

ADMINISTRATIVE RULES

Fiscal Estimate & Economic Impact Analysis

1. Type of Estimate and Analysis <input checked="" type="checkbox"/> Original <input type="checkbox"/> Updated <input type="checkbox"/> Corrected	2. Date 1/28/2025
3. Administrative Rule Chapter, Title and Number (and Clearinghouse Number if applicable) Wisconsin Administrative Code ch. Trans 154	
4. Subject Permitting optional electronic vehicle odometer disclosure requirements	
5. Fund Sources Affected <input type="checkbox"/> GPR <input type="checkbox"/> FED <input type="checkbox"/> PRO <input type="checkbox"/> PRS <input checked="" type="checkbox"/> SEG <input type="checkbox"/> SEG-S	6. Chapter 20, Stats. Appropriations Affected 20.395(5)(cq)
7. Fiscal Effect of Implementing the Rule <input checked="" type="checkbox"/> No Fiscal Effect <input type="checkbox"/> Increase Existing Revenues <input type="checkbox"/> Increase Costs <input type="checkbox"/> Decrease Costs <input type="checkbox"/> Indeterminate <input type="checkbox"/> Decrease Existing Revenues <input type="checkbox"/> Could Absorb Within Agency's Budget	
8. The Rule Will Impact the Following (Check All That Apply) <input type="checkbox"/> State's Economy <input checked="" type="checkbox"/> Specific Businesses/Sectors <input type="checkbox"/> Local Government Units <input type="checkbox"/> Public Utility Rate Payers <input type="checkbox"/> Small Businesses (if checked, complete Attachment A)	
9. Estimate of Implementation and Compliance to Businesses, Local Governmental Units and Individuals, per s. 227.137(3)(b)(1). \$0.00	
10. Would Implementation and Compliance Costs Businesses, Local Governmental Units and Individuals Be \$10 Million or more Over Any 2-year Period, per s. 227.137(3)(b)(2)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11. Policy Problem Addressed by the Rule Bring Wisconsin Administrative Code ch. Trans 154 into conformity with recent Federal changes regarding odometer disclosures. 49 CFR 580 now allows electronic disclosure to transferees and lessors concerning the odometer mileage. Incorporate the use of electronic signatures for various signatures and certifications required for odometer disclosures under this rule. Wis. stat. s. 342.155(1)(b) allows the department to accept odometer disclosures in an automated format authorized by the department.	
12. Summary of the Businesses, Business Sectors, Associations Representing Business, Local Governmental Units, and Individuals that may be Affected by the Proposed Rule that were Contacted for Comments. Motor vehicle industry businesses to include motor vehicle dealers, motor vehicle auctions, motor vehicle insurers, lien holders, and third-party vehicle title processing partners.	
13. Identify the Local Governmental Units that Participated in the Development of this EIA. None	
14. Summary of Rule's Economic and Fiscal Impact on Specific Businesses, Business Sectors, Public Utility Rate Payers, Local Governmental Units and the State's Economy as a Whole (Include Implementation and Compliance Costs Expected to be Incurred) The proposed rule changes are permissive and will not create any new fiscal or economic burdens.	
15. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule The rule change permits stakeholders to incorporate new or existing technology into business practices. The benefit of implementing the rule change is to permit economic efficiencies through electronic verification services.	
16. Long Range Implications of Implementing the Rule Long range implications will allow WIDOT and business stakeholders to integrate with evolving technologies, including both intrastate and interstate electronic titling; create efficiencies, including reduced response time; reduce title and title odometer fraud; and enhance customer service.	

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17. Compare With Approaches Being Used by Federal Government

These changes bring Wisconsin into compliance with recent changes by NHTSA related to electronic Odometer Disclosure Requirements.

18. Compare With Approaches Being Used by Neighboring States (Illinois, Iowa, Michigan and Minnesota) Indiana

Changes proposed in July to make them more e-title friendly.

<https://forms.in.gov/Download.aspx?id=5061>- Form still says ink signature required.

IA - Iowa does not have a state-sponsored system for capture of e-signature for title and registration documents. Iowa is starting a System Modernization project, they do not know yet if they will ask to create this opportunity in that new system. Iowa targets having the new Vehicle functions available as early as July 1, 2028.

MI - Vehicle Dealer Manual - Chapter 4- All odometer mileage disclosure statements must be completed by the seller. The statement is signed by both buyer and seller; both parties also print their names. "Print" means hand-printed in ink by the person whose signature appears – not typed or computer-generated

MN - Sec. 325E.15 MN Statutes 325E.15 TRANSFER OF MOTOR VEHICLE; MILEAGE DISCLOSURE. No person shall transfer a motor vehicle without disclosing to the transferee the true mileage registered on the odometer reading or that the actual mileage is unknown if the odometer reading is known by the transferor to be different from the true mileage. The regulations contained in Code of Federal Regulations, title 49, sections 580.1 to 580.17, that implement odometer disclosure requirements and prescribe the manner in which electronic or written disclosure must be made in this state are adopted by reference. No transferor shall violate any regulations adopted under this section or knowingly give a false statement to a transferee in making any disclosure required by the regulations.

IL - Illinois has an electronic registration and title program similar to Wisconsin's eMV Public. Paperwork must be submitted by mail.

<h4>19. Contact Name</h4> <p>Reed McGinn State of Wisconsin Department of Transportation Division of Motor Vehicles 4822 Madison Yards Way Room S206 Madison, Wisconsin 53705 Email address: DOTAdminRules@dot.wi.gov</p>	<h4>20. Contact Phone Number</h4> <p>608 266-7857</p>
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ATTACHMENT A

1. Summary of Rule's Economic and Fiscal Impact on Small Businesses (Separately for each Small Business Sector, Include Implementation and Compliance Costs Expected to be Incurred)

2. Summary of the data sources used to measure the Rule's impact on Small Businesses

3. Did the agency consider the following methods to reduce the impact of the Rule on Small Businesses?

- ☐ Less Stringent Compliance or Reporting Requirements
☐ Less Stringent Schedules or Deadlines for Compliance or Reporting
☐ Consolidation or Simplification of Reporting Requirements
☐ Establishment of performance standards in lieu of Design or Operational Standards
☐ Exemption of Small Businesses from some or all requirements
☐ Other, describe:

4. Describe the methods incorporated into the Rule that will reduce its impact on Small Businesses

5. Describe the Rule's Enforcement Provisions

6. Did the Agency prepare a Cost Benefit Analysis (if Yes, attach to form)

☐ Yes ☐ No
