



GENTNER DRUMMOND
ATTORNEY GENERAL

ATTORNEY GENERAL OPINION
2026-11

The Honorable Dick Lowe
Oklahoma House of Representatives, District 56
2300 N. Lincoln Boulevard, Room 547
Oklahoma City, OK 73105

August 24, 2026

Dear Representative Lowe:

This office has received your request for an official Attorney General Opinion in which you ask, in effect, the following question:

Is an implement of husbandry (“implement”), or a vehicle hauling an implement of husbandry, subject to the escort requirement for oversized vehicles operating on Oklahoma highways under title 47, section 14-120.1 of the Oklahoma Statutes?

I.
SUMMARY

Title 47, section 14-120.1 of the Oklahoma Statutes requires certain oversized vehicles “operating on highways in this state” to be accompanied by an escort vehicle. However, title 47’s definition of “vehicle” specifically excludes “implements of husbandry.”¹ 47 O.S.2021, § 1-186(B). Title 47 separately defines “implement of husbandry” (“implement”) broadly to include any device designed to “be used exclusively for agricultural, horticultural or livestock-raising operations,” as well as devices designed “for lifting or carrying an implement of husbandry.” *Id.* § 1-125. As a result, title 47’s escort requirement does not apply to an “implement of husbandry” or to a trailer being used to haul an implement. *Id.* § 1-125(1)–(2). However, any person hauling an implement must comply with the safety requirements in title 47, sections 11-406 and 12-215, which includes lighting and following manufacturer instructions to reduce the width of the implement.

II.
BACKGROUND

¹ “Words used in the singular number include the plural, and the plural the singular, except where a contrary intention plainly appears.” 25 O.S.2021, § 25.

Your request stems from an Oklahoma Highway Patrol trooper’s official collision report finding that a driver “hauling a swather² on a trailer . . . did not have escorts as required.” Rep. at 3 (on file with author). The trooper relied on the Department of Public Safety’s interpretation that the trailer was subject to the title 47 escort requirement for oversized vehicles.

Specifically, title 47, section 14-120.1 requires “any vehicle or combination of vehicles with an outside width that exceeds twelve (12) feet operating on highways in the state . . . [to] be accompanied by an escort vehicle or vehicles.” 47 O.S.Supp.2022, § 120.1(A)(1). Consequently, the answer to your inquiry depends on whether an implement is a “vehicle” for the purposes title 47, section 1-186. Title 47’s definition of “implement of husbandry” is especially pertinent here. Finally, Tenth Circuit case law affirms that title 47 exempts implements from a number of safety requirements.

III. DISCUSSION

Read siloed, title 47, section 1-186’s initial provisions of the Oklahoma Statutes, which defines “vehicle,” would likely encompass implements of husbandry. “A vehicle is any device in, upon or by which any person or property is or may be transported or drawn upon a highway, excepting devices used exclusively upon stationary rails or tracks.” 47 O.S.2021, § 1-186(A). But section 1-186 continues: “As used in this title, the term ‘vehicle’ shall not include: [i]mplements of husbandry, as defined in Section 1-125 of this title.” *Id.* § 1-186(B)(1). And the definition of “motor vehicle” also excludes implements of husbandry. *Id.* § 1-134(B)(1). Thus, anything falling under section 1-125’s definition of an “implement of husbandry” is not a vehicle or motor vehicle in accordance with title 47.³

In *Bingham v. Hollingsworth Mfg. Co., Inc.*, the Tenth Circuit discussed the public policy underlying the various implement exemptions in title 47, explaining:

The implement of husbandry exception to vehicle codes was designed to allow farmers occasionally to tow non-complying farm equipment along the highways as they traveled short distances from one field to another or from their fields to storage areas The fact that this mechanism can trailer bulk fertilizer along the highway is to be regarded as an incidental use. It does not cause it to be subject to Oklahoma’s trailer safety requirements.

695 F.2d 445, 453–54 (10th Cir. 1982). The court also reasoned, “Allowing certain farm vehicles to lawfully be on the road only for a few limited purposes is not illogical.” *Id.* at 451. Accordingly, both Oklahoma statutes and case law have long acknowledged necessary exemptions for the Oklahoma’s agricultural industry and families to operate on roadways and highways without the onerous restrictions otherwise applicable to other vehicles and industries.

² A “swather” is a “harvesting machine that cuts and windrows grain and seed crops.” *Swather*, MERRIAM-WEBSTER.COM, <https://www.merriam-webster.com/dictionary/swather> (last visited Aug. 24, 2026).

³ Title 25, section 2 requires that this exclusion should apply throughout title 47 wherever the term “vehicle” is used, “except where a contrary intention plainly appears.” 25 O.S.2021, § 2.

Along with exempting implements from registration requirements, the definition for “implement of husbandry” broadly extends beyond just devices “used exclusively for agricultural, horticultural or livestock-raising operations.” 47 O.S.2021, § 1-125. An “implement of husbandry” also includes such devices used “for lifting or carrying an implement of husbandry.” *Id.* Section 1-125, subsection 2 also encompasses “[t]railers and semitrailers . . . used exclusively . . . for the purpose of transporting to the farm material or things to be used thereon shall also be considered implements of husbandry for the purposes of this title.” *Id.* § 1-125(2). Therefore, using the example provided, both the swather and the trailer carrying the swather fall within the definition of “implement of husbandry.”

While escorts are not required, operators driving or hauling implements must follow other safety requirements in title 47 of the Oklahoma Statutes.⁴ In *Reed v. Landstar Ligon, Inc.*, the Tenth Circuit observed: “Oklahoma has carved out an exception from motor vehicle requirements, . . . permitting ‘implements of husbandry’ to operate on the roadways *so long as they are equipped with the appropriate safety devices.*” 314 F.3d 447, 450 (citing 47 O.S. § 11-406) (emphasis added).

Two provisions in title 47 impose such safety requirements. Title 47, section 11-406 states, in relevant part, that “[a] tractor or implement may be operated on any . . . roadway in this state if the operator has attached all the safety devices required by law and *has taken reasonable steps to reduce the width of the tractor or implement* as provided for by the manufacturer.”⁵ 47 O.S.2021, § 11-406 (emphasis added). Further, section 11-406, subsection A describes how an operator must maneuver an implement on a roadway when the implement is wider than fifty percent of the highway. Yet, section 11-406 does not require a highway escort. In fact, section 11-406(B) requires all “other vehicle[s] [to] yield the right of way . . . and pull over . . . and remain in such position until the tractor or implement has passed” when an implement encounters a bridge or guardrail. *Id.* § 11-406(B). Nevertheless, a person operating an implement still has “the duty to drive with due regard for the safety of all persons using the roadway.” *Id.* § 11-406(C).

Additionally, title 47, section 12-215 generally requires farm tractors and implements to possess an electric lighting system, lamps, or strobes. 47 O.S.2021, § 12-215. Lighting must be visible from a minimum distance while the tractor or implement of husbandry is traveling on the roadway.⁶ *Id.* Like section 11-406, section 12-215 also does not mention any escort for the tractor or implement. Thus, the silence on the escort requirement but mandatory lighting clearly indicates that implements are distinguishable and title 47, section 14-120.1 does not apply.

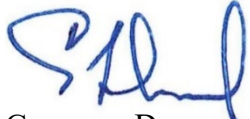
⁴ Of course, title 47, section 14-120.1’s escort requirement does apply when a retail implement dealer is transporting an implement to a farm or other location farther than one hundred fifty (150) miles from the distribution point.

⁵ To be clear, implements are prohibited from traveling on interstate and defense highways. 47 O.S.2021, § 11-406(A).

⁶ Title 47, section 14-118 exempts farm equipment “including, but not limited to, implements of husbandry as defined in Section 1-125 of . . . title [47]” from special permitting “due to size.” 47 O.S.2021, § 14-118(G). Seemingly, the tradeoff for the special permit exemption is the lighting required by title 47, section 12-215. Section 14-118, subsection G also incorporates section 12-215 by reference.

It is, therefore, the official Opinion of the Attorney General that:

Implements of husbandry, as defined by title 47, section 1-125 of the Oklahoma Statutes, are not subject to the escort requirement under title 47, section 14-120.1(A). Title 47, sections 1-134(B)(1) and 1-186(B)(1) expressly exclude “implements of husbandry” from the definition of “motor vehicle” and “vehicle.” Even so, farm equipment and implements must adhere to road safety requirements, including the use of lighting systems and minimizing the width of the implement being hauled, as required by title 47, sections 11-406 and 12-215.



GENTNER DRUMMOND
ATTORNEY GENERAL



THOMAS R. SCHNEIDER⁷
DEPUTY GENERAL COUNSEL



⁷ The office acknowledges the work of former Assistant Attorney General Peter Otis who prepared an initial draft of this Opinion. He departed the office for other employment prior to this Opinion’s issuance.