



STATE OF RHODE ISLAND

**DIVISION OF MOTOR VEHICLES
ADMINISTRATION OFFICE**

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February 12, 2025

The Honorable Evan P. Shanley
Chair, House Committee on State Government and Elections
State House
Providence, RI 02903

**RE: 2025 H-5193- AN ACT RELATING TO HEALTH AND SAFETY – OFFICE OF
STATE FIRE MARSHAL**

Dear Chair Shanley:

The Division of Motor Vehicles ("DMV") writes to express concerns with House Bill 5193, An Act Relating to Health and Safety – Office of State Fire Marshal.

The proposed bill would create a program through which registrants of hybrid and electric vehicles can request stickers to affix to enclosures which house those vehicles in order to promote first responders' safety in the event of an electrical fire. The proposed bill would also require the DMV to provide information regarding the program to registrants, and to maintain a list of electric and hybrid vehicle registrations which is to be sent to the fire departments and fire districts within the state on a quarterly basis.

The DMV has several concerns with the proposed bill, with the first being the requirement that DMV "provide any person who registers or renews a registration for an electric or hybrid motor vehicle with written notice of the office of state fire marshal's electrical fire safety program and the opportunity to obtain a sticker to affix to any enclosure housing a hybrid or electric motor vehicle." While this may be straightforward for new registrations where the customer is physically present at the DMV or a motor vehicle dealer, registration renewals are a more complicated matter. Nearly half of all customers choose to process their registration renewals online. Providing the notice to electric and hybrid customers through the online portal would require significant programming changes at a cost of approximately twenty-five thousand dollars (\$25,000.00) and require six months of development time.

A more significant concern is the data which the DMV would be required to provide to the fire departments and fire districts within the state. While the proposed bill indicates that this is a voluntary program, the DMV would nonetheless be providing lists of customer data to outside entities, even for those customers who do not voluntarily opt into the program. The release of DMV data is regulated by the federal Driver's Privacy Protection Act - 18 U.S.C. § 2721 et seq. - and its Rhode Island counterpart, R.I.G.L. § 27-49-3.1. Although the sharing of DMV data with another government agency is considered a discretionary permissible use under these laws, the intent of the statutory scheme is to

The Honorable Evan P. Shanley
February 12, 2025
2025 H-5193
Page 2

minimize the release of personally identifiable information (PII). To promote the protection of PII, the data required to be released by DMV under the proposed bill should be limited to the garaged address of the hybrid or electric vehicles, which would still effectuate the stated goal of the proposed bill. The required notice to registrants should also inform them that some of the PII that they have provided to the DMV will be shared with the entities listed in the proposed bill.

An additional concern with the data lists required of DMV under the proposed bill is the accuracy of the data which would be provided. Vehicle types at registration are determined through a Vehicle Identification Number (VIN) decoder. While the VIN decoder is fairly accurate with respect to identifying battery-electric vehicles, it may not be as accurate identifying traditional hybrid vehicles, and the DMV often relies on the self-reporting of the registrant in those cases. Thus, the lists provided to the fire departments and fire districts may not reflect all of the vehicles which are intended to be covered by the proposed bill.

Finally, at present there is no method of electronically transferring the data from DMV to the fire departments and fire districts. Therefore, whether the data is emailed or sent by traditional mail, that information would have to be manually inputted by those fire departments and fire districts. Additionally, the fire departments and fire districts that receive such data should be limited to those that provide fire protection services. There are a handful of fire districts that do not provide these services. Providing those districts with this data is not necessary to accomplish the goals of the proposed bill.

The DMV looks forward to working with the sponsor to determine if provisions can be drafted to further the goals of the proposed bill and ensure that first responders are in the safest possible position when faced with an electrical fire.

Thank you for your consideration.

Sincerely,



Walter R. Craddock, Esq.
Administrator

Cc: The Honorable Members of the House Committee on State Government and Elections
The Honorable Earl A. Read, III
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House
Thomas A. Verdi, Director, Department of Revenue