

## American Association of Motor Vehicle Administrators

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September 15, 2006

Mr. Jonathan Frenkel  
Director, Law Enforcement and Information Sharing Policy  
Department of Homeland Security  
Naval Security Station  
3801 Nebraska Ave., N.W.  
Washington, DC 20528

Dear Mr. Frenkel:

The American Association of Motor Vehicle Administrators (AAMVA) appreciates the opportunity to respond to the questions posed in your letter of August 24<sup>th</sup> 2006. We thank the Department of Homeland Security (DHS) for the opportunity to contribute our expertise and experience to develop potential solutions for implementing the provisions of The Real ID Act. Given the timeframe provided in the request, AAMVA has produced as thorough a response and supporting preliminary high-level estimates as possible. Enclosed you will find our response to the three questions from your letter as well as the US DOT report to Congress titled Evaluation of Driver Licensing Information Programs and Assessment of Technologies and a document titled "CDLIS Success Stories." AAMVA looks forward to continuing to work with DHS and the jurisdictions to develop a detailed, workable technical solution to successfully implement an all drivers system to support Real ID.

In 2001, the National Highway Traffic Safety Administration and the Federal Motor Carrier Safety Administration, in conjunction with AAMVA, submitted a report to Congress recommending the use of the Commercial Driver's License Information System (CDLIS) to support the one driver/one record/one license concept for all driver license holders. AAMVA strongly believes that the recommendations still apply today.

In our opinion, the CDLIS model provides the only viable baseline system which can meet the requirements for 50-state license searches of all covered drivers. This solution, in our analysis, is the best approach to meet the Real ID requirements as it will build on a successful program and will allow AAMVA and the jurisdictions to apply their past experience with the CDLIS program to an all drivers solution. Utilizing the CDLIS as a baseline will minimize the impact on the jurisdictions by not requiring them to develop and maintain separate systems, one for the commercial driver licenses and one for the non-commercial licenses.

Mr. Jonathan Frenkel

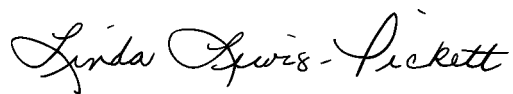
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Ultimately, AAMVA believes that by using the CDLIS as a foundation for supporting the Real ID requirements, the jurisdictions and the Federal Government will realize substantial economies of scale and operational efficiencies that will materially contribute to improving our country's overall security and safety.

Please feel free to contact me at 703-908-5766, email [llewis-picket@aamva.org](mailto:llewis-picket@aamva.org) or Philippe Guiot at 703-908-8289, email [pguiot@aamva.org](mailto:pguiot@aamva.org) if you have any questions concerning our submission.

Sincerely,

A handwritten signature in black ink that reads "Linda Lewis-Pickett". The script is cursive and fluid, with the first name "Linda" being the most prominent.

Linda Lewis-Pickett  
President and CEO

LLP/sfb

Enclosures

Copy to:  
John Hill (FMCSA)  
Mike Calvin  
Tom Wolfsohn  
Vivienne Cameron  
Philippe Guiot