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IDAHO TRANSPORTATION DEPARTMENT

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September 10, 2021

Subject: Imported Vehicle Titling Policy

Dear Licensed Idaho Dealer:

The Idaho Transportation Department is preparing to implement recommendations from the American Association of Motor Vehicle Administrators (AAMVA) for the titling of imported vehicles. This policy will go into effect on October 1, 2021 and applies to imported vehicles that:

1. Were manufactured for use in another country and were not built to comply with U.S. federal motor vehicle safety standards (FMVSS), and
2. Are being titled for the first time in the U.S.

This includes vehicles manufactured to meet Canadian motor vehicle safety standards (CMVSS) and gray market vehicles manufactured for use in other countries.

Any of the following would indicate a vehicle has been imported:

- Ownership document issued by a country other than the U.S.
- Federal importation documentation presented, such as U.S. Customs and Border Protection (CBP) forms, Environmental Protection Administration (EPA), and DOT National Highway Traffic Safety Administration (NHTSA) documents.
- Vehicle is 1981 or newer and does not have a conforming 17-character VIN. The VIN either will have fewer or more characters, or will have too many numbers in positions where there usually are letters, especially positions four through 11. (Note: if the vehicle has already been titled by another state, it can be retitled in Idaho like other out-of-state-titled vehicles without meeting special requirements for imported vehicles, as it is assumed it met these requirements at the time of titling.)

The following must be submitted to title an imported vehicle sold by an Idaho dealer:

- **Report of Sale and Application for Certificate of Title, ITD 0502.**
- **Original primary ownership document.** This would typically be a **title** if the country of origin issues titles, or a **registration** otherwise. If key information on the primary ownership document such as

owner and lienholder information can't be determined because the document is in a foreign language, a certified translation is required. A used Canadian vehicle will have a **registration** while a new Canadian vehicle will have a **New Vehicle Information Statement (NVIS)**.

- **Original or verified copy of a bill of sale or release of interest from each prior owner** (a bill of sale or separate release from the registered owner is not required if an assignment on the registration or title has been properly completed).
- **CBP Form 7501** U.S. Customs and Border Protection Entry Summary, stamped and signed by CBP (original or verified copy). Required for legal entry into the U.S.
- **HS-7 Declaration Form** from the U.S. DOT National Highway Traffic Safety Institute (NHTSA) with either Box 1, 2B, 3 or 8 declared. (Optional if DOT Bond release letter submitted, vehicle was at least 25 years old when imported, or vehicle is ATV, UTV or motorbike.)
- **DOT Bond Release Letter** – required when a non-conforming on-highway vehicle was imported for resale or commercial use by a Registered Importer (Box 3 declaration on HS-7 form)*.
- **Indemnifying Affidavit** certifying there are no liens other than any listed on the title application. In lieu of this, a lien search report may be provided from the agency that maintains lien records in the country/province that issued the ownership.
- **VIN Inspection** for Canadian vehicles.
- **MVI Statement of Facts** for gray market vehicles. If waived by an MVI, **VIN Inspection**.
- **Odometer conversion statement** - required only when all of the following occur:
 - The odometer has been converted from kilometers to miles.
 - The title is being issued with an odometer reading.
 - The odometer status is "Actual."

The statement must include the year, make, vehicle identification number, and the original reading in kilometers as well as the mileage to which the new speedometer assembly was set. The statement is completed by the technician who did the work.

If the odometer device simply has buttons for switching from kilometers to miles, a statement from the VIN inspector to this effect will suffice in lieu of a technician's conversion statement.

*All Gray market and Canadian vehicles less than 25 years old that were imported for resale must be imported by a registered importer (RI) under Box 3 of the HS-7 form. The RI must post a DOT conformity bond and must modify the vehicle to meet FMVSS and resolve any open recalls within 120 days. The RI must submit evidence to NHTSA in a conformity package that demonstrates the vehicle has been modified to meet FMVSS and all outstanding manufacturer recall notices have been addressed. If NHTSA approves, it will issue a bond release

letter. If the vehicle has not been brought into conformity within 120 days, it must either be surrendered to the DOT or exported. The vehicle generally cannot be titled and registered until a DOT Bond release letter has been issued. However, if the RI states on an indemnifying affidavit that more than 30 days have passed since the conformity package was submitted to NHTSA and NHTSA has not responded, title can be used but will carry the notation, "DOT BOND RLS PENDNG". This notation may be removed if the title is subsequently submitted with a bond release letter.

Canadian and gray market vehicles cannot be salvage, repaired salvage or reconstructed vehicles.

Titles for Canadian vehicles that were imported for personal use only and not for resale (Box 2B declared on NHTSA HS-7 declaration form) will be issued with the brand, "Canadian Vehicle".

When a gray market vehicle was at least 25 years old at the time of import and is being titled without a DOT bond release letter, the title will be issued with the brand, "Gray Market – Exempt from FMVSS Compliance". When a Canadian vehicle was at least 25 years old at the time of import and is being titled without a DOT bond release letter, the title will be issued with the brand, "Canadian Vehicle– Exempt from FMVSS Compliance".

Additional information regarding CBP and DOT importation requirements may be found at:

<https://www.cbp.gov/trade/basic-import-export/importing-car> <https://icsw.nhtsa.gov/cars/rules/import/>

Sincerely,

Dealer Operations
Division of Motor Vehicles
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