



Institute of
Scrap Recycling
Industries, Inc.

www.isri.org

June 29, 2016

Denise E. O'Donnell
Director
Bureau of Justice Assistance
U.S. Department of Justice
810 Seventh Street NW
Washington, DC 20531

Re: Key Recommendations Concerning the National Vehicle Title Information System (NMVTIS) from the 2014-2016 NMVTIS Advisory Board

Dear Director O'Donnell,

It is my pleasure, as Chair of the National Motor Vehicle Title Information System (NMVTIS) Advisory Board (NAB), to share with you the final recommendations of the NAB as we approach the close of our most recent charter term. The NAB is tasked with providing the Office of Justice Programs, Bureau of Justice Assistance with critical input and key recommendations regarding the effective and efficient administration of the NMVTIS program.

A key focus of the NAB during its 2014-2016 term was identifying means for raising awareness of the NMVTIS "product" among consumers. More specifically, the product is the public-facing NMVTIS website (vehiclehistory.gov and NMVTIS.gov), which is the main portal by which consumers access the NMVTIS information system to investigate used cars they are considering for purchase. Awareness of the availability – and usefulness – of the NMVTIS website is critical to the success of the NMVTIS program as originally envisioned under the Anti Car Theft Act of 1992. The website is a key resource to consumers to help protect them against fraud and unsafe vehicles. It is with that in mind that I am proud to deliver to you the NAB's set of key recommendations.

Key Recommendations

The following key recommendations represent the consensus of the NAB and were developed to bring greater awareness, and use, of the product:

1. The NAB recommends that the DOJ formally change the name of the NMVTIS product, which currently goes by NMVTIS.gov and vehiclehistory.gov, to **VIN.gov**. Should this recommendation be accepted, all marketing, advertising and communication materials available to the public will need

to be changed to reference VIN.gov instead of vehiclehistory.gov. The vehiclehistory.gov and NMVTIS.gov links would be phased out over time and all references moving forward will be toward the new VIN.gov.

The research we have done indicates that VIN.gov is not currently owned by any organization and thus is available to be acquired and used for this purpose. In addition to VIN.gov, the NAB recommends that all domain names that could be used with VIN (e.g. .org, .biz, etc.), and that are available, should also be obtained by the DOJ and directed to VIN.gov.

Rationale: The goal of this recommendation is to establish a name for the NMVTIS product that creates a more accurate expectation of what the consumer is purchasing, and the NAB believes this name and marketing change take a positive step in that direction. The current website name – vehiclehistory.gov - creates confusion, and in some people’s view, leads to a misrepresentation of the product. This is primarily due to the fact that a number of commercial enterprises are currently marketing products that provide full vehicle histories beyond what NMVTIS is designed to offer, thus creating expectations when consumers go onto the vehiclehistory.gov website that they will receive data that NMVTIS cannot provide (and deters future use by those customers). Further, vehiclehistory.com and NMVTIS.com are both currently routed to a competing commercial enterprise, adding to the confusion as to whether the NMVTIS program is and its value.

The NAB anticipates that changing the name of vehiclehistory.gov to VIN.gov will have several positive impacts, including:

- The new name and link will more accurately represent the product that is available.
- “VIN” is a common term that is typically known and understood by consumers in the market for purchasing a vehicle and, therefore, easily recognizable.
- Accidental misrouting by consumers to VIN.com will lead to a non-competitive organization (Veterinary Information Network) compared to where Vehiclehistory.com leads, and thus will not deter the customer from ultimately accessing VIN.org.
- While the recommendation would necessarily include the need for creation of a redirect to VIN.gov, this is consistent with the current information system in which consumers that enter one address in their browser (nmvtis.gov) are automatically sent to another address (vehiclehistory.gov).
- Only minimal changes would be needed to the content of the NMVTIS website to make it clear to consumers where they have arrived.
- While there will be an additional cost of maintaining two website links, such cost is expected to be minimal.

2. The NAB recommends that BJA authorize AAMVA to spend up to \$22,000 of program income funding for the development of a NMVTIS branded video to replicate the TX DMV “Title Check” video (see <http://www.txdmv.gov/motorists/buying-or-selling-a-vehicle/title-check-look-before-you-buy>). The video would be used by AAMVA states to promote NMVTIS consumer use. Should AAMVA be able to utilize some of the existing TX DMV Video in the production of its video, then the costs are expected to be closer to \$10,000. However, NAB estimates that should AAMVA have to create a completely new video, the costs would be \$22,000.

Production of a NVMTIS video would necessarily include specific references to the NMVTIS website. Thus, the NAB strongly recommends that the DOJ first adopt the NAB’s recommendation to change

the name of the website to VIN.gov (above) and then move to authorizing the production of the NMVTIS video. In that way, the new name will be incorporated into all scripting, formatting, etc.

Continuing Concerns

In addition to the focus on Awareness, the NAB spent a lot of time during its last year examining the following issues that will require continued work.

Financial Self-Sustainability. The NAB spent considerable time during the last year reviewing the finances of the NMVTIS program with the goal of helping to ensure that the program is able to meet the stated goal in the Cooperative Agreement between BJA and AAMVA to reach financial sustainability by FY 2019. While we were able to raise a number of questions and provide suggestions regarding the major assumptions for both program expenses and revenue, this will require continued close watch and guidance by NAB and the stakeholder community over the next three years to ensure the stated goal is reached.

Non-Reporting/Compliance. The NAB noted that while the number of reports in the NMVTIS system is increasing over time, there remains a significant issue related to compliance with some entities not reporting because they do not understand the NMVTIS requirements or believe the law will not be enforced. The significant scale of non-reporting requires a closer look into whether adequate resources have been allocated to NMVTIS enforcement and educational efforts.

The NAB Board explored the need to estimate the population of all potential reporting entities by state and then estimating the compliance levels for each group. Unfortunately the NAB ran out of time before it could conclude its discussions on this topic and develop specific recommendations as to how to pursue this goal.

Additional Awareness Efforts. In June of 2015, the NAB obtained consensus on two recommendations designed to further raise awareness among stakeholders as to the availability and effectiveness of the program. Both recommendations need to be followed up upon with BJA and monitored, as follows:

1. The NAB recommended to BJA that a law enforcement campaign be initiated. The next NAB should monitor the success of the advertisements and determine if it should recommend expanding, discontinuing or altering the initiative. Law Enforcement Advertising was approved and is in the production stages.
2. The NAB recommended that funding be appropriated for the creation of a public service announcement-type video for use on the Public Broadcast Service (PBS) Spotlight On program cycle (see <http://www.trivue.org/spotlight-on-overview/>). Spotlight On programs are short, educational/public service announcement-type, 4–5 minute shows with a guaranteed airing platform on public television affiliates nationwide. The completed video will be owned by the U.S. Department of Justice (DOJ) and therefore available for leveraging in other awareness campaign areas and mechanisms such as the updated Web site, YouTube, Facebook, and trainings. Open items include:
 - Script review and approval. We need to ensure it captures the program accurately and does not oversell, undersell or negatively target any particular group.
 - Assuming the VIN.gov name and link are approved, they need to be used for advertising on the video.
 - Once completed, the sharing of the video to external sources (DMVs, YouTube page etc.) for marketing of the program needs to be addressed.

Outstanding Issues for Future Discussion

There were a number of additional issues identified by individual members of the NAB during its 2014-2016 term that there was not time to fully explore as a group. Thus, I am listing them below for consideration by the next NMVTIS Advisory Board. Please note that these items do not represent the consensus of the current NAB but instead are simply concerns and suggestions put forth by individual members for future NAB agenda items:

- Need for Vehicle Export and Accurate Vehicle Lien data to be add to the NMVTIS Process. This information is important to understanding and addressing vehicle cloning, theft and fraud.
- Possibility of adding recall data to NMVTIS in order to create a singular source of information for consumer protection. Doing so would require an interface between the National Highway Traffic Safety Administration (NHTSA) and DOJ systems. NHTSA would be required to notify DOJ whenever a "safety-related" recall is either placed or removed from a vehicle ("safety-related" is emphasized since only recalls that effect the safety of a vehicle should be reported). There were some suggestions that this could be accomplished under a pilot program under the FAST Act.
- Concern was raised over IP Addresses from Mexico being allowed to query NMVTIS and obtain information on privately owned US Vehicles. In the wrong hands (e.g., Drug Lords and/or Cartels), this information could jeopardize the safety of US Citizens. This may be an issue requiring consultation with the US State Department.
- Allowing single individuals to have the ability to register for a NMVTIS reporting ID without having to be a business. All applicants for a NMVTIS reporting ID should be required to produce a valid personal identification, such as a driver's license; or – if a business – a license number or other business-related tax ID number.
- There is confusion among the vehicle sales industry regarding how to interpret the statutory definition of "salvage automobile" to determine which vehicles must be reported to NMVTIS. There is concern that the definition is vague, leading to various plausible means to calculate whether a vehicle meets the definition of "salvage automobile" and thus inconsistent reporting among reporting entities. It also causes a situation where potentially hundreds of thousands of lightly-damaged clean titled vehicles that no one would consider "salvage" and that do not meet the definition of salvage under state law, are being reported to NMVTIS (over-reporting).
- The reliance by some state DMV's on the inconsistent "salvage yard and junk yard" database of vehicles is resulting in conflicts with consumers and state attorneys general when those DMV's attempt to issue a salvage title for a lightly damaged vehicle that was sold on a clean title but reported to NMVTIS. A lack of confidence by State DMV's in the reliability of the database could harm the long-term viability of the program. If the database develops a reputation for being unreliable and inconsistent (something that is already happening in the vehicle sales industry), consumers and businesses will not pay for reports. This could threaten the long-term financial viability of the program.

Summary

I am grateful for the opportunity to have served as Chair of the NAB over the last year, and as a Board member since the inception of the NAB. The Board is a unique and talented blend of diverse stakeholders that come together several times a year for a common purpose. The addition of several new faces on the NAB this past year – including the addition of three federal partners: the Environmental Protection Agency (EPA), the Federal Trade Commission (FTC), and NHTSA – helped further strengthen our discussions. On a personal note, I hope that you continue to invite these partners to the table as integral members of the next NAB. This is especially important given the likely agenda items for the next NAB.

Thank you again for the opportunity to serve.

Sincerely,

A handwritten signature in black ink, appearing to read "Robin K Wiener". The signature is fluid and cursive, with the first name "Robin" being the most prominent part.

Robin K Wiener
President, ISRI
NAB Chair, 2015 - 2016