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Massachusetts Environmental Police

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James J. Hanlon, *Director*

March 27, 2007

Alvin C. Harrell
Oklahoma City University
School of Law
2501 N. Blackwelder
Oklahoma City, OK 73106

Subject: UCOTA/Watercraft

Dear Mr. Harrell:

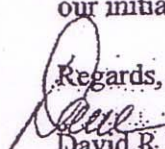
The Numbering and Titling Committee within the National Association of State Boating Law Administrators (NASBLA) have followed the UCOTA process and as you know, our observers have attended several UCOTA work sessions on the initial Act.

Our committee recently received an announcement that watercraft may be looked at in the coming months and NCCUSL was seeking input and participation. We have appointed a sub-committee to work with NCCUSL as they attempt to add watercraft to the act. Our membership consists of Boating Law Administrators, Registration and Titling Management from across the country. We have representation from both title and non-title states as well as those states that title both vehicles and watercraft out of the same office. We believe our initial goal is to highlight the differences between vehicles and watercraft and identify those items that are unique to watercrafts. With this in mind, we will be sending our comments for NCCUSL's review within a couple of weeks.

We would like to be "at the table" when watercraft is discussed. We would be willing to send one or two representatives from our committee whenever NCCUSL plans discussions on watercraft.

As the sub-committee chair, I would appreciate your comments and thoughts concerning our initial approach and thank NCCUSL for considering watercraft at this time.

Regards,


David R. Barber
Chief, Registration & Titling

617-626-1611

dave.barber@state.ma.us



**MASSACHUSETTS ENVIRONMENTAL POLICE
REGISTRATION & TITLING BUREAU**

**251 Causeway Street - Suite 101
Boston, MA 02114-2153**

April 23, 2007

Jennifer Holling
Administrative Assistant II
Conference on Consumer Finance Law
OCU Law School
2501 N. Blackwelder
Oklahoma City, OK 73106

Dear Jennifer:

As requested in your email of April 4, 2007, we are pleased to support any effort to expand UCOTA to include watercraft and submit below our comments for Task Force consideration.

1. Does NASBLA believe that a uniform act covering watercraft would be helpful, and would NASBLA actively participate in such a project?

a. Yes, inclusion of watercraft into UCOTA would be most helpful and we agree with Mr. Miller's comments that watercraft and manufactured homes should have their own study committee. To this end, NASBLA has created a sub-committee within our Numbering and Titling Committee to work exclusively with NCCUSL. One or two of which will be available to attend study committee or Task Force meetings.

2. Would NASBLA like to contribute to our pending Task Force report? If so, who are the contact persons we should communicate with?

a. We do wish to contribute to the Task Force and the individuals that should be listed are:

Dave Barber, Sub-Committee Chair
Office: 617-626-1611 Cell: 978-270-8897
Dave.Barber@state.ma.us
Walden.Boyd@hsmv.state.fl.us
Rick.Barrera@dnr.state.oh.us

3. What are the basic issues that highlight the differences between vehicles and watercraft that need to be addressed?

- a. Not all States Title watercraft.
- b. Differing definitions between vehicle and watercraft.
- c. Hull Identification Number (12 Characters vs Vehicle Identification Number (17 characters)).
- d. Manufacture Statement of Origin vs Building Certificate.
- e. Watercraft Titles may vary in length (State option).
- f. State vs Federal Regulations.
- g. Documents required varies by State.
- h. Watercraft MFG HIN's are regulated by Coast Guard or States.
- i. State of Principal Use vs State of Residence.
- j. Optional titling available in some states for watercraft not normally required to be titled. (Small craft)
- k. Power vs Non-powered watercraft titles.
- l. Limited title classifications among States.
- m. State title vs Ships mortgage (NVDC- Federally registered).
- n. Electronic vs Paper Titling.
- o. Perfection may occur at various times.
- p. Liens not always sent to lien holder.

4. Would NASBLA be willing to take a detailed look at UCOTA and provide recommendations regarding possible changes that could be included in the Task Force Report?

- a. Yes, our committee has spent time reviewing the Act and believe that some of the differences may be eliminated by modifying definitions (e.g. Vehicle/Watercraft, Highway/Waterway or Hull ID/Vehicle ID) or as footnotes (HIN-12 Char/VIN-17Char).
- b. We are willing to review any area that the Task Force request and respond as to the implications associated with watercraft.

5. What other persons or organizations should be invited into the process?

- a. There are several Associations that would support both our efforts. We are currently updating addresses with contacts and will forward when completed. Additional groups or Associations may be added later.
 - i. Boat Owners Association of the United States
 - ii. Marine Retailers Association of America
 - iii. International Association of Marine Investigators
 - iv. National Boating Federation
 - v. National Insurance Crime Bureau
 - vi. National Marine Bankers Association
 - vii. National Marine Manufacturers Association
 - viii. National Association of Professional Insurance Agents
 - ix. United States Coast Guard
 - x. National Vessel Documentation Center

Mandatory Watercraft Titling will benefit Boaters, Banking Institutions, Insurance Firms and Law Enforcement. We look forward to working with the Task Force on this project. As the process develops, issues will surface needing review and recommendations, our group is willing to assist in that endeavor. We are hopeful that this process although slow and meticulous is a far better avenue for National Titling than to attempt to convert the sixteen states that currently have no title laws. Attached to this letter are two documents:

A list of Titled and Non-Titled States and a listing of a few benefits associated with Mandatory Titling. I am certain that the Task Force can appreciate our willingness and eagerness to work toward a national title format that ultimately will be used to protect our constituents, lenders and a vital tool for Law Enforcement within the States and federally with the US Coast Guard.

Please feel free to contact our committee at any time and we look forward to a successful Task Force report.

Regards,

Dave Barber
Chief, Registration & Titling
617-626-1611

cc: Committee members

Attached: List of Titled and Non-Titled States
Benefits of Mandatory Titling



"Malatak, John"
<John.M.Malatak@uscg.mil>
Sent by:
John.M.Malatak@uscg.mil

To <CStalker@leg.state.va.us>
cc "Hoedt, Jeff" <Jeff.N.Hoedt@uscg.mil>
bcc

05/09/2008 02:38 PM

Subject NCCUSL & UCOTA -boats

History: This message has been forwarded.

Good afternoon Ms. Stalker (Caroline),

Jeff Hoedt forwarded your email regarding the above mentioned subject to me as my Branch is responsible for coordination of the Vessel Identification System (VIS) to the states, and since VIS is a key to titling standards for the states, my branch was the obvious choice to assist with your request. We will serve as the liaison to you for assistance regarding this matter.

I noted that you were requesting that the Coast Guard provide a letter stating that we support the concept and are willing to be involved with the drafting process as the project moves forward. We would be happy to provide comment and assist in any way we can to move the process along.

Could you accept this email as an interim statement of our willingness to participate in the process? There are so many additional critical matters we are working currently, that I wanted to provide you with as quick a response as I could to inform you of our intent to contribute. With everything we have before us, submitting a letter at this time will need to be delayed until after May 23. I'll be better positioned to provide you with the letter you need (if in fact you will still need one).

We look forward to working this issue with everyone.

John M. Malatak
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Boating Safety Division
Department of Homeland Security
U. S. Coast Guard (CG-54222)
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