

National Salvage Vehicle Reporting Program

June 27, 2011

Honorable Senator DeSaulnier
Chair, Senate Transportation Committee
California State Senate
State Capitol, Room 5035
Sacramento, CA 95814

Re: AB 1215 – NSVRP Support for Legislation to Implement Mandatory Access to the National Motor Vehicle Title Information System (NMVTIS) in Conjunction with the Sale of all Used Motor Vehicles

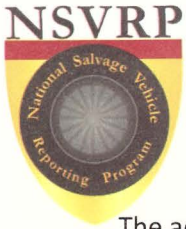
Dear Senator DeSaulnier,

The National Salvage Vehicle Reporting Program (NSVRP) is a leading not-for-profit law enforcement support organization dedicated to reducing auto theft, title fraud and abuse, and for helping to control criminal activities related to the exportation of stolen and fraudulently obtained vehicles. NSVRP works closely with the Department of Justice, the FBI, Customs and Border Patrol and other parties to help further these objectives. In addition, NSVRP is a recognized third party standards body for NMVTIS, the National Motor Vehicle Title Information System (NMVTIS) created as a result of the Anti-Car Theft Acts of 1992 and 1996. NSVRP's board is made up of representatives of local and national law enforcement organizations.

NSVRP has reviewed the most recent language of AB 1215 and would personally like to commend your committee for the careful and thoughtful attention that has been taken in crafting this bill. NSVRP is recognized as an independent 3rd party standards body for NMVTIS, and works very closely with many Federal, state and local agencies in issues related to title fraud, title abuse and auto theft. NSVRP has also had the pleasure in working directly with some of the California agencies in many of these areas.

The benefit to be gained by the public from the assurance of seeing a NMVTIS report as a sticker before they purchase a used vehicle will be of tremendous value. The legislation sets another milestone in that NSVRP understands that this language was based upon a working agreement that your office was able to forge between the dealers and leading consumer groups. That in itself is an achievement for which you should be congratulated. Absent this public advisory warning label approach, the public will often purchase a vehicle unaware that a NMVTIS reporting history exists for the vehicle that they are in the act of acquiring.

The National Salvage Vehicle Reporting Program (NSVRP) is a not-for-profit 501 (C) (3). The organization was founded to support law enforcement and to promote and support efforts to advance the National Motor Vehicle Title Information System (NMVTIS). NSVRP's mission is to support initiatives to control auto-theft and title abuse. NSVRP's Board of Directors consists of representatives of major law enforcement groups, and is an independent third party standards provider for NMVTIS. NSVRP has been recognized both by the Department of Justice and the FBI for 'Exceptional Service in the Public Interest' for its public policy efforts



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The actual language that has been drafted also appears to strike the kind of proper balance that meets everyone's legitimate needs, and fairly provides the right kind of language to advise a consumer without either understating or overstating the conditions. The trigger for when the warning language should be presented seems to be exactly appropriate – when there is either a branded title or there has been a vehicle reported by a NMVTIS Junk/Salvage/Insurance reporting entity. The nature of the warning is also proper in that a NMVTIS J/S/I submission is a strong indicator that there could be an issue with a vehicle, however there can also be perfectly good vehicles also handled and reported by these J/S/I NMVTIS reporting entities so that a NMVTIS reporting does not always mean that there is a problem with such a vehicle. A weaker warning would not provide a strong enough advisory to the consumer, but a stronger warning would be unfair to the commercial entities, as many report undamaged vehicles into NMVTIS to make sure that they are never at risk of unintended failure to meet their NMVTIS reporting requirements.

Again, everyone should be congratulated for their efforts here, both for the language in the bill itself, and for the apparent success in getting these dealer and consumer groups together to arrive at a well thought out and effective solution.

NSVRP looks forward to the passage of this bill in its current form. NSVRP also urges you to make sure that the bill does not get altered in any material fashion to either weaken its provisions, to change the warning label, or to provide opt out language or escape clauses for any groups – be it dealers, auctions, rental car companies or insurers. A consumer should be able to expect that this advisory provision applies to all types of vehicle sales, and that when the NMVTIS sticker appears on a vehicle that the vehicle either had a branded title or was previously reported some time in its life history by a NMVTIS J/S/I reporting entity. They should also be assured that every used or salvage vehicle is covered by the reporting sticker requirement regardless of the party engaging in the sales process.

On behalf of the NSVRP,

Howard Nusbaum
Administrator, NSVRP

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