

# Temporary Operating Permit (TOP) Issuance to Dealers

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## New Policy

TOPs will **not** be issued to extend the operational period of a report of sale (ROS) and/or temporary license plates (TLP) beyond the 90-day period allowed by statute.

## Dealer New and Used Vehicle Purchases

When a vehicle is purchased through a dealer, the dealer is required to submit an electronic ROS to the Department of Motor Vehicles (DMV) within five days after the date of sale.

Dealers **must** then submit a corresponding application to DMV with all fees due:

- For used vehicles, within 30 days of the date of sale.
- For new vehicles, within 20 days of the date of sale.

Before delivery of the vehicle to the purchaser, the dealer must attach the ROS for display on the vehicle. If the vehicle does not have California license plates, the dealer must also affix TLPs. The ROS and TLPs allow operation of the vehicle for 90 days from the date of issuance. They should be displayed on the vehicle until the license plates and/or registration card are received by the purchaser or 90 days from the date of sale, whichever occurs first.

## Background

Dealers have been requesting TOPs from DMV Industry Business Centers to extend the validity period of the ROS and/or TLP when their dealer applications are incomplete.

The ROS validity period was changed from 6 months to 90 days due to statutory changes and implemented with revisions of the Application for Registration of New Vehicle (REG 397) and Report of Sale Used-Vehicle (REG 51).

A one-time 30, 60, or 90-day TOP may **only** be issued in limited and specific circumstances as identified in the *Vehicle Industry Registration Procedures Manual* §25.055 to allow operation of a vehicle when all registration fees are paid and license plates and/or stickers have not been issued.

## References

*Vehicle Code* §4456, 4456.1, and 5901

VIN 2018-22 CA Department of Tax and Fee Administration

VIN 2018-20 Report of Sale/Temporary License Plates Status

VIN 2019-01 Electronic ROS/TLP Procedures

## Distribution

Notification that this memo is available online at [dmv.ca.gov](http://dmv.ca.gov) under Vehicle Industry Services was made via California DMV's Automated Email Alert System in January 2022.

## Contact

Call the DMV Customer Communications Section at (916) 657-6560 for further clarification of this memo.