

## Kei Vehicle Counterpoints

- “Kei Vehicles cause pollution”
  - Kei vehicles are very fuel efficient, include all major emissions equipment
- “It’s not fair that Kei Vehicles are allowed on-road, but not OHV / ATV / UTV”
  - Kei Vehicles are **designed for on-road use under 62mph**, are **federally recognized as on-road vehicles**, and do not have off-road abilities beyond that of a typical crossover.
  - **Kei Trucks are just trucks**, like a Ford F-150. A farmer or rancher can choose to use an F-150 instead of an off-road UTV, but this does not make an F-150 into a UTV.
  - Off topic, but some notes on the subject of ATV/UTV/OHV on public roads:
    - Colorado law already provides for a “local option” that permits cities and counties to permit OHVs on local roads. Kei Vehicles younger than 25 years are federally recognized as off-road vehicles when installed with 25mph speed limiters.
    - The idea of allowing off-road vehicles onto Colorado’s heavily touristed roads en-mass like Utah, Montana or Wyoming is politically untenable.
- “The AAMVA has recommendations against Kei Vehicles”
  - The AAMVA is a private non-profit **funded by the US and all 50 states** that has **no political oversight or input from the public**. Its membership consists only of State Police and State DMV leaders. The recommendations they cite come from themselves and only reflect their point of view.
  - The AAMVA publication on Kei Vehicles dated Jan 10, 2011 has either been pulled or is no longer available for the public or this committee to read.
    - This document includes statements indicating that if a jurisdiction is to legalize these vehicles, it should have rules in place including:
      - Ensuring proper importation (Colorado already complies)
      - Require dealers to be licensed (Colorado already complies)
      - Verify the VIN (Colorado already complies)
      - Prohibiting use on roads with higher speed limits (this bill proposes)
  - AAMVA is ok with LSEV / Golf Carts despite being **proven to be more dangerous**.
    - The AAMVA asked the IIHS (Highway Safety) to support their Kei policy, but the response was effectively “Sure, Kei aren’t the safest vehicles on the road, but you seem to have no problem allowing LSV / golf carts and those are deadly”.

## Kei Vehicle Counterpoints

- “Kei Vehicles are not safe”; or it’s not fair that federal rules permit them:
  - **Federal and state laws balance the safety needs of mass-market vehicles against the public’s desire to access specialized vehicles for utility, historic, or enthusiast purposes.**
  - All permitted vehicles that don’t comply with modern safety standards **have barriers that prevent mass adoption:**
    - Pre-2000 US vehicles (or older Pinto, Beetle, Model-T) are vanishingly rare.
    - Motorcycles & similar (limited utility, limited weather usability)
    - Colorado LSEV / Golf Carts (no heat, limited to roads 35mph or under)
    - Foreign direct import vehicles (including Kei Vehicles)
      - Must be >25 years old, limited local parts & mechanical support, vehicles must be shipped (\$2k-\$5k) using a complicated export/import process with a foreign and domestic broker, limited supply.
      - Taxed up to 25% on import.
      - **Need to be able to fix things yourself** (farmer, rancher, enthusiast)
      - The **proposed 55mph limit** for these vehicles further reduces the attractiveness of this vehicle to the mass market.
  - **Private insurance companies** often impose restrictions on permitted vehicles to improve safety, for example limiting them to occasional use, or requiring a separate daily driver. Commercial policies generally only cover vehicles adhering to safety standards.
  - Newer Kei Vehicles (1999+, being imported today) **include airbags and enhanced crumple zones**. Older Kei Vehicles are already aging out.
  - Colorado has historically encouraged unconventional vehicles use
    - Colorado permits motorcycles and autocycles, some with a top speed of 55mph, to be driven on Interstates with **no helmet and flipflops**.
    - Colorado allows innovative on-road “LSEV” - Low Speed Electric Vehicles (think rugged golf carts) on roads up to 35mph.
      - The IIHS performed a series of crash tests in 2010 where they separately tested an LSEV and a Kei Truck clone. The LSEV was proven **far less safe than the truck..**
  - Canada’s “Advanced Technology Vehicles Program” report states of newer Kei Vehicles:
    - “Preliminary frontal crash test results on these small cars suggest that they meet the applicable occupant protection standard under the Motor Vehicle Safety Act.”
  - Colorado is a state that historically recognizes the freedom of residents and visitors to make their own personal risk assessments when it comes to activities like hiking, biking, skiing, mountaineering, and riding motorcycles.