



American Association of Motor Vehicle Administrators

Neil D. Schuster
President and CEO

Glenn Turner, Chair of the Board
Chief of Staff, Florida Division of Motor Vehicles

May 6, 2008

David Bounds, Chief, SAVE Program
USCIS Verification Division
U.S. Citizenship and Immigration Services
470 L'Enfant Plaza East, SW
Washington, DC 20024

Dear Chief Bounds:

As the association representing state driver licensing officials in the United States, I would like to convey our members' concerns regarding the Department of Homeland Security's (DHS) plan to increase the transactional costs for the utilization of the Systematic Alien Verification for Entitlements (SAVE) program.

As I am sure you are aware, many motor vehicle jurisdictions have already expressed concerns to DHS regarding the costs associated with implementing the Real ID Act of 2005. Congress has provided some assistance to the states by allocating approximately \$80 million in grant funding to further compliance with Real ID implementation; however, this funding still falls considerably short in addressing the overall cost – estimated by DHS to reach \$4 billion nationwide – that each state is expected to bear.

The new pricing structure for SAVE represents a significant increase over current transaction costs. While we understand SAVE currently operates in a deficit, it is not advantageous for states to have to absorb the costs of both implementing the Real ID Act and subsidizing additional federal programs in which the Real ID Act is dependent on through an increase in fees. Jurisdictions have indicated that this increase will result in an additional barrier toward their efforts to become compliant with the Real ID Act, and that such an increase will also require state legislative appropriations to be increased to allow the continuation of utilizing the SAVE program in their state.

We request that you reconsider this price increase to minimize the negative impact it has on an already underfunded program. We are appreciative of the efforts your agency has made toward homeland security and desire to continue our communication in an effort to finding a solution that will be agreeable to all those involved.

Sincerely,

A handwritten signature in black ink, appearing to read 'Neil D. Schuster'.

Neil D. Schuster
President & CEO

NDS/sfb

Copy to:
Kathleen Kraninger, Director (U.S. Department of Homeland Security)

An International Safety Association of Motor Vehicle and Law Enforcement Administrators