



TECHNICAL ADVISORY

DIVISION OF MOTORIST SERVICES

DATE: March 3, 2016	Technical Advisory RS/TL16-005
SUBJECT: Replacement License Plate Issuance	

Overview:

Motor vehicle dealers are required to obtain title and registration on behalf of their customers within 30 days of the vehicle's purchase. It has become common practice for the dealer to pay the applicable fees necessary to obtain the title and registration, then collect the fees from their customer when the license plate is delivered. This practice is referred to as Cash on Delivery (COD) and is authorized by Section 320.02(16), Florida Statutes.

When a consumer enters into a COD contract with a dealer and then fails to reimburse the dealer for the cost associated with these transactions, the dealer may request the Department of Highway Safety and Motor Vehicles (Department) to place a stop against the registration of that vehicle by submitting documentation as outlined in Procedure RS-50. An "Unpaid Fee" (UF) stop will be placed on that vehicle's registration. This stop is meant to prevent the customer from renewing or replacing the license plate on that vehicle. It is important to understand that these stops are placed for COD transactions only. If the title and registration fees are financed an "Unpaid Fee" stop is not authorized.

Details:

The Department has seen an increase in the number of replacement plates being issued to consumers who have not reimbursed the dealer for the original or transferred registration paid for by the dealer. The customers are instead obtaining replacement registrations at a much lower cost.

Our most recent case involved a consumer who contracted with a dealer for the purchase of the title and registration. The consumer then went to an issuing agency, requested a replacement plate and did not check any of the boxes indicating why the replacement plate was needed. The replacement plate was issued and subsequently the dealer contacted the Department inquiring as to why the transaction was allowed. If a consumer does this intentionally, it is considered fraud. However, because the consumer had not indicated a reason for the replacement plate on the form, it increases the difficulty in pursuing the case.

Replacement license plates should not be issued to a motor vehicle when a "UF" stop exists on the record. In addition, when a customer requests a replacement license plate and a UF stop does **not** exist, Tax Collector Offices (TCO) and License Plate Agencies (LPA) should perform a Registration History Inquiry to determine whether the license plate being replaced was **recently (within the past 60 days) issued to the customer by a dealer**.

MTRFQ106 - Registration History Inquiry

LIC PLT NUM		RETRAL	TRANS CODE DESC	TRANSFER REG REGIS
VEH ID NUM			FL/DO/OOS #	
BIENNIAL FLAG	<input type="checkbox"/>	PREV LP	INIT EXEMPT PLT NUM	
EFF. DATE	08/03/2015	EXP. DATE	03/10/2016	INITIAL FEE STATUS
LIC	RGR	EXP. DATE	02/21/2025	PLATE ISS DATE
DECAL YEAR	2016	DECAL NUM	11696179	DECAL ISS DATE
DECAL TYPE	VDC	CANC. REASON		CANC. DATE
REPLACE RSN		LIC PLT STATUS	I	TITLE NUM
LEGISLATIVE	<input type="checkbox"/>	FLEET NUM		VES REG NUM
REG TYPE	R	REG ONLY REASON		REG ONLY FLAG
REG STATUS	A	COUNTY		RENTAL PARK
VEH CLASS	001	REG USE	PR API	MAIL TO
TRUE LICENSE PLATE		REGIS NUM		VOIDED
TAX CREDIT STATE		TRANS. ID		AMENDED
DLR/AGENT LIC NUM	VI10030601			RESTORED
NON DLR/AGENT NUM				PREV ID
EMPLOYEE				MAIL TRANS
UNSTRUCT. NAME				MORE...
COMMENT				HISTORY DETAIL
PLATE EXPLANATION				FEE'S
CUSTOMER				TITLE
				REFUND INFO
				VERRIDE
				PRINT
HOV		TEMP LP ISSUE REASON		
HOV DECAL		ISS RSN		
HOV EXP.		ISSUE REASON DESC		
REPL REASON				

At the bottom of the window, there are icons for a green checkmark, a red X, a magnifying glass, a printer, and a question mark.

If the registration was recently issued by a dealer, that is a key indicator that the **customer has not picked up, and may not have paid for, their license plate**. The screen print above has been modified to remove any identifying information; however, the dealer license number captured in this transaction is the key indicator that a dealer was involved in the transaction. If it is determined that the previous registration transaction was processed by a dealer, please advise the customer that a license plate has been issued and they should contact the dealer to pick up their license plate. If the customer insists they received the plate from the dealer, request that they bring documentation from the dealer indicating the license plate was delivered. Dealers have shared with us that many offices call them to verify certain information including information on this specific issue.

It is imperative that a comprehensive appraisal be performed to determine whether we are issuing the replacement plate as the statute intended - ONLY for lost, stolen or damaged license plates. It is equally important that a replacement reason be selected in Section 1 of the Application for Replacement License Plate, Validation Decal or Parking Permit, before issuing a replacement plate.

Conclusion:

If you have any questions or need additional information, please contact the Field Support Center.