



Texas Department *of* Motor Vehicles

Study on the Feasibility of Requiring Title for All
Trailers, Semitrailers, and Travel Trailers

**Prepared for the
Texas Legislature**

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Executive Summary

House Bill (HB) 2394, enacted during the 83rd Regular Session of the Texas Legislature, required the Texas Department of Motor Vehicles (TxDMV) to conduct a study of the feasibility of requiring title for each trailer, semitrailer, or travel trailer that is not manufactured housing.

In conducting the study, the TxDMV must, in relation to trailers, semitrailers, and travel trailers covered by the study:

- determine the cost and feasibility of assigning vehicle identification numbers;
- develop options for obtaining title;
- evaluate the processes of inspection, verification, and assignment of vehicle identification numbers;
- develop recommendations for requiring the permanent affixation of vehicle identification numbers;
- determine the approximate fiscal impact from theft and evaluate options to decrease this theft; and
- evaluate the level of access individuals in rural areas have to obtain title.

The TxDMV was required to receive input from local governmental entities that provide title services, statewide associations representing agricultural, automotive theft experts, and statewide association of counties, and prepare a report that contains the study's findings and makes recommendations regarding possible legislative solutions to any problems found in the processes for obtaining title for trailers, semitrailers, or travel trailers covered by the study.

Because trailers with a gross vehicle weight (GVW) greater than 4,000 pounds, certain farm trailers/semitrailers, and travel trailers that are not manufactured housing are currently required to be titled, the study covered only the two categories of trailers currently exempt from titling requirements: 1) trailers/semitrailers with a GVW of 4,000 pounds or less and 2) trailers/semitrailers used only for the transportation of farm products if the products are not transported for hire. Though these two types of trailers/semitrailers are not currently required to be titled, statute does allow for the permissive (i.e., voluntary) titling of 4,000 pounds or less GVW trailers and farm semitrailers between 4,001 and 34,000 pounds GVW that meet certain conditions.

For comparison purposes, the study examined trailer/semitrailer titling requirements and exemptions in ten other states. The survey found five states required all non-farm trailers/semitrailers to be titled regardless of GVW. The remaining five states exempted non-farm

trailers/semitrailers from titling based on GVW ranging from 1,000 pounds or less to 4,000 pounds or less. Farm trailers/semitrailers are required to be titled in four states regardless of GVW. Farm trailers/semitrailers are exempted from titling in three states regardless of GVW, and one state exempts all farm trailers/semitrailers, as long as they are not used on public roads. Two states exempted farm trailers/semitrailers from titling based on GVW. Voluntary titling of exempted trailers is allowed in two states.

The stakeholders identified four areas of concern if Texas begins requiring the titling of currently exempt trailers/semitrailers: 1) trailers/semitrailers that do not have a vehicle identification number (VIN) physically on the trailer/semitrailer, 2) trailers/semitrailers that do not have a VIN in the motor vehicle record, 3) the impact of completing VIN inspections and assignments for these trailers/semitrailers, and 4) retroactively titling all existing trailers and semitrailers currently exempt from titling requirements.

Since two of the stated purposes of the vehicle title laws in Texas relate to lessening and preventing vehicle theft, any discussion about vehicle titling is intertwined with vehicle theft prevention. As noted in the concerns above, issues relating to a VIN are of paramount concern in vehicle titling. Texas law requires a VIN when titling a vehicle, and this identification number assists in recovering a vehicle if it is stolen. When a vehicle is stolen, including trailers/semitrailers, the National Crime Information Center database requires a VIN or manufacturer's unique number be entered as part of the reporting process by law enforcement. If a stolen trailer/semitrailer does not have a VIN or manufacturer's unique number, that theft is typically not entered into the database and may be reported as property or equipment theft rather than as a trailer/semitrailer theft. As a result, trailers/semitrailers that do not have a VIN or a manufacturer's unique number are not reported stolen at all or are recorded inaccurately in the database. This results in a likely underreporting of trailer/semitrailer thefts.

Though Texas law requires a VIN for titling, it does not require one for registration. Therefore, a trailer/semitrailer currently exempt from being titled may not have a VIN. Furthermore, even if it does have a VIN, the VIN may not be recorded on the motor vehicle record. As of March 2014, there were 738,742 trailers/semitrailers that did not have a VIN recorded on their motor vehicle record. To have a VIN assigned or reassigned, the trailer/semitrailer must be inspected by an auto theft investigator to ensure it has not been reported stolen. Following the inspection, a TxDMV Regional Service Center assigns or reassigns a VIN and provides it on a department form. If trailers/semitrailers currently exempt from titling were required to obtain titles, the

trailers/semitrailers would be subject to VIN inspection and assignment and other titling requirements including the payment of titling fees.

Titling all trailers/semitrailers could result in a decrease of trailer/semitrailer thefts, an increase in the recovery of stolen trailers/semitrailers, and would provide for a more accurate transfer of ownership. These benefits would be offset by costs to citizens and government agencies.

Requiring citizens to title all trailers will result in monetary costs and loss of time. The TxDMV and county tax assessor-collectors also face potential increases in operating costs and work load due to the number of trailers/semitrailers that would be required to be titled. In addition, there is the potential for a significant increase in work load for auto theft investigators.

Conclusion

Based upon the findings of the study and opinions of the various stakeholders, the TxDMV Board does not recommend changing the existing vehicle titling requirements as they relate to trailers/semitrailers at this time. Those trailers/semitrailers currently exempt from mandatory titling should remain that way, and voluntary titling of them should continue to be allowed. While recognizing the role requiring a title, and therefore a VIN, can have in the recovery of stolen trailers/semitrailers, those benefits are not considered to outweigh the costs to consumers and governmental entities that would come from mandatory titling of all trailers/semitrailers. However, the Board does recommend that if titling were to become mandatory, implementation of the new requirement should be done only at the time of transfer of ownership rather than requiring all existing exempted trailers/semitrailers to be titled immediately.

House Bill 2394 – The Instructions for the Study

House Bill 2394, enacted during the 83rd Regular Session of the Texas Legislature, required the TxDMV to conduct a study of the feasibility of requiring title for each trailer, semitrailer, or travel trailer that is not manufactured housing (see [Appendix B](#) for text of HB 2394).

In conducting the study, the TxDMV must, in relation to trailer, semitrailers, and travel trailers covered by the study:

- determine the cost and feasibility of assigning vehicle identification numbers;
- develop options for obtaining title;
- evaluate the processes of inspection, verification, and assignment of vehicle identification numbers;
- develop recommendations for requiring the permanent affixation of vehicle identification numbers;
- determine the approximate fiscal impact from theft and evaluate options to decrease this theft; and
- evaluate the level of access individuals in rural areas have to obtain title.

The TxDMV was required to receive input from local governmental entities that provide title services, statewide associations representing agricultural, automotive theft experts, and statewide association of counties, and prepare a report that contains the study's findings and make recommendations regarding possible legislative solutions to any problems found in the processes for obtaining title for trailers, semitrailers, or travel trailers covered by the study (see [Appendix C](#) for study participants).

Because trailers/semitrailers with a GVW greater than 4,000 pounds, certain farm trailers/semitrailers, and travel trailers that are not manufactured housing are currently required to be titled, the study covered only the two categories of trailers currently exempt from titling requirements: 1) trailers/semitrailers with a GVW of 4,000 pounds or less¹, and 2) trailers and semitrailers used only for the transportation of farm products, if the products are not transported for hire². Though those two types of trailers are not currently required to be titled, statute does allow

¹ Transportation Code 501.002(17)

² Transportation Code 501.004(b)(1)

for the permissive (i.e., voluntary) titling of 4,000 pounds or less GVW trailers³ and farm semitrailers between 4,001 and 34,000 pounds GVW that meet certain conditions⁴.

State Representative Charles Perry authored HB 2394. Representative Perry submitted the following as direction to the TxDMV in conducting the study:

HB 2394 called for the Texas Department of Motor Vehicles (TxDMV) to prepare a study on the feasibility of requiring title for all trailers, semitrailers, and travel trailers not considered manufactured housing. Many Texans rely on the use of a trailer every day, whether it is for recreation, personal benefit, or even as a source of income. For a state as expansive and diverse as Texas, trailers are an integral part of our society. With the current system of laws, there is often no record of trailers, and as such, there is no method of recourse for stolen property or proof of ownership for insurance purposes. Some counties have begun implementing their own regulatory policies aimed at addressing this issue, which has caused mass inconsistencies across the state. It is necessary to understand the problem and potential solutions as thoroughly as possible. HB 2394 provides for TxDMV to gain a better understanding of alternative solutions. The only action this bill called for was to have TxDMV to carry out this study and provide the findings to the Legislature. This will offer ideas for the Legislature to take up next session if a clear and viable option even exists.

³ Transportation Code 501.037

⁴ Transportation Code 501.036

History of Trailer/Semitrailer Titling in Texas

The Certificate of Title Act of Vernon's Civil Statutes required motor vehicles, including trailers and semitrailers, to be titled starting October 1, 1939. However, owners were given until January 1, 1942, to title any motor vehicle purchased after January 1, 1936. In 1959, the Certificate of Title Act was revised to require title for all house trailers and trailers/semitrailers with a gross weight in excess of 4,000 pounds. An exclusion was made for trailers/semitrailers used solely for the transportation of farm products, if such products were not transported for hire.⁵

In 1995, Senate Bill 971 (74th Legislature, Regular Session) recodified the Vernon's Civil Statutes into the Texas Transportation Code. The Certificate of Title Act became Chapter 501 of the Transportation Code, which continued to charge the department with the responsibility of issuing certificates of title for motor vehicles.

In 2001, HB 2217 (77th Legislature, Regular Session) allowed the permissive titling of farm semitrailers with a GVW of more than 4,000 pounds, if the farm semitrailer meets titling and registration requirements. These provisions were later amended by HB 505 (80th Legislature, Regular Session) and HB 2357 (82nd Legislature, Regular Session). In 2013, HB 2741 (83rd Legislature, Regular Session) allowed the permissive titling of trailers with a GVW of 4,000 pounds or less if the trailer meets titling requirements.

TITLING OF TRAILERS AND SEMITRAILERS

	Non-Farm	Farm
Trailer		
4,000 lbs and less	Permissive	Cannot be titled
Between 4,001-34,000 lbs	Required	Cannot be titled
Greater than 34,000 lbs	Required	Required
Semitrailer		
4,000 lbs and less	Cannot be titled	Cannot be titled
Between 4,001-34,000 lbs	Required	Permissive
Greater than 34,000 lbs	Required	Required

⁵ See Texas Department of Motor Vehicles *Motor Vehicle Title Manual* for statutory history of titles

Current Process for Titling a Trailer/Semitrailer

As stated earlier, statute requires most trailers/semitrailers to be titled and allows some trailers and farm semitrailers not required to be titled to be titled permissively. The process below applies regardless of whether the titling is mandatory or permissive.

Forms and Paperwork

To title a trailer/semitrailer in Texas, the applicant must apply at their County Tax Assessor-Collector's office (or a subcontractor if available), complete the *Application for Texas Title*, **Form 130-U**, and submit the following form(s) if applicable: *Prescribed Form for Statement of Fact for Ownership of Homemade/Shop made Trailer, Semitrailer, or Travel Trailer*, **Form VTR-305-A**; *Notice of Assigned Number or Installation of Reassigned Vehicle Identification Number*, **Form VTR-68-N**; and photocopy of the completed *Application for Assigned or Reassigned Number*, **Form VTR-68-A**.⁶

In addition, the applicant must provide an acceptable government issued photo identification, ownership evidence (e.g., bill of sale, Manufacturer's Certificate of Origin, etc.), a certified weight certificate, and photographs of the trailer/semitrailer. Additionally, some County Tax Assessor-Collectors require a pencil tracing or photograph of the trailer's/semitrailer's VIN, manufacturer's unique number, or TxDMV assigned or reassigned number.

The applicant must also pay the required title fees of \$28.00 if the title application is filed in a non-Texas Emissions Reduction Plan (TERP) County, or \$33.00, if the application is filed in a TERP county.⁷ The title fee revenue is split between the county and various funds within the state treasury.

In order to complete the titling process, an applicant might have to visit three different locations: an auto theft inspection location, a TxDMV Regional Service Center, and their County Tax Assessor-Collector's office.

The TxDMV operates Regional Service Centers in the following counties: Bexar, Dallas, Ector, El Paso, Gregg, Harris, Hidalgo, Jefferson, Lubbock, McLennan, Nueces, Potter, Tarrant, Taylor, Travis, and Wichita (see [Appendix E](#) for Regional Service Center Map). The Regional Service Center locations were selected to be centrally located in geographic areas across the state. Each Regional Service Center is responsible for serving multiple counties in its geographic area.

⁶ Information for titling of trailers/semitrailers can be found in the *Motor Vehicle Title Manual*

⁷ Transportation Code 501.138

Obtaining a VIN

A VIN is a unique serial number attached to each vehicle for identification purposes. The characters of a VIN identify characteristics of a vehicle and can be decoded to give law enforcement and other governmental entities valuable information about the manufacture of the vehicle, vehicle attributes, model year, plant location, and the sequential number of the vehicle.

A vehicle must have a VIN or manufacturer's unique identification number to be titled in Texas.⁸ In addition, the National Highway Traffic Safety Administration, through 49 Code of Federal Regulations, requires all manufactured motor vehicles, including trailers, operating on United States public highways, roadways, or streets to have a VIN. Statute states the department may assign or reassign a VIN to a vehicle when the VIN is missing, altered, obliterated, or has never been assigned.⁹

VIN Inspection, Verification, and Assignment

To receive an assigned or reassigned VIN, the applicant must first go to the auto theft unit of a county or municipal law enforcement agency for a VIN inspection. The applicant must take the trailer/semitrailer and ownership evidence to the auto theft inspection location for the inspection. The auto theft investigator verifies the VIN or indicates the VIN is missing, altered, or obliterated, and reports the finding on a **Form VTR-68-A**. The applicant provides the completed **Form VTR-68-A** to a TxDMV RSC which will then provide to the applicant an assigned or reassigned VIN for the trailer/semitrailer on **Form VTR-68-N**.¹⁰

If the applicant is unable to provide ownership evidence to the auto theft investigator, then the trailer/semitrailer cannot be inspected and thus cannot receive an assigned VIN. If this situation occurs, the trailer owner would be required to obtain a court order awarding ownership before having the VIN inspection and assignment completed.

The verification of the trailer's/semitrailer's newly assigned or reassigned VIN occurs at the County Tax Assessor-Collector office during the titling process when the applicant presents ownership evidence along with the completed inspection forms. In some cases, the county Tax Assessor-Collector will require a pencil tracing or photograph of the trailer/semitrailer VIN.

⁸ Transportation Code 501.021

⁹ Transportation Code 501.032 & 501.033

¹⁰ *Texas Title Manual*, Chapter 13

VIN Installation

An assigned or reassigned VIN is required to be die-stamped or otherwise affixed in the manner designated by the department. If the TxDMV assigns a VIN to a trailer/semitrailer, the applicant is responsible for die-stamping the VIN onto the trailer/semitrailer in a location specified by the department. It should be noted, there is no physical inspection by the TxDMV Regional Service Center or the County Tax Assessor-Collector to verify that the VIN has been die-stamped onto the trailer/semitrailer for which it was assigned. The location of where the VIN is to be die-stamped is identified on the **Form VTR-68-N**. If TxDMV Regional Service Center personnel reassign a manufacturer's VIN, the reassigned VIN is stamped onto a Mylar decal and then affixed by Regional Service Center personnel to the trailer/semitrailer in the appropriate location.

Feasibility of Requiring all Trailers/Semitrailers be Titled

When conducting the feasibility study mandated by HB 2394, the department did so by first examining the titling of all trailers/semitrailers in light of the statutory purpose of the Certificate of Title Act. That purpose is to lessen and prevent the theft of motor vehicles, the importation and trafficking of stolen motor vehicles, and the sale of an encumbered motor vehicle without the enforced disclosure to the purchaser of a lien secured by the vehicle.¹¹

Trailer/Semitrailer Theft in Texas

There are two data sources for determining the number of stolen trailers/semitrailers in the state. The first source is the TxDMV database which receives stolen vehicle information from the Texas Department of Public Safety (TxDPS). The second data source is the National Crime Information Center database.

For purposes of the study, only the theft data for those trailers/semitrailers currently exempt from titling were examined. As of March 2014, the TxDMV database had a total of 6,908 trailer/semitrailer records marked as stolen. That total broke out to 5,154 trailers with a GVW of 4,000 pounds or less and 1,754 farm trailers with a GVW of 34,000 pounds or less. The National Crime Information Center database reported that 5,373 trailers/semitrailers were stolen in Texas in calendar year 2013.

Statewide Fiscal Impact of Trailer Theft

The approximate fiscal impact of trailer/semitrailer theft can be estimated if the types of trailers/semitrailers stolen, the number of each type stolen within a specific timeframe, and the value of each type of trailer/semitrailer stolen is known.

Unfortunately, determining the fiscal impact of trailer/semitrailer theft proved difficult because of the constraints and limitation of available data. It should be noted that the National Crime Information Center data do not report the value, year, model, weight, or condition of the trailer/semitrailer when it was stolen, and if recovered, the condition of the trailer/semitrailer when recovered.

To determine the estimated fiscal impact of trailer/semitrailer theft, an average value of \$2,000 per trailer/semitrailer stolen was used. Using the number of 5,373 trailers/semitrailers stolen and using a presumed average value per trailer/semitrailer of \$2,000, the fiscal impact would have been

¹¹ Transportation Code 501.003

approximately \$10,746,000 for 2013. This number represents the fiscal impact of trailers/semitrailers stolen that were reported to the National Crime Information Center

Theft Data Limitations

There are inherent limitations to the usefulness of the available data sources regarding trailer/semitrailer theft. Therefore, the data should be considered only as an indicator of theft in a given time frame and not the total number of trailers/semitrailers stolen.

The National Crime Information Center does not report trailers/semitrailers stolen by GVW but by trailer/semitrailer type. This is a more subjective determination than weight based only reporting would be. The above data reported for 2013 represent the stolen data that best fit the types of trailers/semitrailers examined in this study. Also, the data do not include trailers/semitrailers not reported or recorded as stolen in the national database or trailers/semitrailers that might have been reported to the database as stolen property or equipment theft because the trailer/semitrailer did not have a VIN or manufacturer's unique number.

As with the National Crime Information Center data, the data in the TxDMV database most likely do not fully represent the total number of stolen trailers/semitrailers. The TxDMV database receives a TxDPS stolen vehicle data file on a daily basis. The TxDMV database reads the TxDPS stolen data file and first searches for a document number match. If no match is found, it searches for a VIN and license plate number combination match. If there is still no match, the final search is by VIN only. If no matching record is found within all search criteria, the TxDPS stolen data are rejected and not retained in the TxDMV database due to there being no record that corresponds to the inputted data. As an example, if one of the 738,742 trailers/semitrailers in the TxDMV database that does not have a VIN as part of its record was stolen and the owner provided law enforcement with a manufacturer's VIN, there would be no match in the database. This would also apply to homemade and shop made trailers/semitrailers with no TxDMV assigned number. An additional downside of not having a VIN and/or not having it recorded in the TxDMV database is that an owner in such a situation could have difficulty filing an insurance claim.

Conclusions

Agricultural stakeholders participating in the study group doubted the level of theft of currently title exempt farm trailers/semitrailers warranted the mandatory titling (and therefore the mandatory assigning and recording of a VIN) of those trailers/semitrailers. The agricultural stakeholders also doubted that titling in and of itself would have an appreciable effect on deterring theft.

Law enforcement stakeholders in the study group believed a significant number of stolen trailers/semitrailers are never entered into the National Crime Information Center because of a lack of a VIN.

VIN Assignment and Installation

HB 2394 specifically requires the study to look at several aspects of titling trailers/semitrailers as it relates to the VIN. As stated before, a VIN is a prerequisite for getting a title, so the lack of a VIN, whether actual or not, must be addressed if a currently non-titled trailer/semitrailer is going to be titled.

As of March 2014, the total number of trailers/semitrailers covered by the study that were registered in Texas but did not have a VIN recorded on its motor vehicle record was 738,742. The break down by type is 449,381 trailers/semitrailers with a GVW of 4,000 pounds or less, 27,367 farm trailers/semitrailers with a GVW of 4,000 pounds or less, 261,994 farm trailers/semitrailers with a GVW of 4,001 pounds to 34,000 pounds.

However, just because one of the above trailers/semitrailers does not have a VIN on its motor vehicle record with the department does not mean the vehicle would require a VIN inspection. Some of the records in the database may no longer be active and therefore would not be affected by a change in title laws. Also, some of the trailers/semitrailers may already have a VIN on the vehicle, but that number was never reported or recorded in the TxDMV database. For these vehicles, a change in the title requirements would affect them, but not nearly as inconveniently than if the vehicle does not actually have a VIN.

In Texas, many trailers/semitrailers have been built or assembled at home. These trailers/semitrailers do not have a VIN and as such have no unique number to identify them. This not only makes it difficult for law enforcement to recover and then return the vehicle to the rightful owner if ever stolen, but means the vehicle cannot be titled even if the owner wishes to do so. If a trailer/semitrailer has never been issued a VIN or the original VIN cannot be located or identified, the owner would have to apply to have a VIN assigned by the TxDMV in order to apply for a title.

In addition to the above trailers/semitrailers with no VIN on their vehicle records, there are likely to be untitled trailers/semitrailers that have a VIN on their vehicle record but the VIN is invalid. This can happen when the number on the record was generated or provided by the owner, county Tax Assessor-Collector, or sheriff's department. These numbers do not qualify as valid VINs since

state law prohibits that practice and only allows the department to issue VINs.¹² In such instances, the invalid VIN would prevent the trailer/semitrailer from being issued a title and would necessitate the owner complete a VIN inspection and assignment process to proceed with the title application.

Cost Analysis of Assigning a VIN

The groups impacted when a trailer/semitrailer without a VIN is required to be titled are the owners of the trailer/semitrailer, auto theft investigators, county Tax Assessor-Collectors, and TxDMV Regional Service Centers. For purposes of the study, a cost scenario was performed assuming the need to assign 1,000 VINs.

For auto theft investigators, to conduct 1,000 VIN inspections, estimated at 30 minutes per inspection, would take an additional 500 hours of labor. With an auto theft investigator's hourly mean wage of \$36.80 per hour¹³, the additional labor cost would be \$18,400. The maximum VIN inspection fee of \$40.00 is sufficient to cover the inspection labor cost, but because current registered owners are exempt from the VIN inspection fee¹⁴, the actual revenue collected would likely be less.

The cost to a TxDMV Regional Service Center to process 1,000 applications for an assigned number is estimated at 13 minutes per application for a total of 210 labor-hours. With a TxDMV Regional Service Center personnel average labor rate of \$17.00 per hour, the labor cost would be \$3,570. The assigned VIN fee of \$2.00¹⁵ would not cover the additional labor cost, and there would be a cost incurred of \$1,570.

The cost to the owner per trailer/semitrailer would be up to \$40.00 for the VIN inspection and the \$2.00 TxDMV fee for the assigned or reassigned VIN, for a total of up to \$42. The customer may incur further costs per trailer/semitrailer such as fuel to transport the trailer/semitrailer for a VIN inspection and for reassignment of a manufacturer's number, if necessary; obtaining photographs of the trailer/semitrailer; obtaining a certified weight certificate; die-stamping the assigned number on the trailer/semitrailer, and lost wages and time.

Evaluation of the VIN Assignment Process

Given the current processes for inspection, verification, and assignment of a VIN, agricultural stakeholders were concerned that the VIN assignment process would be the most problematic part

¹² Transportation Code 501.032 & 501.033

¹³ Wage data is based on the US Department of Labor, Bureau of Labor Statistics, Occupational Employment and Wages, May 2013, Detectives and Criminal Investigators' hourly mean wage for Texas.

¹⁴ Transportation Code 501.033(e)

¹⁵ Transportation Code 501.033(c)

of moving to a mandatory titling requirement for all trailers/semitrailers. A significant problem would arise in that there are many implements in agricultural use that could be considered a trailer/semitrailer but would not easily be defined. Such items can be found in many configurations and are often custom made by the farm operator. If such an item does not easily fit the definition of a trailer/semitrailer, then an owner would be unsure whether the item would need a title and therefore have to go through the VIN assignment process.

Law enforcement stakeholders were concerned that the VIN inspections needed to implement mandatory titling would overwhelm their resources. For example, there are only four investigators in Amarillo to handle VIN inspections in the Panhandle region. Law enforcement stakeholders were concerned that there are simply not enough auto theft investigators throughout the state to inspect all trailers. There was specific concern expressed about the availability of trained auto theft investigators in rural areas, which is most likely where the greatest demand for such services would be if titling became mandatory.

Currently, when a VIN inspection is required, each TxDMV Regional Service Center has a list of known entities which perform these VIN inspections. The chart below provides the number of available entities known to each TxDMV Regional Service Center; however, there may be additional entities which perform these inspections. Several of these Regions have overlapping Task Forces which may result in an entity being counted for each region (see [Appendix F](#) for complete list). Additionally, the TxDPS may have trained auto theft investigators to conduct VIN inspections and may assist local law enforcement upon request.

KNOWN LAW ENFORCEMENT ENTITIES CONDUCTING INSPECTIONS BY TxDMV REGION

Region	# of Inspection Entities
Abilene	2
Amarillo	1
Austin	4
Beaumont	3
Corpus Christi	5
Dallas	17
El Paso	3
Ft. Worth	5
Houston	7
Longview	3
Lubbock	1
Midland/Odessa	1
Pharr	3
San Antonio	3
Waco	6
Wichita Falls	0 (Referred to Ft. Worth/Dallas)

Law enforcement stakeholders also were concerned about the possibility of allowing VIN inspections to be conducted by non-law enforcement personnel. Law enforcement believed such personnel might misidentify numbers, rubber stamp the VIN inspection forms, or generally not maintain the integrity of the VIN inspection program.

However, law enforcement stakeholders believed TxDMV should conduct its own inspections if all trailers/semitrailers become subject to mandatory titling. An additional option would be to allow TxDPS Commercial Vehicle Enforcement Troopers, who are Department of Transportation certified, perform VIN inspections. Another solution to address the lack of available auto theft investigators was to allow all law enforcement personnel (not just trained theft investigators) to perform VIN inspections for all trailers/semitrailers. However, stakeholders believed a standardized training program would need to be developed for VIN inspections should individuals other than trained auto theft investigators be allowed to perform this function.

The possibility of allowing existing trailers/semitrailers to have a VIN assigned and therefore title issued without having a VIN inspection was evaluated. Law enforcement stakeholders were concerned that without the VIN inspection, stolen trailers/semitrailers could receive a VIN and then receive a clean Texas title. Since the purpose of title is to prevent theft and trafficking of stolen vehicles, changing the VIN assignment process in a way that would increase the possibility of a stolen vehicle being “laundered” would be counterproductive.

County Tax Assessor-Collectors in the study group presented the idea that the VIN assignment process could be improved for all trailers/semitrailers regardless of whether titling is required if the TxDMV issued a block of trailer VINs to County Tax Assessor-Collectors. This could expedite the assignment of VINs to customers titling a trailer/semitrailer. Issuing a block of trailer VINs to Tax Assessor-Collectors would eliminate the requirement of owners to obtain an *assigned* VIN from a TxDMV Regional Service Center. However, owners would still be required to obtain a *reassigned* VIN from the TxDMV. Thus creating a dual process for assigned versus reassigned VINs. Such a dual process could create confusion for customers and others involved in the VIN assignment process. Furthermore, TxDMV would need to develop a process to track, manage, and control the block assignment of VINs to each County Tax Assessor-Collector.

There was a general consensus that requiring an annual TxDPS inspection of all trailers/semitrailers would reduce trailer/semitrailer theft. The inspection process records the VIN,

which assists in recovery of stolen trailers. Requiring an annual TxDPS safety inspection of all trailers/semitrailers would require a change to the TxDPS inspection program policies and procedures and an amendment to Chapter 548 of the Texas Transportation Code.

Installing an Assigned VIN

Once a VIN is assigned or reassigned by the TxDMV, the VIN is required to be installed or affixed on the trailer/semitrailer by die-stamping or otherwise affixed in a manner designated by the TxDMV.¹⁶ The current process for a reassigned number is for a Mylar decal to be stamped by the TxDMV Regional Service Center with the reassigned number and then affixed to the trailer/semitrailer in the appropriate location.¹⁷

There was general concern among stakeholders about the durability of the Mylar decals remaining affixed, especially on boat trailers/semitrailers that are exposed to both fresh and salt water. If the decal were to detach, selling the trailer/semitrailer or recovering it if stolen would be more difficult. Additional concerns were raised by agricultural groups about developing a standardized VIN location if all trailers/semitrailers are required to be titled. The variety of configurations of equipment which could be classified as needing to be titled and therefore needing a VIN would make a standard VIN placement location of the equipment difficult.

Various methods for installing the VIN on trailers/semitrailers were discussed by the study group. Bead welding rather than die-stamping, as is specified in current statute, could be a more useful method especially for larger trailers/semitrailers due to the fact that as the thickness of the metal increases, the effectiveness of die stamping decreases. Another proposed option was to have a governmental agency affix a unique, permanent identification number, by die-stamping per specific, secure die specs, such as standard size and configuration dies, similar to Harley-Davidson and General Motors, that are difficult to alter or remove without leaving some indication of the alteration. This method would also have the VIN be stamped or welded to the trailer/semitrailer in a secondary location. An amendment to Chapter 217 of the Texas Administrative Code would be required to add bead welding or something similar as a method to permanently affix a VIN.

There was general consensus among stakeholders that a more ideal approach would have the VIN die-stamped or bead welded on the trailer/semitrailer rather than using the current Mylar decals. Stopping the use of Mylar decals would require the TxDMV to conduct a cost and requirements analysis to support any replacement method. Also, if Texas disallowed the use of Mylar or other

¹⁶ Transportation Code 501.032(c)

¹⁷ Texas Motor Vehicle Title Manual, Chapter 13

metallic decals on trailers/semitrailers sold in Texas, there could be resistance from trailer/semitrailer manufacturers due to the fact that National Highway Traffic Safety Administration allows the use of such decals.

The study group considered ways to ensure that the assigned VIN actually gets die-stamped or affixed to the trailer/semitrailer. Currently, it is largely up to the applicant to die-stamp the assigned number once received from the department. An option to ensure the installation of the VIN would be to begin having TxDMV Regional Service Center or County Tax Assessor-Collector personnel either verify that the VIN has been die-stamped onto the trailer/semitrailer prior to titling. TxDMV policies and procedures would have to be amended for Regional Service Center personnel to physically inspect trailers/semitrailers for VIN installation. Further analysis would need to be conducted to determine the additional Regional Service Center personnel requirements needed to physically inspect VINs on trailers/semitrailers. To have the County Tax Assessor-Collector conduct a similar visual inspection at time of application for title would require a workforce assessment by each county as well as the development of standardized policies and procedures from the TxDMV.

A second option discussed by the study group was to have Regional Service Center employees do the die-stamping themselves at the time the VIN is assigned or reassigned. For the TxDMV to begin die-stamping an assigned or reassigned VIN at the Regional Service Center, an assessment of all 16 offices would be required to identify the resources (equipment, facilities, personnel, tools etc.) needed to begin conducting such activities. This assessment would identify the cost and funding needed to create the die-stamping stations and identify the additional staffing and training needed to perform the die-stamping. Die-stamping policies, procedures, and training would also need to be developed and provided.

Options for Titling

For comparison purposes, the study examined trailer/semitrailer titling requirements and exemptions in the following states: Florida, Illinois, Michigan, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Virginia, and Washington. The survey found five states required all non-farm trailers/semitrailers to be titled regardless of GVW. The remaining five states exempted non-farm trailers/semitrailers from titling based on GVW ranging from 1,000 pounds or less to 4,000 pounds or less. Farm trailers/semitrailers are required to be titled in four states regardless of GVW. Farm trailers/semitrailers are exempted from titling in three states regardless of GVW, and one state exempts all farm trailers/semitrailers, as long as they are not used on public roads. Two

states exempted farm trailers/semitrailers from titling based on GVW. Voluntary titling of exempted trailers is allowed in two states. Based on the data gathered from the survey, there were no standard approaches used by other states regarding the titling of trailers, and therefore no “best practices” could be ascertained. The data gathered from this survey can be found in [Appendix G](#).

The study group evaluated multiple scenarios if mandatory titling for all trailers/semitrailers were implemented in Texas. The first scenario evaluates the option of a single effective date. Scenario two evaluates the option of titling upon registration renewal. The final scenario evaluates the option of titling upon ownership transfer.

It is difficult to determine the exact number of trailers/semitrailers that will require a VIN inspection; therefore, a cost analysis was conducted based on 1,000 trailers/semitrailers requiring a VIN inspection and assignment. The analysis is then aggregated, with each increment representing a percentage of the total trailers/semitrailers that may not have a VIN. The results show an escalating cost as the percentage of trailers/semitrailers required to complete the VIN inspection and assignment process increases. The chart below lists the numbers.

INSPECTION AND VIN ASSIGNMENT COST ANALYSIS

Number of Trailers	Percentage of Trailer Population	Inspector Labor hour 30 minutes / Inspection	Inspector Labor Rate \$36.80/HR	Inspection Fees Collected	RSC VIN Assignment Labor Rate \$17.00/HR	VIN Assignment Fees Collected
1	0.00%	0.50	\$ 36.80	\$ 40.00	0.21	\$ 3.57
1,000	0.14%	500	\$ 18,400	\$ 40,000	210	\$ 3,570
100,000	14%	50,000	\$ 1,840,000	\$ 4,000,000	21,000	\$ 357,000
550,000	74%	275,000	\$ 10,120,000	\$ 22,000,000	115,500	\$ 1,963,500
738,742	100%	369,371	\$ 13,579,200	\$ 29,549,680	154,980	\$ 2,637,309

Scenario 1 – Single Effective Date

This scenario represents the labor cost (excluding fringe benefits) that would be incurred should titling become mandatory for all trailers/semitrailers by a fixed date. If all 738,742 trailers/semitrailers were required to be titled at once and also required a VIN assignment, this would require 178 full time auto theft investigators and 75 TxDMV personnel. This would be a one-time cost of \$13.6 million for auto theft investigators and \$2.6 million for TxDMV personnel. There would also be additional ongoing costs, which were not quantified, to maintain the program after the first year of implementation.

Scenario 2 – Titling at Registration Renewal

This scenario represents the labor cost (excluding fringe benefits) that would be incurred should titling become mandatory for all trailers/semitrailers at the time of registration renewal. Based on a three month average of registration renewals of existing non-titled trailers without VINs, approximately 550,000 trailers/semitrailers would be titled during the first year. This would require an additional 132 full time auto theft investigators and 56 TxDMV personnel. There would be an initial cost of \$10.1 million for auto theft investigators and \$2.0 million for TxDMV personnel during the first year. The remaining 190,000 trailers/semitrailers that already have a VIN would not impact auto theft of TxDMV personnel, as the owners of these trailers/semitrailers would only have to apply for Texas title.

Scenario 3 – Titling on Ownership Transfer

This scenario represents the labor cost (excluding fringe benefits) that would be incurred should titling become mandatory for all trailers/semitrailers upon ownership transfer. Based on a three month average of ownership transfers of existing non-titled trailers/semitrailers without VINs, approximately 100,000 trailers/semitrailers would be titled per year. This would require an additional 34 full time auto theft investigators and 10 TxDMV personnel; however, in order to ensure one additional staff member at each Regional Service Center, 16 full time employees would be required. There would be an annual cost of \$1.8 million for auto theft investigators and \$560,000 for TxDMV personnel.

Again, agricultural stakeholders believed the benefits of titling are not sufficient to outweigh the costs. Many farm trailers/semitrailers have been handed down or acquired at farm and other sales venues and do not have evidence of ownership or a VIN. There were concerns from stakeholders about the lack of a one-stop shop to complete all the title requirements. A major concern was that customers would have to travel to various locations (TxDMV, Tax Assessor-Collector, law enforcement, certified weight scale, etc.) to complete the titling process.

Boating industry stakeholders recommended a title requirement for all trailers to simplify the process for the dealers, who now have to title some trailers/semitrailers and file Uniform Commercial Code forms for others. Multiple stakeholders recommended making it mandatory for anyone who sells a trailer, regardless of its GVW, to take the registration and title paperwork to the County Tax Assessor-Collector. It was also recommended a one-stop shop be created to complete all the requirements to obtain a title, so customers do not have to travel to various locations (TxDMV, Tax Assessor-Collector, law enforcement, certified weight scale, etc.) to

complete the titling process. Another suggestion was to use sale days to set up and conduct VIN inspections in rural areas.

There was a general consensus among the stakeholders that if all trailers/semitrailers require titling, it should be done upon transfer of ownership. To title currently exempt trailers/semitrailers upon transfer of ownership would require an amendment to Chapter 501 of the Texas Transportation Code to include trailers/semitrailers with a GVW of 4,000 pounds or less in the definition of a motor vehicle and repeal existing exemptions for farm trailers and farm semitrailers in Chapter 501.

Creating a one-stop shop at non-TxDMV Regional Service Center or non-county Tax Assessor-Collector facilities for titling trailers/semitrailers located in rural areas would require agreements with TxDMV and law enforcement auto theft investigators, private businesses (sales barns, auction houses, portable scale providers, etc.), and the County Tax Assessor-Collectors.

In order to make it mandatory for retailers who sell trailers/semitrailers to file registration and title paperwork with the county Tax Assessor-Collector, amendments would have to be made to Transportation Code 503 and Occupations Code 2301. Enforcing this requirement would require the TxDMV Enforcement Division to provide enforcement and education of the laws and administrative rules.

Finally, if mandatory titling of trailers/semitrailers were to be implemented, it would become necessary to communicate the new requirements to owners with a currently registered trailer/semitrailer. Communicating the title requirements for trailers/semitrailers will require a media campaign to educate the public. The public would need to be informed of available resources and the “effective date” of any new statute(s).

Recommendations

- 1) Do not mandate titling of currently exempt trailers/semitrailers. However, if titling does become mandatory, implement the requirement upon transfer of ownership only.
- 2) Transportation Code 501 should be amended to allow all trailers/semitrailers currently exempt from titling to be titled. This would expand the current permissive titling of trailers/semitrailers to include semitrailers/farm semitrailers with a GVW of 4,000 pounds or less and farm trailers with a GVW of 34,000 pounds or less. This would provide for the mandatory or permissive titling of every type of trailer/semitrailer in the state.
- 3) Train additional law enforcement and non-law enforcement personnel to conduct VIN inspections.
- 4) Require proof that an assigned VIN has been installed properly on the trailer/semitrailer.
- 5) Amend statute to require that once a trailer/semitrailer has been permissively titled, the trailer/semitrailer cannot be changed to non-titled.

Appendix A - Definitions

Assigned VIN – TxDMV generated numbers affixed to vehicles on which no identification numbers were ever affixed by the manufacturers; or the original manufacturer's VIN has been removed, changed, or obliterated; and the true identification number cannot be verified.

GVW - Gross Vehicle Weight

HB - House Bill

Motor Vehicle - Transportation Code, §501.002(17), (A) any motor driven or propelled vehicle required to be registered under the laws of this state; (B) a trailer or semitrailer, other than manufactured housing, that has a gross vehicle weight that exceeds 4,000 pounds; (C) a travel trailer; (D) an all-terrain vehicle or a recreational off-highway vehicle, as those terms are defined by Section 502.001, designed by the manufacturer for off-highway use that is not required to be registered under the laws of this state; or (E) a motorcycle, motor-driven cycle, or moped that is not required to be registered under the laws of this state.

Reassigned VIN - An original manufacturer's unique number, verified by an auto theft investigator, which has been duplicated by the department on a Mylar decal to be affixed to the vehicle when the original number has been removed, changed, or obliterated.

Semitrailer - Transportation Code, §501.002, Definitions (23) "Semitrailer" means a vehicle that is designed or used with a motor vehicle so that part of the weight of the vehicle and its load rests on or is carried by another vehicle.

Trailer - Transportation Code, §501.002, Definitions (29) "Trailer" means a vehicle that: (A) is designed or used to carry a load wholly on the trailer's own structure; and (B) is drawn or designed to be drawn by a motor vehicle.

Travel Trailer - Transportation Code, §501.002, Definitions (30) "Travel trailer" means a house trailer-type vehicle or a camper trailer: (A) that is a recreational vehicle defined under 24 Code of Federal Regulations Section 3282.8 (g); or (B) that: (i) is less than eight feet in width or 40 feet in length, exclusive of any hitch installed on the vehicle; (ii) is designed primarily for use as temporary living quarters in connection with recreational, camping, travel, or seasonal use; (iii) is not used as a permanent dwelling; and (iv) is not a utility trailer, enclosed trailer, or other trailer that does not have human habitation as its primary function.

TxDMV - Texas Department of Motor Vehicles

TxDPS - Texas Department of Public Safety

VIN - Vehicle Identification Number

Appendix B - Text of HB 2394

AN ACT

relating to a study on the feasibility of requiring title for all trailers, semitrailers, and travel trailers not considered manufactured housing.

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF TEXAS:

SECTION 1. Subchapter A, Chapter 501, Transportation Code, is amended by adding Section 501.007 to read as follows:

Sec. 501.007. STUDY ON FEASIBILITY OF TITLE BEING OBTAINED FOR ALL TRAILERS, SEMITRAILERS, AND TRAVEL TRAILERS THAT ARE NOT MANUFACTURED HOUSING. (a) The department shall conduct a study of the feasibility of requiring title for each trailer, semitrailer, or travel trailer that is not manufactured housing.

(b) In conducting the study required under this section, the department must, in relation to all trailers, semitrailers, and travel trailers covered by the study:

(1) determine the cost and feasibility of assigning vehicle identification numbers;

(2) develop options for obtaining title;

(3) evaluate the processes of inspection, verification, and assignment of vehicle identification numbers;

(4) develop recommendations for requiring the permanent affixation of vehicle identification numbers;

(5) determine the approximate fiscal impact from theft and evaluate options to decrease this theft; and

(6) evaluate the level of access individuals in rural areas have to obtain title.

(c) In conducting the study, the department must use input from local governmental entities that provide title services for trailers, semitrailers, or travel trailers, automotive theft experts, statewide associations representing agricultural

entities, and statewide associations of counties. The department may use input from any other organization, as necessary.

(d) On request of the department, the comptroller shall assist the department in conducting the study.

(e) The department shall prepare a report that contains its study findings and makes recommendations regarding possible legislative solutions to any problems found in the processes for obtaining title for trailers, semitrailers, or travel trailers covered by the study. Not later than September 1, 2014, the department shall submit the report to the lieutenant governor, the speaker of the house of representatives, and the presiding officer of each legislative standing committee with primary jurisdiction over motor vehicles.

(f) This section expires August 31, 2015.

SECTION 2. This Act takes effect immediately if it receives a vote of two-thirds of all the members elected to each house, as provided by Section 39, Article III, Texas Constitution. If this Act does not receive the vote necessary for immediate effect, this Act takes effect September 1, 2013.

Appendix C - Study Participants

	Meetings	
	1/21/2014	3/26/2014
Legislators		
Adam Leggett, Senator Hancock's Office	X	X
Scott Hutchinson, Representative Perry's Office	X	
Rusty Perry, Representative Perry's Office		X
County Tax Assessor Collectors		
Ronnie Keister, Lubbock County	X	X
Kevin Kieschnick, Nueces County	X	X
Association Participants		
Brittani Booth, Boating Trade Association of Texas	X	X
Norman Garza, Texas Farm Bureau	X	X
Ned Meister, Texas Farm Bureau		X
Charlie Gee, Texas Logging Council	X	X
Dianne Farrell, Recreation Vehicle Industry Association		X (Telecom)
Ender Reed, Texas Association of Counties	X	X
Jason Skaggs, Texas and Southwest Cattle Raisers Association	X	
Bill Smith, Harris County Sheriff's Office, Texas Association of Vehicle Theft Investigators	X	X
Tom Wooley, Travis County Sheriff's Office, Texas Association of Vehicle Theft Investigators	X	
Manufacturers and Dealers		
Lynn Beal, Big Tex Trailers		X
PJ Buerger, Princesscraft RV		X
Texas Department of Motor Vehicles		
Government & Strategic Communications Division		
Jeremiah Kuntz, Director		X
Taurie Randermann, Government Relations Specialist	X	X
Motor Vehicle Division		
Michelle Lingo, Attorney		X
Vehicle Titles and Registration Division		
Randy Elliston, Director	X	
Tim Thompson, Deputy Director	X	X
Clint Thompson, Title Services Chief	X	X
Linda Kirksey, Registration Services Chief	X	X
Trey Lusk, Regional Services Chief		X
Pam Carter, Regional Services Assistant Chief	X	
Gus Bernal, Planner	X	X
Tammera Parr-Lamb, Planner	X	X
Schon Connaker, Planner	X	X
Regional Service Centers		
Gary Gradel, Waco Regional Manager	X	
Belinda Martin, San Antonio Regional Manager		X

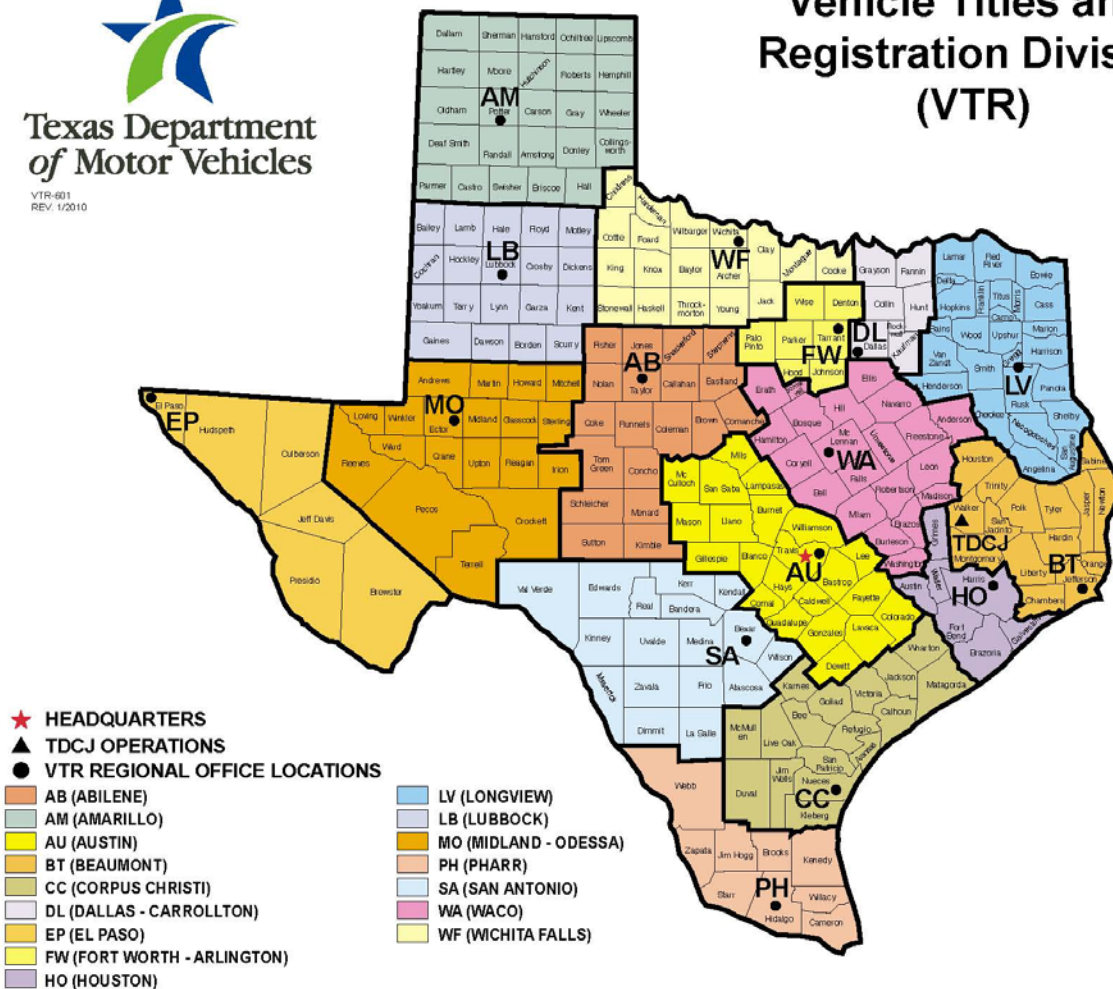
Appendix D - Application for Texas Title

APPLICATION FOR TEXAS TITLE TYPE OR PRINT NEATLY IN INK					
TAX OFFICE USE ONLY					Standard Presumptive Value
Tax Collector: _____ County: _____					<input type="checkbox"/> SPV \$ _____
Date: _____ Transaction Number: _____					<input type="checkbox"/> Appraisal Value \$ _____
1. Vehicle Identification Number	2. Year	3. Make	4. Body Style	5. Model	6. _____
7. Empty Weight (lbs.)	8. Carrying Capacity (lbs.)	9. Plate No.	10. Vehicle Unit No.	11. Major Vehicle Color	12. Minor Vehicle Color (two colored)
13. Applicant Type <input type="checkbox"/> Individual <input type="checkbox"/> Business <input type="checkbox"/> Government <input type="checkbox"/> Trust <input type="checkbox"/> Non-Profit Business, Government, Trusts and Non-Profits, use the Business Name line below.					
14. Applicant's/Owner's Legal Name 1/Business Name					Owner's County Name
First	Middle	Last			Suffix
Mailing Address					City State Zip
14a. Applicant/Owner 1 Photo ID Number					
ID Type	<input type="checkbox"/> U.S. Driver's License	<input type="checkbox"/> U.S. State Identification	<input type="checkbox"/> Texas	<input type="checkbox"/> Other	(Name of State or Territory)
	<input type="checkbox"/> U.S. Passport	<input type="checkbox"/> Foreign Passport	(Name of Foreign Country)	<input type="checkbox"/> U.S. Military ID	<input type="checkbox"/> NATO ID
	<input type="checkbox"/> Other Military Status of Forces Photo ID	<input type="checkbox"/> U.S. Department of Homeland Security ID	<input type="checkbox"/> U.S. Citizenship & Immigration Services ID	<input type="checkbox"/> U.S. Department of State ID	
14b. Applicant's/Owner's Legal Name 2					
First	Middle	Last			Suffix
Mailing Address					City State Zip
14c. Registrant's Name (Renewal Notice Recipient)/Business Name					
First	Middle	Last			Suffix
Mailing Address					City State Zip
14d. Vehicle Physical Location Address					
15. Previous Owner's Legal Name/Business Name					15a. GDN - Dealer Use Only
First	Middle	Last			Suffix
Mailing Address					City State Zip
THIS VEHICLE IS SUBJECT TO THE FOLLOWING FIRST LIEN					
16. 1st Lien Date	1st Lienholder Name		16a. Electronic Title Request? <input type="checkbox"/> YES (16c cannot be checked)		
	Mailing Address		16b. Certified Lienholder ID No.		
	City	State Zip	16c. Additional Lien(s)? <input type="checkbox"/> YES (Attach Form VTR-257)		
17. FOR CORRECTED TITLE, CHECK REASON(S) <input type="checkbox"/> Change in Vehicle Description <input type="checkbox"/> VIN <input type="checkbox"/> No Change in Ownership <input type="checkbox"/> Add Lien <input type="checkbox"/> Remove Lien <input type="checkbox"/> Odometer Brand <input type="checkbox"/> Odometer Reading <input type="checkbox"/> Year <input type="checkbox"/> Make <input type="checkbox"/> Body Style <input type="checkbox"/> Other					
18. ODOMETER DISCLOSURE - FEDERAL AND STATE LAW REQUIRES THAT YOU STATE THE MILEAGE UPON TRANSFER OF OWNERSHIP. FAILURE TO COMPLETE OR PROVIDING A FALSE STATEMENT MAY RESULT IN FINES AND/OR IMPRISONMENT.					
I, _____, state that the odometer now reads _____ (no tenths).					
(Name of Seller/Agent)					
THE MILEAGE SHOWN IS <input type="checkbox"/> A - Actual Mileage <input type="checkbox"/> N - Not Actual Mileage (WARNING-ODOMETER DISCREPANCY) <input type="checkbox"/> X - Mileage Exceeds Mechanical Limits <input type="checkbox"/> Exempt					
19. CHECK ONLY IF APPLICABLE MOTOR VEHICLE TAX STATEMENT					
<input type="checkbox"/> I hold Motor Vehicle Retailer's (Retail) Permit No. _____ and will satisfy the minimum tax liability (V.A.T.S., Tax Code § 152.046 (c)).					
<input type="checkbox"/> I am a Dealer or Lessor and qualify to take the Fair Market Value Deduction (V.A.T.S., Tax Code § 152.002 (c)). GDN or Lessor Number _____					
20. DESCRIPTION OF VEHICLE TRADED IN (if any)	Year	Make	Vehicle Identification Number	20a. ADDITIONAL TRADE-INS? (Y/N)	
21. SALES AND USE TAX COMPUTATION					
<input type="checkbox"/> (a) Sales Price (\$ _____ rebate has been deducted) \$ _____			<input type="checkbox"/> \$90 New Resident Tax - (Previous State)		
(b) Less Trade-In Amount, Describe in Item 20 Above \$(_____)			<input type="checkbox"/> \$5 Even Trade Tax		
(c) For Dealers/Lessors/Rental ONLY - Fair Market Value Deduction, describe in Item 20 above. \$(_____)			<input type="checkbox"/> \$10 Gift Tax - Use Comptroller Form 14-317		
(d) Taxable Amount (Item a. minus item b./item c.) \$ _____			<input type="checkbox"/> \$85 Rebuilt Salvage Fee		
(e) 6.25% Tax on Taxable Amount (Multiply item d. by .0625) \$ _____			<input type="checkbox"/> 2.5% Emissions Fee (Diesel Vehicles 1996 and Older > 14,000 lbs.)		
(f) Late Tax Payment Penalty <input type="checkbox"/> 5% or <input type="checkbox"/> 10% \$ _____			<input type="checkbox"/> 1% Emissions Fee (Diesel Vehicles 1997 and Newer > 14,000 lbs.)		
(g) Tax Paid to _____ (STATE) \$ _____			<input type="checkbox"/> Exemption claimed under the Motor Vehicle Sales and Use Tax Law because _____		
(h) AMOUNT OF TAX AND PENALTY DUE (Item e. plus item f. minus item g.) \$ _____			<input type="checkbox"/> \$25 or \$33 APPLICATION FEE FOR TEXAS TITLE (Contact your County Tax Assessor-Collector for the correct fee.)		
I HEREBY CERTIFY THAT ALL STATEMENTS IN THIS DOCUMENT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.					
22. Signature of SELLER, DONOR, OR TRADER 1		PRINTED NAME (Same as signature) 1		Date	
23. Signature of SELLER, DONOR, OR TRADER 2		PRINTED NAME (Same as signature) 2		Date	
24. Signature of PURCHASER, DONEE, OR TRADER 1		PRINTED NAME (Same as signature) 1		Date	
25. Signature of PURCHASER, DONEE, OR TRADER 2		PRINTED NAME (Same as signature) 2		Date	
WARNING: Transportation Code, §501.155, provides that falsifying information on title transfer documents is a third-degree felony offense punishable by not more than ten (10) years in prison or not more than one (1) year in a community correctional facility. In addition to imprisonment, a fine of up to \$10,000 may also be imposed.					

Appendix E - TxDMV Regional Service Center Map



Vehicle Titles and Registration Division (VTR)



Appendix F - Entities Conducting VIN Inspections by TxDMV Region

TxDMV Region	Entities
Abilene	Jones County Sheriff's Department Tom Green County Sheriff's Department
Amarillo	Amarillo Police Department
Austin	Travis County Sheriff's Combined Auto Theft Task Force Travis County Sheriff's Office Williamson County Sheriff's Department The City of Austin Police Department
Beaumont	Hardin County Auto Theft Task Force Jefferson County Auto Theft Task Force Montgomery Auto Theft Task Force
Corpus Christi	Jackson County Sheriff's Department Wharton County Sheriff's Department The City of Corpus Christi Police Department The City of Victoria Police Department
Dallas	North East Texas Auto Theft Task Force North Texas Auto Theft Task Force Tarrant Regional Auto Crimes Task Force Tri-County Auto Burglary & Theft Prevention Task Force Collin County Sheriff's Department The City of Arlington Police Department The City of Burleson Police Department The City of Dallas Police Department The City of Farmers Branch Police Department The City of Fort Worth Police Department The City of Frisco Police Department The City of Garland Police Department The City of Irving Police Department The City of Mesquite Police Department The City of Paris Police Department The City of Plano Police Department The City of Richardson Police Department
El Paso	The El Paso Tax Assessor Collector Enforcement Division The City of El Paso Police Department The City of Odessa Police Department
Fort Worth	Tarrant Regional Auto Crimes Task Force Tri-County Auto Burglary & Theft Prevention Task Force The City of Dallas Police Department The City of Fort Worth Police Department
Houston	Montgomery County Auto Theft Task Force Missouri City Burglary and Automobile Theft Task Force Harris County Sheriff's Department Montgomery County Sheriff's Office The City of Houston Police Department The City of Pasadena Police Department The City of Galveston Police Department
Longview	East Texas Crushers Auto Theft Task Force The City of Paris Police Department The City of Longview Police Department
Lubbock	Lubbock County South Plains Auto Theft Task Force
Midland/Odessa	The City of Odessa Police Department
Pharr	Hidalgo County Sheriff's Office Cameron County Sheriff's Office The City of Laredo Police Department
San Antonio	San Antonio Regional Auto Crimes Team Bexar County Sheriff's Department The City of San Antonio Police Department
Waco	Heart of Texas Auto Theft Task Force Montgomery County Auto Theft Task Force North Texas Auto Theft Task Force East Texas Crushers Auto Theft Task Force Tarrant Regional Auto Crimes Task Force Travis County Sheriff's Combined Auto Theft Task Force
Wichita Falls	None (Referred to Fort Worth/Dallas)

Appendix G – Survey of State Trailer Titling Rules

State	Does your state title all trailers or semi-trailers regardless of GVW or Type?	If yes, does that include Trailers or Semitrailers under 4000 pounds?	If yes, does that include Farm Trailers or Semitrailers under 34000 pounds?	If no, does your state exempt any trailers from titling?	Are Trailers less than 4000 pounds exempt from titling?	Are Semitrailers less than 4000 pounds exempt from titling?	Are Farm Trailers less than 34000 pounds exempt from titling?	Are Farm Semitrailers less than 34000 pounds exempt from titling?
Florida	No. Per FL statute trailers 2,000 lbs. or more must be titled. Trailers 1,999 lbs. or less cannot be titled but are required to be registered.	n/a	n/a	No.	No.	No.	All trailers over 2,000 lbs must be titled.	All trailers over 2,000 lbs must be titled.
Illinois	Yes.	Yes.	Yes.	No.	n/a	n/a	n/a	n/a
Michigan	Two tier process 2500 lbs or more must be reg & titled under 2500 lbs reg only no title may, permissive title. Trailer coaches (Human Habitation) must be titled. Trailer means Trailer and Semi-trailer	n/a	Farm wagon is exempt if never on public roads. If used on Public roads see Column B.	Yes, Trailer under 2500 lbs reg only no title may, permissive title	2500 lbs	2500 lbs	If never used on public roads	If never used on public roads
New Jersey	No. Trailers 2,500 lbs or more must be titled.	n/a	n/a	Yes. All trailers under 2,500 lbs can not be titled.	All trailers under 2,500 lbs can not be titled.	All trailers under 2,500 lbs can not be titled.	All trailers over 2,500 lbs must be titled.	All trailers over 2,500 lbs must be titled.
New York	No. Trailers 1,000 lbs. or more (must be 1973 or newer) are required to be titled and registered. Trailers 999 lbs. or less, and 1972 and older, are not titled but must be registered. Registration of Transfer is issued as proof of ownership.	n/a	n/a	No.	n/a	n/a	Farm trailers/semitrailers are not required to be titled but must be registered. Registration of Transfer is issued as proof of ownership.	Farm trailers/semitrailers are not required to be titled but must be registered. Registration of Transfer is issued as proof of ownership.
North Carolina	Yes.	Yes.	Yes.	No.	n/a	n/a	n/a	n/a
Ohio	All registered, 4000 lbs or less no title. Trailer and semi-trailers Camping type Trailer (Human Habitation) must be titled.	Yes	Farm use only no title regardless of GVW	Yes, Trailer under 4000lbs, reg only no title, no permissive title	Yes	Yes	All Farm Trailers	All Farm Semi-trailers
Pennsylvania	Yes.	Yes.	Yes.	No.	n/a	n/a	n/a	n/a
Virginia	Yes.	Yes.	Yes.	No.	n/a	n/a	n/a	n/a
Washington	No. Trailers used for farm transport and function do not require title regardless of weight. All other trailers require a title.	n/a	n/a	Yes. Farm trailers that are used to transports goods to market or to another farm are exempt from title	No.	No.	All Farm Trailers	All Farm Semi-trailers
State	Does your state have permissive titling?	Does this include Trailers less than 4000 pounds?	Does this include Semitrailers less than 4000 pounds?	Does this include Farm Trailers less than 34000 pounds?	Does this include Farm Semitrailers less than 34000 pounds?			
Florida	No.	n/a	n/a	n/a	n/a			
Illinois	No.	n/a	n/a	n/a	n/a			
Michigan	Yes	Yes, under 2500 lbs	Yes, under 2500 lbs	Yes, under 2500 lbs	Yes, under 2500 lbs			
New Jersey	No.	n/a	n/a	n/a	n/a			
New York	No.	n/a	n/a	n/a	n/a			
North Carolina	n/a	n/a	n/a	n/a	n/a			
Ohio	No	NA	NA	NA	NA			
Pennsylvania	n/a	n/a	n/a	n/a	n/a			
Virginia	No.	n/a	n/a	n/a	n/a			
Washington	Yes.	n/a	n/a	Yes.	n/a			