

**MEMORANDUM**

TO: Joseph Kirk, Ohio Department of Public Safety

FROM: Emily Kaylor, Regulatory Policy Advocate

DATE: November 7, 2016

RE: **CSI Review – International Registration Plan (OAC 4501:1-8-01, 4501:1-8-09, 4501:1-8-10, 4501:1-8-12, 4501:1-8-15, 4501:1-8-16, and 4501:1-8-17)**

On behalf of Lt. Governor Mary Taylor, and pursuant to the authority granted to the Common Sense Initiative (CSI) Office under Ohio Revised Code (ORC) section 107.54, the CSI Office has reviewed the abovementioned administrative rule package and associated Business Impact Analysis (BIA). This memo represents the CSI Office's comments to the Agency as provided for in ORC 107.54.

Analysis

This rule package consists of one amended and six no-change rules submitted by the Ohio Department of Public Safety (ODPS) for their statutorily required five-year review. The rule package pertains to the International Registration Plan (IRP) and was submitted to the CSI Office on October 6, 2016. The comment period closed on October 28 with no comments received.

The IRP is an agreement to recognize the registration of commercial motor vehicles registered by other jurisdictions. Excluding Alaska and Hawaii, all states and the District of Columbia were mandated to join the IRP by 1996 after enactment of the Intermodal Surface Transportation Efficiency Act of 1991. In addition to the 48 mandated states and the District of Columbia, 10 Canadian provinces are included in the agreement. Members of the plan have the authority to set registration fees and determine how they want to implement the IRP to issue cab cards and plates for vehicles.

The no-change rules detail Ohio's entry into the IRP, information that must be included for an application for registration into the IRP, electronic registration, how vehicles based in non-IRP

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member jurisdictions must register to operate in Ohio, requirements for household goods carriers, and the IRP oversight committee within the Bureau of Motor Vehicles. One rule is amended to align it with the current practice of providing credits for the unused portion of a vehicle registration.

The BIA states that the impacted community includes owner and operator members of the IRP and operators of large commercial vehicles from other jurisdictions who have a need to occasionally travel on Ohio roads. The impacts include time and costs related to completing vehicle registration paperwork and fees. The fees and costs depend on the other jurisdictions in which the stakeholder operates, and are not established in these rules. For stakeholder outreach, ODPS emailed the rules to stakeholders on August 26. No input was provided, nor were any comments received during the CSI process.

After reviewing the proposed rules and the BIA, the CSI Office has determined that the rules satisfactorily meet the standards espoused by the CSI Office, and the purpose of the rule package is justified.

Recommendation

For the reasons explained above, the CSI office does not have any recommendations for this rule package.

Conclusion

Based on the above comments, the CSI Office concludes that the Ohio Department of Public Safety should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.