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## **Testimony of the Department of Commerce and Consumer Affairs**

**Before the**  
**House Committee on Transportation**  
**Thursday, February 6, 2025**  
**10:00 a.m.**

**State Capitol, Conference Room 430 and via videoconference**

**On the following measure:**  
**H.B. 220, RELATING TO MOPED INSURANCE**

Chair Kila and Members of the Committee:

My name is Jerry Bump, and I am the Acting Insurance Commissioner of the Department of Commerce and Consumer Affairs' (Department) Insurance Division. The Department offers comments on this bill.

The purpose of this bill is to require that moped operators carry an insurance policy by incorporating mopeds into the insurance laws governing motorcycles and motor scooters, including with respect to provisions concerning required licensure, the relationship with tort law, proof of insurance card, penalties, rate regulation, and minimum coverage levels; and to make conforming amendments.

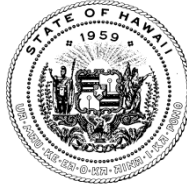
The Department notes that admitted insurers who write individual coverage for motorcycles and motor scooters under article 10G, Hawaii Revised Statutes (HRS) might not currently be offering individual coverage for mopeds so they may need some time to implement programs to provide moped insurance before this bill goes into effect.

We also note that should article 10G be amended to include mopeds, amendments to article 10C would be necessary to avoid conflict with the State's current no-fault insurance laws.

1. HRS § 431:10C-304(1)(C) would need to be deleted.
2. HRS § 431:10C-305(c)(3) would need to be amended to include the term "moped."
3. HRS § 431:10C-408(c)(1) would need to be amended to include the term "moped."

Thank you for the opportunity to testify.

JOSH GREEN, M.D.  
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February 6, 2025  
10:00 a.m.  
State Capitol, Room 430 & Videoconference  
**H.B. 220**  
**RELATING TO MOPED INSURANCE**

House Committee on Transportation

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The Hawaii Department of Transportation (HDOT) **supports the intent of H.B. 220** which requires that moped operators carry an insurance policy by incorporating mopeds into the insurance laws governing motorcycles and motor scooters, including with respect to provisions concerning required licensure, the relationship with tort law, proof of insurance card, penalties, rate regulation, and minimum coverage levels. Makes conforming amendments.

According to HDOT crash data, in 2023, there were 417 crashes involving mopeds. Of these, 241 involved another motor vehicle while 6 of the moped crashes involved bicyclists and 5 involved pedestrians.

According to the Hawaii Department of Health, from 2021 through 2022, a total of 744 injured moped riders were transported to Hawaii hospitals. Most (81.5%) of the patients had some form of insurance; payment source for about 13.4% of the patient was described as "self-pay/charity care", most used insurance was QUEST or Medicaid (30.3% of patients), followed by "no fault" (14.0%), and HMSA (12.1%).

The medical charges for injuries related to moped crashes totaled \$17.2 million in 2021 and \$17.4 million in 2022. The average medical charges for unhelmeted riders (\$70,721) were higher than those for helmeted riders (\$54,086).

The HDOT believes that all moped operators should be insured against loss resulting in bodily injury, death or property damage while operating on the public roadways.

Thank you for the opportunity to provide testimony.

**HB-220**

Submitted on: 2/5/2025 7:46:21 PM

Testimony for TRN on 2/6/2025 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Manabo Sato	Moped Doctors Inc	Oppose	Written Testimony Only

Comments:

Aloha Honored Chair, Vice Chair and Committee members. I am Manabo "Robert" Sato . I am the Vice president and cofounder of Moped Doctors Inc., a local moped repair and sales business here in Honolulu for the last fifteen years.

We at Moped Doctors VEHEMENTLY OPPOSE Bill HB220. This bill under a different number was brought up last year and it was almost UNANIMOUSLY OPPOSED by the public.

This bill will increase operating costs to the most financialy burdened of us in Hawaii. A very large portion of moped drivers buy mopeds BECAUSE THEY DON,T REQUIRE INSURANCE MANDATORILY. Many people who own mopeds are on Quest and other subsidized health insurances. People who can't even afford to pay for insurance for their own bodies WON'T be able to pay the extra required for a moped insurance policy.

This will change the classification of a moped to a scooter class. This will require getting a special motor scooter/motorcycle license and limit people who were once able to enjoy the freedom of using their existing car drivers license.

This will drastically reduce the sales of mopeds in Hawaii and destroy businesses like ours and force us to go out of business and cost Hawaii the loss of dozens of businesses , hundreds of employees and millions of dollars that could be taxed as revenue for Hawaii.

This is UNNECESSARY, moped riders should be offered an option and the statutes and rules on what a moped is should be LEFT ALONE and kept SACROSANCT instead of tampering with them. As the DCCA Commissioner's testimohy states, , changes will have to be made to the definition of a moped in order to avoid conflicts of interest. . The status of a moped has ALREADY been tampered with back when it went from a bicycle class vehicle to a "device" just below a motor vehicle. This added ALL KINDS of EXTRA costs to moped riders. A one time permanent registraton of \$15 went up to \$17 a year safety and \$32.50 a year registraton first year (every year after \$27.50. If a moped was stolen it went from the owner picking it up for free from the bicycle cage at Honolulu Police Dept if recovered for free anytime to having a tow truck take a recovered moped to Sand Island, charge the owner \$250 for the tow and \$25 a day additonal holding fees BEFORE even spending a dime on repairing the usually HUNDREDS of dollars worth of theft damage to a stolen , recovered moped. Most mopeds cost around a thousand dollars and up so imagine your car being stolen , and to pay for towing is a quarter of

the value of the car? And the repair brings it to HALF the value of the car? Is that equitable or fair? No , it certainly is not.

And I don't see why our duly elected officials keep trying to PUSH this bill and idea when if you look at the testimony from the general public, you know , the people who put you in power and actually know what's good for them? You will see that EVERY SINGLE POST is OPPOSED, OPPOSED, OPPOSED.

This bill takes away one of the few affordable forms of practical transportation available in our overly expensive state and burdens the most financially vulnerable with even more costs.

Moped insurance should be offered as an OPTION with a choice, NOT forced down the throats of the moped owners and businesses who are already struggling as it is (Yes, between the tariffs and increased costs, WE ARE STRUGGLING and customers are VERY PRICE SENSITIVE) and any more costs will simply break the damn.

Please DEFER this bill. It is just going to hurt the owners of mopeds and the businesses that support them. The cost of a moped was \$995 in 2010. The cost of a moped is STILL \$995 in 2025. EVERYTHING else has gone up around it . Moped businesses profits HAVEN'T gone up. Moped riders COST Of owning a moped (even if the moped itself hasn't risen in price), towing, repairs, theft losses, licensing, EVERYTHING else but the moped itself has come up. We don't need to have insurance costs added to this mix. We hope we make this a very CLEAR point.

KILL THIS BILL.

Mahalo

Manabo "Robert" Sato

Moped Doctors Inc.

**HB-220**

Submitted on: 2/4/2025 9:16:21 AM

Testimony for TRN on 2/6/2025 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Robert Pitman	Individual	Oppose	Written Testimony Only

## Comments:

I am writing to express my strong opposition to HB220, which seeks to mandate insurance requirements for moped operators in Hawaii. While I recognize the intent to enhance safety and accountability on our roads, this bill presents several concerns that would disproportionately impact moped riders, small business owners, and lower-income individuals.

**1. Financial Burden on Moped Owners**

Mopeds are primarily used by students, low-income workers, and individuals seeking affordable transportation. Requiring mandatory insurance significantly increases the cost of ownership, making this essential mode of transportation less accessible. Unlike motorcycles or cars, mopeds are an economical option for individuals who cannot afford the higher insurance premiums, gas prices, or maintenance costs associated with larger vehicles. The added financial burden could force many riders off the road, limiting their ability to commute to work, school, or other essential destinations.

**2. Lack of Proportional Risk**

Mopeds pose a significantly lower road risk than larger motor vehicles. They have lower speeds and reduced impact potential in accidents and generally operate in a manner that does not warrant the same level of liability insurance as motorcycles or cars. Requiring insurance similar to that of motorcycles ignores the fundamental differences in risk and impact between these vehicles.

**3. Disproportionate Impact on Students and Workers**

Many individuals who rely on mopeds for transportation are students and workers in the service industry who may not have the financial means to afford additional costs. Forcing these individuals to purchase insurance may disproportionately harm those who depend on mopeds for daily commuting, leading to unintended negative economic consequences.

**4. Potential Decline in Moped Usage and Increased Traffic Congestion**

With the additional costs associated with insurance, many moped users may be forced to transition to cars or other motor vehicles, leading to increased traffic congestion and

environmental impacts. Mopeds are an efficient, low-emission transportation option that alleviates road congestion and parking shortages.

## **5. Alternative Approaches Should Be Considered**

Rather than implementing a one-size-fits-all insurance requirement, the legislature should consider alternative solutions that balance safety with affordability. These could include enhanced rider education, incentives for voluntary insurance coverage, or tiered insurance structures based on risk factors rather than blanket mandates.

## **Conclusion**

HB220 places an undue burden on moped owners without sufficient justification. The financial strain, lack of proportional risk assessment, and potential negative socioeconomic impacts warrant a reconsideration of this legislation. I urge the committee to reject HB220 in its current form and seek alternative measures that protect both public safety and the accessibility of affordable transportation.

**HB-220**

Submitted on: 2/4/2025 9:45:07 AM

Testimony for TRN on 2/6/2025 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Joel Hust	Individual	Oppose	Written Testimony Only

## Comments:

I am writing to express my opposition to HB220, which seeks to mandate insurance coverage for moped operators in Hawaii. While the intention of ensuring road safety and financial responsibility is understandable, this legislation places an undue financial burden on low-income residents, students, and workers who rely on mopeds as an affordable means of transportation. The data does not support claims that moped users significantly contribute to uninsured motorist accidents, as mopeds are lightweight vehicles that cause minimal damage compared to motorcycles and cars. Additionally, enforcing this mandate would negatively impact mobility for many residents, reduce accessibility to affordable transport, and harm tourism by increasing rental costs and discouraging visitors from engaging in moped-related activities. The administrative burden of enforcing this law would further strain government resources that could be better utilized for traffic safety improvements. Instead of imposing mandatory insurance, alternative solutions such as education campaigns or voluntary insurance programs should be considered to promote road safety without negatively affecting moped users. I urge the committee to reconsider HB220 and seek a more balanced approach. Thank you for your time and consideration.



**HB-220**

Submitted on: 2/4/2025 10:05:16 AM

Testimony for TRN on 2/6/2025 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Brandon Haught-Aliotti	Individual	Oppose	Written Testimony Only

## Comments:

I oppose this bill again because mopeds are meant to be affordable vehicles for any individual. Requiring mopeds to have insurance would make mopeds extremely unaffordable to the everyday person. Students and other low-income individuals rely on mopeds being affordable, and requiring insurance would increase the affordability of ownership for those individuals. There is also little evidence to suggest that uninsured moped riders present a significant risk to public safety. Instead of imposing this requirement, efforts should focus on alternative solutions such as improving road safety education and awareness.

**HB-220**

Submitted on: 2/4/2025 10:15:47 AM

Testimony for TRN on 2/6/2025 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Robin Thorsen	Individual	Oppose	Written Testimony Only

## Comments:

I am writing to strongly oppose HB220, which proposes mandatory insurance for moped operators in Hawaii. While the goal of improving road safety and financial accountability is understandable, this legislation would impose a significant financial strain on low-income individuals, students, and workers who depend on mopeds as an economical mode of transportation. There is little evidence to suggest that moped riders substantially contribute to uninsured motorist accidents, given that mopeds are lightweight vehicles that cause minimal damage compared to motorcycles and cars. Additionally, enforcing this mandate would hinder mobility for many residents, limit access to affordable transportation, and negatively impact tourism by raising rental costs and deterring visitors from using mopeds. The administrative burden of implementing this law would also divert valuable government resources from more pressing traffic safety initiatives. Rather than mandating insurance, alternative measures such as education campaigns or voluntary insurance options should be explored to enhance road safety without disproportionately affecting moped users. I urge the committee to reconsider HB220 and adopt a more balanced approach. Thank you for your time and consideration.

**HB-220**

Submitted on: 2/4/2025 12:41:04 PM

Testimony for TRN on 2/6/2025 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Kevin Oberhofer	Individual	Oppose	Written Testimony Only

## Comments:

I respectfully submit testimony in opposition to HB220. While I understand the intent to enhance safety and accountability on our roads, I have concerns regarding the proposed mandatory insurance requirements for moped operators.

1. Financial Burden on Riders: Many individuals choose mopeds as an affordable mode of transportation. Mandating insurance could impose a financial strain on low-income residents and students who rely on mopeds for daily commuting.
2. Potential Reduction in Moped Usage: Increased costs associated with insurance may discourage moped use, leading to higher reliance on automobiles, which could exacerbate traffic congestion and environmental impacts.
3. Current Accident Statistics: Data indicates that moped-related accidents constitute a small percentage of overall traffic incidents. Imposing mandatory insurance may be a disproportionate response to the actual risk presented.
4. Administrative Challenges: Implementing and enforcing mandatory insurance for mopeds could create additional administrative burdens for state agencies and law enforcement, diverting resources from more pressing public safety concerns.

While promoting safety is paramount, I believe that education and voluntary insurance programs may be more effective and less burdensome approaches. For these reasons, I urge the committee to reject HB220 or consider alternative measures that address safety without imposing undue hardship on moped operators.

Thank you for the opportunity to testify.

**HB-220**

Submitted on: 2/5/2025 9:05:06 AM

Testimony for TRN on 2/6/2025 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
lillianna shirley	Individual	Oppose	Written Testimony Only

Comments:

Many individuals rely on mopeds as their primary mode of transportation due to their affordability and fuel efficiency. Requiring insurance may force some riders off the road, reducing their ability to commute to work, school, or other essential activities.

**HB-220**

Submitted on: 2/5/2025 9:21:53 AM

Testimony for TRN on 2/6/2025 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Joseph Rogers	Individual	Oppose	Written Testimony Only

## Comments:

i Strongly oppose this, i am a safe driver, i am hyperattentive and haven't ever damaged a car, i am already working multiple jobs to make ends meet, i cant afford another expense, my moped is my only transportation, in addition to that most companies wont give you insurance on a moped unless you have a motorcycle license, i simply cant afford a motorcycle license or insurance and think it is unfair to be punished for being a careful hard working citizen.

## **HB-220**

Submitted on: 2/5/2025 10:19:05 AM

Testimony for TRN on 2/6/2025 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Carla canales	Individual	Oppose	Written Testimony Only

Comments:

Subject: Opposition to HB220

Dear Chair , Vice Chair , and Members of the Committee,

I am writing to respectfully express my opposition to HB220, which proposes [summarize the main points of the bill]. While I understand the intent behind this legislation, I believe it will have unintended negative consequences that outweigh its benefits.

### **Key Concerns:**

#### **1. Financial Burden on Moped Owners**

HB220 would impose mandatory insurance requirements on moped owners, significantly increasing their financial burden. Many individuals rely on mopeds as an affordable mode of transportation, and these new costs could make commuting unaffordable for low-income residents.

#### **2. Impact on Small Businesses**

Many small businesses that rent and service mopeds will face additional regulatory and financial pressures, which could lead to job losses and reduced economic activity in the local transportation sector.

#### **3. Enforcement Challenges**

The implementation of this bill requires enforcement mechanisms that may not currently exist. This could lead to inefficient use of government resources and inconsistencies in enforcement.

#### **4. Alternative Approaches Should Be Considered**

Instead of HB220, I urge the legislature to consider alternative policies such as [suggest alternatives, such as safety awareness programs, voluntary insurance incentives, or targeted enforcement against reckless riding] that would address concerns without imposing undue hardship on moped owners and businesses.

### **Conclusion:**

For these reasons, I urge the Committee to reconsider HB220 and explore alternative solutions that achieve the intended objectives without disproportionately affecting vulnerable populations. Thank you for your time and consideration of this testimony.

Sincerely,

Carla

**HB-220**

Submitted on: 2/5/2025 10:40:27 AM

Testimony for TRN on 2/6/2025 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Andrew	Individual	Oppose	Written Testimony Only

Comments:

Most insurance companies don't even cover mopeds in this state so this will sky rockets insurance policies and would possibly have more moped owners paying more than they should when everybody on island is already working 2 or 3 jobs. As per traffic laws we moped riders are pedestrians on the road and if the driver were to hit me then they should put down their insurance. Nobody is following traffic laws here in Oahu. From running red lights, going over the speed limit, going the opposite direction of one way roads. If HPD could do a better job at enforcing traffic laws and violations then we can have a safer drive on the road

Andrew Manibusan



**HB-220**

Submitted on: 2/5/2025 9:25:19 PM

Testimony for TRN on 2/6/2025 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Mike Rosenman	Individual	Oppose	Written Testimony Only

Comments:

Moped drivers don't have the means of buying insurance, they will not be able to afford health insurance on their policies. They dont have the same financial means as motorcycle drivers, a moped cost \$1000, motorcycles are much more expensive. Also, it is not easy to find insurance carriers that will issue a policy for a moped. HB220 will increase the cost of driving a moped and it will not make the drivers safer, I oppose to this law.