copart.com
10 Industrial Drive
Exeter, Rhode Island 02822

December 20, 2023

RE: 280-RICR-30-10-15, limited power of attorney

Mr. Roger Demers
Department of Revenue
600 New London Avenue
Cranston, RI 02920
Sent via email to roger.demers@dmv.ri.gov

Dear Mr Demers:

Thank you for the opportunity to discuss our concerns with the proposed rule on behalf of Copart. Our company is a global leader in the salvage and auto auction industry and offers a range of services for processing vehicles and selling units over the internet through our online auction technology platform. Copart is proud to be part of the business community in Rhode Island and we operate a facility located in Exeter. Copart is neutral on this proposed rule change and would like to offer comments which we believe are needed for this proposal to be successful.

The first request would be for this power of attorney (POA) to be available in an electronic format. Copart and others in our industry have a significant title processing volume and we are likely the Department's largest customer by number of applications. An electronic format would allow this POA to be sent electronically to customers which can print the form and return it to Copart after it is perfected. These citizens that experience a total loss are in a trying period in their lives and an electronic form would allow them to get back whole faster and with less inconvenience.

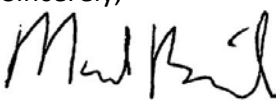
Secondly, if this POA must be in a hard copy format, we ask the Department of Revenue to ensure that bulk orders of the POA are available. We process thousands of titles a year and if we are limited to a small number of POAs at a time this will cause a significant disruption to our customers and the citizens of Rhode Island.

Lastly, we request that consideration be made to allow electronic signatures if a digital form is created. This would be in lieu of a notary requirement and the electronic signature must meet National Institute of Standards and Technology (NIST) Level 2 Authentication as authorized by NHTSA. Once signed electronically, the POA would be able to be printed and submitted with the title application. A validation page would also be submitted to validate the security requirements are met.

Thank you for the opportunity to comment on these proposed rules. We hope you see the value of these suggestions and consider the requests. If you have any questions or concerns, please feel free to reach out to me directly. I am more than willing to provide more information that is needed.

copart.com
10 Industrial Drive
Exeter, Rhode Island 02822

Sincerely,



Mark Binder
Director of Government Affairs
(214) 535-6546
Mark.Binder@Copart.com

Cc: Paul Kirkpatrick, Copart
Lisa Doherty, Copart
Jason Gaudette, Copart
Jarrod Gadd, Copart
Aron Rosenfield, Copart
Kevin Bond, Copart
Max Aguirre, Copart