



Maura Healey, Governor  
Kimberley Driscoll, Lieutenant Governor  
Phillip Eng, Interim Secretary of Transportation  
Colleen Ogilvie, Registrar



To: Commercial Motor Vehicle Owners and Operators, Inspection Stations, Law Enforcement Agencies

From: Colleen Ogilvie, Registrar of Motor Vehicles, Massachusetts

Re: Temporary Authorization for FMCSA-Exempt Digital Camera Monitoring Systems as an Alternative to Rearview Mirror Requirements for Eligible Commercial Motor Vehicles

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Effective 11/30/26, the Registrar of Motor Vehicles ("Registrar") hereby authorizes eligible commercial motor vehicles ("CMVs") operated upon ways of the Commonwealth to be equipped and operated with a qualifying digital camera monitoring system ("CMS") as an acceptable alternative to applicable rearview mirror equipment and inspection requirements established under 49 CFR 393.80(a) and adopted by the Registry of Motor Vehicles ("RMV") at 540 CMR 4.05(15)(n)(4).

This authorization is issued pursuant to the Registrar's authority under M.G.L. c. 90, § 7A, 540 CMR 4.03(1)(i), and applicable exemptions issued by the Federal Motor Carrier Safety Administration ("FMCSA") under 49 U.S.C. §§ 31136(e) and 31315(b) and 49 CFR 381.300. M.G.L. c. 90, § 7A permits the Registrar to waive certain inspection requirements in writing where "any such waiver furthers the public interest or is based on technological development and does not compromise the public safety."

The Registrar finds that FMCSA has determined that qualifying CMS technologies are likely to achieve a level of safety equivalent to or greater than the level of safety provided by the applicable rearview mirror requirement, and that allowing such systems as an alternative means of compliance, subject to the conditions below, is based on technological development, furthers the public interest, and does not compromise public safety.

### **1. Eligible Vehicles**

This authorization applies only to CMVs that meet one or more of the following criteria:

1. Has a vehicle weight, gross vehicle weight rating, gross combination weight, or gross combination weight rating exceeding 10,001 pounds;
2. Is designed or used to transport more than 8 passengers, including the driver, for compensation;
3. Is designed or used to transport more than 15 passengers, including the driver, and is not used to transport passengers for compensation; or

4. Is used in transporting material found by the Secretary of Transportation to be hazardous under [49 U.S.C. 5103](#) and transported in a quantity requiring placarding under regulations prescribed by the Secretary under [49 CFR](#), subtitle B, chapter I, subchapter C.

## **2. Qualifying Camera Monitor Systems**

For purposes of this authorization, a qualifying CMS is limited to those specific camera monitor systems identified in Schedule A. Each system listed in Schedule A is the subject of a current FMCSA exemption authorizing its use as an alternative to the two rearview mirrors required by 49 CFR 393.80(a).

A qualifying CMS must be installed, maintained, inspected, and operated in accordance with:

1. The applicable FMCSA exemption;
2. The manufacturer's installation and operating instructions;
3. Applicable FMCSA Regulations; and
4. The conditions of this Massachusetts authorization.

This authorization does not apply to any camera-based mirror replacement system not the subject of a current FMCSA exemption.

## **3. Conditions of Use**

A CMV may operate under this authorization only if all of the following conditions are met:

1. The CMS is the same make, model, system, or technology covered by a current FMCSA exemption;
2. The CMS is installed in accordance with the applicable FMCSA exemption and manufacturer specifications;
3. Prior to each operation, the driver must inspect the CMS and confirm that all required cameras, monitors, mounts, displays, lenses, heating/defrosting features, and related components are present, properly mounted, unobstructed, and in proper working order;
4. At the end of each day's operation, the driver must inspect the CMS and note any defect or deficiency in the driver vehicle inspection report or other required maintenance record;
5. The motor carrier must repair any CMS defect or deficiency before permitting or requiring the CMV to be operated again;
6. The motor carrier shall develop and maintain a written policy and procedure addressing CMS failure or malfunction occurring during operation, including required driver actions,

safe-stopping procedures, communication with dispatch, and the conditions under which the CMV may continue to be driven to a repair facility or must be towed.

7. The motor carrier must perform annual inspections required under 49 CFR 396.17, 540 CMR 4.00, 540 CMR 14.00, and any other applicable law or regulation; and
8. The vehicle must remain in compliance with all other applicable federal and Massachusetts motor vehicle, inspection, registration, hazardous materials, passenger transportation, and CMV safety requirements.

This authorization does not exempt any vehicle from any separate or additional equipment requirement not addressed by the applicable FMCSA CMS exemption.

#### **4. Inspection Station and Enforcement Guidance**

An eligible CMV equipped with a qualifying CMS shall not be failed, cited, or rejected solely because conventional rearview mirrors are not installed, provided that the operator presents documentation showing that the CMS is covered by a current FMCSA exemption and the CMS is functioning as required.

A CMV shall be failed, cited, or rejected if:

- The CMS is not covered by a current FMCSA exemption;
- The CMS is not functioning properly;
- Required cameras, monitors, lenses, displays, mounts, or related components are missing, damaged, obstructed, or not securely mounted; or
- The operator fails to produce the documentation required by Section 5 of this authorization.

#### **5. Notice of Installation; Required Filing and In-Cab Documentation**

Any owner or motor carrier seeking to operate a CMV under this Massachusetts authorization shall file a Notice of CMS Installation with the Registry of Motor Vehicles, using a method prescribed by the Registrar, no later than five (5) calendar days after: (a) installation of a qualifying CMS on a vehicle already registered under this authorization, or (b) registration of a vehicle acquired with a qualifying CMS already installed.

The Notice of CMS Installation shall include, at a minimum, vehicle information, owner and motor carrier information, mirrorless technology information, installation information, and owner or carrier certification.

A copy of the filed Notice of CMS Installation, shall be kept in the cab of the vehicle together with:

1. A copy of this Massachusetts authorization;

2. A copy of the applicable FMCSA exemption for the installed CMS;
3. Installation certification documentation; and
4. Any other documentation required by the applicable FMCSA exemption.

These documents shall be presented immediately upon request to law enforcement, Registry personnel, inspection personnel, or any other authorized official.

The owner or motor carrier shall file an updated Notice of CMS Installation with the RMV within five (5) calendar days after any material change, including removal or replacement of the CMS, transfer of ownership, change in the responsible motor carrier, or modification of the applicable FMCSA exemption.

#### **6. Driver Training and Familiarization Requirement**

No owner or motor carrier shall permit or require a driver to operate a CMV under this Massachusetts authorization unless the driver has completed CMS training and vehicle-specific familiarization sufficient to allow the driver to safely transition from conventional rearview mirrors to the installed CMS.

At a minimum, the training shall include:

1. Identification of the CMS installed on the vehicle and review of the applicable FMCSA exemption;
2. Differences between conventional mirrors and CMS displays, including field of view, monitor location, depth perception, distance judgment, and blind-spot reduction;
3. Proper use of the CMS during lane changes, turns, merging, backing, parking, passenger loading or unloading where applicable, and operation in traffic;
4. Use of the CMS during nighttime, low-light, glare, rain, snow, ice, fog, and other adverse conditions;
5. Pre-trip and post-trip inspection of cameras, monitors, lenses, mounts, displays, heaters, defrosters, cleaning features, wiring, and related components;
6. Recognition of system defects, malfunctions, image loss, display distortion, obstruction, damage, or degraded visibility;
7. Required driver actions if a CMS defect or failure occurs, including Driver Vehicle Inspection Report reporting, notification to the motor carrier, training on the motor carrier's written policy and procedure for en-route CMS failure or malfunction required under Section 3, and prohibition on redispach until the defect is corrected or compliant conventional mirrors are installed where permitted; and

8. Review of the manufacturer's operating instructions, limitations, warnings, and recommended maintenance procedures.

The training shall include both instructional review and practical familiarization with the installed CMS. This shall encompass classroom instruction on system features and operation, as well as on-road practice to ensure proficiency under actual driving conditions. The motor carrier shall maintain a written or electronic training record for each driver.

A driver shall receive additional training before operating a vehicle equipped with a different CMS, after a material software or hardware change affecting CMS operation, or when the motor carrier determines that retraining is necessary based on driver performance, safety events, or observed misuse of the system.

Initial training and supporting materials should have been provided by the technology manufacturer.

## **7. CDL Skills Testing**

This authorization does not extend to, and has no application in, the administration of Commercial Driver's License ("CDL") skills tests. CDL skills testing shall be conducted using the conventional rearview mirrors only, regardless of whether the CMV being tested is also equipped with a qualifying CMS under this authorization.

No skills test examiner shall administer, and no applicant shall complete, a CDL skills test in which the applicant relies on a CMS, in whole or in part, as a substitute for the traditional rearview mirrors required for testing purposes. A CMV equipped with a qualifying CMS may be used for CDL skills testing only if:

1. The vehicle is also equipped with the conventional rearview mirrors required by 49 CFR 393.80(a); and
2. The applicant uses only those conventional mirrors, and not the CMS, throughout the entirety of the skills test.

Nothing in this Section affects the eligibility of a CMV to operate under this authorization in revenue or non-testing service following successful completion of a CDL skills test conducted in compliance with this Section.

## **8. Duration**

This authorization is valid only for the duration of the applicable FMCSA exemption for the CMS installed on the vehicle, unless rescinded, suspended, or modified earlier by the Registrar.

If FMCSA rescinds, suspends, modifies, or allows an exemption to expire, this Massachusetts authorization shall automatically terminate or be modified to the same extent for that CMS.

## **9. Revocation or Modification**

In addition to when this authorization is automatically revoked or modified as outlined in Section 8, the Registrar may rescind, suspend, or modify this authorization without prior notice if:

1. The motor carrier, driver, or CMV fails to comply with the terms and conditions of this authorization;
2. The continued use of the CMS results in, or is determined likely to result in, a lower level of safety; or
3. Continuation of this authorization is no longer consistent with the public interest or applicable law.

Nothing in this authorization limits the authority of the RMV, law enforcement, or any other authorized agency to take enforcement action for unsafe operation, defective equipment, or any other violation not expressly covered by this authorization.

## Schedule A — FMCSA-Exempt CMS Technologies

| Technology                                  | FMCSA docket        | Attached FMCSA status                                             |
|---------------------------------------------|---------------------|-------------------------------------------------------------------|
| Safe Fleet Bus and Rail<br>“MirrorLESS” CMS | FMCSA-2023-<br>0201 | Effective July 30, 2024 through July 25, 2029.                    |
| Rosco Vision CV Digital CMS                 | FMCSA-2021-<br>0186 | Effective December 4, 2022 through<br>December 4, 2027.           |
| Stoneridge MirrorEye CMS                    | FMCSA-2018-<br>0141 | Renewed effective February 13, 2024 through<br>February 12, 2029. |