

**Motor Vehicle Division Informational Memo # 21-02**  
***Administrative Rule Updates Allowing Zeroes and Adding Flying Our Colors Plates***

**DATE:** January 22, 2021

**FROM:** Angel Robinson, Director  
Vehicle & Motor Carrier Services Bureau

**TO:** Iowa County Treasurers  
Iowa DOT Vehicle & Motor Carrier Services personnel  
Iowa Automotive Dealers Association  
Iowa Independent Automobile Dealers Association

**SUBJECT**

This policy memo explains an update to administrative rule chapter 761-401, Special Registration Plates. The amended rules address the new flying our colors plate and allowing zeroes on personalized license plates.

**SUMMARY**

The amendments to this rule chapter are in response to legislation passed in 2020 that created new flying our colors license plates. Chapter 401 and Iowa Code section 321.34 provide a specific process for applying for special registration plates. The intent of the new rules is to clarify that the flying our colors plates will follow certain administrative processes and to provide an additional option for customers to request the number zero on personalized license plates. The following further explains the new rule amendments:

**Application.** As with certain other special registration plates, flying our colors plate applications will be available from the Vehicle and Motor carrier Services Bureau, from any county treasurer's office, and on the department website. Also like other special registration plates, applications shall be submitted to the department for processing.

**Gift Certificates.** As with certain other special registration plates, gift certificates are available for flying our colors plates.

**Flying Our Colors plates.** A new section has been added to the rules to specifically address flying our colors plates. The application for flying our colors plates shall be submitted to the department in a manner prescribed by the department. The applicant may request letter-number designated flying our colors plates or personalized flying our colors plates. These plates are available for autocycles, motor trucks, motor homes, multipurpose vehicles, motorcycles, trailers, and travel trailers.

**Zeroes.** The new rules also include a change to remove the prohibition against allowing the number zero to be used on personalized license plates. Currently, the number zero may be used on county standard license plates and amateur radio operator plates. This amendment will now allow customers an additional option when requesting personalized license plates.

**The administrative rule amendments are effective on February 3, 2021.**

**LINK TO ADMINISTRATIVE RULES**

\*\*add link once ARRC agenda published\*\*

**QUESTIONS AND ANSWERS**

**WHY IS CLARIFICATION REGARDING OUR LICENSE PLATE RULES BEING PROVIDED?**

Current rules do not provide for zeroes on license plates or clarify the application process and other details for flying our colors plates. This memo is notification that zeroes will be permitted on license plates and to clarify that flying our colors plates will follow existing processes for certain other special registration plates as of February 3, 2021.

**WHERE CAN I FIND ADDITIONAL DETAILS ABOUT THE FLYING OUR COLORS PLATES?**

The legislation for flying our colors plates was effective July 1, 2020 and we have already started processing and issuing these plates. The rule amendments clarify existing process. We previously issued Informational Memo 20-23, 2020 Legislation- Flying Our Colors License Plates. Please refer to IM 20-23 for background and common questions and answers about the flying our colors plates: <https://iowadot.gov/mvd/ctmanual/memos/IM-20-23.pdf>.

**WHERE DO I PLACE THE SPECIAL FARM STICKER ON THE FLYING OUR COLORS PLATE?**

Vehicles that have a Special Farm registration are provided a sticker to signify this designation. Normally this sticker is placed in the lower right of the plate (as the user is looking at the plate). The Flying Our Colors plate, however, has the text "Est. 1846" in this corner and Iowa Code section 321.27 does not allow any plate text to be covered. Therefore, Special Farm stickers should be placed just above this text on the Flying Our Colors plate.

**WHERE DO I PLACE THE PERSONS WITH DISABILITIES STICKER ON THE FLYING OUR COLORS PLATE?**

Customers may apply for a Persons with Disabilities (PWD) sticker under Iowa Code 321L.2(1)(2). Normally this sticker is placed in the lower right of the plate (as the user is looking at the plate). The Flying Our Colors plate, however, has the text "Est. 1846" in this corner and Iowa Code section 321.27 does not allow any plate text to be covered. Therefore, PWD stickers should be placed just above this text on the Flying Our Colors plate.

**WHY WAS THE PROHIBITION AGAINST USING THE NUMBER ZERO ON PERSONALIZED LICENSE PLATES REMOVED FROM THE RULES?**

There are several reasons the decision was made to remove the prohibition against using the number zero on personalized license plates. First, customers have asked for this option and it would allow customers an additional character choice when selecting their personalized license plates. Second, discussions with law enforcement revealed that there is no longer concern that law enforcement will have difficulty distinguishing between the letter O and the number zero for enforcement purposes. This is because we now have a slash in the number zero to distinguish between the two characters. Lastly, with customers wanting this option and law enforcement no longer having an issue with using the number zero, it was unclear to members of the legislature why this rule was necessary any longer.

### **HOW WILL DEALERS BE IMPACTED BY ALLOWING THE NUMBER ZERO ON PERSONALIZED PLATES?**

Dealers do not have the option to request personalized plates on behalf of customers and therefore should not be greatly impacted by this rule change. Dealers that assist customers with title and registration applications that reassign personal plates from one vehicle to another (such as a trade-in to a new purchase) should take care to accurately record the plate characters on the paper application or in the Electronic Record and Title (ERT) application.

### **HOW WILL INDIVIDUAL CUSTOMERS BE IMPACTED BY ALLOWING THE NUMBER ZERO ON PERSONALIZED PLATES?**

Customers will have the option to request the number zero on a personalized plate and therefore will have greater choice in the personalized plate process. Previously the number zero was only available on county standard plates and radio operator plates.

### **HOW WILL COUNTY TREASURER OFFICES BE IMPACTED BY ALLOWING THE NUMBER ZERO ON PERSONALIZED PLATES?**

We anticipate county treasurers will see an initial increase in demand for customers to either request a new personalized plate or to switch from an existing personalized plate. We also anticipate increased questions from customers about the new process.

If a county receives an order for a personalized plate application requesting a zero prior to February 3, 2021, the counties should not accept the order until the rule is effective. As a reminder, if a county accepts a personalized plate application and payment the county should reserve the plate text in ARTS making sure to note the plate type and the customer.

County Treasurers should check their special plate inventory to determine if personal plates that were issued in error because they used zeroes need to be cleared from ARTS. This will make sure that character combinations using zeroes are available for new customers.

Prior to February 3, 2021, if customers ask whether zeroes are allowed on personal plates, counties may inform them that they will not be available until February 3, 2021, and ask them to delay their application until that day if they want to use zeroes.

### **WHEN WILL CUSTOMERS BE ABLE TO REQUEST PERSONALIZED PLATES WITH THE NUMBER ZERO?**

We will begin processing personalized plate applications with the number zero on the effective date of the new rule, which is February 3, 2021. On February 3, 2021, customers may apply online for personalized plates with the number zero. We encourage customers to wait to mail applications until February 3, 2021.

Prior to February 3, 2021, if customers ask whether zeroes are allowed on personal plates, we will inform them that they will not be available until February 3, 2021, and instruct them to delay their application until that day if they want to use zeroes.

We do not have an exact time that the on-line plate order system will be updated to allow for zeroes on personal plates. The approximate time is 8:00 am on February 3. However, the determination of who applies for a plate message first will be based strictly on when the system becomes available and not a given time. In other words, if the system is updated slightly earlier

and a customer picks a specific message at 7:55 am, we will not give priority to a second customer who may have waited until 8:00 am to choose the same message.

We also will advise customers who frequently attempt to order plates or check availability online that they should delete the browser history to ensure that the system resets to the most current version before they attempt to order plates with zeroes.

**WILL A MAILED APPLICATION BE PROCESSED IF IT IS MAILED PRIOR TO FEBRUARY 3, 2021?**

An application mailed prior to February 3, 2021 will be accepted but it will not be placed in the processing queue until February 3, 2021. Because Iowa law will not allow zeroes until February 3, staff cannot process applications with the number zero until that date. We encourage customers to wait until February 3, 2021 to mail their applications or to apply online.

**IF MULTIPLE CUSTOMERS FILE APPLICATIONS FOR THE SAME PLATE TEXT ON THE SAME DAY, HOW WILL WE DETERMINE WHICH APPLICATION IS PROCESSED FIRST?**

We do not anticipate this situation happening very often. However, if the situation does happen priority will depend on the following:

1. If both customers file online applications, the time stamp in our system will show which application was filed first. The customer who filed first will have his or her application processed first.
2. If both customers mail applications, and one application is received before the other, the application that is received first will be processed first. If both mailings arrive on the same day, the decision will be random.
3. If one customer mails an application that is received but not processed until a later date, and a second customer submits an on-line order that is processed in between the day the mail was received versus when it was processed, the on-line order will be accepted over the mail order.
4. Customers also may reserve plates on-line and hold a message for 30 days pending the mail-in request. We will assist customers who call or e-mail and require instructions or assistance on the plate reservation process.

**IF A CUSTOMER'S APPLICATION IS HANDWRITTEN, HOW WILL YOU DETERMINE IF THE CUSTOMER INDICATED THE LETTER O OR THE NUMBER ZERO FOR THE PLATE TEXT?**

We recommend all customers apply online or use typewritten forms to avoid this issue. However, for handwritten forms we are modifying our special plate application to indicate that a customer must designate the number zero with a line slash through it. This is in line with what the text will look like on the plate. It will also create a more customer-friendly experience by reducing the need for staff to reach out to the customer to see what the customer intended. Further, any communications from staff to determine what the customer intended will further delay plate processing for the customer.

If county staff is aware a customer intends to submit a handwritten application, we would encourage staff to communicate to the customer that submitting an online or typewritten application is likely to be a more efficient experience for the customer. If the customer insists on providing a hand-written application, we recommend the customer be informed that they need to indicate a slash for any zeroes intended in the plate text.

**IF A CUSTOMER'S APPLICATION IS HANDWRITTEN AND THE CUSTOMER FAILS TO DISTINGUISH THE LETTER O OR THE NUMBER ZERO AND REFUSES A PLATE WITH THE WRONG TEXT, WHAT WILL THE PROCESS BE?**

DOT staff will assume that any character without a slash is the letter O, not the number zero, and the modified special plate application will inform customers of that assumption. Customers will also be informed that a customer must designate the number zero with a line slash through it. DOT staff will use its discretion if, based on other information on the application, it is clear the customer intended to indicate the number zero. This could include whether there is clear evidence that a customer is switching from a plate that currently uses the letter O to a plate that instead uses the number 0.

If a customer refuses a plate at the counter because he or she wanted the number zero and received the letter O in the plate text, the county should assist the customer in applying to the Iowa DOT for a refund and provide the customer with the options to apply online for a personalized plate or to mail in a new application with the corrected information. However, we encourage the county to caution the customer that there is no guarantee the plate text will be available for the customer for the number zero. Further, if the customer refuses delivery, the plate text with the letter O would be available for different customer to request. In that situation, the customer may risk not having either plate text available.

If, however, a customer has accepted delivery of the first special plate, than the customer will need to follow standard procedure to switch from one plate to another plate. The customer will be charged for the new plate.

**WHAT IS THE BEST WAY FOR A CUSTOMER TO APPLY FOR A PERSONALIZED PLATE WITH THE NUMBER ZERO TO IMPROVE THEIR CHANCES OF GETTING THE REQUESTED PLATE TEXT?**

We encourage all customers to apply online for personalized plates. There are several advantages to a customer applying online.

First, for the online process the customer must input the requested plate text before completing the application. ARTS can then immediately notify the customer if a requested plate text is unavailable. If that customer mails an application, it is possible that a plate text available on the date of mailing is no longer available at the time of processing.

Second, online applications can be processed more quickly than mailed applications. A customer will not need to wait the several days for mail to arrive before the application is ready for processing.

Customers also may reserve plates on-line and hold a message for 30 days pending the mail-in request. We will assist customers who call or e-mail and require instructions or assistance on the plate reservation process.

**WHAT IS THE COST TO SWITCH FROM ANY OTHER STANDARD OR SPECIAL PLATE TO A PERSONALIZED PLATE WITH THE NUMBER ZERO?**

Different personalized plates have different costs depending on the plate design. The cost for a personalized county standard plate is twenty-five dollars. If the customer chooses to switch to a blackout plate, collegiate plate, flying our colors plates, or love our kids plates, the cost is sixty dollars. The cost for a special natural resources plate is ninety dollars.

If the customer currently has a special plate but chooses to order a personalized plate with the number zero, the customer would be charged the full cost for the new plate. At the customer's next renewal, the customer would be charged the renewal fee for the new plate.

**IS THERE A COST FOR A CUSTOMER TO SWITCH TO A PERSONALIZED PLATE WITH A NUMBER ZERO IF THE ONLY CHANGE TO THE PLATE IS THAT THE CUSTOMER WANTS TO SUBSTITUTE THE NUMBER ZERO FOR THE LETTER O IN THE PLATE TEXT?**

Yes, customers will be charged the normal cost of switching from one personalized plate to another personalized plate. This is true even if the only change to the personalized plate text is to replace a letter O with the number zero.

**MAY A CUSTOMER REFUSE DELIVERY OF ANOTHER SPECIAL PLATE TO INSTEAD REQUEST A PERSONALIZED PLATE WITH A NUMBER ZERO?**

If a customer currently has a special plate on order but refuses delivery to instead request and purchase a personalized plate with the number zero, the county should assist the customer in applying to the Iowa DOT for a refund and may assist the customer in starting a new transaction for the purchase of the personalized plate with the number zero or direct the customer to the new application. However, we encourage the county to caution the customer that the plate text may be unavailable with the number zero.

If, however, a customer has accepted delivery of the first special plate, than the procedure listed above to switch to a different plate would apply.

**MAY A CUSTOMER CANCEL A PERSONALIZED PLATE ORDER IF HE OR SHE WANTS TO INSTEAD REQUEST A PERSONALIZED PLATE WITH A NUMBER ZERO?**

No, a customer may not cancel a personalized plate order in advance of the county receiving the plate. The customer must refuse delivery of the plate at the county treasurer's office and then ask for a refund. Because of the complications of cancelling an order mid-process, it is more administratively efficient and cost effective to have the customer refuse delivery at the county treasurer's office.

**WILL A CUSTOMER WHO CURRENTLY HAS A PERSONALIZED PLATE WITH THE LETTER O HAVE PRIORITY TO REQUEST A PERSONALIZED PLATE THAT ONLY SUBSTITUTES THE NUMBER ZERO FOR THE LETTER O?**

No. All customers will be treated the same in switching from one personalized plate to another personalized plate. Our system distinguishes a plate with the letter O as a distinct plate text from a plate with the number zero, even if only a single character is different. We cannot create a process where the assumption is that every customer who currently has a personalized plate with the letter O may someday want a personalized plate with the number 0.

**MAY A CUSTOMER REQUEST A PLATE WITH ONLY THE NUMBER ZERO OR ONLY A SERIES OF NUMBERS?**

No. Iowa Administrative Rule 761.401 prohibits any personalized message using a pattern that is reserved for any other vehicle plate series. Personalized plates may not display any combination that is made up only numbers because that character series is reserved for Official plates that are issued for government agency vehicles.

**WILL THE NUMBER ZERO BE ALLOWED AS A SUBSTITUTE FOR THE LETTER O FOR A PLATE MESSAGE THAT MIGHT OTHERWISE BE PROHIBITED?**

No. Iowa Administrative Rule 761.401 prohibits the department from issuing any combination of characters based on a variety of criteria including sexual in connotation, vulgarity, illegal substances, criminal acts, etc. If a plate message would be prohibited using the letter O, the same message will also be prohibited even if the number 0 is substituted for the letter O because most people will still fully understand the meaning. For example, if the plate message "COCAINE" is prohibited as an illegal substance, the department will not approve "COCAINE" using the number 0.

**WHO WILL BE THE BEST CONTACT PERSON REGARDING QUESTIONS?**

Daniel Yeh, Vehicle Services Manager

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