

# **Commercial Vehicle Dual Registration**

An Explanation of Alberta's Dual Registration Program

## **Background**

In the Province of Alberta, it is possible for a single vehicle to hold more than one registration certificate within the same time period. This is the Dual Registration Program.

Under the Dual Registration Program, the vehicle cannot be driven with more than one of these multiple certificates and licence plates at the same time. However, the vehicle can be issued more than one certificate and plate, and these can be switched on the vehicle when the vehicle is being used for different purposes without having to re-register at an Alberta registry office.



This Alberta Motor Transport Association (AMTA) bulletin will explain some of the details of the Dual Registration Program. It will also direct the reader to where they need to go for more information and to see if this program is of any use in their operations.

This bulletin is for information purposes only.AMTA does not generally recommend the use of the Dual Registration Program due to the complexities involved; however, AMTA can be contacted for guidance for a specific individual or corporation's interest in the Program.

# Registration Basics – An Overview of Alberta Vehicle Registries

In Alberta, the Government uses registry offices to provide services related to registration and licensing [1]. Registry offices are non-government, meaning that they are not owned by the Government of Alberta. But, they do provide government-directed services.

Registry offices provide a variety of services, but for the context of this bulletin the focus will be on their motor vehicle and driver services. These include, but are not limited to:

- · Vehicle registrations
- Licence plating
- Drivers abstracts (personal and commercial)
- Driver licensing and testing
- Fine payment

## Vehicle Registration – Personal versus Commercial

There are different rules for registering vehicles for personal and commercial purposes. The <u>Government of Alberta's website</u> explains the details for different commercial plate classes and what constitutes personal use [2]. Commercial vehicles have extra requirements for registration in Alberta, and the <u>"Commercial Vehicle Safety Compliance in Alberta"</u> manual is a useful resource for determining the specific commercial plate class and requirements for the commercial vehicle's intended purpose [3].

One of the biggest distinctions between commercial and non-commercial vehicle registration is the requirement for the person/corporation to have a Safety Fitness Certificate (SFC). AMTA has recently published a <u>bulletin</u> explaining the process for obtaining an SFC [4].

## Clarifying Terms

When it comes to registries, the term "passenger" or "private passenger" is used to describe a vehicle that is only being used for private, non-commercial purposes [2]. This can create some confusion with those familiar with National Safety Code (NSC) compliance since the term "passenger" is used to describe commercial vehicles like buses [3].

This bulletin will use the term "private passenger vehicle" to refer to vehicles used for non-commercial purposes that are registered privately as opposed to being registered under a safety fitness certificate.

## **How the Dual Registration Program Works**

First, the driver of the vehicle must have the correct class of licence for the vehicle they are operating [3]. This applies regardless of how the vehicle is registered.

It is possible to have a single vehicle registered and plated for different purposes. For example, a vehicle could have two licence plates: one for use as a private passenger vehicle, and a second for use a commercial vehicle to be operated under a Safety Fitness Certificate (SFC). A vehicle may also hold dual registration with a single licence plate if the dual registration exists within the same class of plate [5].

Those interested in having one of the plates being a farm plate will need to use clear, not dyed, fuel commercially and then later apply for a rebate from Alberta Treasury Board and Finance when carrying out farm business. Dual registrations may not necessarily have the same expiration date for each registration certificate, so these dates need to be tracked by the operator [5].

Dual registration certificates must have the same name for the registrant on each of them. This means that a company name may have to appear on the private passenger registration. Another option is to have a joint file created for multiple clients; contact a registry office for details for specific situations [6].

Finally, the when the vehicle is being operated under one of the registration certificates, it must be operated in accordance with all the rules for that certificate. This means that while a normally NSC- and SFC-regulated commercial truck may be able to hold a second registration as a private passenger vehicle, when it is being operated for commercial purposes it must have the correct plate on the vehicle, the correct registration in the cab, and follow all other commercial vehicle regulations (such as hours of service, Commercial Vehicle Inspection Program (CVIP), etc.).

When the owner wants to use a dually-registered vehicle for private passenger purposes, they must:

- · Install the correct plate, and
- Have the correct registration certificate in the cab

Once the plate and registration have been swapped, the vehicle is exempt from the commercial regulations that apply to vehicles operated under an SFC. While being operated personally, it cannot be used for any commercial reasons [5].

#### Decide How the Vehicle Will Be Used

It is important to have a solid understanding of how the vehicle will be used before applying for dual registration. Incorrect vehicle operation can lead to penalties from law enforcement and/or penalties from other government departments.

When registering the vehicle at a registry office, the registry agent will use the information provided by the person registering the vehicle to determine what type of registration certificate and plate to provide. If the applicant provides incorrect information and the wrong plate is issued, the vehicle registrant and/or driver will be the one facing penalties.

## Decide If Dual Registration is Necessary

Some commercial vehicle owners may be interested in using one of their commercial vehicles for personal purposes and therefore consider the Dual Registration Program. However, a commercial vehicle can be used for transporting personal products and/or passengers if the commercial vehicle regulations are still followed.

This means that a commercial truck could potentially be used to pull a personal trailer like a camper; the hours of service, trip inspection, and all other rules simply have to be followed for the use of the vehicle. While this may seem like extra restrictions for a personal trip, it may actually be simpler to comply with the commercial rules instead of going through the process of getting a second registration.

## Follow the Right Rules for the Right Plate

Each type of vehicle registration and licence plate has their own rules that must be followed. If a commercial vehicle is being operated under an SFC, the commercial regulations apply [3].

The Dual Registration Program offers increased flexibility for the use of a single vehicle. It also comes with the added responsibility for the user to understand the requirements for all uses of the vehicle.

## **Complications and Challenges**

The Dual Registration Program is not common knowledge amongst the public and within the transportation industry, and as a result it is often misunderstood. The next sections will give the reader some information on challenges they may face if they choose to use the Program.

#### Law Enforcement

A heavy vehicle that is being used as a private passenger vehicle may be legal to use for personal reasons and be exempt from commercial regulations. However, the vehicle may still look like a commercial vehicle and attract the attention of law enforcement.

The misuse of a commercial vehicle for personal purposes is a serious offence under the Alberta Traffic Safety Act [7]. Law enforcement officers have a certain amount of discretion in determining whether a vehicle is being used appropriately for the type of plate it carries. Drivers of vehicles being used as private passenger vehicles that look like a commercial vehicle (like a semi-tractor or other vehicle that has obvious work-related features) should be prepared for extra attention from law enforcement.

## Weigh Station Reporting

Weigh stations (also known as vehicle inspection stations or scales) are governed by the province. This means that the rules for what vehicles must exit the highway and report to them vary by jurisdiction.

Contacting a weigh station and/or commercial vehicle enforcement officer is useful to learn more about the rules that apply to commercial vehicles. In Alberta, the <u>Sheriff Highway Patrol</u> operates scale sites, offices, and mobile inspection sites [8]. For information for other jurisdictions, the vehicle operator must contact each jurisdiction along their route to determine what the reporting requirements are.

## Potential Liability and the Potential for Abuse

As mentioned above, it is a serious offence for a vehicle operator to use the wrong type of registration and plate for their use of the vehicle. Additionally, using the Dual Registration Program to allow for the use of a heavy vehicle as a private passenger vehicle could potentially lead to additional liability for the registrant and/or vehicle owner. Legal advice should be sought by individuals and businesses.

## **Need Help? Contact AMTA**

AMTA can provide carriers with guidance on the information presented in this bulletin. If you have any questions, please contact AMTA and our experienced staff will be happy to help. For your safety and compliance questions, please email Workplace Support Services (WSS) directly at <a href="www.wss@amta.ca">wss@amta.ca</a>.



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#### References

- 1 "Registry agents", Government of Alberta, accessed June 16, 2021, Registry agents | Alberta.ca
- 2 "Register a vehicle in Alberta", Government of Alberta, accessed June 17, 2021, <u>Register a vehicle in Alberta</u> | <u>Alberta.ca</u>
- 3 "Commercial Vehicle Safety Compliance in Alberta", Government of Alberta, accessed June 17, 2021, Commercial Vehicle Safety Compliance in Alberta manual, 2021
- 4 "Safety Fitness Certificates in Alberta", Alberta Motor Transport Association, accessed June 17, 2021, <u>SFC Bulletin June 2021 (amta.ca)</u>
- 5 Information for this bulletin concerning the details of the Dual Registration Program was gathered from conversations with private Alberta registry offices. It was confirmed through discussions with Service Alberta and Alberta Transportation. These discussions took place in May and June of 2021 between these organisations and Dave Elniski, the Alberta Motor Transport Association's Industry Advisor in Safety and Compliance.
- 6 "Find a registry agent", Government of Alberta, accessed June 17, 2021, <u>Service Alberta: Find a registry agent (gov.ab.ca)</u>
- 7 "Licence plates", Section 53 of the Alberta Traffic Safety Act, accessed June 17, 2021, t06.pdf (alberta.ca)
- 8 "Commercial vehicle inspection stations and branch offices", Government of Alberta, accessed June 17, 2021, Commercial vehicle inspection stations and branch offices | Alberta.ca