



Duane Taylor, Director, Safe and Responsible Use Programs
Recreational Off-Highway Vehicle Association
Testimony Submitted to the Joint Transportation Committee
Opposition to HB 3155

February 10, 2025

Please see the letter below (starting on page 3) indicating that the Recreational Off-Highway Vehicle Association (ROHVA) opposes HB 3155 because the legislation would provide for the allowable on-road use of recreational off-highway vehicles (ROVs – sometimes referred to as side-by-sides or UTVs). This letter was sent via email to each Member of the Joint Transportation Committee on January 21, 2025.

We would like to highlight a couple sections of our letter and correct false information relayed to the committee regarding ROVs during a legislative hearing on February 10, 2025.

ROHVA is a national, not-for-profit trade association formed to promote the safe and responsible use of recreational off-highway vehicles (ROVs) manufactured or distributed in North America. ROHVA is also accredited by the American National Standards Institute (ANSI) to serve as the Standards Developing Organization for ROVs.

We are concerned that during the February 10th hearing ROVs were deemed by some to be comparable to standard passenger vehicles with respect to safety, crashworthiness, and handling ***when operated on public roads***. This is simply not true. As you will find in the attached letter:

- ROV manufacturers design, test, and sell ROVs for off-highway use only.
- Unlike cars and trucks, ROVs do not meet Federal motor vehicle safety standards
- ROVs are not approved or certified by DOT or EPA as was claimed during the hearing by a witness.

The National Highway Traffic Safety Administration, part of the U.S. Department of Transportation, issues Federal Motor Vehicle Safety Standards (FMVSS) for standard

passenger vehicles. ROVs are governed by the Consumer Product Safety Commission (not NHTSA) and therefore do not meet FMVSS.

From the attached letter (emphasis added):

ROV manufacturers, along with the National Highway Traffic Safety Administration, stress that ROVs are not designed for use on public roadways. The vehicles do not handle properly on paved roads and lack vehicle designs and safety equipment required to protect occupants in the event of a collision. On-road ROV operators and passengers face increased risks of collisions with cars and trucks, posing an increased risk of injury or death.

HB 3155 would allow the operation of ROVs on public roads that meet certain equipment standards. We would like to stress that **serious safety risks remain “...even when owners or aftermarket providers install modifications.”** Again – these vehicles were designed for off-highway use only.

Please oppose HB 3155, which would go against manufacturers’ recommendations and provide for the allowable on-road use of ROVs.

Thank you for your consideration. If you have any questions or concerns, please contact me at dtaylor@rohva.org.

- More -



January 17, 2025

The Honorable Jami Cate
900 Court St NE
H-381
Salem, OR 97301

Re: ROHVA opposes HB 3155

Dear Representative Cate:

The Recreational Off-Highway Vehicle Association (ROHVA)¹ opposes HB 3155 because the legislation would provide for the allowable on-road use of recreational off-highway vehicles (ROVs – sometimes referred to as side-by-sides or UTVs)

ROHVA's primary goal is to promote safe and responsible use of ROVs. ROHVA **opposes allowing ROVs on roads that are not part of a designated trail system** because:

- ROV manufacturers design, test, and sell ROVs for *off-highway use only*.
- Unlike cars and trucks, ROVs do not meet Federal motor vehicle safety standards.

Allowing ROVs on roads falsely signals that this practice is safe. It is not. ROV manufacturers, along with the National Highway Traffic Safety Administration, stress that ROVs are not designed for use on public roadways. The vehicles do not handle properly on paved roads and lack vehicle designs and safety equipment required to protect occupants in the event of a collision. On-road ROV operators and passengers face increased risks of collisions with cars and trucks, posing an increased risk of injury or death. These risks remain even when owners or aftermarket providers install modifications.

ROHVA strongly opposes ROV use on public roads. States could prevent a substantial number of ROV-related injuries by keeping ROVs off public roads, which ROHVA proposes in its model legislation.²

¹ ROHVA is a national, not-for-profit trade association formed to promote the safe and responsible use of recreational off-highway vehicles (ROVs) manufactured or distributed in North America. ROHVA is also accredited by the American National Standards Institute (ANSI) to serve as the Standards Developing Organization for ROVs. An ROV is a motorized off-highway vehicle that is compliant with the ANSI/ROHVA 1 standard. More information on the standard can be found at <https://rohva.org/ansi-standard/>. ROVs are designed to travel on four or more tires, intended by the manufacturer for use by one or more persons and having the following characteristics: a steering wheel for steering control; a Roll Over Protective Structure complying with ANSI/ROHVA-1; an Occupant Retention System complying with ANSI/ROHVA-1; non-straddle seating; maximum speed capability greater than 30 mph; less than 80 inches in overall width, exclusive of accessories; and engine displacement of less than 1,000cc. Current models are designed with seats for a driver and one or more passengers.

² <https://rohva.org/model-law/>

Thank you for your consideration. Should you have any questions, please contact me at 703-582-1202.

Sincerely:

A handwritten signature in black ink, appearing to read "Duane Taylor". The signature is fluid and cursive, with the first name "Duane" being more prominent than the last name "Taylor".

Duane Taylor
Director, Safe and Responsible Use Programs