



wisconsinDMV.gov

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Confirmation of ownership documents for Illinois residents

Illinois will no longer accept the Wisconsin Confirmation of Ownership (COO) document to register vehicles for their residents*. This means that an Illinois resident purchasing a vehicle in Wisconsin with a lien will need to obtain the paper title from their lien holder when applying for registration.

Since out of state residents are eligible only for a 30-day temporary plate, in most cases the plate will expire before your customer is able to manage the registration process between Illinois, the lienholder, and themselves. This may cause an undue burden for you as customers may request multiple temporary plates.



Alternatives to COO:

1. Mail the title paperwork directly to the state of Illinois for perfection of the lien and issuance of the customer's registration. The customer will still be eligible for a Wisconsin 30-day temporary

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Copy of lease required with renewals

The next time you receive your dealer renewal application in the mail you will notice a change.

<input type="checkbox"/> Yes	Own Business Real Estate.
<input type="checkbox"/> No	If No, mail a copy of the new lease agreement

Motor Vehicle (MV) dealers will have this box on their renewal form.

(If you lease, submit a copy of your most recent lease agreement)
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Other dealer types will have this notification on their renewal form.

You are asked to mail a copy of your most recent lease agreement with your renewal, if you do not own the business real estate. The lease must provide a minimum two-year term, or a one-year term with tenant option to renew for a second year, to coincide with the licensing period.

Month-to-month leases are not accepted.

plate.

2. Request a letter from the lienholder granting permission for the paper title to be printed and mailed to the customer if you are arranging financing. The title application will need to be mailed to WisDOT for manual processing (REMINDER: standard manual processing can take 6-8 weeks to complete, and a customer's temporary plate will likely expire before WisDOT issues a title).
3. Use a third-party titling agency that operates at a national level to process the customer's title in their home state while ensuring lien perfection. The customer will still be eligible for a Wisconsin 30-day temporary plate.

Remember that your dealership is responsible for perfecting a lien on a title. How you choose to title a vehicle to out of state residents is your business decision.

* Note: Illinois is not the only state that requires a paper title for registration. The above recommendations could apply to any out of state resident sale.

License plate and sticker orders

Due to the current COVID-19 pandemic impacting all areas of business, DMV is limiting all license plate and registration sticker orders for the next few months. DMV will ensure you have enough inventory to continue issuing license plates and stickers to your customers but will adjust large orders if your previous transaction volume doesn't support the number of products being requested.

We appreciate your understanding.

When does a special plate transfer require manual processing?

If a special plate is being transferred from an auto to a light truck, or vice versa, the application must be mailed to WisDOT for manual processing. The

Leases that terminate more than three months prior to the expiration date of the dealer license are not accepted. (For example, your renewed dealer license will have an expiration date of 7/31/2022, but your current lease expires 01/31/2022.)

It is important we have your most current leasing information on file to ensure you can operate at your licensed location. Failure to provide proper documentation and fees can lead to delays in processing your license renewal.

If you have any questions about your license renewal please contact the Dealer Licensing Unit at (608) 266-1425.

Submit customer's opt-out preference electronically

WI dealers have the capability of entering "opt-out" requests for their customers when processing title transactions in eMV PARTNER and vendor systems. The following options are:

- Yes (the customer would like their name to be excluded from mailing lists of 10 or more)
- No (the customer would like their name to be included in mailing lists of 10 or more)
- Unknown (the same Opt Out status the customer currently has will remain).

The electronic Opt Out capability replaces the need to complete/submit the Opt Out form ([MV3592 Request to Withhold Name and Address](#)). Please refrain from using the paper MV3592 and submit your customer's choice electronically.

You are also asked whether the customer wants to sign up for eNotify to receive electronic information about notification of renewals. Please discuss both options with your customer when processing their title application.

Here is an example of the opt-out options in eMV PARTNER:

Primary Owner	Name	Residence Address
<input checked="" type="checkbox"/>	DAVID A TEST	4822 MADISON YARDS WAY MADISON Wisconsin 53705

Does the customer want to receive information about electronic renewal notification(s)?

Yes
 No

Does the primary individual owner/lessee/driver want to opt-out from the WISDOT Mailing List?

Unknown
 Yes
 No

application must include the appropriate full registration fees for the re-registration of the special plate.



Example:

The customer has a Musky Clubs Alliance (MCA) special plate on an automobile. The plate type/registration combination is MCA/AUT. The customer purchases a new light truck and wants to transfer the plate, changing the registration type from AUT to LTK. Third party agents and dealers cannot change the registration type and will need to mail this application to WisDOT for manual processing.

Include full registration fees as though a new plate is being issued, based on the date of delivery or date of operation for the new registration type.

You can find a complete list of vehicle license plate fees on the WisDOT website: [Annual registration fee including special plate donation fee](#)

Keep in mind that a wheel tax may also apply: [Wheel Tax fee](#)

DAS quarterly report numbers

The following numbers have been generated from the Dealer and Agent Section (DAS) Quarterly Report. This data is from the **fourth quarter** of 2019 (October through December).

Field Investigation Unit (FIU)

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

Activity	Fourth Quarter
FIU Complaints Closed	427
FIU Inspections (Dealers)	247

MV11 alterations are "critical" errors

The Agent Partnership Unit is continuing to audit electronically-processed title applications submitted by third party agents.

Auditing is one tool we use to ensure customer products are issued correctly and in compliance with state law. Errors identified through auditing are graded upon severity, with "Critical" errors being the most severe. It only takes one Critical error to fail an audit, leading to corrective action.



Altered MV11 forms are considered a type of Critical error and could have a significant negative impact on your audit. Please remember when submitting MV11 forms and other legal documents that alterations are unacceptable, unless a written statement of intent explaining the change accompanies the altered document.

Ad watch: disclosure of fees

The Field Investigation Unit now audits dealer websites to ensure advertisements meet the requirements of Wis. Admin. Code ch. Trans 139.03, and regulations published by the Federal Trade Commission (FTC). Auditing is designed to help dealers comply with both state and federal law.

Here is a common mistake we see in online disclosure statements, one that is (thankfully!) easy to fix.

Per Wis. Admin. Code ch. Trans 139.03(3)(a) you can exclude tax, title, registration, and service fees from the advertised price of a vehicle, as long as a disclosure is included with the advertisement. The use of proper wording in a disclosure is important to avoid code violation. The use of the phrase "dealer fee", "administrative fee", "documentation fee", or similar language to refer to the service fee is not allowed.

Wis. Admin. Code ch. Trans 139.05(8) explicitly uses the term "service fee" to refer to this charge, and as such you may only use the term "service fee" in a disclosure statement.

Here is an example of an acceptable disclosure of fees:

FIU Educational Presentations 0

"The advertised price does not include sales tax, title, registration, or service fees."

Here are some actual examples of unacceptable disclosure fees that we have found on dealer websites:

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.

"Price does not include applicable tax, title, license, processing and/or documentation fees."

The use of the term *processing and/or documentation fees* is not permitted.

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.

"[Price] does not include taxes, license, title fee, insurance, and \$XXX dealer fee."

The use of the term *dealer fee* is not permitted.

"Price does not include additional fees... including government fees and taxes, any dealer documentation fees, any emissions testing fees, or other fees."

The use of the terms *dealer documentation fees, emissions testing fees, or other fees* are not permitted. In addition, the disclosure does not mention title and registration fees. Unless these fees are included in the advertised price, they should also be disclosed here.

Activity	Fourth Quarter
APU Phone Calls	16,675
DLU Phone Calls	5,178
Business Licenses Issued	550
Individual Licenses Issued	3,809

Please take time to review the disclosure statement on your dealer website to ensure it complies with these requirements. If you have questions, please contact Tristan Kloss at Tristan.Kloss@dot.wi.gov.

Advertising Guidelines

Here's the link to the complete, updated advertising guidelines:

[DOT Advertising Guidelines Update](#)

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	161

Electronic Title and Registration Processing

Dealers and agents processing titles and/or registration electronically:

Committee Repeals Wis. Admin. Code ch. Trans 139.06(8)

Activity	Fourth Quarter
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Last year the Division of Motor Vehicles was tasked with identifying rules that contradicted statute or didn't have explicit

Renewal Agents	853
Title Agents (includes dealerships)	4,804
Total	5,657

Wisconsin motor vehicle dealers are required to electronically process all title/registration applications for their customers. For more information regarding electronic processing options, visit the DMV [eMV11 Electronic Processing webpage](#).

These systems are available for electronic processing:

- eMV11 - for dealers only
- eMV Agent - for lenders only
- Computerized Vehicle Registration (CVR)
- Dealertrack Registration and Title, formerly known as TriVIN
- National Financial Corporation (NFC) - registration only
- Opus Inspection Inc., formerly known as Systech International LLC - registration only

Electronic Title Delivery

Lenders receiving electronic title records:

Activity	Fourth Quarter
Lenders	986

These service providers deliver and manage electronic titles:

- Secure Title Administration, Inc.
- Dealertrack Collateral Management Services
- Decision Dynamics, Inc.
- PDP Group, Inc.
- VINTek

The electronic lien and title (also known as ELT or e-Title) program is an optional program for lien holders who prefer receiving electronic title records instead of paper titles. This program has been available since July 30, 2012. For more information

authority to enforce under 2017 Wisconsin Act 108. After consideration from the Joint Committee for Review of Administrative Rules, Wis. Admin. Code ch. Trans 139.06(8) was repealed.

This rule related to the method of reimbursement for motor vehicle manufacturers reimbursing motor vehicle dealers for repairs under warranties and service contracts. This rule was deemed obsolete as a result of 2011 Wisconsin Act 91. Rules regarding warranty reimbursement can still be found in Wis. Stat. § 218.0125(3m).

The repeal of Trans 139.06(8) will take effect April 1, 2020. The complete text of the final summary rule can be found here: [Repeal Trans 139.06\(8\)](#).



Account activity alerts added to DMV's eNotify online service

eNotify is the easiest way to get plate renewal and driver license/ID reminders through email or text.

Subscribers to eNotify also receive alerts when certain transactions occur, such as when an application for a duplicate driver license or ID card is made, or when their address is changed in DMV's systems.

wisconsin.dmv.gov/enotify

WisDOT Enforcement Actions List

[View a Complete List of Recent Enforcement Actions](#)

We're at .gov

Note: Only the website with .gov is the official state DMV website. Other DMV sites with .org and .com are not official and may have extra charges for forms or list information that is outdated or incorrect.

regarding ELT options, visit the DMV [Title to Lien Holder webpage](#).



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