

5/26/2021

Colleen Ogilvie, Acting Registrar
Massachusetts Registry of Motor Vehicles
PO Box 55889
Boston, MA 02205

Dear Ms. Ogilvie,

I am writing on behalf of our 1,100 member agencies in Massachusetts to share our concerns about a number of the RMV's COVID-related limitations that continue to negatively impact our agents and customers alike.

Massachusetts independent insurance agents offer valuable services to consumers as a part of their purchase of auto insurance. The restrictions imposed by the RMV, while certainly understandable during the height of the pandemic, have made agents' jobs more challenging, labor-intensive, and costly, and caused significant delays for consumers waiting to get their cars on the road. In light of Governor Baker's announcement that the Commonwealth would be lifting all remaining COVID restrictions on May 29th, we respectfully request that the RMV take action to resolve these issues as soon as possible.

Below are some of the most common concerns we continue to hear from our member agencies:

- **Lack of Full-Service Branch Locations-** RMV branches are open by appointment only and are limited to consumers only. Agents and runners (and in some cases, consumers) must go to designated drop-off locations, which can be over an hour away – especially on the Cape and in Western Massachusetts.

Request: We urge the RMV to reopen their "full service" locations as soon as possible and remove the by-appointment-only system for agents/runners, enabling faster and more effective service for our customers and agent drop offs in the same branch.

- **Lack of Agent/Runner Drop-Off Program-** Agents and runners are required to take a number, wait outside for a text before they are allowed to get in line for drop-off and pickup. This process can take over an hour for customers and agents alike.

Request: With capacity limitations and social distancing requirements now removed, we request that the RMV reinstate the drop-off program for agents and runners.

- **Inability of Agents to Review Documents-** At drop-off centers, agents are unable to review documents if something causes a registration to bounce, thereby forcing them to make at least two trips to correct and submit the proper documentation.

Request: As the RMV transitions back to full-service branches, we urge the RMV to allow agents to be able to process a limited amount of live transaction, as they were able to pre-COVID, and to review documentation at those remaining drop-off locations.

- **Inaccurate Communications-** Many agents indicate that notification on pickup has been poor; they frequently report that they did not get a call, despite the RMV indicating that they did.

Request: We ask the RMV review its communication processes and ensure that accurate information is being provided to our agents and runners.

- Premature Return to 7-Day Transfer Law- Massachusetts allows a grace period of 7 calendar days from the date a customer disposes of a previous vehicle to register their newly acquired vehicle. This grace period was extended to 21 days during the state of emergency. Our understanding is that the state reverted to the 7-day timeframe as of May 29th. Our agents are receiving multiple calls from customers saying that it is impossible to get appointments within the 7-day window, and if the transaction is dropped off at a branch, the RMV is behind in processing.

Request: We urge the RMV to maintain the 21-day grace period for registration transfers until these appointment issues can be resolved.

We share the RMV's objective of providing excellent customer service, and we would greatly appreciate your consideration of these solutions. We would welcome the opportunity to discuss these issues and provide any additional information.

Sincerely,



Nicholas A. Fyntrilakis
President and CEO