



STATE OF RHODE ISLAND
DIVISION OF MOTOR VEHICLES
ADMINISTRATION OFFICE
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March 25, 2026

The Honorable Walter S. Felag, Jr.
Chair, Senate Committee on Special Legislation and Veterans' Affairs
State House
Providence, RI 02903

**RE: 2026 S-2178 - AN ACT RELATING TO MOTOR AND OTHER VEHICLES –
PARKING FACILITIES AND PRIVILEGES**

Dear Chair Felag:

The Division of Motor Vehicles ("DMV") writes to express concerns with Senate Bill 2178, An Act Relating to Motor and Other Vehicles – Parking Facilities and Privileges.

The proposed bill would create a new registration plate for qualified individuals to possess an "adaptive vehicle license plate" to accommodate the transportation needs of an individual with a significant mobility impairment.

First, it is unclear what benefit would be conferred upon the registrant that isn't already available to holders of a disability parking privilege placard issued pursuant to R.I. Gen. Laws § 31-28-7. Individuals who would qualify for the new plates already qualify for the disability parking privilege placard based on the definitions contained in R.I. Gen. Laws § 31-28-7(h). The placards also display the "International Symbol of Access" and allow the holder to park and unload in designated areas for qualified individuals. The placards are also removable and may be utilized in any vehicle which is being operated by or in which the qualified individual is being transported. On the contrary, the proposed license plate would be limited to the vehicle for which it is registered.

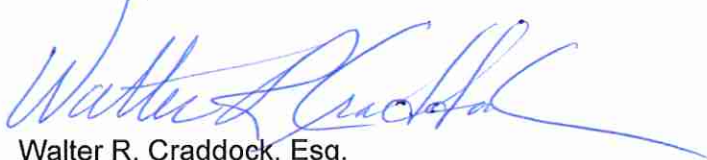
A secondary concern is the provision in the proposed bill which would allow registrants with the new plate to be exempt from "certain height, width, or bumper restrictions applicable to non-modified vehicles." The language is vague and could lead to unintended consequences. The DMV routinely registers and inspects vehicles which have been modified with special equipment to accommodate the transportation needs of individuals with mobility impairments and exemptions from the allowable dimensions are rarely, if ever, an issue.

Finally, as currently drafted, the proposed bill would take effect upon passage. Most, if not all, legislative changes and new laws require the DMV to make significant modifications to its computer system's code and operating system. Providing the DMV with ample time to implement legislatively mandated changes will minimize risks to the system and allow for the successful completion of all development necessary to effectuate the intent of the legislature. As such, the DMV respectfully requests an amendment to the bill's effective date from upon passage to six (6) months after passage.

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Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Walter R. Craddock". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Walter R. Craddock, Esq.
Administrator

Cc: The Honorable Members of the Senate Committee on Special Legislation
and Veterans' Affairs
The Honorable Lori Urso
Kristen Silvia, Deputy Chief of Staff/Director of Legislation
Jane E. Cole, Interim Director, Department of Revenue