

<h1>Regulatory Analysis Form</h1> <p>(Completed by Promulgating Agency)</p> <p>(All Comments submitted on this regulation will appear on IRRC's website)</p>		<p>INDEPENDENT REGULATORY REVIEW COMMISSION</p> <p>RECEIVED</p> <p>Independent Regulatory Review Commission April 16, 2025</p>	
<p>(1) Agency</p> <p>Department of Transportation</p>		<p>IRRC Number: 3434</p>	
<p>(2) Agency Number: 18</p> <p>Identification Number: 488</p>			
<p>(3) PA Code Cite: 67 Pa. Code Chapter 47. Display of Registration Plates</p>			
<p>(4) Short Title:</p> <p>Rescission of Validating Stickers</p>			
<p>(5) Agency Contacts (List Telephone Number and Email Address):</p> <p>Primary Contact: Victoria P. Edwards, Regulatory Counsel, Office of Chief Counsel, Keystone Building, 400 North Street, 7th Floor, Harrisburg, PA 17120, telephone number 717-787-5299, email address victoredwa@pa.gov.</p> <p>Secondary Contact: Scott Shenk, Division Manager, PennDOT, Bureau of Motor Vehicles, Vehicle Registration Division, 1101 S. Front Street, Harrisburg, PA 17104, telephone number 717-787-2171, email address rshenk@pa.gov</p>			
<p>(6) Type of Rulemaking (check applicable box):</p> <p><input type="checkbox"/> Proposed Regulation</p> <p><input type="checkbox"/> Final Regulation</p> <p><input checked="" type="checkbox"/> Final Omitted Regulation</p>		<p><input type="checkbox"/> Emergency Certification Regulation;</p> <p><input type="checkbox"/> Certification by the Governor</p> <p><input type="checkbox"/> Certification by the Attorney General</p>	
<p>(7) Briefly explain the regulation in clear and nontechnical language. (100 words or less)</p> <p>67 Pa. Code Chapter 47 (relating to display of registration plates) governs the display of registration plates on vehicles as prescribed by 75 Pa.C.S. § 1332(a) (relating to display of registration plate). Prior to the passage of act of November 25, 2013 (P.L. 974, No. 89) (act), which amended 75 Pa.C.S. § 1332(d), the Department of Transportation (Department) issued validating stickers that were affixed to the registration plate of the vehicle. As of December 31, 2016, when the act took effect, validating registration stickers were no longer issued by the Department or required to be displayed and § 47.4 was rendered null and void. The purpose of this final-omitted rulemaking is to delete § 47.4 from Chapter 47 to be consistent with current law.</p>			

(8) State the statutory authority for the regulation. Include specific statutory citation.

This rulemaking is authorized under sections 1332 and 6103 of the Vehicle Code (75 Pa.C.S. §§ 1332 and 6103). Specifically, 75 Pa.C.S. § 1332(d) (relating to display of registration plate) provides that “[v]alidating registration stickers shall not be issued or required to be displayed.” Section 6103 of the Vehicle Code (relating to promulgation of rules and regulations by department) states, in pertinent part, “the department shall have the power in accordance with the provisions of the act of July 31, 1968 (P.L. 769, No. 240), referred to as the Commonwealth Documents Law, to promulgate, consistent with and in furtherance of this title, rules and regulations in accordance with which the department shall carry out its responsibilities and duties under this title.” Because the Department is no longer permitted to issue validating stickers, the Department is amending Chapter 77 by rescinding § 47.4 as set forth in Annex A.

(9) Is the regulation mandated by any federal or state law or court order, or federal regulation? Are there any relevant state or federal court decisions? If yes, cite the specific law, case or regulation as well as, any deadlines for action.

Yes, the act states that validating registration stickers shall no longer be issued by the Department and are no longer required to be displayed thus rendering § 47.4 null and void.

(10) State why the regulation is needed. Explain the compelling public interest that justifies the regulation. Describe who will benefit from the regulation. Quantify the benefits as completely as possible and approximate the number of people who will benefit.

Section 47.4 must be rescinded because it was rendered null and void by the legislature. The entire regulated community will benefit from the deletion of § 47.4 as the deletion will avoid confusion and inconsistency in the law.

(11) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulations.

No, there are no provisions that are more stringent than federal standards.

(12) How does this regulation compare with those of the other states? How will this affect

Pennsylvania's ability to compete with other states?

The act rendered § 47.4 null and void. The Department and the taxpayers are saving money with the elimination of the sticker requirement, which was a decision made by the legislature. The deletion of the section does not affect Pennsylvania's ability to compete with other states. In fact, the deletion of § 47.4 only helps avoid confusion and inconsistency.

Neighboring states have varying requirements for registration plates and stickers on plates as follows:

Ohio- A validation sticker is required. See Title 45 Ohio Revised Code Chapter 4503.19

New Jersey – A sticker is not required. See [NJ MVC | Vehicle Registration](#)

Maryland – A validation sticker is required. See [Registration - Substitute License Plates and/or Stickers - Pages](#)

West Virginia – A sticker is not required. See West Virginia Code Article 3 Section 17A-3-10.

New York – The state requires a registration sticker to be placed on the windshield next to the inspection sticker. See [Register and Title a Vehicle | NY DMV](#)

Delaware – A license plate validation sticker is required. See [Fees - Division of Motor Vehicles](#) See also, Delaware Code Title 21. Motor Vehicles Section 2126.

The fact that Pennsylvania law does not require a registration sticker, likely gives Pennsylvania a competitive advantage over states that require a sticker.

(13) Will the regulation affect any other regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

No, the regulation will not affect any other regulations of the Department or other state agencies.

(14) Describe the communications with and solicitation of input from the public, any advisory council/group, small businesses and groups representing small businesses in the development and drafting of the regulation. List the specific persons and/or groups who were involved. ("Small business" is defined in Section 3 of the Regulatory Review Act, Act 76 of 2012.)

The Chair of the House Transportation Committee, Ed Neilson, spoke with representatives of the Department's Driver and Vehicle Services Division. Chair Neilson recommended that the Department proceed with the process of deleting § 47.4 as the regulation has been null and void since December 31, of 2016. Otherwise, the Department has determined that public input is not necessary in this case as the Department is only rescinding a regulation for which the enabling statute has been amended.

(15) Identify the types and number of persons, businesses, small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012) and organizations which will be affected by the regulation. How are they affected?

The final-omitted regulation will affect the owners of 11.8 million registered vehicles in the Commonwealth. This includes individuals and all types of entities, large and small.

(16) List the persons, groups or entities, including small businesses, that will be required to comply with the regulation. Approximate the number that will be required to comply.

Because the regulation is deleted, there are no persons, groups or entities, including small businesses, that will be required to comply with the regulation. However, the deletion of § 47.4 should improve consistency and avoid confusion among the regulated community.

(17) Identify the financial, economic and social impact of the regulation on individuals, small businesses, businesses and labor communities and other public and private organizations. Evaluate the benefits expected as a result of the regulation.

The deletion of § 47.4 should improve consistency and avoid confusion among the regulated community.

(18) Explain how the benefits of the regulation outweigh any cost and adverse effects.

There are no costs or adverse effects of removing a regulation that is null and void as a result of legislation. The Department has saved approximately \$25 million since December 31, 2016, when registration stickers were no longer required. These savings come from eliminating the need to purchase the stickers as well as the cost of mailing and other administrative expenses.

(19) Provide a specific estimate of the costs and/or savings to the **regulated community** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

Because § 47.4 is being deleted, there is no estimated cost or savings to the regulated community associated with compliance, including any legal, accounting or consulting procedures.

(20) Provide a specific estimate of the costs and/or savings to the **local governments** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

Because § 47.4 is being deleted, there is no estimated cost or savings to the local governments associated with compliance, including any legal, accounting or consulting procedures.

(21) Provide a specific estimate of the costs and/or savings to the **state government** associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required. Explain how the dollar estimates were derived.

Because § 47.4 is being deleted, there is no estimated costs to the state government associated with compliance, including any legal, accounting or consulting procedures. The Department has saved approximately \$25 million since December 31, 2016, when registration stickers were no longer required. These savings come from eliminating the need to purchase the stickers as well as the cost of mailing and other administrative expenses.

(22) For each of the groups and entities identified in items (19)-(21) above, submit a statement of legal, accounting or consulting procedures and additional reporting, recordkeeping or other paperwork, including copies of forms or reports, which will be required for implementation of the regulation and an explanation of measures which have been taken to minimize these requirements.

Because § 47.4 is being deleted, there is no estimated cost or savings to the regulated community associated with compliance including legal, accounting or consulting procedures. There are no additional reporting, recordkeeping or other paperwork, including copies of forms or reports required for implementation of the regulation.

(22a) Are forms required for implementation of the regulation?

No, there are no forms required for implementation of the regulation.

(22b) If forms are required for implementation of the regulation, **attach copies of the forms here**. If your agency uses electronic forms, provide links to each form or a detailed description of the information required to be reported. **Failure to attach forms, provide links, or provide a detailed description of the information to be reported will constitute a faulty delivery of the regulation.**

Not applicable.

(23) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

	Current	FY + 1	FY +2	FY +3	FY +4	FY +5
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	FY Year	Year	Year	Year	Year	Year
SAVINGS:	\$0	\$0	\$0	\$0	\$0	\$0
Regulated Community	0	0	0	0	0	0
Local Government	0	0	0	0	0	0
State Government	\$3,988,000	\$4,267,000	\$4,565,000	\$4,884,000	\$5,226,000	\$5,592,000
Total Savings	\$3,988,000	\$4,267,000	\$4,565,000	\$4,884,000	\$5,226,000	\$5,592,000
COSTS:	\$0	\$0	\$0	\$0	\$0	\$0
Regulated Community	0	0	0	0	0	0
Local Government	0	0	0	0	0	0
State Government	0	0	0	0	0	0
Total Costs	0	0	0	0	0	0
REVENUE LOSSES:	\$0	\$0	\$0	\$0	\$0	\$0
Regulated Community	0	0	0	0	0	0
Local Government	0	0	0	0	0	0
State Government	0	0	0	0	0	0
Total Revenue Losses	0	0	0	0	0	0

(23a) Provide the past three year expenditure history for programs affected by the regulation.

Program	FY -3	FY -2	FY -1	Current FY
Vehicle Registration	\$13.1 million	\$13.9 million	\$15.4 million	\$15.8 million

(24) For any regulation that may have an adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), provide an economic impact statement that includes the following:

(a) An identification and estimate of the number of small businesses subject to the regulation. –

When a vehicle is registered with the Commonwealth, the Department does not ask what size business is registering the vehicle. Therefore, the Department has no practical way of knowing the number of small businesses subject to the regulation. Additionally, because § 47.4 is being deleted, small business will not be subject to the regulation, which has been null and void since December 31, 2016.

- (b) The projected reporting, recordkeeping and other administrative costs required for compliance with the proposed regulation, including the type of professional skills necessary for preparation of the report or record. – Because § 47.4 is being deleted there is no recordkeeping or other administrative costs required for compliance.
- (c) A statement of probable effect on impacted small businesses. – No impact is anticipated as §47.4 is being deleted.
- (d) A description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation. – No less intrusive or less costly alternative methods were used to achieve the purpose which is to delete § 47.4 from the regulation.

(25) List any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, the elderly, small businesses, and farmers.

Because § 47.4 is being deleted, there are no specific provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, the elderly, small businesses, and farmers.

(26) Include a description of any alternative regulatory provisions which have been considered and rejected and a statement that the least burdensome acceptable alternative has been selected.

Because § 47.4 is being deleted, no alternative regulatory provisions were considered and rejected. The least burdensome acceptable alternative has been selected.

(27) In conducting a regulatory flexibility analysis, explain whether regulatory methods were considered that will minimize any adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), including:

- a) The establishment of less stringent compliance or reporting requirements for small businesses;
- b) The establishment of less stringent schedules or deadlines for compliance or reporting requirements for small businesses;
- c) The consolidation or simplification of compliance or reporting requirements for small businesses;
- d) The establishment of performance standards for small businesses to replace design or operational standards required in the regulation; and
- e) The exemption of small businesses from all or any part of the requirements contained in the regulation.

Because § 47.4 is being deleted, the impact on small business has not been considered. However, the deletion of § 47.4 is likely to remove doubt, uncertainty, and confusion.

(28) If data is the basis for this regulation, please provide a description of the data, explain in detail how the data was obtained, and how it meets the acceptability standard for empirical, replicable and testable data that is supported by documentation, statistics, reports, studies or research. Please submit data or supporting materials with the regulatory package. If the material exceeds 50 pages, please provide it in a searchable electronic format or provide a list of citations and internet links that, where possible, can be accessed in a searchable format in lieu of the actual material. If other data was considered but not used, please explain why that data was determined not to be acceptable.

Data was not the basis for this regulation.

(29) Include a schedule for review of the regulation including:

- A. The length of the public comment period: N/A
- B. The date or dates on which any public meetings or hearings will be held: To be determined
- C. The expected date of delivery of the final-form regulation: To be determined
- D. The expected effective date of the final-form regulation: Upon publication in the *Pennsylvania Bulletin*
- E. The expected date by which compliance with the final-form regulation will be required: Upon publication in the *Pennsylvania Bulletin*
- F. The expected date by which required permits, licenses or other approvals must be obtained: N/A

(30) Describe the plan developed for evaluating the continuing effectiveness of the regulations after its implementation.

Because § 47.4 is being rescinded, there is no plan to evaluate its continuing effectiveness.

**FACE SHEET
FOR FILING DOCUMENTS
WITH THE
LEGISLATIVE REFERENCE BUREAU**

(Pursuant to Commonwealth Documents Law)

RECEIVED

Independent Regulatory
Review Commission

April 16, 2025

DO NOT WRITE IN THIS SPACE

Copy below is hereby approved as to form and legality.
Attorney General.

By: _____
(Deputy Attorney General)

Date of Approval

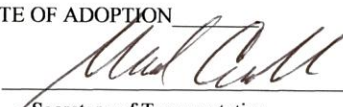
☐ Check if applicable
Copy not approved. Objections attached.

Copy of below is hereby certified to be true and
correct copy of a document issued, prescribed or
promulgated by:

**Department
of
Transportation**
(Agency)

DOCUMENT/FISCAL NOTE NO. 18-488

DATE OF ADOPTION _____

BY 
Secretary of Transportation

Copy below is hereby approved as to
form and legality. Executive or
Independent Agencies.

BY _____

April 7, 2025

(Date of Approval)

(Deputy General Counsel)
(~~Chief Counsel, Independent Agency~~)
(Strike Inapplicable Title)

☐ Check if applicable. No attorney
General Approval or Objection within
30 days after submission.

FINAL (WITH PROPOSED OMITTED) RULEMAKING

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION**

**67 PA. CODE CHAPTER 47
§ 47.4**

RESCISSION OF VALIDATING STICKERS

The Department of Transportation (Department) amends Chapter 47 (relating to display of registration plates) by rescinding § 47.4 (relating to validating stickers) as set forth in Annex A.

Effective Date

This final-omitted rulemaking will become effective upon publication in the *Pennsylvania Bulletin*.

Statutory Authority

This rulemaking is authorized under sections 1332 and 6103 of the Vehicle Code (75 Pa.C.S. §§ 1332 and 6103). Specifically, 75 Pa.C.S. § 1332(d) (relating to display of registration plate) provides that “[v]alidating registration stickers shall not be issued or required to be displayed.” Section 6103 of the Vehicle Code (relating to promulgation of rules and regulations by department) states, in pertinent part, “the department shall have the power in accordance with the provisions of the act of July 31, 1968 (P.L. 769, No. 240), referred to as the Commonwealth Documents Law, to promulgate, consistent with and in furtherance of this title, rules and regulations in accordance with which the department shall carry out its responsibilities and duties under this title.” As the Department is no longer permitted to issue validating stickers, the Department is amending Chapter 47 by rescinding § 47.4 (relating to validating stickers) as set forth in Annex A.

Background and Need for the Rulemaking

Chapter 47 implements 75 Pa.C.S. § 1332, authorizing the affixation of registration plates registered in the Commonwealth. Prior to the passage of the act of November 25, 2013 (P.L. 974,

No. 89) (act), which amended 75 Pa.C.S. § 1332(d), the Department issued validating stickers that were affixed to the registration plate of the vehicle. As of December 31, 2016, § 47.4 was rendered invalid, therefore validating registration stickers were no longer issued by the Department or required to be displayed. The purpose of this rulemaking is to delete § 47.4 from Chapter 47 to be consistent with current law.

Legal Authority for Omitting the Proposed Stage

The Commonwealth Documents Law (CDL) (45 P.S. §§ 1102—1602) establishes three very limited circumstances under which an agency is permitted to promulgate a final-omitted regulation. One of those instances is where notice is unnecessary or impractical. See, 45 P.S. § 1204(3). As the Independent Regulatory Review Commission (IRRC) notes in its publication “The Regulatory Review Process in Pennsylvania” (2019) (IRRC Manual), retrieved from https://www.irrc.state.pa.us/resources/docs/Regulatory_Review_Process_Manual.pdf , “[p]rior notice is generally found ‘unnecessary’ when the agency is rescinding regulations for which the enabling statute has been repealed or amended.” See IRRC Manual, p. 25. The Department is using the final-omitted rulemaking process to rescind § 47.4, because the amendment to 75 Pa.C.S. § 1332(d) has rendered § 47.4 null and void.

Summary of Significant Amendments

The Department amends Chapter 47 by deleting § 47.4 in its entirety.

Fiscal Impact and Paperwork Requirements

The rulemaking will not have a fiscal impact and will not create additional paperwork to the regulated community, the general public or the Commonwealth's political subdivisions. The Department has not issued validating registration stickers since the effective date of the act, saving the Department \$25 million to date.

Regulatory Review

Under section 5.1(c) of the Regulatory Review Act (71 P.S. § 745.5a (c)), on April 16, 2025 the Department submitted copies of the final-omitted rulemaking with a Regulatory Analysis Form to the Independent Regulatory Review Commission (IRRC) and to the Chairpersons of the House Transportation Committee and the Senate Transportation Committee. On the same date, the Department submitted a copy of the final-omitted rulemaking to the Office of Attorney General under section 204(b) of the Commonwealth Attorneys Act (71 P.S. § 732-204(b)).

Under sections 5.1(e) and (j.2) of the Regulatory Review Act (71 P.S. § 745.5a(e) and (j.2)), the regulations were deemed approved by the House and Senate Transportation Committees, and IRRC met on _____ and approved the final-omitted rulemaking.

Contact Person

The contact person for questions about the final-omitted rulemaking is Victoria P. Edwards, Regulatory Counsel, Office of Chief Counsel, Keystone Building, 400 North Street, 7th Floor, Harrisburg, Pennsylvania 17120, telephone number 717-787-5299 and email address victoredwa@pa.gov

Findings

The Department finds that:

- (1) Public notice of the intention to rescind § 47.4 under the procedures in section 201 and 202 of the Commonwealth Documents Law (CDL) (45 P.S. §§ 1201 and 1202) has been omitted under section 204 of the CDL (45 P.S. § 1204) because, in consideration of the act which prohibits the issuance of validating registration stickers and no longer requires that the validating registration stickers be displayed, rendering § 47.4 null and void, publication of proposed rulemaking is impracticable, unnecessary and contrary to the public interest.
- (2) The deletion of § 47.4 as prescribed in the Annex is necessary and appropriate for administration and compliance with 75 Pa.C.S. § 1332(d).

Order

The Department, acting under 75 Pa.C.S. § 1332(d), orders that:

- (1) The regulations of the Department at 67 Pa Code Chapter 47 are hereby amended by rescinding § 47.4 to read as set forth in the Annex A.
- (2) The Department shall submit this final-omitted regulation to the Office of Attorney General and the Office of General Counsel for approval as required by law.
- (3) The Department shall submit this final-omitted regulation to the Independent Regulatory Review Commission, the House Transportation Committee and the Senate Transportation Committee as required by law.
- (4) The Department shall certify this final-omitted regulation and deposit it with the Legislative Reference Bureau as required by law.

- (5) The final-omitted rulemaking shall take effect upon publication in the *Pennsylvania Bulletin*.

Michael Carroll
Secretary of Transportation

Annex A

TITLE 67. TRANSPORTATION

PART I. DEPARTMENT OF TRANSPORTATION

Subpart A. VEHICLE CODE PROVISIONS

ARTICLE III. REGISTRATION

CHAPTER 47. DISPLAY OF REGISTRATION PLATES

Sec.

47.1. Purpose.

47.2. Location.

47.3. Manner of attachment.

47.4. [Validating stickers.] **{Reserved}**.

§ 47.1. Purpose.

The purpose of this chapter is to designate the manner in which registration plates are to be displayed on vehicles as prescribed by 75 Pa.C.S. § 1332(a) (relating to display of registration plate).

§ 47.2. Location.

(a) *Single plate.* A single registration plate shall be located on the rear of the vehicle so as to be illuminated by the license plate light required by 75 Pa.C.S. § 4303(b) (relating to general lighting requirements), except that the registration plate of a truck-tractor shall be located on the front of the vehicle.

(b) *Two plates.* If two registration plates are issued for a single vehicle, one registration plate shall be located on the rear of the vehicle as prescribed in subsection (a), and the other on the front of the vehicle.

(c) *Two plates and an attached carrier.* If two person with disability, disabled veteran or severely disabled veteran registration plates are issued for a vehicle which has a carrier attached to the rear for the purposes of transporting a wheelchair or similar personal assistive device, one plate shall be affixed to the rear of the vehicle as prescribed by subsection (a) and the other shall be affixed to the rear of the carrier instead of affixing the plate to the front of the vehicle.

§ 47.3. Manner of attachment.

Every registration plate shall be securely fastened to the vehicle:

- (1) So as to be clearly visible.
- (2) In a horizontal position.
- (3) At a height of not less than 12 inches from the ground, measuring from the bottom of the registration plate.
- (4) So as to prevent the registration plate from swinging.

§ 47.4. [Validating stickers.] {Reserved}.

[(a) *Issuance.* The Department of Transportation will issue validating stickers upon renewal of a vehicle registration or, if the vehicle registered had a temporary registration, to indicate that registration has been completed and the temporary registration status terminated.]

(b) *Validating window sticker.* For specific geographic areas, the Secretary of the Department (Secretary) may require or permit the display of a Department-issued validating window sticker as an alternative to the standard validating sticker. The Secretary will publish in the *Pennsylvania Bulletin* notice of the geographic areas where a validating window sticker is required or permitted. See 30 Pa.B. 5496 (October 21, 2000).

(c) *Display.* Validating stickers shall be displayed as follows:

(1) *Location of validating stickers.* Unless otherwise allowed by this chapter, a validating sticker shall be affixed to the registration plate of the vehicle for which it was issued in the space or indentation provided on the registration plate.

(2) *Validating window sticker.* Where a validating window sticker is permitted or required by the Secretary, the sticker shall be affixed to the inside of the driver's side bottom corner of the rear window. The printing on a validating window sticker shall be clearly visible from the outside of the vehicle.

(d) *Validity.* A renewed registration may not be considered validated for the new registration period until the appropriate sticker is attached as provided by subsection (c). A temporary registration may not be considered validated for a succeeding registration period until the appropriate validating sticker has been attached as provided in subsection (c).

(e) *Exceptions.* In geographic areas where a validating window sticker is permitted or required, the Secretary, by notice in the *Pennsylvania Bulletin*, may provide an alternate location for display of a validating sticker on specific types or classes of vehicles for which rear window display is impractical or impossible.]



COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL

April 16, 2025

David Sumner, Executive Director
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, Pennsylvania 17101

Re: Proposed Rulemaking
#18-488 – 67 Pa. Code, Chapter 47
Display of Registration Plates

Dear Mr. Sumner:

Enclosed please find a copy of a Final-Omitted regulation package of the Department of Transportation for the rescission 67 Pa. Code § 47.4 (relating to validating stickers). The Department intends to rescind § 47.4 because amendments to 75 Pa. C.S. § 1332(d) (relating to display of registration plate) rendered § 47.4 null and void.

The Department will be happy to provide whatever information the Independent Regulatory Review Commission may require during the course of its review of the rulemaking.

Very truly yours,

Victoria P. Edwards

Victoria P. Edwards
Regulatory Counsel

From: [Josiah Shelly](#)
To: [Edwards, Victoria](#)
Cc: [Kerry Benninghoff](#); [Wagner, Teresa](#); [Spotts, Jeffrey M](#); [Sullivan, Daniel](#); [Domoto, Aaron](#); [Kayer, Kristin](#); [Fertenbaugh, Seth](#)
Subject: Re: [EXTERNAL]: Final Omitted Rulemaking # 18-488 - 67 Pa Code § 47.4 Rescission of Validating Stickers
Date: Wednesday, April 16, 2025 9:51:36 AM
Attachments: [image001.png](#)

RECEIVED

Confirmed

Independent Regulatory
Review Commission

Sent from my iPhone

April 16, 2025

On Apr 16, 2025, at 8:25 AM, Edwards, Victoria <victoredwa@pa.gov> wrote:

Good morning,

Please see the attached rulemaking documents for the final omitted rulemaking – 67 Pa. Code § 47.4 Rescission of Validating Stickers (Agency #18-488). All rulemaking documents, including cover letter, are included in the attached file. Please confirm your receipt of this email by responding with an email confirmation.

Thank you,

Victoria

<[image001.png](#)>

Victoria P. Edwards | Assistant Chief Counsel

Governor's Office of General Counsel
Department of Transportation | Office of Chief Counsel
400 North Street | P.O. Box 8212 | Harrisburg, PA 17105-8212
Phone: 717.787.5299
victoredwa@pa.gov | www.penndot.pa.gov

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April 16, 2025

From: [Gensimore, Justin](#)
To: [Edwards, Victoria](#); [Flynn, Senator Marty](#)
Cc: [Wagner, Teresa](#); [Spotts, Jeffrey M](#); [Sullivan, Daniel](#); [Domoto, Aaron](#); [Kayer, Kristin](#); [Fertenbaugh, Seth](#)
Subject: RE: Final Omitted Rulemaking # 18-488 - 67 Pa Code § 47.4 Rescission of Validating Stickers
Date: Wednesday, April 16, 2025 1:05:08 PM
Attachments: [image001.png](#)

Good afternoon,

Please allow this to serve as confirmation that the Office of Senator Marty Flynn is in receipt of the attached documents from PennDOT.

Thank you!

Warm regards,

Justin M. Gensimore

Executive Director | Senate Transportation Committee

Policy Director | Office of Senator Marty Flynn

Room 543 | Main Capitol | Harrisburg | PA | 17120

(O) 717.787.6481 | (E) Justin.Gensimore@PASenate.com

From: Edwards, Victoria <victoredwa@pa.gov>

Sent: Wednesday, April 16, 2025 8:24 AM

To: Flynn, Senator Marty <marty.flynn@pasenate.com>; Gensimore, Justin <Justin.Gensimore@pasenate.com>

Cc: Wagner, Teresa <teresawagne@pa.gov>; Spotts, Jeffrey M <jespotts@pa.gov>; Sullivan, Daniel <danisulliv@pa.gov>; Domoto, Aaron <aardomoto@pa.gov>; Kayer, Kristin <kkayer@pa.gov>; Fertenbaugh, Seth <sfertenbau@pa.gov>

Subject: Final Omitted Rulemaking # 18-488 - 67 Pa Code § 47.4 Rescission of Validating Stickers

Importance: High

■ EXTERNAL EMAIL ■

Good morning,

Please see the attached rulemaking documents for the final omitted rulemaking – 67 Pa. Code § 47.4 Rescission of Validating Stickers (Agency #18-488). All rulemaking documents, including cover letter, are included in the attached file. Please confirm your receipt of this email by responding with an email confirmation.

Thank you,

Victoria



Victoria P. Edwards | Assistant Chief Counsel

Governor's Office of General Counsel
Department of Transportation | Office of Chief Counsel
400 North Street | P.O. Box 8212 | Harrisburg, PA 17105-8212
Phone: 717.787.5299
victoredwa@pa.gov | www.penndot.pa.gov

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Independent Regulatory
Review Commission

April 16, 2025

April 16, 2025

From: [Wagonseller, Kyle](#)
To: [Edwards, Victoria](#); [Neilson, Ed](#)
Cc: [Wagner, Teresa](#); [Spotts, Jeffrey M](#); [Sullivan, Daniel](#); [Domoto, Aaron](#); [Kayer, Kristin](#); [Fertenbaugh, Seth](#)
Subject: RE: Final Omitted Rulemaking # 18-488 - 67 Pa Code § 47.4 Rescission of Validating Stickers
Date: Wednesday, April 16, 2025 12:07:10 PM
Attachments: [image002.png](#)
[image003.png](#)

Received.



Kyle Wagonseller | Executive Director
House Transportation Committee
Majority Chairman Ed Neilson (D)
127 Irvis Office Building, Harrisburg, PA 17120
Office: 717-772-1786 | Cell: 717-982-1114
E-mail: kwagonse@pahouse.net

From: Edwards, Victoria <victoredwa@pa.gov>
Sent: Wednesday, April 16, 2025 8:25 AM
To: Neilson, Ed <ENeilson@pahouse.net>; Wagonseller, Kyle <KWagonse@pahouse.net>
Cc: Wagner, Teresa <tereswagne@pa.gov>; Spotts, Jeffrey M <jespotts@pa.gov>; Sullivan, Daniel <danisullivan@pa.gov>; Domoto, Aaron <aardomoto@pa.gov>; Kayer, Kristin <kkayer@pa.gov>; Fertenbaugh, Seth <sfertenbau@pa.gov>
Subject: Final Omitted Rulemaking # 18-488 - 67 Pa Code § 47.4 Rescission of Validating Stickers
Importance: High

Good morning,

Please see the attached rulemaking documents for the final omitted rulemaking – 67 Pa. Code § 47.4 Rescission of Validating Stickers (Agency #18-488). All rulemaking documents, including cover letter, are included in the attached file. Please confirm your receipt of this email by responding with an email confirmation.

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Victoria



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PRIVILEGED AND CONFIDENTIAL COMMUNICATION

From: [Elliott, Amy M.](#)
To: [Montgomery, Cynthia](#); [Trotter, Carolyn](#)
Cc: [GC, Regulations](#)
Subject: RE: [EXTERNAL] FW: FINAL-OMITTED DELIVERY – PLEASE SEND TO OAG AND OBTAIN CONFIRMATION OF RECEIPT. 18-488 - Final-omitted rulemaking re: rescinding § 47.4 (relating to validating stickers)
Date: Wednesday, April 16, 2025 9:16:38 AM
Attachments: [image003.png](#)

Receipt acknowledged

Amy M. Elliott
Chief Deputy Attorney General
Legal Review Section
717-783-6316 (w)
717-941-0523 (c)
aelliott@attorneygeneral.gov

From: Montgomery, Cynthia <cymontgome@pa.gov>
Sent: Wednesday, April 16, 2025 9:12 AM
To: Elliott, Amy M. <aelliott@attorneygeneral.gov>; Trotter, Carolyn <ctrotter@attorneygeneral.gov>
Cc: GC, Regulations <RA-GCREGULATIONS@pa.gov>
Subject: [EXTERNAL] FW: FINAL-OMITTED DELIVERY – PLEASE SEND TO OAG AND OBTAIN CONFIRMATION OF RECEIPT. 18-488 - Final-omitted rulemaking re: rescinding § 47.4 (relating to validating stickers)
Importance: High

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Amy –

Attached is a final-omitted rulemaking (18-488) from the Department of Transportation that is being delivered today. The purpose of the final-omitted rulemaking is to eliminate regulations relating to vehicle registration validating stickers as the law was amended to no longer require them. **Please respond to this email with an acknowledgement of receipt so that PennDOT can provide IRRC with proof of delivery.**

Thank you for your review of this final-omitted rulemaking.



Cynthia Montgomery | Deputy General Counsel
Governor's Office of General Counsel
30 North Third Street, Suite 200, Harrisburg, PA 17101
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cymontgome@pa.gov | www.ogc.pa.gov

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From: Edwards, Victoria <victoredwa@pa.gov>
Sent: Wednesday, April 16, 2025 8:24 AM
To: Abelson, Addie <adabelson@pa.gov>; Montgomery, Cynthia <cymontgome@pa.gov>
Cc: GC, Regulations <RA-GCREGULATIONS@pa.gov>; Kayer, Kristin <kkayer@pa.gov>
Subject: FINAL-OMITTED DELIVERY – PLEASE SEND TO OAG AND OBTAIN CONFIRMATION OF RECEIPT. 18-488 - Final-omitted rulemaking re: rescinding § 47.4 (relating to validating stickers)
Importance: High

Good morning, Cyndi.

For delivery to the OAG, please see the attached rulemaking documents for the final omitted rulemaking – 67 Pa. Code § 47.4 Rescission of Validating Stickers (Agency #18-488). All rulemaking documents, including cover letter, are included in the attached file. Please provide me with confirmation of receipt of this email by the OAG once you receive it.

Thank you,

Victoria

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April 16, 2025



Victoria P. Edwards | Assistant Chief Counsel

Governor's Office of General Counsel

Department of Transportation | Office of Chief Counsel

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From: [Ritchie, Nolan](#)
To: [Edwards, Victoria](#)
Cc: [Ward, Senator Judy](#); [Wagner, Teresa](#); [Spotts, Jeffrey M](#); [Sullivan, Daniel](#); [Domoto, Aaron](#); [Kayer, Kristin](#); [Fertenbaugh, Seth](#)
Subject: Final Omitted Rulemaking # 18-488 - 67 Pa Code § 47.4 Rescission of Validating Stickers
Date: Wednesday, April 16, 2025 8:58:03 AM
Attachments: [image001.png](#)
[image001.png](#)
[Judy Ward.pdf](#)

RECEIVED

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Review Commission

Received, thanks!

April 16, 2025

Nolan R. Ritchie, MPA

Sent from iPhone

On Apr 16, 2025, at 8:26 AM, Edwards, Victoria <victoredwa@pa.gov> wrote:

CAUTION : External Email

Good morning,

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Victoria

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