



The Importation of Trailers (or Motor Vehicles and Motor Vehicle Equipment) into the U.S

2022 International Trade Week
May 20, 2022

Today's Agenda

- What is the **National Highway Traffic Safety Administration?**
- What are **NHTSA Regulations?**
- How does the **Importation of Trailers** work?



National Highway Traffic Safety Administration

- Small agency within the U.S. Department of Transportation
- Established in 1966
- Mission is to improve safety on nation's highways and reduce fatalities and injuries associated with vehicle crashes
- Issues the Federal Motor Vehicle Safety Standards (FMVSS)



National Highway Traffic Safety Administration

- Prescribe minimum safety performance requirements for motor vehicles and for certain items of motor vehicle equipment
- Currently there are 64 FMVSS; 50 are vehicle standards; 14 are motor vehicle equipment standards applications





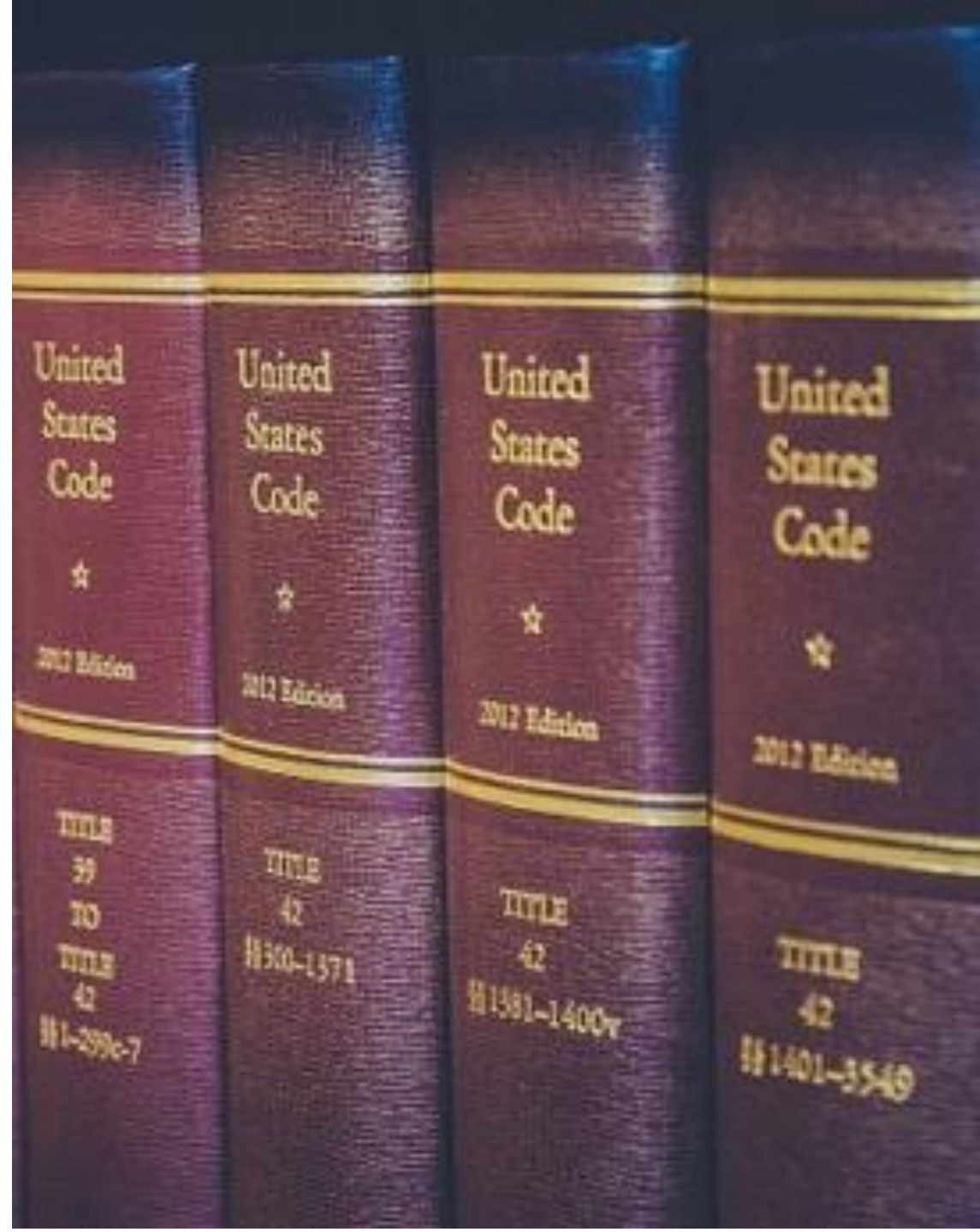
Vehicle Standards

- The FMVSS are codified at 49 CFR Part 571
- Each standard has a number. For example, the Occupant Crash Protection standard is Standard No. 208, found at 49 CFR 571.208
- The majority of FMVSS are “vehicle standards”
- As such, the manufacturer of the vehicle must certify the vehicle’s compliance with the standard by affixing a label to the vehicle

Statutory Prohibition

49 U.S.C. § 30112 (a) (1)

provides that no person shall manufacture for sale, sell, offer for sale, introduce or deliver for introduction in interstate commerce, or import into the United States any motor vehicle or motor vehicle equipment manufactured on or after the date an applicable FMVSS takes effect unless the vehicle or equipment complies with the standard and is so certified by its manufacturer.



Importation Restrictions



- Flat prohibition on the importation of an equipment item, new or used, that is subject to a standard, unless the equipment is manufactured to the standard and is so certified
- Nonconforming vehicles can be imported provided they are determined eligible for importation and are imported by a registered importer under DOT conformance bond

Vehicle Importation - Declaration

HS – 7 Declaration Form

- HS-7 Declaration form must be filed with U.S. Customs and Border Protection (Customs) for motor vehicles and motor vehicle equipment items imported into the United States that are subject to the Federal motor vehicle safety, bumper, and theft prevention standards
- Form has 14 boxes, one of which must be checked to identify a lawful means for importing the vehicle or equipment item
- Customs broker should use HS-7 form as the basis for making the ABI electronic entry
- HS-7 form data elements are programmed into ACE

U.S. Department of Homeland Security National Highway Traffic Safety Administration					— DECLARATION — Importation of Motor Vehicles and Motor Vehicle Equipment Subject to Federal Motor Vehicle Safety, Bumper and Theft Prevention Standards					OMB No. 2127-0002
PORT OF ENTRY		CUSTOMS PORT CODE		CUSTOMS ENTRY NO.			ENTRY DATE			
MAKE OF VEHICLE	MODEL	YEAR	VEHICLE IDENTIFICATION NUMBER (VIN)			REGISTERED IMPORTER NAME AND NHTSA REGISTRATION NUMBER (Required when Box 3 is checked)				VEHICLE ELIGIBILITY NO. (Box 3)
DESCRIPTION OF MERCHANDISE IF MOTOR VEHICLE EQUIPMENT										
<p>Any person knowingly making a false declaration is subject to a fine of not more than \$10,000 or imprisonment for not more than 5 years or both (18 U.S.C. 1001).</p> <p>D1. The vehicle is 25 or more years old or the equipment item was manufactured on a date when no applicable Federal Motor Vehicle Safety Standard or Theft Prevention Standard was in effect.</p> <p>D2A. The vehicle or equipment item conforms to all applicable Federal Motor Vehicle Safety Standards (or the vehicle does not contain solely readily attachable equipment items that will be attached to it before it is offered for sale to the first purchaser for purposes other than resale are not attached), and Bumper and Theft Prevention Standards, and bears a certification label or tag that effect permanently affixed by the original manufacturer to the vehicle or affixed by the manufacturer to the equipment item or to its delivery container in accordance with applicable National Highway Traffic Safety Administration (NHTSA) regulations. (591.50(i))</p> <p>D2B. The vehicle was certified by its original manufacturer conforming to all applicable Canadian motor vehicle safety standards and its original manufacturer certifies that the vehicle conforms to all applicable U.S. Federal Motor Vehicle Safety, Bumper, and Theft Prevention Standards (or that it conforms to all such standards except for the labeling requirements of Standards Nos. 101 and 110 or 120, and/or the specifications of Standard No. 108 relating to daytime running lamps), and the vehicle is not a salvage motor vehicle, a repaired salvage motor vehicle, or a reconstructed motor vehicle, and I am importing it for personal use. (591.50(g))</p> <p>Attachment: Copy of manufacturer's confirmation letter.</p> <p>D3. The vehicle does not conform to all applicable Federal Motor Vehicle Safety and Bumper Standards but does conform to applicable Federal Theft Prevention Standards, but I am eligible to import it because NHTSA has determined that the model and model year of the vehicle to be imported is eligible for importation into the United States, and the vehicle is not a salvaged vehicle or a reconstructed motor vehicle, and I have furnished a bond, which is attached to this declaration, in an amount equal to 150 percent of the entered value of the vehicle as determined by the Secretary of the Treasury, if the Administrator of NHTSA determines that the vehicle has not been brought into conformity with all such standards within 120 days after importation, then I state that I will deliver such vehicle to the Secretary of Homeland Security for export, or abandon to the United States. (591.6), and that</p> <p>a. I have registered with NHTSA pursuant to 49 CFR Part 592 and such registration is not suspended and has not been revoked; or</p> <p>b. I have executed a contract or other agreement, which is attached to this declaration, with an importer who has registered with NHTSA and whose registration is not suspended and has not been revoked. (591.50)</p> <p>Attachment: Copy of DOT Bond, and Copy of Contract with a Registered Importer, if applicable.</p> <p>D4. The vehicle or equipment does not conform to all applicable Federal Motor Vehicle Safety, Bumper and Theft Prevention Standards, but is intended solely for export and is labeled for export on the vehicle or equipment item, and the outside of any container of the vehicle or equipment item bears a label or tag to that effect. (591.50(c))</p> <p>D5. The vehicle or equipment does not conform to all applicable Federal Motor Vehicle Safety, Bumper and Theft Prevention Standards, but I am eligible to import it because all of the following conditions exist:</p> <p>a. I am a nonresident of the United States and the vehicle is registered in a country other than the United States;</p> <p>b. I am temporarily importing the vehicle for personal use for a period not to exceed 1 year, and will not sell it during that time; and</p> <p>c. I will export it not later than the end of 1 year after entry, and the declaration contains my passport number and country of issue. (591.50(f))</p> <p>d. Passport No. _____ Country of Issue _____</p> <p>D6. The vehicle does not conform to all applicable Federal Motor Vehicle Safety, Bumper, and Theft Prevention Standards, but I am eligible to import it because all of the following conditions exist:</p> <p>a. I am a member of a foreign government on assignment in the United States, or a member of the Secretariat of a public international organization so designated under the International Organization Secretariat Act, and within the class of persons for whom free entry of motor vehicles has been authorized by the Department of State;</p> <p>b. I am importing the vehicle on a temporary basis for my personal use, and will register it through the Office of Foreign Missions of the Department of State;</p> <p>c. I will not sell the vehicle to any person in the United States, other than a person eligible to import a vehicle under the paragraph;</p> <p>d. I will obtain from the Office of Foreign Missions of the State Department, before departing the United States at the conclusion of a tour of duty, an overbook slip to the vehicle good for export only; and</p> <p>e. I have furnished a copy of my official orders. (591.50(h))</p> <p>Name of Embassy: _____</p> <p>Attachment: Copy of Official Orders.</p> <p>EPA Requirements: Importers of motor vehicles/engines and nonroad vehicles/engines/equipment must also submit EPA</p> <p>D7. The vehicle or equipment does not conform to all applicable Federal Motor Vehicle Safety and Bumper Standards, but is being imported solely for the purposes of research, investigations, demonstrations or testing, or competitive using events, and I state that I will comply with the applicable restrictions on importers of such merchandise as specified in 49 CFR 591.7 and I will provide the Administrator with documentary proof of export or destruction not later than 30 days following the end of the period for which this vehicle has been admitted into the United States. (591.60)</p> <p>Attachment:</p> <p>a. Copy of NHTSA permission letter if the importer is not an original manufacturer of motor vehicles (or a wholly-owned subsidiary thereof) that are certified to conform to all applicable Federal Motor Vehicle Safety Standards (FMVSS); Use on the public roads must be authorized specifically. (591.60(f))</p> <p>b. Importer's statement describing the use to be made of the vehicle or equipment item if the importer is an original manufacturer of motor vehicles (or a wholly-owned subsidiary thereof) that are certified to conform to all applicable FMVSS. If use on the public roads is an integral part of the purpose for which the vehicle or equipment item is imported, the statement shall describe the purpose that makes such use necessary, state the estimated period of time during which use of the vehicle or equipment item on the public roads is necessary, and state the intended means of final disposition (and disposition date) of the vehicle or equipment item after completion of the purpose for which it is imported. (591.60(g))</p> <p>c. The vehicle was not manufactured primarily for use on the public roads and thus is not a motor vehicle subject to the Federal Motor Vehicle Safety, Bumper, and Theft Prevention Standards or the equipment item is not a system, part, or component of a motor vehicle and thus is not an item of motor vehicle equipment subject to the Federal Motor Vehicle Safety Standards. (591.50(i))</p> <p>Attachment: Importer's statement substantiating that the vehicle was not manufactured for use on the public roads, other than the equipment item was not manufactured for use on a motor vehicle or is not an item of motor vehicle equipment. (591.60(i))</p> <p>D8. The vehicle or equipment item requires further manufacturing operations to perform its intended function, other than the addition of readily attachable equipment items such as mirrors, wipers, or tie and rim assemblies, or engine finishing operations such as painting, and any part of such vehicle that is required to be marked by the Theft Prevention Standard is marked in accordance with that standard. (591.60(j))</p> <p>Attachment: For a vehicle, a copy of the Incomplete Vehicle Order, issued by the incomplete vehicle manufacturer, providing guidance on completing the vehicle so that it conforms to all applicable Federal Motor Vehicle Safety Standards (FMVSS). For an equipment item, a statement issued by the item's manufacturer identifying the applicable FMVSS to which the item does not conform and describing the further manufacturing required for the item to perform its intended function. (591.60(k))</p> <p>D10. The vehicle does not conform to all applicable Federal Motor Vehicle Safety and Bumper Standards but is being imported solely for the purposes of show and display, and I state that I will comply with all applicable restrictions on importers of such vehicles as specified in 49 CFR 591.7. (591.50(j))</p> <p>Attachment: Copy of NHTSA Permission Letter.</p> <p>D11. The equipment item is subject to the Theft Prevention Standard and is marked in accordance with the requirements of 49 CFR Part 541. (591.50(k))</p> <p>D12. The vehicle does not conform to all applicable Federal Motor Vehicle Safety, Bumper, and Theft Prevention Standards, but I am eligible to import it because of the following conditions exist:</p> <p>a. I am a member of the armed forces of a foreign country on assignment in the United States;</p> <p>b. I am importing the vehicle on a temporary basis, and for my personal use;</p> <p>c. I will not sell the vehicle to any person in the United States, other than a person eligible to import a vehicle under this paragraph;</p> <p>d. I will export the vehicle upon departing the United States at the conclusion of my tour of duty; and</p> <p>e. I have attached a copy of my official orders. (591.50(p))</p> <p>Attachment: Copy of Official Orders.</p> <p>D13. The vehicle does not conform to all applicable Federal Motor Vehicle Safety and Bumper Standards, but does conform to applicable Federal Theft Prevention Standards, and I am eligible to import it because I am registered with NHTSA pursuant to 49 CFR Part 592 and such registration is not suspended and has not been revoked. I have informed NHTSA that I intend to import, or I have notified the appropriate Federal agency to decide that the vehicle is eligible for importation, and NHTSA has granted me permission in writing to import the vehicle for that purpose. If the Administrator of NHTSA dismisses my petition, or decides that the vehicle is not eligible for importation, or if I withdraw my petition or I fail to submit a petition covering the vehicle within 180 days from the date of NHTSA's decision, I state that I will deliver such vehicle to the Secretary of Homeland Security for export, or abandon it to the United States, within 30 days from the date of the dismissal, denial, or withdrawal of my petition, or appropriate, or within 30 days from the date of entry if I fail to submit a petition covering the vehicle. If the Administrator of NHTSA grants my petition, then I state that within 15 days from the date that I am notified of the decision, I will furnish a bond, in an amount equal to 150 percent of the entered value of the vehicle as determined by the Secretary of the Treasury, unless the vehicle is destroyed, to ensure that I will bring the vehicle into conformity with all applicable Federal Motor Vehicle Safety and Bumper Standards within 120 days from the date the petition is granted, or will deliver the vehicle to the Secretary of Homeland Security for export, or abandon it to the United States, within 30 days from the date that I fail to furnish NHTSA with documentary proof of that destruction within 15 days from the date that it occurs. (591.50(r))</p> <p>Attachment: Copy of NHTSA permission letter.</p>										

Certification

- Performed by the manufacturer and not NHTSA (no type approval)
- Manifested by a label permanently affixed to the vehicle in a prescribed location
- Identifies the manufacturer, the date of manufacture, the vehicle type
- States that the vehicle complies with all applicable FMVSS in effect on the date of manufacture

Certification Requirements (Cont'd)

- If the manufacturer fails to demonstrate that it exercised “reasonable care” in certifying the vehicle or equipment item to the standard in question, it is subject to civil penalties
- Penalties are currently set at just over \$22,992 per violation, up to a maximum penalty of just over \$114,954,525 for a related series of violations
- A separate violation exists with respect to each vehicle or equipment item that does not comply



Location of Label

- For passenger cars, MPVs, trucks and buses, the label must be in the area of the driver's door
- For motorcycles, the label must be affixed to a permanent member of the vehicle, as close as possible to intersection of the steering post and the handlebar so it can be easily read
- For trailers, the label must be affixed to forward half of the vehicle, on the left side
- For equipment, certification is generally manifested by the letters "DOT" inscribed on the item in a prescribed location



Sample Vehicle Manufacturer Certification Labels

MFD BY: USA PASSENGER CAR CO., INC.		DATE OF MFD: 03/09
GWR 4575 LB	GAWR F 2557 LB	GAWR R 2061 LB
GWR 2075 KG	GAWR F 1160 KG	GAWR R 935 KG
THIS VEHICLE CONFORMS TO ALL APPLICABLE FEDERAL MOTOR VEHICLE SAFETY, BUMPER, AND THEFT PREVENTION STANDARDS IN EFFECT ON THE DATE OF MANUFACTURE SHOWN ABOVE.		
VIN: XXXXXXXXXXXXXXXXXXXX		TYPE: PASSENGER CAR

MFD BY: USA TRUCK MANUFACTURERS, CO.		DATE OF MFG: 03/09	GVWR: 4,083 KG (9,000 LB)
FRONT GAWR	WITH TIRES	RIMS AT	COLD
2,359 KG (5,200 LB)	LT265/70R17E	17X8.0	410 KPA (60 PSI) SINGLE
REAR GAWR	WITH TIRES	RIMS AT	COLD
2,727 KG (6,010 LB)	LT265/70R17E	17X8.0	485 KPA (70 PSI) DUAL
THIS VEHICLE CONFORMS TO ALL APPLICABLE FEDERAL MOTOR VEHICLE SAFETY AND THEFT PREVENTION STANDARDS IN EFFECT ON THE DATE OF MANUFACTURE SHOWN ABOVE.			
VIN: XXXXXXXXXXXXXXXXXXXX			TYPE: TRUCK

Procedural Requirements

- Before exporting its products to the United States, the manufacturer of a conforming vehicle must:
 - ✓ Identify itself and its products to NHTSA pursuant to 49 CFR Part 566
 - ✓ Submit VIN deciphering information to NHTSA pursuant to 49 CFR Part 565
 - ✓ Designate a U.S. resident as its agent for service of process pursuant to 49 CFR Part 551, Subpart D
- This information is available at NHTSA's web site:
 - ✓ Product Information Catalog and Vehicle Listing (vPIC)
 - ✓ <https://vpic.nhtsa.dot.gov/>

A close-up photograph of a car's front wheel and tire. The tire is a Continental EcoContact HP, showing a detailed tread pattern. The silver alloy wheel has a multi-spoke design. The car's body is visible in the background, reflecting the surroundings.

Procedural Requirements (Cont'd)

- Manufacturers of the following equipment items must also affix unique identifying numbers or marks to their products:
 - ✓ Tires
 - ✓ Brake Hoses
 - ✓ Glazing
- NHTSA assigns identifying numbers to tire and glazing manufacturers
- Brake hose manufacturers must submit their unique marks to the agency

Searchable on NHTSA web site

<https://vpic.nhtsa.dot.gov/mid/>

Examples of Trailers





TIRE AND LOADING INFORMATION
RENSEIGNEMENTS SUR LES PNEUS ET LE CHARGEMENT

The weight of cargo should never exceed
~~1,905~~ kg or ~~4,200~~ lbs.

TIRE	SIZE	COLD TIRE PRESS.
FRONT	ST205/75/15	345 KPA (50 PSI)
INTER	NONE	
REAR	ST205/75/15	345 KPA (50 PSI)
SPARE	NONE	

SEE OWNER'S
 MANUAL FOR
 ADDITIONAL
 INFORMATION
 VOIR LE MANUEL
 DE L'USAGER
 POUR PLUS DE
 RENSEIGNEMENTS

4M9BE1225MW097452

MANUFACTURED BY : MP TRAILERS

DATE OF MFG. : 04/2021

GVWR : 3175 KG (7000 LB)

GAWR (EACH AXLE)	WITH TIRES	RIMS AT	COLD
3175 KG (7000 LB)	ST205/75/15	13X4.5	345 KPA (50 PSI) DUAL

THIS VEHICLE CONFORMS TO ALL APPLICABLE U.S. FEDERAL MOTOR VEHICLE SAFETY STANDARDS IN EFFECT ON THE DATE OF MANUFACTURE SHOWN ABOVE

V.I.N. : **4M9BE1225MW097452**



TYPE : TRAILER 7X12

REMOLQUES L.A.

CALLE SINALOA 2106 COL. GUADALUPE BORJA
FRONTERA, COAHUILA C.P. 25680 8661490807

TRAILA
MEDIDA

PESO

RIN

EJE

MODELO

NUMERO SERIE

COLOR

TIPO REMOLQUE

8 X 18 PIES (2.44 M X 5.48 M)

1970 KG

15

2

2021

20210103LA

NEGRO

HECHO EN MEXICO

VIMAR TRAILERS
 VIMAR TRAILERS
www.vimartrailers.com

MODEL:

LOAD CAPACITY:

VIN:

This label must be maintained in service and the label remains permanently valid.

www.vimartrailers.com Vimar Trailers

MODEL: 3175 - 40' 7000 LB

YEAR: 1987 - 41' 3500 LB (MAXIMUM WEIGHT) TARE: 18700 LB - G.O.S. - 41' 412 5000 LB - MAX. GROSS WEIGHT

THIS LABEL CONFORMS TO ALL APPLICABLE FEDERAL MOTOR VEHICLE SAFETY REGULATIONS AS EFFECT ON THE DATE OF MANUFACTURE AND RECALL.

VIN: 3VW1E3NMA1C2100 MODEL: 3175 YEAR: 1987

MANUFACTURED BY: **Vimar Trailers**

DATE: **02/2021**

GVWR 3175 KG (**7000** LB)

GAWR 1587 KG (**3500** LB) PER AXLE WITH **195R15** TIRE **15"X5" 5-5.0** RIM
AT **413** KPA (**60** PSI) COLD SINGLE

**THIS VEHICLE CONFORMS TO ALL APPLICABLE US FEDERAL MOTOR VEHICLE SAFETY STANDARDS
IN EFFECT ON THE DATE OF MANUFACTURE SHOWN ABOVE.**

VIN: 3V9V1EC26MR021020 TYPE:TRAILER MODEL: **VT816FTE**

FD-304 REV A



This document is provided in accordance with 49 CFR Part 568 - Vehicles Manufactured in Two or More Stages (National Highway Traffic Safety Administration), and section 6, Regulations Respecting Safety for Motor Vehicles and Motor Vehicle Components under Motor Vehicle Safety Act (Transport Canada).
The statements contained in this Incomplete Vehicle Document are accurate as of the date of manufacture of the Incomplete Vehicle and can be relied on by any intermediate and/or final stage manufacturer as a basis for certification.

MFD BY: FCA US LLC
VIN: 3C7WRVMGOME558077
VEHICLE MADE IN: MEXICO



DATE OF MFR (BUILT): 6-21	GVWR: 9350 LB / 4242 KG	
GAWR FRONT: 4629 LB / 2100 KG	GAWR REAR: 5291 LB / 2400 KG	WITH RIMS
16X6.0	16X6.0	TIRES
LT225/75R16E	LT225/75R16E	COLD
AT 450 kPa / 65 PSI	AT 550 kPa / 80 PSI	
TYPE: INCOMPLETE	MDH: 060912	MKT: 875
PAINT: PW7		

INCOMPLETE VEHICLE

Upon completion of this vehicle, the final-stage upfitter, alterer or manufacturer must place a completed Vehicle Tire and Loading Placard on driver's side B-Pillar of the vehicle, as required by CMVSS/FMVSS 110 and/or 120. The sticker below shows the information you will need for the Vehicle Placard.

Information Resources

For information on NHTSA's Importation Program:

- <https://icsw.nhtsa.gov/cars/rules/import/>
Information on this site includes a detailed list of answers to frequently asked questions
- <https://icsw.nhtsa.gov/cars/rules/standards/>
A quick reference guide to the FMVSS
- http://www.ecfr.gov/cgi-bin/textidx?SID=325f9935035546c497a0ee7b7ad097b2&mc=true&tpl=/ecfrbrowse/Title49/49cfr571_main_02.tpl
Access to the full text of the FMVSS



National Highway Traffic Safety Administration

Contacts for Import & Certification Division

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Importcertification@dot.gov

<https://www.nhtsa.gov/importing-vehicle>