

# Bulletin

**D-05-16-04**

**Date:** May 6, 2016  
**Bulletin To:** All New and Used Motor Vehicle Dealers  
**RE:** Trade-in Allowance and Registration Fees

**Trade-in Allowance**

It has recently come to our attention that transactions are being submitted or processed by dealerships involving trade-in vehicles that exceed the trade-in value indicated in a national publication of used car values and documentation is not submitted to justify the exceeding value.

As a reminder please be advised, in accordance with COMAR 11.15.33.05, if the trade-in allowance is more than the trade-in value in a national publication of used car values adopted for use by the Administration, the dealer must provide documentation that satisfies the Administration that the higher trade-in value is justified. Documentation includes:

- (1) Evidence of the amount required to release the lien on the trade-in vehicle;
- (2) Evidence of the vehicle customization that increases the vehicle value;
- (3) A current valuation from an alternative national publication; or
- (4) If the traded-in vehicle has already been sold, the actual resale price of the traded-in vehicle.

In order to help ensure compliance with this regulation, the MVA is requesting (1) one the following documentation to justify higher trade-in values as applicable:

- Copy of lien release; with pay-off amount of trade-in,
- Copy of page from national publication of used car value that displays the trade-in vehicle's make, model, year, vehicle identification number, and listing of customized values selected , or
- Statement from dealer, on dealership's letterhead identifying trade-in vehicle by make, model, year, vehicle identification number, and list the customized items along with the value assessed

**Registration Fees**

It has come to the attention of the Business Licensing Division through audits that registration fees being charged are incorrect.

As a reminder to all dealers, the dealers' buyers order must show the exact same fees as the fees reflected on the transaction receipt from MVA and the vendor's software. If your system defaults to the higher registration fee, please contact your vendor immediately to resolve this issue.

The fees collected from the customer should be accurate and compared to the buyer's order before submitting the transaction electronically or by walking in to a local field office. If a customer is overcharged, the additional fees should be refunded immediately.

Please visit our website <http://www.mva.maryland.gov/vehicles/registration/fees.htm> to obtain the current listing of registration fees.

Should you have any questions or concerns, please contact us at [mvablcsd@mva.maryland.gov](mailto:mvablcsd@mva.maryland.gov).