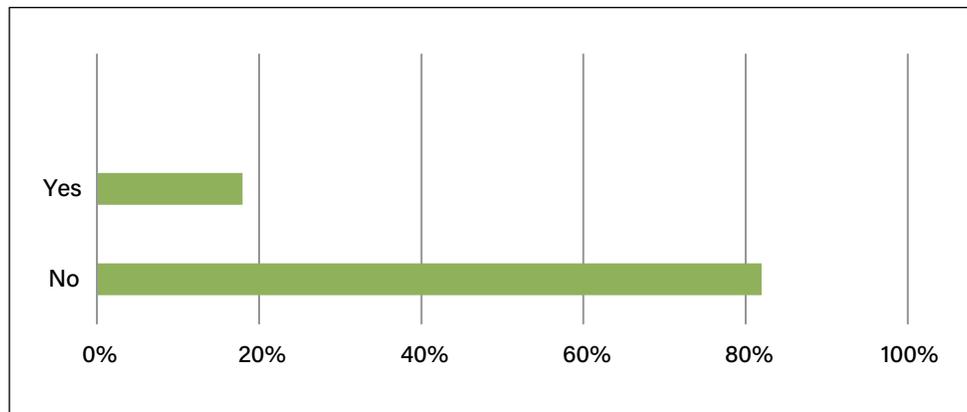


Some responses included the following:

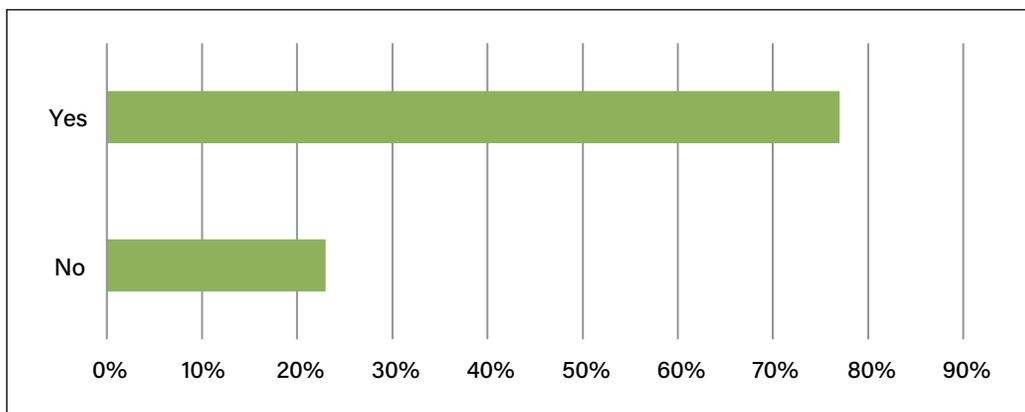
- Worked with MVA vehicle services section staff
- Initial academy training
- During field officer training
- Review of state laws and motor vehicle code
- Bulletins
- From MVA investigators

Of the 52% responding yes to question 1:

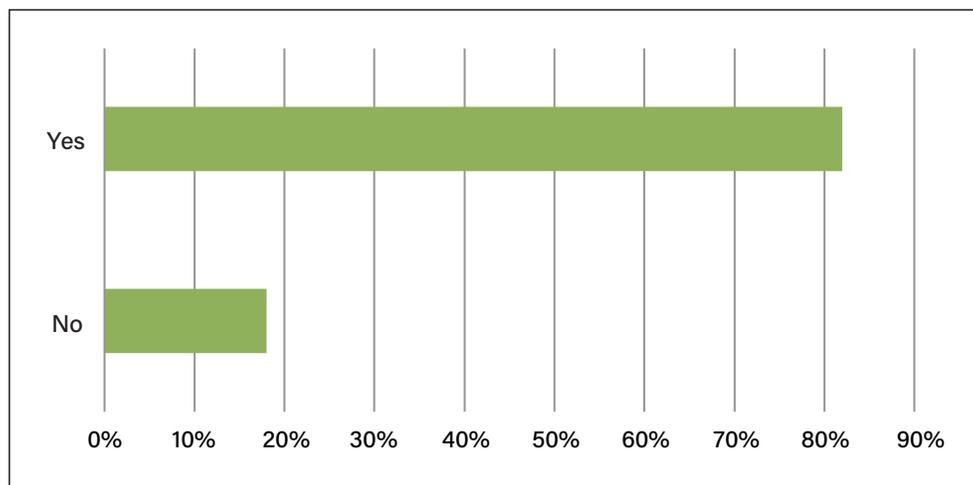
2. Did training you received include information about the permitted use of these license plates in your jurisdiction if the license plate had been issued by another jurisdiction?



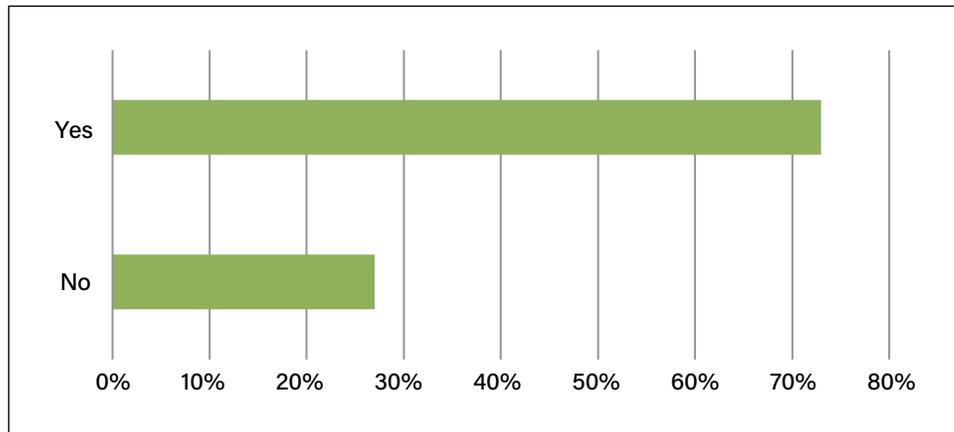
3. When you encounter a license plate displayed on a vehicle that is not assigned to a specific vehicle such as a dealer license plate, do you normally inquire as to whether the license plate is being used properly



4. Have you conducted investigations involving misuse of a license plate not assigned to a specific vehicle?



5. Have you filed traffic or criminal charges for misuse of license plates not assigned to a specific vehicle?



Law enforcement and MVA investigators were also asked what recommendations they had for improvements to specific-use license plate programs to prevent unlawful use and criminal activity. A summary of recommendations is included below.

- Develop national standards for permitted use.
- Require business possessing these plates to maintain a list of what vehicles the plates are on.
- Provide a training video or handout.
- Provide training material that lists code sections, pictures of plate types, and other examples.
- Require license plates to be replaced more frequently.
- Give more education for those using the plates about permitted use.
- Provide information for a customer or user of the vehicle with these license plates that explains permitted use.
- MVA websites should include information about permitted use and related rules or laws.
- Provide model legislation.
- Make sure plate information is on file and able to be queried by law enforcement.
- Require a timely report to law enforcement of lost or missing plates.
- Require more accountability for these plates such as locked in a safe when not in use.

## Appendix E Vehicle Dealer and Transporter Survey

The Working Group conducted a survey in July 2022 with vehicle dealers and transporters. The Working Group believed it was important to hear from these entities to gain better understanding of their perspective on the use of specific-use license plates. This feedback is helpful as enhancements to a program may require law and rule changes which directly impacts these entities. This information may help a jurisdiction prepare to have positive interaction and engagement with these stakeholders as they have a better understanding of concerns or issues.

The survey was conducted using a Microsoft survey tool. A total of 46 responses were received. Respondents were asked a series of questions related to their understanding of current laws, rules, and policies of specific-use license plate programs, and use of the license plates. The majority of those responding stated programs in general were effective at reducing fraud and in ensuring license plates were used appropriately. However, most did provide specific feedback for improving program integrity and effectiveness. The following is a summary of questions and responses.

### Questions

1. Are the current laws, rules, and policies of specific-use license plate programs in your jurisdiction effective to allow for appropriate use of these plates?

- 10% responded “no.”

Examples of comments provided for those responding “no”:

- *It would really help if we could combine Full-use and Demo into one dealer plate*
- *I buy vehicles from southern states and sometimes drive them home but the transporter plate or dealer plate are not allowed out of state or certain miles from business*
- *We need 1 Dealer plate for all uses*

2. Are the current laws, rules, and policies of specific-use license plate programs in your jurisdiction effective in deterring misuse of these plates?

- 10 % responded “no.”

Examples of comments provided from those responding “no”:

- *I see more dealer plates on cars than ever.*
- *I think there is too much confusion on what plates can be used for what. I have had different counties tell me I was driving with the wrong plate when in fact I was on the correct plate.*
- *Misuse of dealer plates is something really hard to track.*
- *I see dealer plates being used on vehicles being driven for personal use in our area and other areas.*

3. If these license plates are lost or missing, are you required to report them to law enforcement?

- 41% responded “no” or “unknown.”

4. If these license plates are lost or missing, are you required to report them to the issuing agency?

- 5% responded “no.”

5. What do you suggest is a reasonable method to determine how many of these license plates a business should be allowed to possess? Is this method different for different license plate types? Explain.

Some responses included the following:

- Size of dealership
- Number of vehicles in inventory or sold
- Number of employees
- Request measured against annual sales
- Up to the licensed dealer to decide
- 20 should be sufficient

6. What complaints or issues exist with these license plates being used within the issuing jurisdiction or outside the jurisdiction?

- 78% responded they had no complaints or issues.

Examples of comments provided for those responding with complaints or issues include:

- *Some states will pull you over for having a dealer plate in the wrong state.*
- *Towing trailers behind a vehicle with a dealer plate.*
- *Employees who do not qualify are being offered demos with dealer plates.*
- *Personal use for extended family.*
- *Being used for vehicles that employees or family are driving as personal vehicles. This isn't supposed to be allowed.*
- *We get new dealer plates every two years, the only thing that changes is the color and the expiration date. I know of no process of "un-reporting" a plate missing or stolen. We have had people be pulled over for this.*
- *License plates go missing.*

7. What recommendations and best practices do you have for improvements to these license plate programs to deter fraud and misuse?

- 52% responded they had no recommendations.

Examples of comments provided for those responding with recommendations:

- *Take your plate off right away after vehicle is driven.*
- *Keep track of your plates.*
- *Have DOT check on dealer plates more often at dealerships.*
- *Dealer licensing should set requirements and oversee misuse.*
- *Smaller dealers should only be issued a small number of dealer plates.*
- *We already do our best to emphasize the importance to those using our plates.*
- *More information, more attainable.*
- *Have dealer plates only used for demonstration.*
- *Allow a specific plate to be purchased for owners and managers to use on their demo's, a two plate Dealer plate for this purpose.*
- *I keep them in my office when not in use.*
- *Limiting the amounts of plates that dealers can have may help this.*
- *Audits to all companies that have plates, not just a selected few.*
- *Maybe the business name can be on them.*
- *Have a team that values the laws and abides by them.*
- *Reduced fees for multiple license types. We have truck repair-loaner plates & towing - transporter*

*plates. A business but must have 2 licenses for 2 types of plates.*

- *Stricter enforcement policies.*
- *Confirmation of business licenses necessary for intended use of plates issued.*
- *I am not sure how you would stop fraud or misuse. Completing training classes for new dealers would probably help.*
- *We track our plates and assign them to manage.*
- *Require each business run a physical check of plates in inventory each year*
- *Combining the full use and demo plate in one dealer plate for anytime or anywhere driving would help.*
- *Maybe consider fines for various abuses with the plates.*
- *Reminder plate rules sent out with annual renewal forms. In the 30+ years of working in this industry, I have rarely seen official rules.*

## Appendix F Examples of Handout and Educational Information

### Example 1: Sample Educational Handout for Law Enforcement and Prosecutors

(includes suggested jurisdiction specific information to consider)

#### What are specific-use plates?

Specific-use license plates are plates not assigned to a particular vehicle but rather assigned to an entity to legally move unregistered vehicles on public roadways. Specific-use license plates serve an important function for entities because it is not always feasible or practical for them to register vehicles for roadway use. However, because these plates are not assigned to specific vehicles and are only allowed for certain purposes, there are challenges for managing, regulating, and enforcement of these plates.

#### Why are they attractive to criminals?

Because these plates are not assigned to a specific vehicle, they are valuable for criminal activity, allowing opportunity for concealment of the vehicle and vehicle operator. They can also be used to move stolen or unsafe vehicles on highways.

#### Can law enforcement in this jurisdiction access information about these plates? If so, how?

Include information specific to your jurisdiction regarding how law enforcement can access information about these plates. Some MVAs include information about the plate and the entity the plate is associated with within their MVA database. This information may or may not be available to an officer on the roadside. Other MVAs do not include these plates in their MVA database, thus requiring law enforcement to call the MVA for further information regarding the plate. Be sure that this section provides enough

information for law enforcement to know how to access plate information.

#### Plate Information (include this for each type of specific-use plate issued by your jurisdiction)

##### Plate Name:

##### Plate Photo:

##### Permissible Plate Use:

**Time:** Is there a particular time of day or week the plate can be used?

**Person using it:** Is its use limited to an employee, customer, or family members of the business owner?

**Specific purpose:** Is its use limited to a particular purpose such as a test drive or repossession?

**Location:** Is its use only permitted in a particular jurisdiction or within a certain distance from a business?

##### Impermissible Plate Use

Include sample scenarios in which the use of this plate would not be permitted.

##### Statutory or Regulatory Citation

What rule or statute addresses the use of this particular plate?

#### Who should law enforcement contact with questions about these plates?

Include contact information for the entity that issues the plates, as well as any licensing or regulatory body overseeing the entity that uses the plates. Law Enforcement should contact these agencies because they often have administrative power to take action against the entity and limit their access to plates.

## Example 2: Sample Template for MVA Websites

### What are specific-use plates?

Specific-use license plates are plates not assigned to a particular vehicle but rather assigned to an entity to legally move unregistered vehicles on public roadways. Specific-use license plates serve an important function because it is not always feasible or practical for these entities to register vehicles for roadway use. However, because these plates are not assigned to specific vehicles and are only allowed for certain purposes, there are challenges for managing, regulating, and enforcement of these plates.

### Plate Information (include this for each type of specific-use plate issued by your jurisdiction)

#### Plate Name:

#### Plate Photo:

#### Permissible Plate Use:

**Time:** Is there a particular time of day or week the plate can be used?

**Person using it:** Is its use limited to an employee, customer, or family members of the business owner?

**Specific purpose:** Is its use limited to a particular purpose such as a test drive or repossession?

**Location:** Is its use only permitted in a particular jurisdiction or within a certain distance from a business?

#### Impermissible Plate Use

Include sample scenarios in which the use of this plate would not be permitted.

#### Statutory or Regulatory Citation

What rule or statute addresses the use of this particular plate?

### For more information, please contact:

Include contact information in case members of the public have questions but more important in the event law enforcement from another jurisdiction encounters one of these plates and needs assistance.

## Example 3: Iowa Motor Vehicle Division

### Actual Website Example

#### SPECIAL/DEALER PLATES

There are five types issued.

- Regular dealer plates for display on cars, motor homes, multipurpose vehicles, trailers, travel trailers and trucks.
- Motorcycle dealer plates for display on motorcycles and motorized bicycles.
- Limited use plates [Application for Special Plates](#) form for display on vehicles solely for the purpose of disposing of vehicles acquired as a result of a damage settlement or recovered stolen vehicles acquired as a result of a loss settlement. Additionally, these plates are used for the purpose of disposing of vehicles acquired or repossessed and for the purpose of delivering, testing, and demonstrating special body equipment and new ambulances, rescue and fire vehicles manufactured and owned by the manufacturer.
- Transporter plates [Application for Special Plates](#) form for use by persons engaged in the business of delivering vehicles owned by the person or delivering vehicles owned by other persons for compensation.
- Dealer plates can be used only by licensed and registered dealers. Dealer plates are issued by the department for purposes of demonstration, delivery, and testing vehicles a dealer may have in inventory. A new car dealer or a used car dealer may operate or move upon the highways

a new or used car or trailer owned by the dealer for either private or business purposes without registering it if the new or used car or trailer is in the dealer's inventory and is **continuously offered for sale** at retail and there is displayed on it a dealer plate issued to the dealer. In addition, while a service customer is having his or her own vehicle serviced or repaired by the dealer, a vehicle — other than a truck or truck tractor — that is in the dealer's inventory can be loaned to the customer, and that vehicle may display dealer plates.

Dealer plates cannot be displayed on:

- Rental vehicles.
- Leased vehicles.
- Loaded trucks, unless provisions of demonstration permits are followed.
- Trucks or truck tractors loaned to service customers.

Dealer plates expire on the last day of December, every two years, starting with December 2008.

Section 321.62 of the Code of Iowa requires that every dealer keep a written record of the vehicles displaying dealer plates. The Iowa DOT's Bureau of Investigation and Identity Protection will periodically inspect the dealership and records, and at that time the records of dealer plates will be checked.

## Example 4: Certificate of Permission for Use of Specific-Use License Plates: Virginia

DMV PERMISION FOR USE OF DEALER'S LICENSE PLATES				DSD 27 (09/25/2015)	
<b>Purpose:</b> Motor vehicle dealers issue this form to a customer or Dealer Authorized Individual as authorization to use dealer's license plates for a specified period of time and purpose.					
<b>Instructions:</b> See instructions on reverse for details.					
ASSIGNED OPERATOR INFORMATION					
FULL LEGAL NAME (last) (first) (middle) (suffix)					
STREET ADDRESS		CITY	STATE	ZIP CODE	
TELEPHONE NUMBER	CELL PHONE NUMBER	EMAIL ADDRESS			
ASSIGNED OPERATOR (check one - form is invalid if more than one box is checked)					
<input type="checkbox"/> PROSPECTIVE PURCHASER		<input type="checkbox"/> CUSTOMER WHOSE VEHICLE IS IN DEALER'S SHOP FOR REPAIRS		<input type="checkbox"/> DEALER AUTHORIZED INDIVIDUAL	
VEHICLE INFORMATION					
VEHICLE IDENTIFICATION NUMBER (VIN)		VEHICLE YEAR	VEHICLE MAKE	VEHICLE MODEL	
PLATE INFORMATION					
DATE ISSUED (mm/dd/yyyy)	TIME ISSUED <input type="checkbox"/> AM <input type="checkbox"/> PM	DATE EXPIRES (mm/dd/yyyy)	TIME EXPIRES <input type="checkbox"/> AM <input type="checkbox"/> PM	DEALER PLATE NUMBER	
DEALER CERTIFICATION					
I certify that the above referenced dealer plate is approved to be used for the time period indicated above in accordance with Virginia Law. I further certify and affirm that all information presented in this form is true and correct, that any documents I have presented to DMV are genuine, and that the information included in all supporting documentation is true and accurate. I make this certification and affirmation under penalty of perjury and I understand that knowingly making a false statement or representation on this form is a criminal violation.					
DEALERSHIP NAME (print)				DEALER CERTIFICATE NUMBER	
DEALERSHIP REPRESENTATIVE NAME (print)		DEALERSHIP REPRESENTATIVE SIGNATURE		DATE (mm/dd/yyyy)	

**Instructions: (back of form)**

Permission for use of a Dealer's License Plates is valid for up to 24 hours or up to 5 days based on the following:

**Up to 24 hours only** - The assigned operator is authorized to use the dealer's plates for up to 24 hours only because the operator is a Dealer Authorized Individual who is to drive the vehicle to/from point of sale, auction, dealer exchange, or a repair facility for mechanical repairs, painting, or installation of parts or accessories.

**Up to 5 days only** - The assigned operator is authorized to use the dealer's plates for up to 5 days because the operator is a prospective purchaser or the operator's vehicle is in the dealer's shop for repairs.

**Note to Dealer:**  
No more than 2 permissions may be granted by a dealer to the same person for successive periods, unless issued to a Dealer Authorized Individual.

Dealer completes form and makes a copy. Dealer issues original to assigned operator. Assigned operator must carry the form in the vehicle at all times when the vehicle is being operated on public highways. The Dealer retains the copy for 5 years.

Dealer retained form copies are subject to inspection by law enforcement and authorized representatives of the Department of Motor Vehicles or the Motor Vehicle Dealer Board.

DMV PERMISION FOR USE OF DEALER OR TRANSPORT PLATE ON TRUCKS OR TRACTOR TRUCKS				DSD 27 A (09/25/2015)	
<b>Purpose:</b> Motor vehicle dealers use this form to allow bona fide prospective purchasers or their authorized agent to use a dealer or transport plate on trucks or tractor trucks - that may be laden - for a period of 5 days or 750 miles, whichever occurs first.					
<b>Instructions:</b> See instructions on reverse for details.					
ASSIGNED OPERATOR INFORMATION					
FULL LEGAL NAME (last) (first) (middle) (suffix)					
STREET ADDRESS		CITY	STATE	ZIP CODE	
TELEPHONE NUMBER	FAX NUMBER	EMAIL ADDRESS			
VEHICLE INFORMATION					
VEHICLE IDENTIFICATION NUMBER (VIN)		VEHICLE YEAR	VEHICLE MAKE	VEHICLE MODEL	
PLATE INFORMATION					
DATE ISSUED (mm/dd/yyyy)	TIME ISSUED <input type="checkbox"/> AM <input type="checkbox"/> PM	DATE EXPIRES (mm/dd/yyyy)	TIME EXPIRES <input type="checkbox"/> AM <input type="checkbox"/> PM	VEHICLE MILEAGE AT ISSUANCE	
<input type="checkbox"/> DEALER PLATE	DEALER PLATE NUMBER	<input type="checkbox"/> TRANSPORT PLATE	TRANSPORT PLATE NUMBER		
DEALER CERTIFICATION					
DEALERSHIP NAME (print)				DEALER CERTIFICATE NUMBER	
DEALERSHIP REPRESENTATIVE NAME (print)		DEALERSHIP REPRESENTATIVE SIGNATURE		DATE (mm/dd/yyyy)	

**Instructions: (back of form)**

1. Dealer completes form and makes a copy.
2. Dealer issues original form to assigned operator. Original form must be in the immediate possession of the person operating or authorized to operate the truck or tractor truck.
3. The dealer retains the copy for 5 years. Dealer retained copies are subject to inspection by law enforcement and authorized representatives of the Department of Motor Vehicles or the Motor Vehicle Dealer Board.

## Appendix G Additional Resources

### MVA Websites

Jurisdictions provide resources on their public-facing websites to educate the public. Using these sites as examples may assist in developing website content to best serve businesses and the public both within and outside a jurisdiction. Listed are some of the available MVA website links providing specific-use license plate resources.

British Columbia: [Demonstration Licence and Number Plates \(icbc.com\)](#)

Colorado: [Other License plates | Department of Revenue - Motor Vehicle \(colorado.gov\)](#)

Iowa: [Miscellaneous Dealer Information, Permits & Plates - Motor Vehicle Division - Iowa DOT](#)

Maine: [Bureau of Motor Vehicles, Dealer Licensing \(maine.gov\)](#) (See paragraph I.E. of this document: [250c103.docx \(live.com\)](#))

Minnesota: [License plates - Dealer Plates \(mn.gov\)](#)

New Brunswick: [Auto Dealer Online Program \(Authenticated Client\) \(snb.ca\)](#)

New Hampshire: [Retail Vehicle Dealer | NH Division of Motor Vehicles](#)

New Mexico: [Chapter 12 – Dealers and Other Businesses Licensed by MVD | Motor Vehicle Division NM \(newmexico.gov\)](#)

Ohio: [Dealer License Plates | Auto Dealers \(ohio.gov\)](#)

Ontario: [Get a manufacturer licence plate, dealer plate or service plate | ontario.ca](#)

Pennsylvania: [67 Pa. Code § 53.4. Use of plates. \(pacodeandbulletin.gov\)](#)

Quebec: [Dealer Plate \(X Licence Plate\) - SAAQ \(gouv.qc.ca\)](#)

South Carolina: [Dealer License Plates \(scdmvonline.com\)](#)

South Dakota: [Dealer Requirements & License Plates | South Dakota Department of Revenue \(sd.gov\)](#)

Texas: [Dealer License plates | TxDMV.gov](#)

Utah: [Dealer Plates \(utah.gov\)](#)

Virginia: [Virginia Car Dealer Licensing Requirements | DMV.ORG](#)

Wyoming: [Existing Dealers \(state.wy.us\)](#)

### Other Information Available on the Internet

Although the jurisdiction MVA and statutes should be the primary resources for accurate information, other internet resources are also available online. The information provided by nongovernmental sites may not always be accurate or up to date but is a source of information the public may accept as factual. Jurisdictions should be aware of this information and utilize website search engine optimization to provide higher priority search results directing the public to jurisdiction trusted websites.

[Getting Pulled Over With Dealer Plates \[Tags Rule\] \(axlewise.com\)](#)

[The DMV Made Simple - DMV.ORG](#)

[DEALER - North Dakota Dealer License plates, dealer stickers, & dealer related \(weebly.com\)](#)

[Ohio Dealer License Plates](#)

[Rhode Island Dealer License Plates \(riplates.net\)](#)

## Appendix H Working Group Roster

### CHAIR

#### **Katie Bower**

*Director*

Michigan State Police

Office of Highway Safety Planning

#### **Jurisdiction Members**

*Rodney (Rod) Allen*

Dealer Licensing/CMV-IRP Manger

Kansas Department of Revenue

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*Chief of Vehicles Services*

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#### **Tracy Olander**

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#### **Paula J. Shaw** (Retired)

*Assistant Commissioner of Driver Services*

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#### **Tom Foster**

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**OUR VISION**

*Safe drivers*

*Safe vehicles*

*Secure identities*

*Saving lives!*



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