

**1. To what extent is CDLIS a suitable solution to meet the requirements for 50-state license searches of all covered drivers?**

**a) Specifically, what is your estimate of the amount (monetary, time to finish, FTE hours, business disruption, integration, etc) of resources necessary to migrate CDLIS, as it exists, to meet the relevant requirements of the Real ID Act?**

The Real ID Act (PL 109-13) requires the state to check whether an individual seeking a license already has a license from another state before issuing a new license. This is to ensure that an individual does not possess multiple valid driver licenses at any given time.

This requirement is very similar if not identical to the requirement that was imposed on commercial drivers by the Commercial Vehicle Safety Act of 1986. At that time, the Federal Highway Administration (FHWA), the jurisdictions and AAMVA decided to develop the Commercial Driver's License System (CDLIS) to support this requirement. All jurisdictions have been participating in the system since 1992 and the program has proven to be very effective in significantly reducing the number of Commercial Driver License (CDL) holders having multiple valid licenses. (See attached CDLIS Success Stories).

In 2000-2001 section 2006(c) of the Transportation Equity Act for the 21<sup>st</sup> century (TEA-21) directed the Secretary of Transportation to improve the ability of the states to identify alternatives to improve access to and exchange of motor vehicle driving records. In response the National Highway Traffic Safety Administration (NHTSA) and the Federal Motor Carrier Safety Administration (FMCSA), in collaboration with the AAMVA, prepared a report to Congress (see attached) assessing the different alternatives available to improve the ability of the states to exchange information about unsafe drivers and to **identify drivers with multiple licenses**.

The report concluded that over a multi-year period the existing CDLIS could be modified to support an all driver system that would enforce the concept of one driver/one license/one record. AAMVA believes that the report's overall recommendations are still applicable. Upon careful review of the resource requirements and the tasks required to undertake such a project, AAMVA believes it will take us and the states longer than the May 2008 deadline for implementation and testing this Real ID Act requirement.

Appendix A provides a detailed breakdown of the timing and costs associated with this option. The major high-level project milestones are as follows:

- January 2007 – start date
- July 2007 – revised CDLIS specifications with Real ID requirements available to states
- March 2008 – modified CDLIS central site ready for testing by jurisdictions
- December 2008 - half of jurisdictions connected to the modified CDLIS
- July 2009 – all jurisdictions connected to the modified CDLIS

The preliminary project schedule is very compressed and allows for only a very limited number of modifications to the central site. Critical components such as the name search for example would not be replaced nor significantly altered. This limitation may be very constraining during the implementation phase and also during the on-going operation of the system as states may receive several potential matches for each inquiry they submit to CDLIS. As a consequence, jurisdictions will need to spend an inordinate amount of time deciphering which person matches

the applicant's characteristics--adding yet an extra step to an already complex driver license issuance process.

The costs necessary to modify the existing CDLIS to implement Real ID requirements will total \$48.7 million, of which \$4.6 million is for the CDLIS technical infrastructure upgrade, \$33 million is allocated to the states to support their application development efforts, and \$11.1 million is for state testing and support activities. This undertaking will provide an interim solution.

As you may know, on August 10, 2005, Congress passed the "Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users" (SAFETEA-LU) and authorized \$28 million to modernize the existing CDLIS. This effort is currently under way and is expected to be completed by the end of 2010. Should the option of modifying the existing CDLIS be selected, the jurisdictions would be compelled to modify their systems twice: once to support the modified CDLIS and the second time to support the modernized CDLIS. This would both increase the states' work and almost double the overall implementation costs of an all drivers system.

**b) What is your estimate of the amount of resources necessary to create a replacement pointer system, perhaps similar to CDLIS, to meet the requirements of the Act?**

As noted above, SAFETEA-LU (PL 109-59) provided funding for modernizing the Commercial Driver License Information System. This effort currently in its inception phase, with its detailed enhancements, will provide the best platform to support the one driver/one license/one record goal contemplated by Congress in The Real ID Act.

It is still sufficiently early to expand the CDLIS Modernization project's scope and fulfill Real ID's intent, for "each state to be able to electronically access information contained in other states' motor vehicle databases." Specifically, the expanded scope will need to include:

- Development of a new name search algorithm optimized to handle 300 million records.
- Review of the security requirements to ensure compliance to all applicable Federal Security Standards and take in account the increased level of security threat that the all drivers system will be subject to.
- Review of the system architecture to support increased storage and processing capacity, increased network bandwidth requirements and increased reliability requirements.
- Reengineering of the messaging infrastructure to support the latest GLOBAL and NIME standards.
- Support for the four U.S. territories.

Appendix B provides a detailed breakdown of the timing and costs associated with this option. The key high-level milestones are as follows:

- January 2007 - start date (for considering Real ID requirements as part of the CDLIS modernization effort – actual start date of the CDLIS modernization effort was August 15, 2006)
- July 2007 - system specifications released to jurisdictions
- October 2008 - central site available for jurisdictional testing
- April 2009 - first jurisdiction connected to the all driver system in production

- December 2010 - all jurisdictions are connected to the all driver system

The additional costs necessary to implement Real ID requirements will total \$67.1 million of which \$13.9 million is for the technical infrastructure, \$39.3 million is allocated to the states to support their application development efforts, and \$13.9 million is for state testing and support activities. This dollar amount is in addition to the \$28 million already appropriated for CDLIS modernization.

In conclusion, the option 1a) of modifying the existing CDLIS places a significant burden on the states and more importantly will not allow the jurisdictions to meet the May 2008 deadline. AAMVA therefore recommends the option 1b). This solution, by using a proven approach supported by state-of-the-art technology, represents the most reliable and efficient option to address the Real ID requirements.

**2. Are there other, non-pointer based approaches that would, in your opinion, be capable of meeting the requirements of the Act? If so, what are the relative merits and trade-offs for such alternative(s), when contrasted with a CDLIS upgrade or other pointer system?**

It is conceivable to implement a non-pointer based solution to address the requirements of the Act. Instead of querying a pointer file containing all drivers, jurisdictions would be compelled instead to query each and every one of the other 54 jurisdictions each and every time they need to find out if an applicant already possesses a license or ID card in another jurisdiction.

Such an approach would present several other significant drawbacks:

- It would increase by almost 54 fold the overall network traffic and state processing requirements compared to a pointer file approach making this solution quite expensive and inefficient.
- Small jurisdictions will be heavily impacted by having the number of queries against their system grows dramatically. For example, the District of Columbia would see the number of queries against its driver system grow by a ratio of 570 compared to a pointer system approach.
- It would also create risks of inconsistencies in the search results as every jurisdiction will have to implement a consistent name search algorithm. Ensuring that the searches return the same results would be very difficult to verify and monitor.
- Finally, a non-pointer solution would also provide incomplete search results as soon as a jurisdiction's system is unavailable. This will require the jurisdictions to follow-up at a later date when all jurisdictions' systems are back on-line, hence creating customer service issues. With 55 systems on-line, the likelihood of one of these systems having an outage on a weekly basis is very high.

**3. Finally, in what ways can a pointer or non-pointer system support and reflect the individual privacy and due process expectations of licensees, who's personal information is accessible and verifiable within that system?**

Regardless of the system selected, any personal information contained within the driver licensing and identification issuance systems are protected. In our opinion, access to the

information in the "all drivers" system would fall under the Driver's Privacy Protection Act (DPPA) as CDLIS does. The DPPA is a federal law that regulates how motor vehicle agencies release and share the information contained in driver records. The DPPA restricts the ability of DMVs to sell or disclose personal, identifying information without an individual's consent. It forbids jurisdictions from distributing personal information to direct marketers. There are exceptions for law enforcement, pollution control courts, government agencies, private investigators, insurance underwriters and similar businesses and other limited purposes. The law also regulates how a recipient of DMV records can share information with another person. The DPPA restricts how personal information is released. It defines personal information as information that identifies a person, and includes a photograph, Social Security Number, driver identification number, name, address (but not the 5-digit ZIP code), telephone number, medical information, and disability information. Personal information does not include information about traffic accidents, traffic violations, or the status of a driver license. DMVs do not release photographs, Social Security Numbers, telephone numbers, medical information, or disability information.

Motor vehicle agencies have procedures in place for individuals to correct information contained in the driving record. Individuals are allowed to review their driving record. Some jurisdictions allow customers to obtain a copy of the driving record at no cost while others charge a nominal fee.

Since launching the operation of CDLIS in 1992, AAMVA has no knowledge of any security breaches or privacy violations having occurred. The CDLIS central site is hosted at a secured data center managed by one of the leading data integrator organizations in the nation. The network infrastructure is also provided and managed by the market leader in network solutions. Access to CDLIS is controlled through a multi-layered security approach that provides for redundant security mechanisms.

From a policy perspective, access to CDLIS is governed by the Federal Motor Carrier Safety Administration as required by the Commercial Motor Vehicle Safety Act of 1986. The Act designates several entities which are authorized to access the system. They include motor vehicle agencies (DMV), law enforcement and employers of commercial driver license holders.

As part of any future solution for an "all drivers" system, AAMVA recommends that an oversight committee composed of states, the Department of Homeland Security, FMCSA, NHTSA and AAMVA representatives be created to develop and maintain the access and privacy policies concerning the "all drivers" pointer file. Such a committee would be involved at the inception of the project to develop the security and privacy policies. It would also remain involved after the system is deployed in production to review the policies on a periodic basis. This would provide ongoing security and privacy oversight for the system and its users.

## APPENDIX A

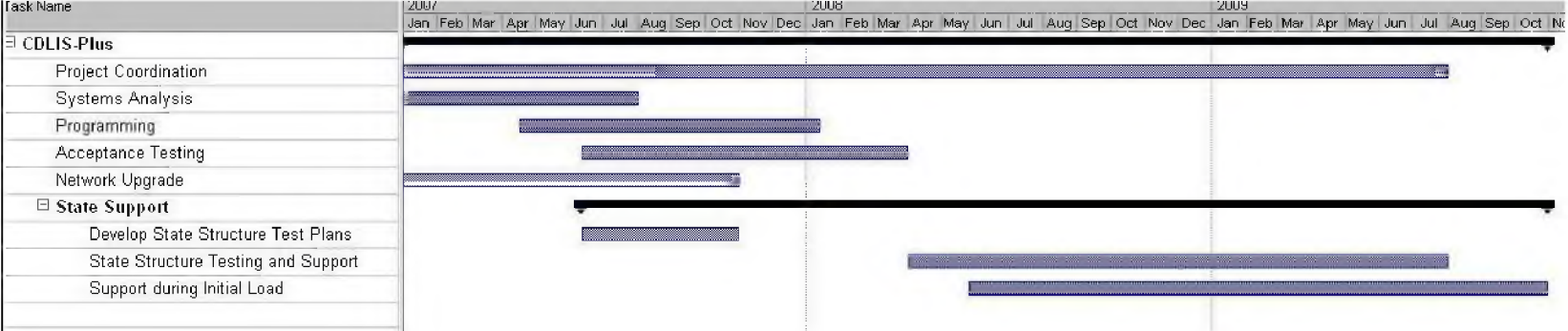
### One-time Cost

Category	Estimated Cost
Project Coordination	\$819,600
System Analysis	\$1,135,458
Programming	\$1,695,224
Acceptance Testing	\$922,897
Network Upgrade - Additional cost	
<b>TOTAL Central Site and Network</b>	<b>\$4,573,179</b>
<b>STATE TESTING &amp; SUPPORT</b>	
Develop State Structure Test Plans	\$686,903
State Structure Testing and Support	\$5,493,115
Support during Initial Load	\$4,963,200
<b>TOTAL State Testing and Support</b>	<b>\$11,143,218</b>
<b>TOTAL AAMVA Budget</b>	<b>\$15,716,397</b>
<b>JURISDICTION GRANT (STATES/DC/TERRITORIES)</b>	
State Grant per jurisdiction	\$600,000
<b>TOTAL GRANT FOR 55 JURISDICTIONS</b>	<b>\$33,000,000</b>
<b>GRAND TOTAL</b>	<b>\$48,716,397</b>

### Ongoing Annual Costs

Category	Estimated Cost
Labor	<b>\$10,117,360</b>
Infrastructure	<b>\$6,940,730</b>
<b>TOTAL ONGOING ANNUAL</b>	<b>\$17,058,090</b>

Project Schedule



## APPENDIX B

### One-time Cost

Category	CDLIS Modernization Funding	Estimated Additional Cost
Project Coordination	\$ 913,920	\$ 164,400
Systems Analysis	\$ 1,320,306	\$ 1,407,380
Programming	\$ 3,042,456	\$ 4,616,404
Acceptance Testing	\$ 1,006,328	\$ 835,809
Hardware/Network/Hosting	\$ 3,828,435	\$ 6,862,287
<b>TOTAL Central Site and Network</b>	<b>\$10,111,445</b>	<b>\$13,886,280</b>
Develop State Structure Test Plans	\$ 337,400	\$ 489,520
State Structure Testing and Support	\$ 4,526,653	\$ 8,449,581
Support during Initial Load		\$ 4,963,200
<b>TOTAL State Testing and Support</b>	<b>\$4,864,053</b>	<b>\$13,902,301</b>
<b>TOTAL AAMVA Budget</b>	<b>\$14,975,498</b>	<b>\$27,788,580</b>
<b>JURISDICTION GRANT (STATES/DC/TERRITORIES)</b>	<b>\$ 255,382</b>	<b>\$ 952,632</b>
<b>TOTAL JURISDICTION GRANT*</b>	<b>\$13,024,502</b>	<b>\$39,370,235</b>
<b>GRAND TOTAL</b>	<b>\$28,000,000</b>	<b>\$67,158,815</b>

\*Total grant in CDLIS Modernization includes 51 jurisdictions, whereas the total grant in DRIVERs includes 55 jurisdictions (50 states, District of Columbia and four Territories)



### Ongoing Annual Costs

Category	Estimated Cost
Labor	<b>\$9,583,220</b>
Infrastructure	<b>\$8,475,119</b>
<b>TOTAL ONGOING ANNUAL</b>	<b>\$18,058,339</b>

Task Name	Start	Finish
<input checked="" type="checkbox"/> <b>CDLIS II Modernization</b>	<b>Tue 8/15/06</b>	<b>Fri 12/31/10</b>
<b>Project Coordination</b>	Tue 8/15/06	Fri 12/31/10
<input checked="" type="checkbox"/> <b>System Analysis</b>	<b>Tue 8/15/06</b>	<b>Fri 12/21/07</b>
Project Definition/Solution Planning	Tue 8/15/06	Fri 9/29/06
Requirements Definition	Tue 8/15/06	Fri 2/23/07
Functional Specification	Mon 11/20/06	Fri 4/27/07
External (Technical) Design	Mon 12/18/06	Fri 6/29/07
Procedure Design	Fri 7/20/07	Fri 12/21/07
<b>Programming</b>	Thu 3/1/07	Fri 2/27/09
<b>States to Apply for Federal Grants</b>	Thu 7/5/07	Thu 7/5/07
<b>Acceptance Testing</b>	Fri 6/29/07	Fri 3/27/09
<b>State Structured Test Plans, Testing &amp; Support</b>	Tue 10/14/08	Fri 12/31/10
<input checked="" type="checkbox"/> <b>Infrastructure Upgrade</b>	<b>Thu 8/31/06</b>	<b>Thu 4/30/09</b>
WAN Upgrade (for encryption)	Thu 8/31/06	Fri 4/24/09
Initial Network Online	Fri 10/26/07	Fri 10/26/07
Server and Data Storage Architecture	Thu 8/31/06	Fri 4/24/09
Continued Network Rollout	Mon 10/29/07	Thu 4/30/09

## Project Schedule

