



Date: March 25, 2019

To: Joint Committee on Transportation:

RE: 2019 Senate Bill 807

EAN Holdings, LLC - Oregon Division
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Members of the Committee:

EAN Holdings, LLC, operating the brands Enterprise Rent-A-Car, National Car Rental, and Alamo Rent a Car, each year purchases a large number of cars and trucks for rental in the state of Oregon. These vehicles are drop shipped directly to our in-fleeting lots by the vehicle manufacturers, which are then registered and plated for rental.

Currently delays can exist in getting our vehicles plated and rented. This delay can be due to a variety of reasons but is ultimately caused by delays in receiving ownership documents and other associated administrative processes.

In Oregon, an Application for Vehicle Registration is required to be accompanied by an ownership record, generally a vehicle title, but most often for fleet companies, a Manufacturers Certificate of Origin. Often, when a vehicle is delivered to us from the factory, it is received on our lot before the ownership record is delivered.

When a retail consumer buys a car from a dealer, similar delays can exist. These delays are bridged with a Temporary Registration Permit, valid for 90 days, which allows the vehicle to be driven while they wait for plates to be mailed. This works because eventually these plates and the vehicle will meet up at the owner's address. Unlike this transaction, our rental vehicle can end up at any of our 50 locations in Oregon, or at any of 5,000 locations in the US. Pairing the plate and the vehicle before the Temporary Registration Permit expires is nearly impossible. Because of this, in order to match the vehicle with the plate, we ground the car when it is purchased, and wait for the plate to arrive. These delays can be anywhere from a few days to a month or more.

Over the last 12 months, EAN Holdings has averaged 100 vehicles that were grounded each day due to these types of delays. That equates to as many as 36,500 days of rental, and over a million dollars in revenue, the basis of which contributes to state, local, and airport taxes and fees.

For additional evidence of the acknowledgement of the problem, and ways states have corrected for this, review the California Vehicle Code which allows for the registration of fleets of 25 vehicles or more without submission of ownership documents.



Christopher Fry
Controller, Oregon Division