

# Vehicle Licensing Guide

## Imported Vehicle (Foreign Market)-Application for Title VLIC-3.330

Original Date: 07/08/1986  
Revision Date: 03/10/2024

ALERT
<ul style="list-style-type: none"><li>• For nonnegotiable titles issued to record a lien for vehicles purchased in Virginia and being titled in another state, follow guidelines in <a href="#">VLIC-3.346</a>.</li></ul>
<ul style="list-style-type: none"><li>• For nonnegotiable titles issued to vehicles titled out-of-state with nonrepairable equivalent brands, follow guidelines in <a href="#">VLIC-3.347</a>.</li></ul>

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POLICY	
<b>Title:</b> Imported Vehicles (Foreign Market)-Application for Title	
<b>Effective Date:</b> July 8, 1986	<b>Revision Date:</b> December 25, 2017
<b>Authority:</b> Code of Virginia §§ <a href="#">46.2-100</a> , <a href="#">46.2-602</a> , <a href="#">46.2-633</a> , <a href="#">46.2-634</a> , National Highway Traffic Safety Administration-Title 49-USC-Chap 301- <a href="#">FMVSS</a>	
<b>Policy:</b> Motor vehicles imported into the United States (U.S.) that are less than 25 years old must comply with all applicable Federal Motor Vehicle Safety Standards (FMVSS), or be brought into compliance with those standards by a Registered Importer, unless exempt.  DMV shall issue imported motor vehicles a Virginia certificate of title and full registration upon submission of acceptable proof of FMVSS compliance, when applicable, along with all required import, ownership, titling documents, applications and fees.  For a vehicle imported temporarily by a foreign military member stationed at a Virginia military base, under the auspices of the North Atlantic Treaty Organization (NATO), and for personal use only, DMV shall issue a standard Virginia title and registration valid only for the duration of the military member's orders in the U.S.	
<b>&lt;&lt;&lt;&lt;REVISION</b>	
<ul style="list-style-type: none"><li>• <a href="#">Modified U.S. market vehicles</a> or <a href="#">foreign market vehicles</a> that are required to comply with FMVSS for which the applicant has <b>no acceptable proof of FMVSS compliance</b> at time of application may be eligible for a title with the special condition of "nonnegotiable" (NONNG) and/or 180-day nonrenewable registration using grey market code "180" to allow the applicant time to obtain the required proof. <b>END REVISION&gt;&gt;&gt;&gt;</b></li></ul>	

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### DEFINITIONS

**Foreign Market Vehicles** – Any motor vehicle originally manufactured outside the United States, which was not manufactured in accordance with 49 U.S.C. § 30101 et seq. and the policies and regulations adopted pursuant to that Act, and for which a Virginia title or registration is sought.

**Registered Importer** – Specially registered with NHTSA (referred to as "registered importer" or "RI"), or by a person who has a contract with an RI to modify the vehicle so that it complies with all applicable FMVSS following importation.

**Imported Vehicles** – Any vehicle (including motorcycles) brought into the United States (U.S.) from any foreign country (including Canada) regardless of where it's manufactured, that may or may not meet the requirements of the National Traffic and Motor Vehicle Safety Act, or other policies and regulations adopted as a result of the Act. This does not include vehicles imported from U.S. territories (i.e. Puerto Rico, Virgin Islands, Guam, American Samoa, and Northern Marian Island, or its possessions).

**Modified U.S. Market Vehicles** – U.S. market vehicles, whether purchased in the U.S. or through an Overseas Military Corporations (OSMC), that have been altered in some manner so that they no longer meet Federal Motor Vehicle Safety

Standards (FMVSS) and vehicles that are required under federal law to have the catalytic converter and oxygen sensor replaced because of the use of leaded fuel in the foreign country.

**Overseas Military Corporations (OSMC)** – Corporations authorized to sell vehicles built to meet United States specifications to U.S. military personnel deployed overseas. A Manufacturer's Certificate of Origin or the customer's Bill of Sale is sufficient to show the vehicle was purchased from an OSMC.

**Unmodified U.S. Market Vehicles** – Vehicles purchased in the U.S., taken to another country, and imported back into the U.S. with no modification to any equipment and no requirement for replacement of any parts as a condition of return. Also includes unmodified vehicles purchased from Overseas Military Corporations (OSMC) authorized to sell U.S. market vehicles to military personnel.

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## OVERVIEW

The National Highway Traffic Safety Administration (NHTSA) issues Federal Motor Vehicle Safety Standards (FMVSS) and Regulations to which U.S. manufacturers of motor vehicles and equipment items must conform. These Federal safety standards provide minimum safety performance requirements for motor vehicles and equipment manufactured for use in the U.S.

All motor vehicles imported into the U.S., whether originally manufactured in the U.S., or in countries other than the U.S., that are less than 25 years old must provide acceptable proof of compliance with, or exemption from compliance with FMVSS before being eligible to be titled and registered in Virginia.

Importers of vehicles must submit required import, ownership, titling documents and fees along with at least one of the acceptable U.S. Customs and Border Protection forms listed in [Customer Requirements](#) for vehicles not exempt from FMVSS standards when required (see [Imported Vehicle Title and Registration Eligibility](#) table below).

Certain imported vehicles are exempted by NHTSA from compliance with FMVSS standards. However, exempted vehicles may qualify for a title and limited registration in accordance with form HS-7, or a trip permit with submission of all required documents and fees.

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## CUSTOMER REQUIREMENTS

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1. Refer to the Customer Requirements & Front Counter CSR Reference Chart below to determine the documentation needed.
2. Pay Required fees. **END REVISION>>>>>**

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## FRONT COUNTER CSR

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1. Verify submission and acceptability of the following:

CUSTOMER REQUIREMENTS & FRONT COUNTER CSR REFERENCE CHART	
DMV Forms	Application for Certificate of Title and Registration ( <a href="#">VSA 17A</a> )
Ownership Document (Photocopies are not acceptable, must contain the full VIN) <sup>1,2,3</sup>	One of the following: <ul style="list-style-type: none"> <li>• Title,</li> <li>• Prior Registration,</li> <li>• Manufacturer's Certificate of Origin (MCO), or Manufacturer's Statement of Origin (MSO),</li> <li>• Export Certificate</li> </ul>
Bill of Sale	Required if the customer is submitting an MCO or MSO or if ownership document is not in the name of the applicant
National Highway Traffic Safety Administration (NHTSA) Form (Must contain the full VIN)	Importation of Motor Vehicles and Motor Vehicle Equipment Subject to Federal Motor Vehicle Safety, Bumper and Theft Prevention Standards - <a href="#">HS-7 Declaration</a> with relevant attachments (if applicable) <sup>8,9</sup> (Refer to <a href="#">HS-7 Imported Vehicle Title and Registration Eligibility Table</a> )
Customs and Border Protection (CBP) Forms <sup>7</sup> (Must contain the full VIN)	One of the following: <ul style="list-style-type: none"> <li>• Entry Summary – <a href="#">CBP Form 7501</a><sup>4,5</sup></li> <li>• Declaration for Free Entry of Unaccompanied Articles – <a href="#">CBP Form 3299</a><sup>4,6</sup></li> <li>• <a href="#">Automated Commercial Environment (ACE) Report</a><sup>4,5,6</sup></li> </ul>
Environmental Protection Agency (EPA) Form (Must contain the full VIN)	Importation of Motor Vehicles and Motor Vehicle Engines Subject to Federal Air Pollution Regulations Declaration Form – <a href="#">EPA Form 3520-1</a>
Proof of Address	When applicable, refer to <a href="#">DMV-177</a> and <a href="#">VLIC-3.530</a>
NOTES	
1.	If the Export Certificate is assigned to an exporting company and not the applicant, a bill of sale or invoice from the exporting company to the VA applicant must be provided to establish the ownership transfer.
2.	Vehicles purchased overseas from <a href="#">Overseas Military Corporations (OSMC)</a> by military personnel are built to meet U.S. specifications and customers are only required to submit either an MCO/MSO or bill of sale indicating vehicle was purchased from an OSMC.

3.	Customer must submit English translations for all documents written exclusively in a foreign language.
4.	CBP forms must be fully completed with an electronic or physical signature. CBP forms are not required to be stamped.
5.	If multiple vehicles are listed on form 7501 or the ACE report and the customer is not titling all of the vehicles listed, make a copy and return the original to the customer. Note on the copy of the form that “the original document was witnessed and returned to the customer” and include the copy with the transaction documents.
6.	Military personnel or U.S. residents may submit form 3299 (Declaration for Title Entry of Unaccompanied Articles CGP3299) in lieu of CBP form 7501. <b>NOTE:</b> This applies to vehicles (excluding motorcycles) that have been titled in the U.S., exported, and subsequently imported back upon their return to the U.S. This form must display the vehicle make, complete Vehicle Identification Number (VIN), and an electronic certification or signature. The customer must also submit certification that the vehicle has NOT been altered to no longer comply with Federal Motor Vehicle Safety Standards (FMVSS). This certification does not have to come from any government entity or be notarized, and can be from the customer directly. This applies to unmodified U.S. market vehicles and OSMC vehicles only.
7.	Forms issued by the U.S. Customs and Border Protection do not signify compliance with FMVSS or EPA regulations, and are only proof that the importer completed the U.S. Customs and Border Protection Import Processing by showing proof of ownership (original, or a certified copy of the original documents).
8.	Ensure that a copy of any document(s) required for the appropriate box on the HS-7 Declaration is provided following the guidelines in the <a href="#">HS-7 Imported Vehicle Title and Registration Eligibility Table</a> .
9.	If Box 3 is checked on the HS-7 Declaration, the customer is required to present a DOT Bond Release letter from NHTSA on official United States Department of Transportation (USDOT) letterhead unless they are submitting an acceptable form showing FMVSS compliance at the time of application. <b>NOTE:</b> All ownership documents must be original, photocopies are not acceptable. All NHTSA, CBP, and EPA forms must contain the full VIN. <b>IMPORTANT:</b> Do not turn the customer away when unable to make a clear determination of a customer’s eligibility for titling and registration. When in doubt, send all related documents to the Titling Work Center via Landing Zone for additional review.

2. Determine imported vehicle’s eligibility for title and registration or trip permit by following the guidelines on the [HS-7 Imported Vehicle Title and Registration Eligibility Table](#). **END REVISION>>>>>**

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3. For an applicant importing an [unmodified U.S. market vehicle](#) back to the U.S, which was previously titled in Virginia, a substitute title is issued (not an original). The customer must submit a [VSA 67](#) with either a CBP Form 3299 or 7501.  
**END REVISION>>>>>**

4. Continue processing title in accordance with [VLIC-3.000](#), or VLIC-3.120 (for substitute titles).  
a. Ensure that the correct odometer reading and odometer code is entered into the system.

**IMPORTANT:** The system will not allow an odometer reading to be recorded that is lower than the odometer reading recorded in the prior Virginia vehicle record or the odometer reading returned from NMVTIS. (Refer to [VLIC-3.520](#))

5. Continue processing registration in accordance with [VLIC-4.000](#).

- Registration periods for vehicles imported for use by foreign military personnel (checkbox 12) are limited to the foreign military member’s tour of duty in the U.S. as indicated on the copy of official orders,
- Expiration dates for nonrenewable, 180-day registrations are calculated by the system upon entry of the grey market code “180”.
- With grey market code “180” a title Held is placed on the record and no title will print.

6. Continue processing trip permit in accordance with [VLIC-4.232](#).

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IMPORTED VEHICLE TITLE AND REGISTRATION ELIGIBILITY TABLE			
HS-7 Imported Vehicle Title and Registration Eligibility Table			
Box(es) checked on HS-7 Declaration	Is the Vehicle FMVSS Compliant?	Additional Documentation Needed?	Title and Registration Eligibility
<b>1</b> Vehicle is over 25 years old	EXEMPT	NO	<<<<<REVISION • VA Title <b>END REVISION&gt;&gt;&gt;&gt;&gt;</b> • Full Registration • Trip Permit (If Requested)
<b>2A</b> Vehicle or equipment conform (ENTER CODE: P)	YES	NO	• VA Title • Full Registration • Trip Permit (If Requested)

<b>2B</b> NEW Vehicle (ENTER CODE: <b>NR</b> )	NOT REQUIRED	YES Manufacturer letter stating FMVSS compliance	<ul style="list-style-type: none"> <li>• Nonnegotiable Title</li> <li>• Trip Permit (If Requested)</li> </ul>
<b>3</b> Vehicle does not conform to FMVSS (ENTER CODE: <b>REQ</b> )	NO	YES DOT Bond Letter from NHTSA (This letter must be on official USDOT letterhead)	<b>Apply to the title record:</b> <ul style="list-style-type: none"> <li>• Nonnegotiable Title</li> <li>• Grey Market Status: 180</li> </ul> <b>Registration:</b> Temporary 180 Registration <b>NOTE:</b> System will automatically calculate the 180 day registration expiration.
<b>4</b> Vehicle or equipment being exported out of the US	NO	NO	<ul style="list-style-type: none"> <li>• <b>DO NOT TITLE</b></li> <li>• <b>DO NOT REGISTER</b></li> </ul>
<b>5</b> Tourist Exemption	NO	NO	<ul style="list-style-type: none"> <li>• <b>DO NOT TITLE</b></li> <li>• Trip permit upon request</li> </ul>
<b>6</b> Foreign military officials	EXEMPT	YES Copy of Official Orders (vehicle cannot be sold in US)	<ul style="list-style-type: none"> <li>• Do not title or register</li> <li>• Customer must contact the U.S. Department of Homeland Security office of Foreign Mission.</li> </ul>
<b>7</b> "Test" vehicles or race cars (ENTER CODE: <b>NR</b> )	NO	YES Copy of NHTSA Permission Letter and Importer Statement	<ul style="list-style-type: none"> <li>• Nonnegotiable Title</li> <li>• Trip permit upon request</li> </ul>
<b>8</b> Off Road Vehicles (ENTER CODE: <b>NR</b> )	NO	YES Importer's Statement	<ul style="list-style-type: none"> <li>• Nonnegotiable Title</li> <li>• Trip permit upon request</li> </ul>
<b>9</b> Incomplete Vehicle	NO	YES Copy of Incomplete Vehicle Document from Vehicle Manufacturer	<ul style="list-style-type: none"> <li>• <b>DO NOT TITLE</b></li> <li>• Trip permit only (upon request)</li> </ul>
<b>10</b> "For Show" vehicles or concept cars	NO	YES NHTSA Permission Letter	<ul style="list-style-type: none"> <li>• Nonnegotiable Title</li> <li>• Trip permit upon request</li> </ul>
<b>11</b> Vehicle Equipment	<b><u>THIS IS NOT A VEHICLE</u></b>		
<b>12</b> Military (ENTER CODE: <b>NR</b> )	NO	YES Copy of Official Orders (vehicle cannot be sold in US)	<ul style="list-style-type: none"> <li>• Nonnegotiable Title</li> <li>• Registration expiration should expire per customer's official orders.</li> <li>• Trip permit upon request</li> </ul>
<b>13</b> Vehicle does not conform to FMVSS	NO	YES Copy of NHTSA Permission Letter	<b>Forward to the Titling Work Center</b>

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## POINTS TO REMEMBER

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- CBP Forms are no longer required to be stamped by U.S. Customs, per [CBP Bulletin CSMS #16-000399](#).  
**END REVISION>>>>>**
- Forms issued by the U.S. Customs and Border Protection do not signify compliance with FMVSS or EPA regulations, and are only proof that the importer completed the U.S. Customs and Border Protection Import Processing by showing proof of ownership (original, or a certified copy of the original documents).
- Whenever a CSC is unable to make a clear determination of an import vehicle's eligibility for titling and registration, DO NOT turn the customer away. Send all related documents to the Titling Work Center via Landing Zone.
- Ensure that all documents are complete and possess customer(s) signature(s).
- The Titling Work Center may arrange with the CSC manager to expedite the customer processing for these transactions. Headquarters' staff will contact CSC management to coordinate all necessary arrangements when necessary.
- Motorcycles imported from a foreign country cannot be shipped to the United States as a "household good".

- For customer questions or for additional information about FMVSS exemptions and required forms, provide the following contact information:

U.S. Dept. of Transportation NHTSA Import Certification OR NEF-32 400 7 <sup>th</sup> Street, S.W. Washington, D.C. 20590 202-366-5291	Classification and Value Division U.S. Customs Service Washington, D.C. 20229 877-227-5511
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### DMV CONTACT CENTER ACTIONS

- To assist customers with questions regarding other types of nonnegotiable titles, or in identifying situations when a nonnegotiable would apply, refer to the [Nonnegotiable Title Eligibility](#) table.
- Do NOT promise the acceptability of documents to customers.
- Do NOT use phrases like:
  - "You have everything you need, just go to a CSC and they will issue your document."
- Use phrasing such as:
  - "*The documents you have listed sound like they may be acceptable: The CSC will make the final determination of your eligibility to receive your Virginia title and/or registration card.*"

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### RELATED LINKS

Department of Transportation Importation of Motor Vehicles & Motor Vehicle Equipment Subject to Federal Motor Vehicle Safety, Bumper and Theft Prevention Standards [HS-7](#) Declaration.

[Nonnegotiable Title Eligibility Table](#)

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### CONTACT

For additional information contact:

- Your CSC Manager/Assistant Manager
- DMV Contact Center Help Desk at (804) 367-6646
- VSA/[Titling Work Center](#)

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