

Bulletin

D-10-20-02

Date: October 27, 2020
Bulletin: All Dealers and Title Services
From: Business Licensing and Driver Instructional Services
Subject: **Electronic Signatures on Odometer Disclosures**

NHTSA has recently released a final rule with respect to electronic odometer disclosure statements.

Effective immediately, the Maryland Department of Transportation Motor Vehicle Administration (MDOT MVA) will begin accepting electronic signatures on federally compliant odometer disclosure statements. The odometer disclosure statements must comply with the federal requirements found in 49 CFR 580.

Dealerships or service providers must use an electronic signature solution that allows the odometer disclosure forms to be signed via a signing device or through a compliant process using email. The electronic signature process must use an identity proofing / authentication protocol or methodology to determine the identity of the signer which meets the National Institute of Standards and Technology assurance level 2.

Dealerships or service providers must submit an electronic signature certification page along with the forms and other transaction documents. Dealerships or service providers must maintain records related to the signature authentication for the normal document retention period.

An attestation statement on the dealership or service provider's letterhead must accompany the transaction documents and it must include this verbiage:

[NAME OF DEALER OR SERVICE PROVIDER] attests that the electronic signature(s) on the odometer disclosure documents meet the requirements set forth by National Highway Traffic Safety Administration Rule 49 CFR 580 for assurance Level 2.

Should you have any questions, please contact us at bldisd@mdot.maryland.gov