

**From:** Devlin, Lotte  
**To:** Adams, Marcia S <Marcia.Adams@SCDMV.net>  
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**Date:** 6/20/2006 1:17:20 PM  
**Subject:** FW: REAL ID Responses

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These are the responses we got from AAMVA on our survey today. The numbers at the bottom are the average costs among all "medium" states reporting (I think they said 18 states fell in this category).

Note other medium states' responses. What we don't directly have in our ongoing cost spreadsheet is the 2.2% increased workload factor or \$56M for additional personnel and facility cost that we came up with using their formula. If we add that to ongoing cost, our ongoing cost would be approx. 66M ...that seems a bit high to me.

-----Original Message-----

**From:** Accius, Jean (DMV) [mailto:Jean.Accius@dc.gov]  
**Sent:** Tuesday, June 20, 2006 10:59 AM  
**To:** 'lotte.devlin@scdmv.net'  
**Subject:** REAL ID Responses

Lotte:

Per our interview, below are the responses from Anne. I've also included the average "rough" estimates for one-time and on-going (for re-enrollment) figures for the medium states. Please feel free to contact me should you have any questions.

#### Question #1

Will changes to Full Legal Name and other DB changes noted in the Database and Principal Resident sections, begin at a point forward (REAL ID Act implementation) or will we need to proactively capture new or changed data for our existing customers or request it whenever a customer interacts with a CSR over the counter?

Our understanding is that all the requirements will be date forward - meaning that effective (say) May 1, 2008 - every transaction conducted will have to be compliant from that day forward. So if a citizen walks in thinking they're going to do a simple address change - nope - need to re-do the entire license in a compliant manner. But, there's no need to go back and re-do anyone who isn't otherwise going to be coming in before that date.

#### Question #2

Lawful Presence Requirements

Real ID Act 202(c)(2)(A), (B) and (C)

Since this requirement refers to section 202(c)(2)(C) of the Act, and this section says If a person presents evidence under any of clauses (v) through (ix) of subparagraph (B), they must get a "temporary" credential, are we to assume that all classes described in i-iv, must be issued a "full-fledged" real ID credential, with the same expiration date as a U.S. citizen? Currently in South Carolina, we issue a 5-year license to permanent residents, though a US citizen is eligible for a 10-year license if issued over the counter. We also treat refugees and asylees differently from a US citizen, and issue them a one-year credential pending their change in status.

Our understand is the answer to your question is that this it will be yes. If they are legally present as verified by SAVE and are in those first (I -iv) categories - they're entitled to the regular credential. The others must be time-limited. Obviously, under other REAL ID provisions - no credential can be longer than 8 years. And the if there is no known "length of stay" end date, say for pending assylee applications, then a one-year is the max allowed.

#### Question #3

Database:

1. Will AAMVA DL/ID International Specs be updated to reflect regulations generated for security and data changes required by Real ID Act.
2. Is it planned that this digital image exchange would be used in conjunction with Drivers?

It's my understand that AAMVA would intend to update the standards to reflect the final regs - but at this point is advocating the standards be adopted as the regs. We've heard DHS wants to mandate digital image exchange - but there's not enough currently known about their "federated system" concept for something like "Drivers" to know if they can or would be integrated.

Hope these "answers" - such as they are - help. Again, remember, at this point all we have is "point in time" info that's subject to change.

Average one-time= 16 million

Average on-going (just for re-enrollment) = 30 million

Again, these are rough estimates.

Jean