



COLORADO
Department of Revenue

Division of Motor Vehicles

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BULLETIN

For: Colorado Motor Vehicle Dealers

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Date: March 27, 2017

Subject: Imported Motor Vehicles Titling Requirements

BL 17-01

The Motor Vehicle Investigations Unit (MVIU) has recently been in contact with U.S. Customs and Border Protection, the Auto Industry Division of the Colorado Department of Revenue and motor vehicle dealers, regarding a rise in vehicles being imported from Canada and other foreign countries. Following these conversations, a determination has been made regarding how vehicles imported from Canada and other countries are titled in Colorado. These changes are outlined in this memo.

When vehicles that do not meet Federal Motor Vehicle Safety Standards (FMVSS) are imported into the United States, federal law requires that these “non-conforming” vehicles be altered to meet federal standards. Registered importers are required to submit a conformity packet to the National Highway Traffic Safety Administration (NHTSA) for review. These vehicles must be held and cannot be sold, titled or registered before NHTSA issues a “bond release letter” – or until 30 days following submission of a conformity packet have passed, whichever comes first.

Despite these requirements, the Division of Motor Vehicles has seen an increase in vehicles that do not meet FMVSS being improperly titled and sold. To ensure compliance with these regulations, and to protect the public from fraudulent activity, the Colorado DMV will no longer issue titles without a NHTSA “bond release letter” or proof that 30 days have passed following submission of a conformity packet to NHTSA. The DMV has created foreign imports titling procedures outlined in enclosure 1.

These titling procedures do not apply to military personnel titling their vehicles upon returning to Colorado from a foreign country.

These changes are effective April 1, 2017. Please contact the Title and Registration Section with any questions at 303-205-5608.

Foreign Imports Titling Procedures

Conforming Vehicles

When processing transactions for conforming vehicles, submit the following completed documents:

- DOT Declaration (HS-7)
- Foreign title or registration
- Any one of the following U.S. Customs and Border Protection entry forms is acceptable as proof of customs entry (copy acceptable):
 - CBP 7523 — Entry and Manifest of Merchandise Free of Duty
 - CBP 3299 — Declaration For Free Entry of Unaccompanied Articles
 - CBP 3311 — Declaration For Free Entry of Returned American Products
 - CBP 7501 — Entry Summary (Does not require a Customs Inspector's signature).
 - CBP 3461 — Entry/Immediate Delivery Secure and Verifiable ID will be required.
- DR 2698 Verification of Vehicle Identification Number.
- A certified weight slip may be required: kilograms (x) 2.21 (=) pounds
- Odometer disclosure – Odometer disclosed on secure form. Owner must sign to begin odometer tracking
- If documents require translation, anyone with the knowledge of a particular language can write a translation.
- All translations must be signed and notarized or signed under penalty of perjury.

Nonconforming Vehicles

When processing transactions for non-conforming vehicles, submit the following completed documents:

- Bond Release Letter form DOT/NHTSA (proof of conformity)
- DOT Declaration (HS-7)
- Foreign title or registration
- Any one of the following U.S. Customs and Border Protection entry forms is acceptable as proof of customs entry (copy acceptable):
 - CBP 7523 — Entry and Manifest of Merchandise Free of Duty
 - CBP 3299 — Declaration For Free Entry of Unaccompanied Articles
 - CBP 3311 — Declaration For Free Entry of Returned American Products
 - CBP 7501 — Entry Summary (Does not require a Customs Inspector's signature)
 - CBP 3461 — Entry/Immediate Delivery Secure and Verifiable ID will be required
- DR 2698 Verification of Vehicle Identification Number
- A certified weight slip may be required: kilograms (x) 2.21 (=) pounds
- Odometer disclosure – Odometer disclosed on secure form. Owner must sign to begin odometer tracking.

Enclosure 1

- If documents require translation, anyone with the knowledge of a particular language can write a translation.
- All translations must be signed and notarized or signed under penalty of perjury

Federal Importation laws require a 30-day hold period for nonconforming vehicles.

If the 30 days have passed, and the National Highway Safety Administration (NHTSA) has not provided the importer with a Bond Release Letter, the law allows the importer to title the vehicle without a Bond Release Letter as long as all of the required forms listed below have been submitted.

Nonconforming Vehicles without a Bond Release Letter

When processing transactions for nonconforming vehicles without a Bond Release Letter, submit the following completed documents

- Statement of conformity from NHTSA
- Statement of Fact (SOF) from the importer (see wording below)
- DOT Declaration (HS-7)
- Any one of the following U.S. Customs and Border Protection entry forms is acceptable as proof of customs entry (copy acceptable):
 - CBP 7523 — Entry and Manifest of Merchandise Free of Duty
 - CBP 3299 — Declaration For Free Entry of Unaccompanied Articles
 - CBP 3311 — Declaration For Free Entry of Returned American Products
 - CBP 7501 — Entry Summary (Does not require a Customs Inspector's signature)
 - CBP 3461 — Entry/Immediate Delivery Secure and Verifiable ID will be required
- DR 2698 Verification of Vehicle Identification Number
- A certified weight slip may be required: kilograms (x) 2.21 (=) pounds
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- All translations must be signed and notarized or signed under penalty of perjury.

Importers must sign a SOF stating the following:

“All appropriate entry and conformity documents, including photos, were properly completed, signed, dated, and submitted to NHTSA for approval on _____(date.)”

Agents, subagents, dealers, or notaries may witness (certify or notarize) the importer's signature. Dealers may not sign in the place of the importer.