



STATE OF CONNECTICUT
Department of Motor Vehicles

Antonio Guerrero
Commissioner

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September 27, 2023

Dear Joanna,

I am in receipt of your letter dated September 15, 2023, and appreciate your inquiry concerning potential implications of [Public Act 23-40](#), Section 24, which was approved during the General Assembly's 2023 regular session.

As always, I welcome engagement from our regulated community and hope to address some of your questions and concerns.

Connecticut state statute requires new car dealers to operate in conjunction with manufacturers while adhering to manufacturer standards expressed through franchise agreements. This collaborative relationship is instrumental in maintaining vehicle quality and safety. Public Act No. 23-40, Section 24, is specific to a licensed repairer in accordance with Section 14-52 and, as such, the Department of Motor Vehicles (DMV) does not interpret applicable provisions to include a new car dealer.

The DMV does interpret as unambiguous the requirement that a comprehensive description of the recall must be provided to the consumer in the form of a written notice in the newly adopted language. The intent is to protect consumers and ensure vehicle owners receive clear and detailed information about recalls directly. Providing an online link to where consumers can find this information online, and must go search for it, would not be sufficient.

It is the opinion of the DMV that any of the written communication methods described below would be reasonable examples to convey recall information:

1. Sending a phone text message prior to initiating preventative maintenance or repair;
2. Sending an email prior to initiating preventative maintenance or repair;
3. Printing on a repair estimate in hard copy or digital format; or
4. If preventative automotive maintenance-only services are requested that do not require a formal written estimate, printing the written notice on a separate document in hard copy or digital format.

I would strongly recommend that you share insights on this front with the leadership of the General Assembly's Transportation Committee, each of whom I have found approachable and open to feedback from stakeholders and those impacted by legislative action.

As you may also be aware, the open recall notification proposal began as a stand-alone measure before being added to Public Act 23-40, which transitioned to an omnibus transportation measure that included policies in addition to DMV-submitted proposals. The safety recalls measure started as [House Bill No. 6654](#), which was the subject of a February 15, 2023, public hearing and received a favorable vote from the Transportation Committee on March 17, 2023.

The DMV must fulfill its responsibilities fairly and consistently, based on statutory provisions adopted by the General Assembly and signed into law by the Governor. That said, I too believe that communication and engagement with our regulated community is critical, which is why I prioritized notification of new open recall provisions to DMV-licensed entities back in July. Please feel free to contact my legislative liaison, Jim Polites (Phone: 860-263-5026; E-mail: james.polites@ct.gov), with additional questions and if you wish to discuss this matter further.

Again, thank you for your letter and feedback.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Antonio Guerrero', written in a cursive style.

Antonio "Tony" Guerrero
Commissioner