

Problems with Vessel Titling & Registration

RBAW recently published information in this article space regarding vessel titling and registration under the Washington State Department of Licensing's (DOL's) new computer system. After further investigation, and meeting with key DOL staff on January 12, 2017 RBAW is providing an update on this issue. Here's what we learned:

(Updated Added March 2, 2017...See Below)

The Code of Federal Regulations (33 CFR 181.25) was established back in 1972. It is a 12-digit format for Hull Identification Numbers (HINs). Federal regulations in discussion since 2010, and now mandated to be implemented in 2017 (see: 33 CFR 174.16), requires ALL State titling/registration agencies to confirm that every registered vessel has a HIN that conforms exactly to one of the three allowed formats – see this third-party web-page at <http://www.boatsafe.com/nauticalknowhow/hin.htm> -for concise explanation of what FORMATS are allowed.

Of the roughly 240,000 registered vessels in Washington, DOL has scanned their files and identified approximately 29,000 vessels (nearly one in eight!) that do not appear to have compliant HINs. DOL will be individually contacting each of these affected vessel owners directly to advise them of this situation, by letter or e-mail – in plenty of time to rectify the non-compliant HIN before the June 2017 registration renewal cycle – or immediately, for vessels undergoing re-titling.

What if you have a non-compliant HIN?

You'll need to obtain a new title and registration, with a State-assigned new HIN, and pay the standard applicable fees (\$21). Then you must attest (by signing the new registration) that the new HIN is properly displayed on your vessel.

Which vessel transactions are affected? When?

Any title or registration transactions, or address updates (or any other vessel transactions, excluding lienholder changes) are affected. This DOES include all registration renewals, with next cycle coming up June 2017. When such transactions are conducted, DOL's new computer system will identify the non-compliant HIN if you haven't gone thru the new-title process to change it already, and force re-titling and issue a new HIN.

What do vessel owners need to do?

If you receive notification that your vessel's HIN is "non-compliant", the vessel owner must visit a vehicle licensing office (VLO) in person. If you attempt to renew online, the system will stop you and direct you to visit a VLO in person. For these transactions, DOL does not require the old title in-hand, in order to issue the new title.

If you believe your HIN as embossed on, or attached to, the vessel's hull does meet the exact format standards (but for example, the correct-format HIN - as seen on the vessel - is not on the title/registration due to clerical error or incorrect original reporting), please bring a photo or a pencil rubbing of your current HIN to the office, and DOL will attempt to process your

transaction for you, retaining the proper HIN. If DOL made an error in its records, no fee will be charged to you.

The new HIN will typically have the state-issued prefix (first three digits of “WNZ”).

DOL will provide each recipient of a new HIN, very specific instructions where and how this new HIN must be attached to the vessel, to meet Federal requirements.

This is certainly a major undertaking for our State (and all other States), to meet this new Federal Mandate! Please assist Washington State Department of Licensing in every way you can during this fulfillment cycle – THEY are not the instigator of this new requirement!

UPDATE:

RBAW (and NMTA, State Parks Boating Law administrator, and marine titling agencies) are now in every-three-weeks conference calls to DOL about the rollout of their HIN-format-compliance project – here are the most recent developments, amending above information:

1. DOL will NOT charge any fee for re-titling to assign a compliant HIN. This could save the Recreational Boating community as much as \$600,000! – we are pleased to have pushed for this result on your behalf, and duly appreciate DOL’s generosity in absorbing this “unfunded mandate”.
2. DOL is NOT reviewing compliance for “Documented” vessels, as (according careful reading of the driving CFR) that task rightly falls to the Federal Documentation Center – we have no information yet when or if that organization will issue new Federal “Documents” = titles, with new compliant HINs assigned.
3. For pre-1972 vessels (before the legal mandate to have a HIN), DOL will accept ANY format of original HIN, even just a one-or-two-digit manufacturer’s number... but if there is no HIN at all on the State title/registration, then DOL will assign a “WNZ”-format HIN.

RBAW will do our best to keep you advised on new developments.