



November 20, 2025

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Chair, American Association of Motor Vehicle Administrators  
Via email to: [catherine.curtis@maine.gov](mailto:catherine.curtis@maine.gov)

Re: National Motor Vehicle Title Information System Reports and Recommendations

Dear Mr. Davis and Ms. Curtis:

We write to you from two of the leading national organizations that advocate on behalf of car buyers for access to safe, affordable vehicles. Consumer Federation of America is an association of non-profit consumer organizations that was established in 1968 to advance the consumer interest through research, advocacy, and education. The National Consumer Law Center provides assistance and resources on consumer law issues to legal services offices, government attorneys, and private attorneys representing low-income consumers across the country. It publishes the Consumer Law Practice Series of manuals that have been helping the field represent consumers for over 40 years.

In our own prior work in private practice and legal aid, as well as our current work interacting with consumer attorneys across the country, we have seen the use of vehicle history reports in facilitating fraud and deception by dishonest dealers.

We share the concerns set forth in detail in our colleague Bernard Brown's letter dated October 31, 2025 regarding the deficiency of NMVTIS reports. Mr. Brown has a wealth of experience researching and litigating the issues that surround how vehicle history reports (both from NMVTIS and other private companies like Carfax) are created, used by dealers, and relied on by car buyers, as he clearly demonstrates in his letter. We also share his optimism for clear, deployable solutions that can help reorient these reports toward their original, Congressionally-mandated purpose to allow a user to establish instantly and reliably whether a vehicle is or has been a junk or salvage titled vehicle. See 49 U.S.C. 30502(d)(3).

Consumers cannot obtain information from NMVTIS directly, but rather must obtain NMVTIS data from private entities. As Mr. Brown describes, there are numerous issues with the content and structure of these reports. The use of obscure, confusing language, often in lengthy reports where important NMVTIS-sourced information about a vehicle's salvage history is mixed with other, less relevant or even apparently contradictory information from different sources, risks making these reports a tool for deception rather than the boon to consumers that they should be. The lack of a clear visual component to help consumers focus on and understand the importance of the NMVTIS information and the inconsistent report formats and content from different providers mean that consumers may miss the very NMVTIS information they are trying to buy.

Changes are necessary to ensure that NMVTIS fulfills its potential. Mr. Brown has suggested very useful ways in which the current reports could be reformed. Requiring a clear and conspicuous bold warning label at the beginning of the NMVTIS data and that the NMVTIS information be presented in the same format, regardless of which entity sells the report, would greatly reduce the confusion that results from the current NMVTIS reports.

It is crucial to consider the context in which these reports are reviewed by car buyers. Buying a car is one of the most complex transactions a consumer ever faces. They are negotiating multiple components at once (the car they want, the car they are trading in, add-ons, insurance costs, interest rates, etc.), almost always while at the dealership being pressured by sales people and finance managers, all while a new car is just out of reach.

Advocates recommend that consumers get an independent inspection of a vehicle before they buy it. For consumers, the availability of clear, concise, and affordable access to NMVTIS data could help avoid the time and expense of inspecting vehicles with already known junk or salvage history. Confusing or contradictory reports can result in consumers needlessly inspecting cars they could have avoided or, even worse, unwittingly thinking cars with known history of problems are safe and reliable.

Car dealers will also benefit from better NMVTIS reports. Clear and concise NMVTIS reports avoid any possibility of confusing dealers in regards to known problematic history of the cars they offer for sale. Fixing these reports to ensure that everyone who looks at it can readily ascertain the vehicle's history can reduce considerable friction between dealers and buyers.

Finally, as policy advocates, we are routinely asked for guidance about "best practices" for car buyers, like how to get a safe affordable vehicle without being scammed, and what to avoid or seek out when buying a car. We would welcome changes that enable us to give better guidance about vehicle history searches and help consumers to know exactly what kind of vehicle they are using to drive to work, to their kids' school, and to their medical appointments. Cars are a lifeline, and consumers deserve a way to easily and affordably access the important information in the NMVTIS database.

Sincerely,

Erin Witte  
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Consumer Federation of America

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Senior Attorney  
Project Director, Working Cars for Working Families  
National Consumer Law Center