

From: Devlin, Lotte

To: 'Anne.Witt@dc.gov' <Anne.Witt@dc.gov>

CC: Adams, Marcia S <Marcia.Adams@SCDMV.net>

Date: 1/18/2006 6:13:12 PM

Subject: RE: Real ID: Update and Survey Request from SC

Attachments: [realID_survey1_1-5-06.doc](#)

Hello Anne,

Marcia Adams asked me to forward on this survey to you. She wanted to review the responses and will get through them tonight. If there are any changes, we'll forward to you in the morning. Otherwise if you don't hear from us by noon Thursday, these are SC responses.

Lotte Devlin

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

From: Adams, Marcia S

Sent: Friday, January 06, 2006 1:10 PM

To: Devlin, Lotte

Subject: FW: Real ID: Update and Survey Request

[Lotte](#),

Attached is a survey that needs a response by Jan 18. Please coordinate the response and meet with me to discuss it. There are a lot of good points in this e-mail. We will discuss.

[Marcia](#)

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

From: Witt, Anne (DMV) [mailto:Anne.Witt@dc.gov]

Sent: Friday, January 06, 2006 10:16 AM

To: Adams, Marcia; Alldritt, Carmen; Andre.Shirley; Anne Collins (anne.collins@state.ma.us); Bannock, Duane; Batiste, John; Beecher, Ginny; Brown, Judy; Caltrider, Frank; Carpenter, Ralph; Cox, John; Darlene Walsh; Dillinger, Terry; Dorris, Carla; Flowers, Robert; Gavin, Chip; Gentry, Karen; Guiot, Philippe; Hammond, Les; Hillmer, Deb; Howell, Roscoe; Joseph J. Cicchirillo; Judd, Lynne; Julie Allen; Kamimura, Dennis; Kuo, John; Lewis, Ginny; Lewis-Pickett, Linda; Linh Nguyen; Lowe, Pamela; Luce, Elizabeth; Magnusson, Keith; Mayer, Mike; McClellan, Thomas; McCormack, Patricia; Mike Calvin (mcalvin@aamva.org); Mike Keyser; Neth, Beverly; O'Brien, Kevin; Ortiz, Kenneth; Ren Donato; Rigby, Joe; Ripley, Marie; Roberts, Dean; Rutledge, Bonnie; Sanders, Sonia; Sandra Lambert; Serian, Betty; Shahan, Mike; Silverman, Joel; Sims, Susan; Smit, D.B.; Stanton, Stacey; Steve Robertson; Tatum, George; Taylor, Tiffany; Thomas Wolfsohn (twolfsohn@aamva.org); Vecchi, Joan; Wartella, Mike; Witt, Anne

Cc: Cheye Calvo (cheye.calvo@ncsl.org); Joseph Trella (jtrella@nga.org); molly.ramsdell@ncsl.org; Nolan Jones (njones@nga.org)

Subject: Real ID: Update and Survey Request

Colleagues -

Happy New Year. We know it will certainly be an interesting one!

After a few weeks of silence, there's a bit of catching up to do - as this is an active month for our REAL ID Task Force work. There are some specific things I hope you'll pay attention to. In addition to a general report - included below is the first of survey request coming out of the cost impacts group. Your prompt attention is important. You may have

also heard from your governor's office re an NGA request related to all this, and I'll address that here as well. And there are some philosophical issues/questions on which your input would be helpful.

General Update

You'll soon be receiving a communication from Linda Lewis-Pickett about what sounds like a very successful meeting yesterday with Assistant DHS Secretary Stuart Baker and the Executive Directors of AAMVA, NGA and NCSL. Part of that agenda was to be sure DHS was aware of the process and efforts we're undertaking, and to encourage them to make good use of our expertise.

In that regard - all three of the Task Force work groups are scrambling to complete their efforts for submission and consideration at our REAL ID Steering Group meeting to be held in Los Angeles next week, just before the AAMVA Board meeting. Specifically, work group one is on the umpteenth draft of model regulation wording. Based on feedback from DHS yesterday, we may be converting that input into a different format that is more useful for them.

Work group two has developed two draft surveys that will assist in refining our costs and impact analysis based on the outcomes of group one. The technology work group will present nearly 30 pages of documentation relating to the specific needs and issues around verification systems.

In Los Angeles, the Steering Group will review these efforts in the context of our Credo, and adopt our working products. We hope to be able to get copies of as much as possible out to you during the following week (Jan 17-20) so you'll have some familiarity before our regional briefing sessions the following week. And as you know, DHS has scheduled its second state work group meeting on the 17th, which will provide additional fodder for our briefing discussions.

Cost Impacts Survey

As you know, the policy/decision makers need to know what all this means in terms of cost, service, systems, product, etc. Our first efforts last summer certainly communicated the magnitude and complexity of those impacts, but also created some confusion given the wide range of assumptions used in making them. Therefore our impacts work group is developing some common guidelines to help us develop more understandable impact analyses.

The first of those surveys seeks to tabulate some basic demographic and production measures - those things (e.g. numbers of licenses, facilities, etc.) which will be affected by any changes - and is attached. **Please ensure this receives attention. We're seeking responses by January 18.** There's contact info on the survey if there's a need for any questions and clarifications.

Future efforts will define cost impacts of specific changes (e.g. scanning documents, or adding a specific security feature to a license) as suggested by AAMVA, DHS or others. As the various options emerge - we're hoping the existence of this first survey will allow straight mathematical calculations off base data whenever possible - so we minimize having to come back to you on the simple stuff. Of course we'll need your help on the more complex and situation-dependent impacts (e.g. systems development, front-end image capture etc.) and those will be the focus of future surveys. As always, reactions and suggestions are welcomed.

NGA Request

On Wednesday, January 4th, David Quam, Director of Federal Relations at NGA, sent an e-mail to all the Governor's Washington Representatives, asking for comments on an early draft of our model regs work group. David is one of the key staff we've been meeting with at NGA - he participated in the work group meeting last month, and will also be in Los Angeles next week. As a result of his request, we're hearing a number of you are being asked for input and not quite sure what the document represents - particularly since quite a bit of additional work has been done since that early effort which left a lot of blanks.

I talked to David yesterday and he chose the early version so the maximum number of issues were still open and on the table for input. That draft is still in "model regulations" format (a format which, as I said above, will likely be revised) - and I believe the request is basically *asking for any advice and/or concerns about things which your jurisdiction feels should or shouldn't be addressed as the rulemaking goes forward*. I know it's a little circular - as many of your representatives are already making input to the very document you're being asked to make input to - but he was pleased to hear Governor's reaching out to Administrators - as it validates the collaborative model we've chosen.

Philosophical Dilemma

My guess is NGA's request and your review will raise an issue which has become prevalent in this effort - and that I believe will be the main challenge for our Steering Committee next week - so I want to be sure it's on the table and open for discussion. I call it the "how much less is more?" question.

You'll recall back to the discussion of the "REAL ID Conundrum" slides and the deliberation which lead to our Credo - we spent a lot of time to properly define AAMVA's role in this discussion - and settled on our expertise as the technical experts who will own the implementation of what's to come.

We also spent a lot of time factoring in our multiple relationships with other stakeholders - particularly the governors and legislators for whom we work - who we acknowledged had different vantages, concerns and roles from that of technical professional association. And throughout, we've acknowledged that while sharing an identical challenge, there are no completely identical situations or cookie-cutter solutions that will apply to all jurisdictions.

As our work has progressed, this has repeatedly lead to discussion and debate as to what level of specificity - or even what level of mention - we should make on various provisions and issues. On the one hand, our Credo said we would rely on the myriad of 'best practice' work, research and experience to inform our advice. On the other hand, we agreed to focus on 'minimum standards' so there would be maximum flexibility for state implementation and circumstances.

What's happened as the process has unfolded, is we start with a long list of issues (similar to the those in the draft David sent), then we find the tons of info we've got on it, then we start distilling that info to the "minimum", and then someone realizes - "you know, if we stay silent on that, no one will have a problem meeting what we don't say - maybe we should just omit that". True enough.

However, I'm personally not sure that's in our best interest - or even appropriate for our association - so want to raise the concern. The metaphor I think of and have mentioned is as follows: Let's say there was a discovery of a new treatment for childhood cancer. I think it would be almost "in-credible" for the Association of Pediatric Oncologists not to have a reaction or opinion about it. As the technical experts - we would expect them to at least say whether or not they felt the therapy would work, be promising, appear questionable, have too many risks, etc. Now that wouldn't even start to address whether there were ethical issues in the treatment method, cost issues for the insurance and hospital community, etc. etc. - on which any number of other groups would weigh in with their views and expertise.

So, I'm of the mind our work needs to result in some "statement" which at least reflects what do-able and not do-able in the world of Motor Vehicle Administrators. We have the added advantage of developing and doing this in coordination with NGA and NCLS - who I know will also have their "statements" about other issues (funding, states rights, immigration, etc.) affecting the "advisability" of the "doability" (did that make sense?!).

If you followed that at all - I'd appreciate any reaction/advice to inform our efforts next week. And of course - we'll have more opportunities for all sorts of discussion at the regional briefings, where I hope you'll be able to have representation.

Thanks - and don't forget: Surveys are due by January 18th!!

Anne Witt, Director
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