

Motor Vehicle Procedure Manual

Title and Lien

**Certificate of Title Requirements for Recreational Vehicles, Mobile Homes
and Office Trailers**

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Legal Authority

[Section 319.21\(2\)](#), Florida Statutes, states, "When a motor vehicle is built in two or more stages, each manufacturer must provide a manufacturer's statement of origin for each stage."

[Section 320.8231\(1\)](#), Florida Statutes, states "Each recreational vehicle-type unit, as defined in [s. 320.01\(1\)\(b\)](#), manufactured in this state or manufactured outside this state but sold or offered for sale in this state shall meet the Uniform Standards Code ANSI book A-119.2 or A-119.5, as applicable, approved by the American National Standards Institute. Such standards shall include, but are not limited to, standards for the installation of plumbing, heating, and electrical systems and fire and life safety in recreational vehicle-type units and park trailers. However, those park trailers exceeding 400 square feet shall meet the Federal Manufactured Home Construction and Safety Standards and shall have a United States Department of Housing and Urban Development label (HUD)."

[Section 320.01\(1\) \(b\)](#), Florida Statutes, defines recreational vehicles as units primarily designed as temporary living quarters for recreational, camping, or travel use having either its own motive power, mounted on, or drawn by another vehicle. The basic entities are:

Travel Trailer: A vehicular portable unit, mounted on wheels, of such a size or weight as not to require special highway movement permits when drawn by a motorized vehicle. It is primarily designed and constructed to provide temporary living quarters for recreational, camping, or travel use. It has a body width of no more than 8 1/2 feet and an overall body length of no more than 40 feet when factory-equipped for the road.

Fifth-Wheel Trailer: A vehicular unit mounted on wheels, designed to provide temporary living quarters for recreational, camping or travel use, of such a size or weight as not to require a special highway movement permit. The gross trailer area shall not exceed 400 square feet in the setup mode, and it is designed to be towed by a motorized vehicle that contains a towing mechanism that is mounted above or forward of the tow vehicle's rear axle.

Camping Trailer: A vehicular portable unit mounted on wheels and constructed with collapsible partial side walls which fold for towing by another vehicle and unfold at the camp site to provide temporary living quarters for recreational, camping or travel use.

Truck Camper: A truck equipped with a portable unit designed to be loaded onto, or affixed to, the bed or chassis of the truck and constructed to provide temporary living quarters for recreational, camping, or travel use.

Motor Home: A vehicular unit which does not exceed the length, height and width limitations provided in [s. 316.515](#), Florida Statutes, is a self-propelled motor vehicle, and is primarily designed to provide temporary living quarters for recreational, camping, or travel use.

Private Motor Coach: A vehicular unit which does not exceed the length, width, and height limitations provided in [s. 316.515\(9\)](#), Florida Statutes, is built on a self-propelled bus type chassis having no fewer than three load-bearing axles, and is primarily designed to provide temporary living quarters for recreational, camping, or travel use.

Van Conversion: A vehicular unit which does not exceed the length and width limitations provided in [s. 316.515](#), Florida Statutes, is built on a self-propelled motor vehicle chassis, and is designed for recreation, camping and travel use.

Park Trailer: A transportable unit which has a body width not exceeding 14 feet and which is built on a single chassis and is designed to provide seasonal or temporary living quarters when connected to utilities necessary for operation of installed fixtures and appliances. The total area of the unit in a setup mode, when measured from the exterior surface of the exterior stud walls at the level of maximum dimensions, not including any bay window, does not exceed 400 square feet when

constructed to American National Standard Institute (ANSI A-119.5 standards) and 500 square feet when constructed to United States Department of Housing and Urban Development Standards. The length of park trailer means the distance from the exterior of the front of the body (nearest to the drawbar and coupling mechanism) to the exterior of the rear of the body (at the opposite end of the body), including any protrusions.

Mobile Home: [Section 320.01\(2\)](#), Florida Statutes, provides a definition for "mobile home." A mobile home is defined as a structure, transportable in one or more sections, that is 8 body feet or more in width and is built on an integral chassis which is designed to be used as a dwelling when connected to the required utilities, and includes the plumbing, heating, air-conditioning, and electrical systems contained therein. For tax purposes, the length of a mobile home is the distance from the exterior of the wall (nearest to the drawbar and coupling mechanism), to the exterior of the wall at the opposite end of the home where such walls enclose living or other interior space. Such distance includes expandable rooms, but excludes bay windows, porches, drawbars, couplings, hitches, wall and roof extensions, or other attachments that do not enclose interior space. If the mobile home owner has no proof of the length of the drawbar, coupling, or hitch, then the tax collector may in his discretion either inspect the home to determine the actual length or may assume four feet to be the length of the drawbar, coupling, or hitch.

Office Trailer: An office trailer is a mobile building, used to conduct normal office duties, duly approved as meeting applicable codes, may or may not be affixed permanently to a foundation and may be removed after completion of a task for which it was installed. The weight of an office trailer may be determined by multiplying length X width X 20 pounds.

Description and Use

This procedure provides information and instructions to assist employees of the tax collector, license plate agent, and Florida Highway Safety and Motor Vehicles (FLHSMV) in carrying out requirements to issue certificate of title for recreational vehicles, mobile homes, and office trailers.

As of July 01, 2023, FLHSMV has updated the Form HSMV 82040 Application for Certificate of Title With/Without Registration. HSMV 82040 has been updated into three separate forms:

- HSMV 82040 MV – Application for Certificate of Motor Vehicle Title - [HSMV 82040 MV](#)

HSMV 82040 MV should be used when processing applications for certificate of title for the following vehicle types:

- AU – Auto
 - BS – Bus
 - MC – Motorcycle
 - OH – Off-Highway
 - TO – Tools
 - TR – Truck
 - TT – Travel Trailers
 - VT – Vehicle Trailers
- HSMV 82040 VS – Application for Certificate of Vessel Title - [HSMV 82040 VS](#)

HSMV 82040 VS should be used when processing applications for certificate of title for the following vehicle type: VS – Vessel

- HSMV 82040 MH – Application for Certificate of Mobile Home - [HSMV 82040 MH](#)

HSMV 82040 MH should be used when processing applications for certificate of title for the following vehicle type: MH – Mobile Home

Effective July 01, 2023, all certificate of Florida titles issued for Vessels will be required to be processed using Form HSMV 82040 VS – Application for Certificate of Vessel Title. The signed Form HSMV 82041 will no longer be accepted in lieu of Form HSMV 82040 VS.

FLHSMV anticipates accepting the current HSMV 82040 – Application for Certificate of Title With/Without Registration for Motor Vehicles and Mobile Homes until December 31, 2023.

Effective January 01, 2024, all certificate of Florida titles issued for Motor Vehicles and Mobile Homes will be required to be processed using Forms HSMV 82040 MV – Application for Certificate of Motor Vehicle Title and HSMV 82040 MH – Application for Certificate of Mobile Home Title.

Documentation Required and Special Instructions

- A. When a vehicle has been titled in Florida, follow Procedure [TL-11](#) for transfer of certificate of title. When the vehicle has been titled outside of Florida, follow [TL-10](#) for Original Certificate of Title Applications.
- B. A certificate of title is not allowed for slide-in campers, add-a-rooms, port-a-rooms, and trailers under 2,000 pounds. However, trailers weighing 2,000 pounds or more must be titled. All manufactured homes are built to HUD standards, recreational vehicles are built to ANSI 119.2 standards and park trailers are built to ANSI 119.5 standards (up to 400 square feet) or HUD (up to 500 square feet).

Tiny homes are often built on flatbed trailers or boat trailers and are ownerbuilt. Their square footage usually does not surpass 300 square feet. These homes are not built to United States Department of Housing and Urban Development standard (HUD) or to American National Standards Institute (ANSI) standards and therefore do not fall under the jurisdiction of the Department.

However, tiny homes built on trailers weighing 2,000 pounds or more must be titled as a trailer. A manufacturer's statement of origin must be issued for the trailer by the trailer manufacturer. A line-make for the trailer is required to process the title transaction. This line-make will be entered in the line-make code table in the motor vehicle issuance system. For homemade trailers see [TL-43](#).

- C. In order to charge the proper tax rate for registration, all certificate of title applications for recreational vehicles must show one of the following types:
 - 1. "TV" for rigid-walled travel trailers, equal to or less than 40 feet, and must also show length (including the hitch).
 - 2. "CA" for folding-walled trailers and must show length (including the hitch).
 - 3. "MH" for all self-propelled recreational vehicles and must show weight.
 - 4. "PC" for all private motor coaches and must show weight.
 - 5. "VC" for all van-type recreational vehicles and must show weight.
 - 6. "HS" for all mobile homes and must also show length (excluding the hitch).
 - 7. "OT" for all office trailers and must show weight (the weight may be determined by multiplying length X width X 20 pounds).
 - 8. "PT" for all park trailers and must show length (including the hitch).

9. "PM" for pickup truck with a mounted camper. The camper itself is not titled.

- D. The following list shows how travel trailers, mobile homes and other vehicles may be described on the Manufacturer's Certificate of Origin (MCO) and the Division of Motorist Services (DMS) Body Type Abbreviation:

<u>Type Unit Code</u>	<u>Body Type</u>	<u>DMS Body Type Abbreviation</u>
D.M.H.	Duplex Mobile Home	H
Mini H.	Mini Motor Home	MH
Mo. H.	Motor Home	MH
P.T.	Park Trailer	PT
PVT. Co.	Private Motor Coach	PC
R.V. Van	Rec. Vehicle/Van	VC
TR.C.	Slide-In-Trailer Camper (not subject to FL title)	PM
T.C.	Tent Camper	CA
T.T.	Travel Trailer	TV
F.W.	5th Wheel Travel Trailer	TV

- E. Manufacturer's Certificate of Origin for Motor Homes and Van Conversions:

1. The FLHSMV will require a second stage MCO on units that have been converted from a van type vehicle to a recreational type vehicle. In order for a converted unit to qualify as a recreational vehicle, it must have at least one of the following installed by a licensed recreational vehicle manufacturer:
 - 110-volt electrical wiring
 - Liquified Petroleum gas piping
 - Plumbing system (consisting of permanently attached water-using toilet facility).
2. The second stage MCO will bear the name and VIN number assigned by the converting manufacturer which must accompany the first stage MCO. The converting manufacturer must be licensed and bonded by the FLHSMV as a recreational vehicle manufacturer.
3. The VIN number shown on the second MCO, issued by the converting manufacturer, must be identical to the VIN number shown on the first stage MCO which is initiated by the manufacturer (e.g.: Ford, Dodge), and is permanently affixed to the vehicle.

4. Motor homes and van conversions are to be titled in the following manner:
- All 1981 and later model year motor homes and all model year van conversions: Form HSMV 82040, Application for Certificate of Title With/Without Registration should show the make and year of the vehicle on the second stage MCO and the VIN number as shown on the first stage MCO. Always show the year on the second stage MCO even if NMVTIS brings back a different year for the vehicle. However, there should never be more than a two-model year difference.
 - 1980 and prior model year motor homes: Form HSMV 82040, Application for Certificate of Title With/Without Registration show the make, year, and VIN number on the second stage MCO. The VIN number shown on the first stage MCO is not to be used.
 - A motor home and van conversion previously titled in another state will be titled in Florida using the same description of the vehicle as shown on the out-of-state Certificate of Title.
 - If a "title only" is being applied for on a recreational vehicle it will be tagged at a later date if an affidavit is required. The affidavit must state that the recreational vehicle is in dead storage and will remain there until it is properly registered.

F. Conversion Affidavit:

In the case of an individual converting their own vehicle and requesting to have the identity changed on the title in order to have it registered and licensed as a recreational vehicle, the customer must submit an affidavit to the tax collector. The affidavit must certify that the unit has been converted to the extent to include one of the aforementioned items to qualify it as a recreational vehicle.

EXAMPLE:

This is to certify that I, _____, owner of a (Year) _____, (Make) _____, (VIN) _____, hereby request the vehicle be classified as a recreational vehicle for the following reason:

- () Installed 110-volt electrical wiring
- () Installed LP gas piping
- () Installed plumbing system

Miscellaneous Information

A. Questions and Answers Involving Mobile Homes and Recreational Vehicle Brokers.

1. Are licensed mobile home or recreational vehicle brokers required to appear in the chain of title of mobile homes or recreational vehicles they sell?

No. Because mobile home and recreational vehicle brokers do not take possession of title to mobile homes or recreational vehicles. There is no requirement that mobile home or recreational vehicle brokers appear in the chain of title.

2. What type of records must a mobile home broker or recreational vehicle keep?

Because brokers are a type of dealer, they are required to keep the same kinds of records required of mobile home dealers by [section 320.77\(8\)](#), Florida Statutes.

3. Are brokers required to apply for title on behalf of a retail customer per [section 319.23\(6\)](#)?

Yes. [Section 319.23\(6\)](#), Florida Statutes requires that the dealer apply for title in the case of sale "by a licensed dealer". Because this provision is intended to protect the public welfare, it should be liberally construed to affect its intended end. Therefore, even though the broker is not the owner of the mobile home, transactions conducted through brokers should be considered sales by licensed dealers for the purpose of this subsection.

B. Question and Answer Involving Classification of Trailer Combining Living Space with Storage Space:

Should a trailer which combines living space with storage/transport space, such as a horse trailer with living accommodations for humans, be classified as a "travel trailer" under [section 320.01\(1\)\(b\)1](#), Florida Statutes?

1. Yes. A trailer which combines living space with storage/transport space, such as a horse trailer with living accommodations for humans, should be classified as a "travel trailer" under [section 320.01\(1\)\(b\)1](#), Florida Statutes.

It is clear that the trailers in question meet this definition and should be classified as "travel trailer." Even though they are designed for dual use, they are primarily designed and constructed to provide living quarters for recreation, camping or travel use. This phrase is intended to distinguish these trailers from mobile homes, which are designed to be used as "dwelling units," per [s. 320.01\(2\)\(a\)](#), Florida Statutes; storage trailers and office trailers, which could conceivably be used to sleep in, are not primarily designed as living quarters.

Therefore, these trailers must be registered using class codes 60, 61, 77 or 78 to ensure assessment of the appropriate registration tax and fees.

C. Questions and Answers Concerning Changing a Heavy Truck or Truck Tractor to a Recreational Vehicle:

1. Can a heavy truck be converted/changed to be titled and registered as a recreational vehicle?

Yes. A heavy truck can be changed from its current classification to a recreational vehicle, if it continues to meet the definition listed in [s. 320.01\(10\)](#), Florida Statutes, AND is only used for the purpose of carrying the personal effects of the passengers. The vehicle type will be Auto (AU), and the body type will be Motor Home. If the vehicle meets the definition of [s. 320.01\(10\)](#), Florida Statutes, and its purpose is to carry goods other than the personal effects of the passengers, then it must be titled and registered as a heavy truck. Conversions are typically built on a commercial truck chassis. For title and registration purposes in Florida, these truck conversions may be designed or equipped with a connecting device for the purpose of drawing a trailer. A trailer as defined in [section 320.01\(4\)](#), Florida Statutes, is "any vehicle without motive power designed to be coupled to or drawn by a motor vehicle and constructed so that no part of its weight or that of its load rests upon the towing vehicle."

Notice that the definition is specific in that "no part of its weight or that of its load rests upon the towing vehicle." In other words, these heavy truck conversions may have a connecting device on the back of the vehicle to tow a vehicle, boat trailer, etc., however, they may not have a fifth wheel connecting device.

The Vehicle Identification Number will be the VIN on the chassis. The year will be the year of the chassis. The vehicle type will be Auto (AU), and the body type will be Motor Home. The vehicle type will be Auto (AU), and the body type will be Motor Home.

If you receive an application for truck conversion, the first question you ask should be, "Is there a fifth-wheel connecting device on this conversion?" If the answer is yes, the vehicle cannot be titled and/or registered as a Recreational Vehicle.



Notice the connecting device is not a fifth-wheel.

Above is a picture that illustrates what a truck conversion looks like.

If the vehicle meets the definition of [s. 320.01\(10\), Florida Statutes](#), and its purpose is to carry goods other than the personal effects of the passengers, it must be titled and registered as a heavy truck.



2. Can a truck tractor be converted/changed to be titled and registered as a recreational vehicle?

No. Truck-tractors as defined in [s. 320.01\(11\), Florida Statutes](#), may not be converted to a recreational vehicle.

Truck-tractors are designed with a fifth wheel for the primary purpose of drawing a semitrailer.

[Section 320.01\(5\), Florida Statutes](#), defines a semitrailer as any vehicle without motive power designed to be coupled to or drawn by a motor vehicle and constructed so that some part of its weight and that of its load rests upon or is carried by another vehicle.

Notice that the definition is specific in that “part of its weight and that of its load rests upon or is carried by another vehicle.”

Below is a picture of a truck conversion that does not qualify as an RV.



Notice the fifth-wheel connection. This vehicle must be titled and registered as a truck- tractor.

D. Auctions are allowed to deal in Recreational Vehicles:

Chapter 320, Florida Statutes, clarifies the process for a dealer to dispose of recreational vehicles taken in trade through licensed motor vehicle auctions.

1. [Section 320.27](#), Florida Statutes, allows a licensed motor vehicle dealer to sell at retail or wholesale, recreational vehicles they have acquired as trade-ins during the regular course of business. However, a motor vehicle dealer may not buy a recreational vehicle for the purpose of resale unless they are licensed as a recreational vehicle dealer pursuant to [s.320.771](#), Florida Statutes.
2. [Section 320.27\(1\)\(c\)4](#), Florida Statutes, defines a "motor vehicle auction" as any person offering motor vehicles or recreational vehicles for sale to the highest bidder where buyers are licensed motor vehicle dealers. Such person shall not sell a vehicle to anyone other than a licensed motor vehicle dealer.
3. [Section 320.77](#), Florida Statutes, allows mobile home and recreational vehicle dealers to buy recreational vehicles being sold at auctions.

E. A documentation checklist is attached to this procedure as Exhibit A.

- F. Graphic illustrations are attached to this procedure as Exhibit B.
- G. See Forms Appendix for a sample of the Florida Highway Safety and Motor Vehicles (HSMV) forms referred to in this procedure.

Revision(s)

06/26/23 Added instructions for the new Form HSMV 82040s

09/14/22 Added procedure to the new format. Removed “The Department” from the procedure and changed it to “Florida Highway Safety and Motor Vehicles”. Conducted Statutory review. Added images of a Slide-In-Trailer Camper and Truck Tractor. TL-43 was added to the procedure. The verbiage “PM” for pickup truck with a mounted camper. The camper itself is not titled, and the vehicle type will be Auto (AU), and the body type will be pickup truck with a mounted camper (PM).
01/09/20 Conducted Statutory review, added Historical Revisions section, added links to exhibits, procedures, and statutes. Removed modular home from page 3, II, B.

**RECREATIONAL VEHICLES, MOBILE HOMES AND
OFFICE TRAILERS CHECK LIST**

FORMS

FLORIDA RECORD/NEW VEHICLE

_____ HSMV 82040

_____ Florida Title

OR,

_____ First and second stage MCO
ownership

OUT-OF-STATE RECORD

_____ HSMV 82040

_____ HSMV 82042, or the VIN
Verification section on form
HSMV 82040.

_____ Out-of-state proof of

_____ Lien satisfaction(s), if applicable.

_____ Florida sales tax or specify sales tax exemption information on form HSMV 82040.

_____ Florida license plate number, non-use affidavit or the mobile home or Real Property
decal.

_____ Title fees.

For an individual completing a van conversion the following must also be submitted

_____ Conversion affidavit certifying that the unit has been converted to the
extent to include one of the items below to qualify it as a recreational
vehicle.

_____ Installed 110-volt electrical wiring

_____ Installed LP gas piping

_____ Installed plumbing system

Exhibit B



PRIVATE MOTOR COACH



MOTOR HOME



FIFTH WHEEL



TRAVEL TRAILER



MOBILE HOME



PARK TRAILER



Slide-In-Trailer Camper