



COMMONWEALTH OF MASSACHUSETTS
THE GENERAL COURT
STATE HOUSE, BOSTON 02133-1053

February 3, 2010

Ms. Rachel Kaprelian, Registrar
Registry of Motor Vehicles
P.O. Box 199100
Boston, MA 02119

Dear Registrar Kaprelian:

We are writing to request that the Registry of Motor Vehicles revisit and revise the current policy with regard to the registration of dual rear wheel pickup trucks because of the hardship imposed on those who operate such vehicles for personal or recreational use.

Specifically, 540 CMR 2.05-3(b) states "*Any vehicle which has five or more wheels on the ground*" must be registered as commercial. The regulation excludes campers, motor homes, and a variety of other vehicles, but not dual rear wheel pickups. This regulation imposes an additional financial burden for owner of trucks with trailer campers. It makes the registration, inspection, and toll fees significantly higher by hundreds of dollars without any apparent reason other than to prevent abuse from some businesses seeking to avoid commercial registration fees. This seems patently unfair to the many owners of thousands of dual rear wheel pickup trucks who do not utilize the vehicles for commercial purposes.

We request that the Registry amend the CMR to provide that any one ton class pickup, regardless of having four or six wheels, be registered for recreational use provided that it is legally being utilized for non-commercial purposes. The current Registry policy allows a 44,000 pound, six-wheel motor home with camper plates to be registered at the non-commercial fee and without DOT inspection. However, the policy does not treat an F-350 six-wheel pickup truck towing a 6,000 pound camper trailer in the same manner. This interpretation appears to be unfair and lack common sense.

Thank you in advance for your consideration and attention to this request.

Sincerely,

RICHARD T. MOORE
State Senator
Worcester & Norfolk District

cc: His Excellency Deval L. Patrick