



October 10, 2024

**Registration and Title Bulletin #003-24  
Policy and Procedure**

**TO:** All County Tax Assessor-Collectors and Licensed Motor Vehicle Dealers

**SUBJECT:** Odometer Disclosure Exemption for Certain Rental and Lease Companies

**PURPOSE**

The purpose of this bulletin is to provide guidance on the exemption from odometer disclosure requirements for new motor vehicles purchased by a rental or lease company who are in the business of renting or leasing vehicles for a period of 30 days or less.

**DETAILS**

49 United States Code §32705 provides an exemption to odometer disclosure requirements when a new motor vehicle is transferred from a vehicle manufacturer jointly to a licensed franchised dealer and a rental or lease company in the business of renting or leasing vehicles for a period of 30 days or less. Joint transfer occurs when the vehicle manufacturer issues the manufacturer's certificate of origin (MCO) to the franchised dealer and rental or leasing company on the face of the MCO. When joint transfer has occurred, an odometer disclosure statement is not required to accompany the transfer of the MCO from the franchised dealer to the rental or leasing company. The odometer reading reported on the *Application for Texas Title and/or Registration* (Form 130-U) is acceptable.

The rental or leasing company is responsible for determining whether they qualify for the exemption, and proof is not required to be submitted with the title application. Once the vehicle is titled in the rental or leasing company's name, any subsequent title transfer is subject to odometer disclosure requirements, unless otherwise exempted under federal law.

**COUNTY ACTION**

Effective immediately, accept title applications without an odometer disclosure statement for new motor vehicles sold by a licensed franchised dealer to a rental or lease company that were jointly assigned to the licensed franchised dealer and rental or lease company on the MCO. Use the mileage reported on the Form 130-U to enter the odometer reading in the Registration and Title System. Do not reject a transaction if an odometer disclosure is provided when it is not required.

**CONTACT**

If you have any questions, please contact your local Texas Department of Motor Vehicles Regional Service Center.

Sincerely,

*A. Quintero*  
Annette Quintero, Director  
Vehicle Titles and Registration Division  
Texas Department of Motor Vehicles