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Pennsylvania AAA Federation

September 6, 2012

Ms. Penni Bernard
Customer Service Division
Department of Transportation
3rd floor, Riverfront Office Center
1101 S. Front Street
Harrisburg PA 17104

Dear Penni:

I have a few comments, questions and a suggestion regarding the Proposed Rulemaking – Authorization to Verify Identification Number.

(1) - 17.2 Applicability.

This section was proposed to be changed to read: **Visual verification** is required in the following situations when it is impossible to obtain a **signed and dated** legible tracing or photograph of the **public** vehicle identification number:

I suggest adding the underlined or similar words in the next paragraph because it is not clear who must sign and date the legible tracing or photograph of the public vehicle identification number.

17.2 Applicability.

Visual verification is required in the following situations when it is impossible to obtain a **signed and dated** legible tracing or photograph of the **public** vehicle identification number. **If a tracing or photograph of the public VIN plate is submitted, it must be signed and dated by an authorized person outlined in Section 17.3.**

(2) - 17.2 Applicability.

The following information is proposed to be deleted from this section.

[(3) When the application for initial certificate of title is for a truck, truck-tractor, or motor home, regardless of source of ownership.]

I am confused why VIN verification would not be required for a truck, truck-tractor, or motor home, regardless of source of ownership or perhaps am misreading the proposed change. What is the difference between a truck, truck-tractor, or motor home when it comes to VIN verification when compared to a passenger vehicle? PennDOT currently requires VIN verification for all types of vehicles when an out-of-state title is submitted as proof of ownership.

It is my understanding that PennDOT requires VIN verification when an "out-of-state" MCO is submitted for all types of vehicles (a truck, truck-trailer, motor home, trailer, passenger vehicle, motorcycle, moped, motor driven cycle, bus, taxi, limo, etc.).

It is my understanding that PennDOT does not require VIN verification when a PA MCO is submitted for all types of vehicles (a truck, truck-trailer, motor home, trailer, passenger vehicle, motorcycle, moped, motor driven cycle, bus, taxi, limo, etc.)

Does PennDOT plan to delete: [(3) When the application for initial certificate of title is for a truck, truck-tractor, or motor home, regardless of source of ownership.] because ALL vehicles including truck, truck-tractor, or motor homes will be included at 17.2 (1) When a Pennsylvania resident acquires a new or used vehicle from a nonresident of this Commonwealth?

If so, does that mean VIN verification will be required for either ALL vehicle types or NO vehicle types when sold by a PA dealer and the proof of ownership is an MCO?

(3) 17.5. Validation process.

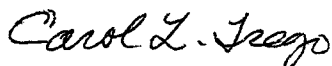
The verification of public vehicle identification number shall be signed by the authorized person performing the verification. The signature must be accompanied by:

- (1) The **printed name of the authorized person.**
- (2) An identification number for the authorized person, such as badge number, notary number, employee number, dealer number, mechanic identification or other identification number.

I believe that would mean PennDOT and online business partners such as DealerTrack must include a block on Form MV-41 or the Applicant Summary Statement for online title processing (when VIN verification was completed and the issuing agent employee signed his/her name attesting to that fact on the Applicant Summary Statement) for the authorized person to hand-print his/her name. Is that correct?

Thank you for the opportunity to provide comments regarding the proposed rulemaking for authorization to verify identification number.

Sincerely,



Carol L. Trego
Manager, License & Title
PA AAA Federation