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**Date:** 4/30/2007 1:37:08 PM

**Subject:** Fwd: AAMVA Real ID comments: For Review Only - Not for Distribution

**Attachments:** AAMVA Response to Real ID Rule Making - DRAFT 4-2.doc

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Marcia and Scott, I wanted to make sure you saw these comments that AAMVA will be submitting on the REAL ID proposed regs. Let me know if you have any problems with them? Also, have we or is South Carolina DMV considered submitting their own state specific comments?

Also, I'd like to put on your radar that Congress, in particular the Senate is considering increasing their funding of REAL ID. It's all very preliminary but it might be as little as \$1 billion or as much as \$3 billion. However, as the number goes higher the Senate will likely consider their part of the cost paid for, and that will be far short of the \$11 billion need to fund REAL ID, which would be problematic.

I know we have legislation introduced that would state that South Carolina intends to not comply with REAL ID, please give me a heads up if that moves. I'd appreciate it.

Thanks,

Blair

>>> DQuam@NGA.ORG 4/30/2007 12:26:24 PM >>>

To: Washington Representatives and State Federal Contacts

Re: Draft AAMVA comments to DHS NPRM on Real ID

NOTE: Please do not distribute these comments outside of your governors office.

Attached please find the latest draft comments compiled by the American Association of Motor Vehicle Administrators (AAMVA) regarding the NPRM for Real ID.

The comments are quite detailed and comprehensive and track with the recommendations made by NGA, NCSL and AAMVA in last year's Impact Analysis. The comments also include a call for a second review period to allow DHS to address issues left unanswered in the original comment period. (Note: Neither NGA nor NCSL have policy regarding the request for an additional comment period.)

Because of the specific nature of AAMVA's comments, NGA and NCSL staff have discussed submitting a separate letter to DHS from the two organizations highlighting our longstanding macro recommendations. The letter would reference and underscore the comments made by AAMVA, but be filed apart from AAMVA's submission. This would allow AAMVA to file separately while keeping the three groups working in coordination with one another. Individual states are encouraged to file separately.

All comments are due to DHS May 8.

There will be a brief discussion on this topic at today's Washington Reps meeting.

Please do not hesitate to call with any comments or questions.

DCQ

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