



TRUCK RENTING AND LEASING ASSOCIATION

February 4, 2010

Honorable Stephen R. Ucci
42 John Street, Unit 2
Johnston, RI 02919

Dear Assemblyman Ucci:

I am writing on behalf of the members of the Truck Renting and Leasing Association (TRALA) that rent and lease vehicles in Rhode Island regarding your legislation House Bill 7230. In HB 7230, you proposed to amend Rhode Island Statutes § 31-5-33 –Rental of motor vehicles – Licenses required by adding a sentence at the end of subsection (b) which states, “Any such vehicle rented or leased in the State of Rhode Island shall be registered, insured and inspected in the State of Rhode Island.” TRALA is concerned that this proposed amendment may contradict the International Registration Plan (IRP) – the registration reciprocity agreement between states in the U.S. and provinces in Canada. Under the IRP, vehicles operating in interstate commerce are eligible to be registered under the Plan so that registration fees may be allocated to multiple states based on fleet distances traveled in those states.

TRALA members have interpreted the proposed amendment to § 31-5-33 to mean that full vehicle registration fees would be required to be paid to Rhode Island, without apportionment or reciprocity. If this is the correct interpretation of the proposed amendment, it would violate the IRP and place a burden on Rhode Island companies operating rented or leased vehicles in the State. This would effectively create a “double registration” and discriminate against operation in interstate commerce for any company that operates rented or leased vehicles in Rhode Island. These vehicles would be subject to the Rhode Island registration requirement, as well as being required to register under the IRP so that their fleet distance traveled in other states may be accounted for.

I would very much appreciate an opportunity to talk to you about your proposal to amend Rhode Island Statutes § 31-5-33. TRALA would like to work with you to help you achieve your

Honorable Stephen Ucci
February 4, 2010

Page Two

legislative goals while still preserving the benefits of the IRP and the ability to operate freely in interstate commerce.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Thomas M. James', with a large, stylized initial 'T' and 'J'.

Thomas M. James
President and CEO

Cc: John Atwood
President, Rhode Island Trucking Association