

A Case for Consistent Kei Truck Policy in Oregon

Background

In November 2010, a letter was written by David Zuby, the Senior Vice President of Vehicle Research on behalf of the Insurance Institute for Highway Safety (IIHS), and delivered to Keith Kiser, the Director of Vehicle Programs for the American Association of Motor Vehicle Administrators (AAMVA). This letter was a reaction to the growing popularity of imported and registered off-road mini trucks originating from Japan and China. Mr. Zuby's intent was to convince the AAMVA—through sweeping generalizations—that these trucks were unfit for American public roadways.

The AAMVA listened and subsequently published a document titled Best Practice Regarding Registration and Titling of Mini-Trucks in January 2011. This document echoed many of the sentiments in the original IIHS letter, concluding with an official “best practice” recommendation that jurisdictions should neither title nor register these vehicles for use on American public roadways. The document was later revised and rereleased in 2021 with an even more aggressive and restrictive tone—not only to prevent off-road mini trucks from being used on public roadways but to discourage the registration of all 25+ year-old JDM vehicles that were not built to Federal Motor Vehicle Safety Standards (FMVSS).

This 2021 revision of Best Practices prompted many jurisdictions, including the Oregon Department of Transportation (ODOT), to stop titling and registering these vehicles—going so far as to revoke existing registrations, resulting in an outright ban. The result of this hasty and sweeping reaction in many states, including Oregon, is where the situation stands today.

Obstacles & Issues

IIHS - Support to Ban Mini-Trucks

The foundational catalyst of today's issue was the 2010 letter supporting the AAMVA's proposed Best Practices on behalf of the IIHS. That letter asserted that these vehicles should “not be registered for on-road use ... and that their on-road use be limited to crossing public highways, consistent with permitted use for other vehicles designed for off-road use.” It strengthened the perception of “mini trucks” as off-road-only vehicles, further categorizing them as Low-Speed Vehicles (LSVs): “Mini-trucks were imported as off-road vehicles, thus evading FMVSS altogether ... at least one mini-truck manufacturer (Chongqing ChangAn) has opened a plant in the United States and sells the Tiger as an LSV.”

This language leads to the first point of confusion: the conflation of Kei trucks with off-road mini trucks. The IIHS cited the Tiger Truck as a primary example of an off-road LSV unfit for American highways. This Chinese-manufactured mini truck was—and still is—primarily designed for off-road and industrial use. Some models are even retrofitted with 25 mph speed inhibitors to comply with federal LSV regulations. These concerns are legitimate—for Tiger trucks.

However, the letter failed to address Kei trucks or JDM vehicles more broadly. This is a critical oversight. “Mini truck” is a broad term that can refer to both off-road LSVs designed for industrial use and roadworthy Kei trucks specifically designed for public roads in Japan. By omitting this distinction and focusing only on Tiger trucks, the IIHS opened the door for misinterpretation, allowing Kei trucks to be swept into the same category.

AAMVA - Recommended Best Practice

Following the IIHS’s support, the AAMVA released its official recommendation in Best Practice Regarding Registration and Titling of Mini-Trucks. This document includes several reasons mini trucks should not be allowed on public roads, many of which are opinion-based, logically flawed, or hypocritical.

For example, it claims that mini trucks “restrict vehicle body size and engine displacement” and fall under standards that “differ significantly from North American vehicle safety standards.” However, FMVSS has no specific mandates on body size or engine displacement.

It also states that mini trucks do not comply with emissions standards and were not designed to operate on North American roadways. This argument collapses when considering the many other imported vehicles over 25 years old—such as a classic Fiat 500—which also weren’t designed for North American roads or DEQ testing, yet remain legal in Oregon.

The document also contains opinion-laced language such as, “The U.S. [is] accepting another nation’s cast-offs—vehicles that no longer meet the exporting country’s vehicle safety or emissions standards.” This logic would disqualify virtually every vintage or niche imported vehicle already legal for road use.

Further, it states that “significant numbers of used mini-trucks and vans are being imported into the U.S. primarily as off-road vehicles,” continuing the conflation of Kei trucks with off-road LSVs.

Cited safety concerns are frequently exaggerated or outright false:

- Tires not DOT approved: False. Kei trucks can be equipped with DOT-approved tires, such as the Yokohama Geolandar KT.
- Catalytic converters missing: False. Many Kei trucks, even from the 1980s, include catalytic converters.
- Right-hand drive as a safety concern: Baseless. Countless street-legal vehicles have right-hand drive.

Other claims involve missing seatbelts, headlights, reflectors, and glass safety features. Again, many of these apply to OHV mini trucks like the Tiger Truck—not Japanese Kei trucks, which meet Japan’s rigorous vehicle standards. In the end, the AAMVA recommendation states that accepting older model mini trucks “undermines government,” hinders “fleet turnover,” and increases traffic risk. Yet motorcycles, antique cars, and

imported sports cars—all with their own limitations—remain legal. The inconsistent application of these concerns to Kei trucks alone is unfounded.

Benefits & Corrective Measures

Kei trucks are practical, efficient, and uniquely suited for many real-world applications. They offer a low-cost, fuel-efficient alternative to large American pickups. Their compact footprint is ideal for municipal use, and their affordability benefits small businesses, farms, nurseries, campuses, local delivery services, and even food trucks.

Even Portland's Bureau of Transportation supports scaling back the oversized-vehicle trend and aligns philosophically with what Kei trucks represent: right-sized utility¹.

We call upon ODOT and the Oregon DMV to reconsider their policy surrounding the titling and registration of Kei trucks. There is no logical reason for the current bias against 25+ year-old Kei trucks when other vehicles of similar age and build are treated differently. Kei trucks are reputable, roadworthy vehicles serving a valuable niche, and their exclusion is inconsistent with both legal precedent and public interest.

We are not asking for special treatment—only consistency. If Oregon permits the registration of 25+ year-old imported vehicles from Europe, South America, and elsewhere—even with right-hand drive or without emissions controls—it should apply the same standard to Kei trucks. Enforcement must be rooted in sound logic and equitable application, not outdated and misapplied guidance.

We respectfully request that ODOT and the Oregon DMV:

1. Suspend the current ban on Kei truck titling and registration.
2. Create a clear, public-facing policy allowing the legal registration of 25-year-old imported vehicles, including Kei trucks.
3. Reinstate previously revoked titles without additional fees or penalties.
4. Consider stakeholder input—including owners, importers, mechanics, and safety experts—when crafting updated regulations.

Conclusion

Oregon's current policy lacks legal justification, public safety benefits, and environmental foresight. Other states—including North Carolina, Texas, Michigan, and Massachusetts—have recognized these inconsistencies and reversed their bans. Oregon has the opportunity to correct course, lead with fairness, and reaffirm its commitment to practical and equitable transportation policy.

1) <https://bikeportland.org/2023/10/24/pbot-joins-the-fight-against-big-trucks-and-suvs-381015>