



STATE OF MICHIGAN  
RUTH JOHNSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

**Dealer Bulletin: ORV's cannot be Titled For On-Road Use**

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**To All Michigan Vehicle Dealers:**

Vehicles manufactured as an off-road vehicle (ORV) cannot be modified and titled as an assembled vehicle for on-road use. Without fundamental and comprehensive changes in the construction of the vehicle that causes it to meet the definition of an assembled vehicle, a vehicle that was manufactured for off-road use only cannot be re-titled as an assembled vehicle for on-road use. A vehicle manufactured as an ORV, even if accessories listed on the TR-54 (Vehicle Number and On-Road Equipment Inspection Form) are added by the owner, does not qualify as an assembled vehicle, including a low-speed assembled vehicle. An assembled vehicle is defined as:

1. One built (assembled) from new or used materials and parts by someone not recognized as a manufacturer (usually an individual). Example: homemade vehicle.
2. One altered or modified to the extent that it no longer reflects its original manufacturer configuration. Example: a Volkswagen made into a dune buggy.
3. One which has had its body replaced with that from another vehicle. Example: pickup truck has its cab replaced.
4. One assembled from a kit designed for road use (often called "kit cars")

ORV manufacturers state their vehicles are not designed for on-road use and include a statement on their Manufacturer's Certificate of Origin (MCO) that the vehicle was built for off-road use only. ORV's that cannot be titled for on-road use as an assembled vehicle include:

- a) Four-wheel and six-wheel ORV utility vehicles such as the Polaris Ranger, John Deere Gator, Kawasaki Mule, Yamaha Viking, Honda Pioneer, and Kubota RTV.
- b) Four-wheel all-terrain vehicles (ATV's), often referred to as "quads."
- c) Dune buggies, military surplus HUMVEE, and other vehicles manufactured for off-road use only.

- d) Gray Market off-road “mini trucks.” These are imported as ORV’s rather than motor vehicles. Examples include the Suzuki Carry, Subaru Sambar, Honda ACTY, Mazda Scrum, and Diahatsu Hijet.

**NOTE:** ORV’s already titled as an assembled vehicle are not affected. The titles can be transferred and the vehicle will retain its status as an assembled vehicle.

Trail bikes (two-wheel off-road motorcycles) may be upgraded for on-road use. The cycle must have all of the on-road equipment required by the Michigan Vehicle Code as listed on the Department of State’s TR-54 VIN/On-Road Equipment Inspection form.

Vehicles whose MCO shows the vehicle was built to Federal Low Speed Vehicle standards may be titled as a Low Speed Vehicle using the year, make, and VIN shown on the MCO. The body style is “Low Speed.”

### Golf Carts

For the same reasons as with ORV’s, golf carts cannot be modified and titled as an assembled vehicle for on-road use.

If a golf cart’s MCO shows the vehicle was built as a Low Speed Vehicle, it may be titled as a Low Speed Vehicle using the year, make, and VIN shown on the MCO. The body style is “Low Speed.” These are not considered an ORV.

**NOTE:** Section 257.657a of the Vehicle Code allows a village or city with a population under 30,000 to approve use of golf carts on their streets without being registered with the Department of State. These golf carts do not have to meet Low Speed Vehicle requirements.