

## MLI Training Session Q & A:

1. **Can the system be changed so that a “No” response can be processed in one step?** The reinstatement process is currently done in two steps to ensure that reinstatement fee is collected. The first is to Submit the “No response – registrant admitting to operating vehicle without insurance”. The MVD will work to streamline the process during future system enhancements if possible.
2. **If a registrant sells their vehicle, subsequently acquires a replacement vehicle, and transfers the plate to the replacement vehicle...why would they receive an MLI Verification Notice for the previously owned vehicle?** If the registration is not immediately transferred to a replacement vehicle, the license plate should be surrendered. If the registration is not immediately transferred to a replacement vehicle or the license plate is not surrendered to the licensing official and the registration is revoked, the registration is still active and subject to insurance verification.
3. **Is it wise to advise a registrant that they can transfer their plate to another vehicle since there could be a possibility that the prior vehicle might be hit with an MLI inquiry?** See previous response.
4. **We get complaints from registrants with personalized plates who must surrender their plates because they sold or traded a vehicle (that they don’t plan on replacing right away).** See previous response. The personalized license plate can be reissued in a subsequent registration year. Note: Inactive personalized license plate messages/numbers are reserved for up to two years.
5. **If the registration is suspended (S1/S2) and the registrant does not qualify for any of the “Good Cause” reasons, is the registrant required to pay the reinstatement fee?** If the registrant can present evidence of insurance on the insurance verification date, the reinstatement fee is not due. If the vehicle was not insured on the insurance verification date and the registrant does not qualify for the stored/inoperable exemption, or one of the good cause extension reasons, the registrant must pay the reinstatement fee and provide evidence of current insurance to reinstate the registration.
6. **Why would a registrant have an MLI Suspension from a 2018 violation, but they have renewed their plate for 2018 and 2019?** It is possible that the licensing officials’ registration system did not properly flag the record, or the registration renewal was issued with an “open” MLI record. The MLI suspension file includes MLI records for the past 3 years. These MLI issues should be addressed prior to subsequent registrations. The MLI suspension file was amended to include all MLI record statuses.
7. **If a registrant sold their vehicle, the MLI record is in suspended status, and they don’t plan on transferring the plate – does the registrant still need to provide a bill of sale (as required on the Request for Registration Revocation, form MV 32-7A-5 for sold vehicles)?** See answers 2-4. Since the MLI record is already in suspended status, the thirty-day time period to claim a stored/inoperable exemption has already passed. The suspension will remain on the registration until the 3-year look back period has passed.
8. **Can registrants get a refund for the prorated amount of the plate when surrendering a plate?** Refunds or credits of license fees are not permitted if the vehicle was operated any time during the registration period per Administrative Rule 810-5-8-.06. This rule does not apply to ad valorem taxes.
9. **Should we accept plate surrenders if the plate is already expired or expiring in the renewal month?** If the registrant is eligible to claim a stored/inoperable exemption, and the registration is already expired, the plate can be reissued for the current registration period. If the plate is revoked during the renewal month, the plate number cannot be used until the next registration period. Note: a registration/license plate cannot be used in the same registration year that it was revoked.
- ~~10.~~ **What happens when the registration has been renewed and their registration is now suspended?**  
See response to number 6.
11. **If a registrant comes in after the 30-day surrender period has expired, are we allowed to revoke the license plate if they do not meet the criteria on the Mandatory Liability Insurance Affidavit (form MV 32-7A-11)? Example: If a registrant has a vehicle that is inoperable and dropped insurance and now has a roadworthy vehicle and wants to renew the plate will they have to pay the \$200 even if it hasn’t been on the road for months. -For MLI records created on 12/18/2019 or thereafter:** if the registration is suspended, the registrant must qualify for one of the good cause extension reasons on the Mandatory Liability Insurance Affidavit (form MV 32-7A-11) to be exempt. **For MLI records created prior to 12/18/2019:** the licensing office may allow the registrant to provide evidence of the stored/inoperable vehicle and revoke the registration using procedures prior to the law change effective 1/1/2020. In order to process these old, select one of the “Good Cause” extension reasons and add a comment that the record is being processed under the old law.

12. **If we process a revocation and plate surrender, is there, a required waiting period before a registrant can be issued a new plate?** No, the revocation and re-registration (assigning a new plate) can be processed in the same day/visit.
13. **What supporting documents do registrants have to provide to prove one of the reasons on the Mandatory Liability Insurance Affidavit (form MV 32-7A-11) (if any)?** As noted on the form, the documentation provided must be to the satisfaction of the licensing official.
14. **We have registrants voluntarily surrendering their plates before there is an MLI record. How do we update the system?** Registrants may voluntarily surrender license plates prior to cancelling insurance to avoid MLI issues. The licensing official would process the revocation/plate surrender in their registration system and the state registration database will be updated. Once the plate is revoked, OIVS will not attempt to verify insurance coverage and no MLI record would be created.
15. **How do registrants file an appeal?** Registrants can file an appeal thirty (30) days after the date on the suspension notice with the Alabama Tax Tribunal by visiting [www.alabamataxtribunal.com](http://www.alabamataxtribunal.com)
16. **If it's a registrant's renewal month and we are revoking the plate, do we charge \$24.25 for the plate and charge them for the renewal also?** If the registration is revoked anytime during the current registration year, including the renewal month, the license and issuance fee must be charged to issue a new registration. During the renewal month, the registrant may be required to pay the license and issuance fee for the current and subsequent registration years. Note: The \$24.25 is the standard fee plus issuance fee. Depending on the type of license plate (i.e. distinctive) other fees may apply.
17. **When does the one "get out of jail free card" apply? Is that part of the new MLI law (Act 2019-446) that became effective January 1, 2020 or does this also apply for previous years?** The "get out of jail free card" phrase is used to describe the law change that allows the registrant to claim the stored/inoperable exemption only once per year. It applies to MLI records created on or after 12/18/2019.
18. **Can the registrant appeal after 30 days of suspension?** It is up to the tax tribunal. In most cases the tax tribunal will refuse to hear these appeals. See response to number 15.
19. **When processing a reinstatement, does the reinstatement letter auto print?** MLI notices are available to be printed by the clerk from the MLI system by clicking the "Reinstatement Letter" PDF in the record history.
20. **Is it true that the Alabama Department of Revenue can only process YES responses (registrant had insurance)?** The Department (which includes the call center and taxpayer service centers) can only process a response for which insurance can be verified through OIVS or an insurer. Responses for which insurance cannot be verified that result in the collection of reinstatement fees or registration revocations must be processed by licensing officials.
21. **For registrants who contact the Department within 30 days (from the mailing of the verification notice), but do not surrender their plate to a local licensing official's office; do we still process a plate surrender or does the registrant have to pay the fee?** If the registrant does not surrender the license plate within the thirty-day time period and the registrant does not qualify for the "good cause" extension reasons, the reinstatement fee is due.
22. **What if the registrant is requesting to surrender the plate but it is after the 30 days and the registrant is claiming the vehicle was inoperable, and the inoperable proof is valid?** See answer to number 11. The registrant would need to qualify for one of the good cause extension reasons (MV 32-7A-11)
23. **Is there a provision in MLI law that the registrant's Driver's License will be suspended at any point?** The MLI law administered by the Alabama Law Enforcement Agency (ALEA) suspends the driver license. The MLI law administered by the Alabama Department of Revenue suspends the vehicle registration.
24. **For registrants that leave their vehicles stored every year because they go home out of state, is there a different option to avoid them having to surrender before they drop insurance down to storage insurance or have to fix it when they come back to this area?** Many insurance companies will not verify "storage" insurance using OIVS. In order to avoid MLI issues, it is recommended that the registration not be renewed until the vehicle is ready to be operated. Note: ad valorem taxes may be due.
25. **For unconfirmed open records, can we renew a registrant's plate until they obtain the proof of coverage on letterhead?** Registrations with open MLI records can be renewed; However, it is strongly recommended that the registrant address this issue prior to the issuance of a registration in order to avoid an MLI suspension and any future issues.
26. **If the plate is in a suspension status and the insurance does not confirm does the 30 days restart from there?** The registration will remain in suspended status until proof of insurance coverage is received, or the reinstatement fee is paid.

- 27. Is it a requirement to enter the policy effective/expiration dates in the MLI system when entering policy data?** These are optional fields to ensure that the policy period indicated on the evidence of insurance is accurate.
- 28. Why does the reinstatement letter state the registrant's registration is valid for 30 days from the date of correspondence?** The reinstatement notice is physical evidence of the reinstatement and should be carried in the vehicle and provided to law enforcement if there are any issues.
- 29. After 30 days, when the vehicle was in an exempt status on the insurance verification date and the MLI record is in suspended status, why is there not an option for stored and inoperable?** The Stored, Inoperable, and Otherwise Unused exemptions are only available during the 30-day period. Once the record is in a suspended status, the registrant must qualify for the "good cause" extension reasons to qualify for an exemption.
- 30. If the registrant does not respond to the MLI Verification Notice within 30 days, do they automatically have to pay the reinstatement fee?** If the registrant can provide evidence of insurance on the insurance verification date, or they are eligible to claim a good cause extension reason, reinstatement fees are not due.
- 31. If a registrant sold their vehicle and did not respond within 30 days (from the mailing of the MLI Verification Notice, should the registrant be required to pay the reinstatement fee for the sold vehicle?** See responses 2-4.
- 32. When the registrant still has the plate from the car that was sold, and he responds to the verification notice for the vehicle that was sold, wouldn't that license plate be revoked and thereby unusable?** The registration is only revoked when the license plate and/or revocation affidavit is surrendered to the licensing official within thirty-days from the MLI verification notice.
- 33. If a registrant comes in to the licensing office to find that the license plate/registration has (2) MLI records (an s1 and an s2) and proceeds to make a statement that the vehicle will be sold instead of paying the reinstatement fees; is the registrant responsible for paying those reinstatement fees?** If the registrant fails to respond to the MLI verification notices within thirty-days, the registration will be suspended and will remain in suspended status for three (3) years. Rule 810-5-8-.06 entitled MLI Registration Suspension, Reinstatement, and Revocation Procedures prevents the registrant from selling the vehicle to avoid reinstatement fees.
- 34. When the individual has moved and didn't get the notice, would we be able to use one of the exemptions? We have been told these notices are not being forwarded to the resident's current addresses. How does this affect registrants dealing with suspended records?** This is not one of the permitted exemption reasons. The MLI notices are mailed to the address reflected on the registration record. The notices are also emailed if an email address has been collected by the licensing official. The law does not require the receipt of the notice by the registrant. If the registrant had insurance on the insurance verification date, the registration can be reinstated.