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Commissioner

# State of Alabama Department of Revenue

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## **MEMORANDUM**

**2012-8**

**TO:** License Plate Issuing Officials

**FROM:** Jay Starling, Assistant Director  
Motor Vehicle Division

**SUBJECT:** Mini-Trucks and Low Speed Vehicles

This memorandum will clarify several common misconceptions regarding mini-trucks and low speed vehicles.

### **Mini-trucks and low speed vehicles are not the same type of vehicle.**

A **mini-truck** is defined as a four-wheeled reduced dimension truck that is not less than 48 inches wide, with an unladen weight, including fuels and fluids, of not less than 1,500 pounds, equipped with a fully enclosed metal cab, an installed speed governor to prevent the truck from attaining a speed of more than 25 miles per hour, headlamps, stop lamps, front and rear turn signal lamps, tail lamps, reflex reflectors, a parking brake, rearview mirrors, windshield, seat belts, and a nonconforming vehicle identification number (§40-12-240). See attached picture.

A **low speed vehicle** is defined as a four-wheeled motor vehicle with a top speed not greater than 25 miles per hour, a gross vehicle weight rating (GVWR) of which is less than 3,000 pounds and complying with the safety standards provided in 49 C.F.R. Section 571.500. The term includes neighborhood electric vehicles. Other examples of low speed vehicles include ATVs, UTVs, dune buggies, rail buggies, etc.

Low speed vehicle dealers and manufacturers often advertise low speed vehicles as “street legal.” Both mini-trucks and low speed vehicles are exempt from titling in Alabama; however, **the registration requirements for mini-trucks and low speed vehicles are different.** Note that both type vehicles are exempt from titling regardless of whether they can be registered.

Low speed vehicles may only be operated on the public roads if they are certified as meeting all federal and state statutes, rules, and regulations governing safety, emissions, and anti-theft standards. Accordingly, the license plate issuing official must verify the following information before registering a low speed vehicle. The low speed vehicle must have a 17 digit vehicle identification number (VIN) which conforms to National Highway Safety and Traffic Administration (NHTSA) standards, and the manufacturer’s statement of origin (MSO) **must** state that the vehicle complies with the safety standards for a low speed vehicle or that the vehicle complies with Title 49 Code of Federal Regulations (CFR) section 571.500. The manufacturer will also affix a decal certifying that the vehicle meets these standards. **Often the MSO or bill of sale will reflect that the low speed vehicle is for off road use only, which indicates**

**that the low speed vehicle cannot be licensed for use on the roadways.** If the MSO or bill of sale states “off road use only”, the vehicle cannot be registered.

**A mini-truck may only be issued a mini-truck license plate** and cannot operate on interstate highways (§32-6-59). Mini-truck license plates are ordered through the Plate Reservation and Ordering System (PROS) and will be mailed to the registrant.

**Prior to issuing a license plate or transferring a license plate for use on a motor vehicle that is not required to be titled, the license plate issuing official must physically inspect the vehicle to verify that the VIN on the vehicle is the same as the VIN on the documents required to register the vehicle [§32-8-32(b)].** This inspection will also enable license plate issuing officials to determine whether the vehicle can be registered in Alabama. Operation of vehicles that are not intended for use on the roadways, regardless of whether they are registered, may subject the vehicle operator to citation by law enforcement. Note that county license plate issuing officials may utilize form MVT 5-10 (see attachment) to appoint government officials to inspect vehicles located in Alabama on their behalf.

If you have any questions, please contact the Registration Section at (334) 242-9006 or [tags@revenue.alabama.gov](mailto:tags@revenue.alabama.gov).



*Mini-truck*