

January 12, 2022

Hello Salvage Title Task Force members,

DVS appreciates the work of this group and of house and senate staff on this issue and the draft for consideration.

DVS recognizes the Task Force is working to balance several considerations as they look to modify in the salvage title process. DVS wishes to provide the following feedback on the proposed statute as currently drafted:

- Adding a this new brand is not considered an American Association of Motor Vehicle Administrators (“AAMVA”) best practice as it may not be clear to other jurisdictions and consumers what it means. Other states will not know what “insurance loss” means and this could cause these vehicles to receive inconsistent branding in other states. The AAMVA guidelines have been attached to this email.
- Adding a new salvage brand called “insurance loss” has the potential to create additional confusion in the salvage process. This brand is not different from the existing brand “prior salvage” but applies to a different group of vehicles. These vehicles could be covered by the existing AAMVA recognized brand of prior salvage.
- If the task force would like to ensure that vehicles that do not meet high value late model definition are branded so that consumers can be on notice of a vehicle’s history, those vehicles can be given a prior salvage brand (without requiring inspection), similar to the way out of state vehicles are branded (325F.6642, subd. 3).
- Removing the definition “total loss” and replacing it with salvage could add additional confusion as total loss is not always a salvage vehicle (such as in the case of a stolen but unrecovered vehicle).
- An effective date of the day following final enactment will be impossible for DVS to implement. Any changes to the salvage branding process will require programming to MNDRIIVE, updating forms, communicating changes to staff and Deputies and the public. An effective date of January 1 of the following year provides DVS the time to implement these changes.

Please let me know if you have any questions.

Thank you,



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