



GEORGIA DEPARTMENT OF REVENUE

▪ MOTOR VEHICLE DIVISION ▪

P.O. Box 740381, Atlanta, GA 30374-0381 ▪ Tel: 1-855-406-5221

Frank M. O'Connell, State Revenue Commissioner

Robert Worle, Director

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NOTICE TO COUNTY TAG OFFICES Japanese *Kei* Vehicles and Minitrucks

The purpose of this bulletin is to notify County Tag Offices of the Department's policy that prohibits the titling and registering of Japanese *kei* vehicles, minitrucks and similar vehicles (collectively, *Kei* Vehicles) in Georgia. *Kei* Vehicles are imported (primarily from Japan) for use as farming vehicles and off-road recreational vehicles in the United States. Periodically customers attempt to title and register these vehicles. *Kei* Vehicles are not compliant with U.S. Federal Motor Vehicle Safety Standards (FMVSS). Therefore, they are not "street legal." *Kei* Vehicles are barred from titling and registration.

Kei Vehicles are street legal in Japan. They have many features also found on street legal vehicles in Georgia, including headlights, taillights, seat belts and other features seen in other vehicles that are permitted on Georgia roads. Additionally, some states do consider *Kei* Vehicles to be street legal. Due to the similarities between *Kei* Vehicles and other street legal vehicles, combined with the differing laws in various states, both customers and county tag offices have been confused by the title and registration laws relating to these vehicles. Due to this confusion, certain customers have successfully, albeit unlawfully, had their *Kei* Vehicles titled and registered in Georgia.

It is important for counties to avoid titling and registering *Kei* Vehicles. The Insurance Institute for Highway Safety issued a [report](#) warning that *Kei* Vehicles cannot protect passengers from collisions with even the smallest, lightest FMVSS vehicles. *Kei* Vehicles are not safe to be driven on Georgia roads.

How do I handle a *Kei* Vehicle that was titled in another state?

Even if a *Kei* Vehicle was titled in another state, it cannot be titled in Georgia.

How can I tell if a vehicle is a *Kei* Vehicle (and therefore not allowed to be titled and registered)?

Sometimes it can be difficult to know for certain, but the following guidelines should cover most situations. If you have questions, you may contact the County Help Line for assistance.

The primary reason *Kei* Vehicles cannot be titled and registered in Georgia is because they are not compliant with FMVSS. There are three easy ways to check whether a vehicle is FMVSS compliant.

First, count the characters in the vehicle identification number (VIN). Motor vehicles that are FMVSS compliant have a 17-character VIN. If the vehicle does not have a 17-character VIN, it cannot be titled or registered. (This rule does not apply to vehicles with a model year before 1981.)



For more information, please visit the Motor Vehicle Division website at dor.georgia.gov/motor-vehicles or scan the QR code.

Second, you can use the National Highway Traffic Safety Administration's (NHTSA) [VIN Decoder](#) to see if the vehicle is FMVSS compliant. Type the VIN into the VIN Decoder. The VIN Decoder may provide this message: "Error Text: 7 - Manufacturer is not registered with NHTSA for sale or importation in the U.S. for use on U.S roads; Please contact the manufacturer directly for more information." That message means the vehicle you searched in the VIN Decoder is not FMVSS compliant and cannot be titled or registered.

Third, a physical inspection of the vehicle provides helpful information. Manufacturers that comply with FMVSS in the manufacturing of a specific vehicle will certify FMVSS compliance on a label placed on the doorframe inside the driver's side door. The label will contain the following statement: "This vehicle conforms to all applicable Federal Motor Vehicle Safety Standards (FMVSS) in effect on the date of manufacture shown above." If the label is present, you may assume that the vehicle is FMVSS compliant and may be titled and registered. If no label is present, the vehicle is not FMVSS unless U.S. Customs or the U.S. Department of Transportation has issued FMVSS certification as more fully described in the final question below, titled "*Does importation paperwork let me know whether a Kei Vehicle can be titled and registered?*"

Why do I see *Kei* Vehicles on the road with Georgia license plates?

We are aware that some *Kei* Vehicles imported into Georgia have been improperly titled and registered. When the Department learns of such titles and registrations, we issue a letter (i) notifying the owner that the title and registration are invalid and (ii) requesting return of the title. We also cancel the title and revoke the registration.

What should I do if a customer asks for a legal reason why *Kei* Vehicles cannot be titled or registered?

The Department and the County Tag Offices cannot give legal advice, which should be made clear to customers. The County Tag Office is also not responsible for providing legal defenses of Department positions. However, you may share with customers who insist on a legal basis for excluding *Kei* Vehicles from titling and registration that O.C.G.A. § 40-3-30.1(f) prohibits titling or registering unconventional motor vehicles. *Kei* Vehicles are manufactured for the Japanese domestic vehicle market and are not manufactured to be compliant with FMVSS, so under Georgia law they are unconventional motor vehicles and cannot be titled and registered.

Does importation paperwork let me know whether a *Kei* Vehicle can be titled and registered?

The Department has yet to see any importation paperwork confirming that a *Kei* Vehicle is FMVSS compliant and can be titled and registered in Georgia. O.C.G.A. § 40-3-30 does provide that if the U.S. Customs Service or the U.S. Department of Transportation certifies that a vehicle complies with FMVSS, then the vehicle can be titled. However, such a certification would be a special document separate from the standard importation paperwork, and we have yet to see an importer, dealer or owner present such a document.

Some owners believe that because the U.S. Customs Service permits a vehicle to be imported into the United States then the vehicle is street legal and can be titled and registered in Georgia. This is incorrect. If customs officials permit a *Kei* Vehicle or other non-FMVSS vehicle to be imported, that means the vehicle can legally enter Georgia but may be used for off-road uses only.

The customs documentation provided by an owner can provide clues that the vehicle cannot be titled and registered. For example, the U.S. Department of Transportation's Form HS-7, Declaration—Importation of Motor Vehicles and Motor Vehicle Equipment Subject to Federal Motor Vehicle Safety, Bumper and Theft Prevention Standards has two checkboxes that are commonly used to import *Kei* Vehicles.



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Box 1 is for vehicles 25 or more years old. If the importer checks that box, he is representing the vehicle in question is not FMVSS compliant. Because the vehicle is not FMVSS compliant, it cannot be titled and registered in Georgia.

Additionally, box 8 is for vehicles that were not manufactured primarily for use on public roads. If the importer checks that box, he is representing the vehicle in question is for off-road use only, and therefore not FMVSS compliant. These vehicles cannot be titled and registered in Georgia.



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