



# Plain Dealing

A policy and administrative bulletin for licensed dealers  
from the WisDOT DMV Dealer and Agent Section



October 2024, v. 35, no. 4

## Article Index

- [Electronic Processing Fee increased to \\$38](#)
- [New Recreational Vehicle Dealer bill signed into law creates changes for dealers](#)
- [Negative discounts on the motor vehicle purchase contract](#)
- [Emissions waiver repair cost limit increase](#)
- [Quarterly report](#)
- [Enforcement actions](#)

## Electronic Processing Fee increased to \$38, new MV11 and MV2132



On October 1, 2024, the Electronic Processing Fee increased to \$38.

The Electronic Processing Fee may be charged to consumers when a dealer utilizes a third-party APP vendor program to process title and registration, title-only, repossession, replace title, and standalone lien add transactions. (NOTE: the fee may not be charged when dealers utilize the eMV PARTNER system for title and registration processing.)

For transactions started on or after October 1, 2024, dealers may charge the \$38 Electronic Processing Fee to their customers. *However, if a transaction was started prior to October 1, 2024, dealers may not charge more than \$19.50, even if the transaction is completed on a later date.*

To accommodate this change, the department has also made changes to the MV11 Title and Registration Application form, and the MV2132 Mail to DOT form, to reference the new fee amount. **Dealers who have remaining stock of older MV11 and MV2132 forms may continue to use these forms until their inventory is exhausted.** MV11 forms are available from your forms vendor; [the MV2132 can be downloaded from the department website](#).

Questions related to Electronic Processing Fees? Email [eMVPARTNER@dot.wi.gov](mailto:eMVPARTNER@dot.wi.gov).

## New Recreational Vehicle Dealer bill signed into law creates changes for dealers

In March 2024, a new bill was signed into law affecting Recreational Vehicle (RV) Dealers and RV Manufacturers/Distributors/Importers. This bill updated Wisconsin State Statute §218 with an effective date of October 1, 2024.

To be compliant with this new law for RV sales in Wisconsin:

- All RV manufacturers, distributors, or importers will be required to be licensed by the Wisconsin Division of Motor Vehicles. For more information on RV manufacturer/distributor/importer licensing click [here](#).
- A dealer agreement from RV manufacturers, distributors, or importers will be required to be submitted via form [MV2137 Recreational Vehicle Manufacturer/Importer/Distributor Certification of Dealer](#). (Wisconsin State Statute §218.161)
- All Wisconsin licensed RV dealers will now have to maintain a valid [MV2511 Dealer bond](#) or [MV1046 Irrevocable Letter of Credit \(ILOC\)](#) in the amount of \$50,000. Please note if your dealership already has a \$50,000 bond or ILOC on file because you hold both a RV dealer license and a Motor Vehicle dealer license this requirement is already fulfilled. (Wisconsin State Statute §218.11)

If your dealership is still not compliant with this new law, please submit the above applicable forms immediately. If you have any further questions regarding the changes to Wisconsin State Statute §218 please contact our Dealer Licensing Unit at [dealerlicensingunit@dot.wi.gov](mailto:dealerlicensingunit@dot.wi.gov) or by phone at 608-266-1425.



## Negative discounts on the motor vehicle purchase contract

PRICE OF THE VEHICLE		
a. Dealer Retail Price.....	30,000	
b. Services Fee.....	300	
c. Discount.....	-3000	
1. Cash Price (a + b - c).....	1.	32700

*Here, a negative sign in the Discount line item adds \$3000 to the vehicle selling price, rather than discounting the same amount.*

Recently, the department has encountered several instances of vehicle pricing issues stemming from the use of a negative (-) sign on the motor vehicle purchase contract (MVPC). The inclusion of a negative sign before the Discount line item on the MVPC can lead to incorrect calculation of the final selling price, as shown in the hypothetical example shown here.

If your dealership uses software to complete the MVPC, be aware that the use of a negative sign in the Discount line item may lead to incorrect calculation of the final selling price.

Dealers should not be using the Discount line item for any adjustments to a vehicle price aside from a dealer discount. Any additional charges included in the purchase, such as dealer mark-ups, dealer installed options, or any taxable or non-taxable items being purchased with the vehicle, should be listed on the appropriate line item on the MVPC.

## Emission waiver repair cost limit increase

The repair cost limit for all model year vehicles subject to emissions testing increased to \$1,110 on July 1, 2024. This figure is adjusted annually by the DNR per NR 485.045.

Vehicles subject to emissions testing that continue to fail may be eligible for a cost waiver if actual costs of emissions related repairs exceed the repair cost limit. Only repairs that are related to the vehicle's cause of failure can be used to apply for a cost waiver. Costs covered by any warranty or costs to repair/replace emissions control equipment that has been removed, modified, or disconnected are excluded.

The owner must have emissions related repairs performed on the vehicle at a recognized repair facility to qualify for waiver consideration. A list of recognized repair facilities may be found at [wisconsinvip.org](http://wisconsinvip.org).

The application form to apply for Recognized Repair Shop status may also be found at the above link under Forms and Downloads. TRANS 131.02(39) includes franchised NEW car dealerships as recognized repair facilities.



# Quarterly Report

The following numbers have been generated from the Dealer and Agent Section (DAS) Quarterly Report. This data is from the **fourth quarter** for the fiscal year beginning July 2024 (July through September 2024).

## Field Investigation Unit (FIU)

The following statistics represent the Field Investigation Unit's compliance efforts, community outreach and enforcement actions.

Activity	Fourth Quarter
Complaints closed	417
Dealer inspections	268
Educational presentations	1

## APU/DLU

The Agent Partnership Unit (APU) answers phone calls from dealers, government agencies, financial institutions, gas stations, grocery stores and various other types of agents throughout the state. These agents electronically process either title and registration, or renewal registration applications on behalf of the DMV.

The Dealer Licensing Unit (DLU) issues and renews multiple business license types. Individual licenses are issued to individuals who are selling or purchasing vehicles on behalf of dealerships. DLU answers dealer licensing questions as well as provides information about consumer harm and how to file a dealer complaint to the general public.

Activity	Fourth Quarter
APU phone calls	8,554
DLU phone calls	4,079
Business licenses issued	724
Individual licenses issued	4,821

## Lemon Law

DMV receives telephone and email inquiries from consumers, dealers, lawyers, manufacturers, and law makers. The inquiries range from questions about the specifics of the Lemon Law, to assisting all facets of pursuing a claim.

Activity	Fourth Quarter
Lemon Law inquiries	72

## FIU Enforcement Actions

Connect with us on social media for breaking news



Published by the  
Wisconsin Department of Transportation,  
Division of Motor Vehicles, Bureau of Vehicle Services, Dealer and Agent Section.

**Tommy Winkler Jr.**, Administrator  
**Ann Perry**, Bureau Director (BVS)  
**Maura Schifalacqua**, Section Chief (DAS)  
**Bryon Gerick**, Vehicle Emissions Program, Supervisor  
**John Kleinfeldt**, Field Investigation Unit, Supervisor  
**Shin Lin Tung**, Business and Consumer Services Unit, Supervisor  
**Tristan Kloss**, editor

Wisconsin Department of Transportation  
Dealer & Agent Section  
PO Box 7909  
Madison WI 53707  
[dealers.dmv@dot.wi.gov](mailto:dealers.dmv@dot.wi.gov)  
Phone: (608) 266-1425

