



April 25, 2025

Jay Doyle
Chief Executive Officer
Service Oklahoma
2401 N. Lincoln Blvd.
Oklahoma City, OK 73194

Re: Concerns Regarding Oklahoma's Mandatory Electronic Lien and Title Program Implementation

Dear Mr. Doyle,

On behalf of the National Title Solutions Forum (NTSF) of the American Financial Services Association (AFSA)¹, we write to express serious concerns about the implementation timeline, communication practices, and operational barriers within the current rollout of the Service Oklahoma electronic lien and title (ELT) mandate, scheduled to take effect on July 1, 2025. Without critical improvements and delays to allow for proper onboarding and collaboration, this program risks introducing significant compliance and operational burdens for lenders, lessees, service providers, and ultimately consumers in Oklahoma and across the country.

NTSF provides a platform for vehicle finance companies (lienholders) to raise issues and concerns regarding title processing, with the long-term goal of replacing inefficient paper-based systems with streamlined electronic lien and title (ELT) solutions. Many NTSF participants already operate in states with established ELT programs and are eager to support Oklahoma's transition. However, to ensure a successful rollout of Oklahoma's mandatory ELT program, it is essential that the implementation process is collaborative, transparent, and mindful of operational challenges. Oklahoma now has an opportunity to join the growing number of states that have modernized their title systems through inclusive and well-executed ELT programs.

¹ Founded in 1916, the American Financial Services Association (AFSA), based in Washington, D.C., is the primary trade association for the consumer credit industry, protecting access to credit and consumer choice. AFSA members provide consumers with many kinds of credit, including traditional installment loans, direct and indirect vehicle financing, mortgages, and payment cards. AFSA members include national banks and non-bank state licensed financial institutions. AFSA does not represent payday lenders, title lenders, or credit unions.

Lack of Industry Engagement

NTSF and AFSA members have attempted to engage with Service Oklahoma since 2022, when the ELT program was initially introduced. At that time, members expressed concern that the system design included non-standard requirements such as manual document uploads, the use of external systems to facilitate activities, notarization requirements, etc. Despite these concerns, large national lenders and their service providers were not engaged.

In September 2024, stakeholders were notified via AAMVA of a mandatory go-live date of July 1, 2025. Since then, key national stakeholders have continued to be left out of the process, with outreach appearing to be focused primarily with local Oklahoma-based institutions and credit unions. This limited engagement contrasts sharply with how other states—such as Georgia, Florida, Maine, North Carolina, and South Carolina—have worked closely with national lenders and service providers to ensure smooth ELT implementation and all stakeholder needs are considered in the design of the program.

Unrealistic Implementation Timeline

With less than three months remaining, NTSF members are concerned that access to business rules, response to stakeholder questions, etc. are not available, which are necessary for the members to internally assess modifications and costs that will be required to participate in the program.

In addition, if Oklahoma proceeds with the July 1 effective date without affording equal access to all service providers, national lenders may face dual workflows, an inability to comply with state requirements, and disruptions to titling and lien release operations. There is also no clear guidance on whether paper titles issued on or after July 1 will be converted into the lenders title management system once the applicable service provider has been certified. This compounds the risk of recordkeeping failures and inconsistent treatment and may ultimately delay or disrupt the sale or transfer of vehicles for Oklahoma residents. While Service Oklahoma has verbally indicated that paper titles may be converted, this is not required, and no formal guidance has been issued outlining the process.

Barriers to Paper Title Access and Lease Compliance

Another significant concern for NTSF members is the shift away from readily available paper titles. In the context of leased vehicles, national lessors often need to obtain a paper title at the end of a lease to facilitate sale or transfer, especially if the vehicle will be titled in another state.



Under the new Oklahoma process, duplicate paper titles will require a notarized application and an \$11 fee, even when no lien is present. This policy imposes unreasonable costs and delays on large-volume lessors who need efficient access to title documents in order to comply with state and regulatory requirements.

Challenges and Risks of the OK Cars Portal

The current Service Oklahoma platform—OK Cars—presents major usability and compliance challenges for lenders. The system permits only a single login per ELT ID, meaning that institutions with dozens or hundreds of users cannot assign appropriate role-based access or segregate credentials by business function. This design fails to meet the compliance and internal control standards required by most national institutions.

The portal does not support batch processing, a standard function in nearly all modern ELT systems. Lenders must manually input data one transaction at a time, dramatically increasing the potential for error and creating unacceptable inefficiencies at scale. Mistakes are difficult or impossible to correct without contacting Service Oklahoma directly, and NTSF members report that losing portal access due to user error is a real and unresolved risk.

In addition, staffing limitations and the costs associated with managing both a vendor system and a separate state portal are likely to lead to unintended consequences, such as delays in title releases or challenges for Oklahoma residents attempting to register vehicles in another state. These concerns are especially pronounced for leased vehicles, where reliance on paper titles remains critical.

Clarification on Title Printing Under Oklahoma's ELT Statute

We also note that language in Oklahoma's ELT statute—specifically Title 47 O.S. § 1105—may suggest that title printing remains permitted under certain circumstances. We encourage the Oklahoma Tax Commission to clarify whether, and in what cases, lienholders or dealers may continue to request paper titles after the July 1 implementation date. Clear guidance on this issue would help prevent misinterpretation and ensure consistency in title processing practices across the state. Additionally, we understand there may be questions regarding whether the announced rules were implemented in alignment with the procedural framework set forth in Title 75 §§ 250–308. We respectfully encourage further transparency around the rulemaking process to ensure that all stakeholders can proceed with confidence.



Conclusion and Requested Actions

Given these concerns, we respectfully urge Service Oklahoma to take the following steps:

- Delay the July 1, 2025, ELT effective date until all approved service providers have been onboarded and all program materials—including technical specifications, MOUs, and business rules—are finalized and distributed. This will allow lenders and their service providers sufficient time to test systems, train staff, and ensure compliance.
- Convene a formal meeting with national stakeholders, including NTSF, to discuss the operational, legal, and technical challenges outlined above. This would mirror the inclusive approach taken in Georgia and Maine, where state officials collaborated closely with industry to ensure functionality for all market participants.
- Written clarification on the process for duplicate title requests, including confirmation that titles can be requested to be printed for any purpose at the lender’s discretion, and that the process will not require notarized, hard-copy submissions. These procedures should be incorporated into system documentation and made available to all participants.

NTSF and AFSA members are committed to working with Service Oklahoma and appreciate your attention to these pressing concerns. While our membership is eager to move toward fully electronic processing and supports modernization efforts, it is essential that states allow for flexibility during the transition to ensure continued compliance and operational consistency. We look forward to your response and stand ready to support a successful transition to digital lien and title management. Thank you for considering our comments and questions. If you have any questions or would like to discuss this further, please do not hesitate to contact me at erayhan@afsamail.org or (805) 501-8873 at your convenience.

Sincerely,

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