



American Association of  
Motor Vehicle Administrators

**NMVTIS Conference Call - DOJ**  
*Tuesday, March 3, 2009*  
***Questions/Answers/Comments***

<b>State</b>	<b>Question</b>	<b>Response</b>
<b>Utah</b>	Did DOJ check with the states to see if the extension to January 2010 was workable?	<b>DOJ:</b> Through the public comment process, DOJ heard from the states that the proposed June 2009 deadline was unrealistic. DOJ relied on input from the states, input from other NMVTIS stakeholders that urged more immediate timeframes, and timelines associated with state grant proposals and prior efforts to connect states to extend the deadline to January 2010. As part of any federal regulatory process, there are limitations on the level of direct consultation that can take place once the NPRM is issued. DOJ notes that many states are already online, consistent with the requirements of the Act that have been in place since 1992.
<b>Utah</b>	What happens if states have legislative barriers that will not allow implementation by the January 2010 date?	<b>DOJ:</b> DOJ continues to work collaboratively with states to help bring them into full compliance and is available to discuss any barriers with individual states. <b>ACTION:</b> AAMVA will set up a follow up calls between states (Utah, Maryland, and Kansas) and DOJ.
<b>Utah</b>	How will DOJ help states with ongoing NMVTIS-related costs?	<b>DOJ:</b> DOJ has no federal appropriations to fund NMVTIS and never has. However, DOJ is committed to exploring funding and technical resources to help states implement and comply with the Anti Car Theft Act and its final regulations. In the last few years,



American Association of  
Motor Vehicle Administrators

## NMVTIS Conference Call - DOJ

Tuesday, March 3, 2009

### *Questions/Answers/Comments*

State	Question	Response
		<p>DOJ has issued a funding solicitation for states and only a small number have applied. Prior to direct funding from DOJ, federal funds were available and disseminated to states through AAMVA. In addition, upcoming funding opportunities for states include:</p> <ul style="list-style-type: none"><li>• Byrne Justice Assistance Grants through the Recovery Act (\$2 billion)</li><li>• Byrne Justice Assistance Grants FY09 (\$500 million)</li><li>• Byrne Discretionary Grants Program.</li></ul> <p>For more information on funding sources, visit BJA's website at <a href="http://www.ojp.usdoj.gov/BJA/">http://www.ojp.usdoj.gov/BJA/</a>.</p>
<b>Wisconsin</b>	Will AAMVA provide data from third party consolidators to the states? Particularly interested in "end of life" status.	<p><b>AAMVA:</b> Information will be reported by Junk, Salvagers - when a vehicle is crushed etc. At this point this can be accessed by individual VIN. We had not anticipated sharing "bulk" data from third parties, as there are concerns regarding commercial information etc. Would need to do further research.</p>
<b>Wisconsin</b>	Are any of the consolidators identified?	<p><b>AAMVA:</b> Auto Data Direct, Inc. is the only contracted data consolidator at this point. Working on getting one more (ISO) before March 31, 2009.</p>



American Association of  
Motor Vehicle Administrators

## NMVTIS Conference Call - DOJ

Tuesday, March 3, 2009

### *Questions/Answers/Comments*

State	Question	Response
Illinois	Legal question – What is the legal authority to charge fees? Why are states being charged fees for the data they provide rather than paying states for the data?	<i>DOJ:</i> The Anti-Car Theft Act of 1992 as amended is the legal authority for what is prescribed in the rules. The Act clearly states that the system is to be funded through user fees and not dependent on federal funding. There is no requirement to pay any entity for their data. This was covered in the Rule as well.
Illinois	Can they overnight a file of vehicles for verification of data and get it back to the states before they issue a title?	<i>AAMVA:</i> At this point this is not a facility that we available. However, we will be exploring opportunities that would support our member's ability to comply with the Rule.
Illinois	How will enforcement be handled for Junk, Salvage and Insurance reporting?	<i>DOJ</i> is responsible for enforcement and compliance.
Illinois	Who is responsible for data errors created by Junk, Salvage and Insurance reporting?	<i>DOJ:</i> States are not responsible for correcting any erroneous data submitted by a reporting entity other than a state. Third party reporters can submit corrections by notation and DOJ has taken steps to minimize errors by the third party reporters.
Illinois	What are the 2010 fees going to be?	<i>AAMVA:</i> They will be posted shortly, but will be the current fee schedule as approved by the Board.
Massachusetts	Are all states required to be fully implemented by January 1, 2010?	<i>DOJ:</i> Yes. Fully implemented means at a minimum, providing data to the system (at least daily), using the system to conduct title



American Association of  
Motor Vehicle Administrators

**NMVTIS Conference Call - DOJ**  
*Tuesday, March 3, 2009*  
***Questions/Answers/Comments***

<b>State</b>	<b>Question</b>	<b>Response</b>
		verifications on out of state vehicles, and payment of user fees. See the final rule for more specific discussion of requirements.
<b>New York</b>	How will standalone be integrated for large states?  How can states be expected to use a system that may not be available?	<b>DOJ:</b> Standalone development is expected to be based on work completed by DOJ for law enforcement. Envisioned as a single inquiry but we will need to establish a method of inquiry that suits state needs, especially in cases of central issue states for example. For some states, full online implementation may be the only or best option. A more concerted effort will be placed on developing the stand alone access mechanism once the court ordered dates have been met.
<b>Illinois</b>	Does standalone mean individual inquiry or also batch?	<b>AAMVA:</b> Initially, individual inquiry was contemplated but DOJ has now indicated that we need to also do batch inquiry to accommodate central issue states for example.
<b>Arkansas</b>	Define difference between standalone and integrated?	<b>AAMVA:</b> Fully integrated means that a state integrates the NMVTIS application into the state's titling system. It is used as a seamless part of the title process. Standalone would be separate web-based inquiry that would enable a VIN to be query and information from NMVTIS returned. The state would then have to determine what if any actions to take based on information returned.



American Association of  
Motor Vehicle Administrators

## NMVTIS Conference Call - DOJ

Tuesday, March 3, 2009

### *Questions/Answers/Comments*

State	Question	Response
<b>New York</b>	Concerns about timeframes and only one solution fully available at this point	<i>DOJ</i> : Acknowledged that this is problematic. Pledged to make stand alone access the top priority once the court ordered deadlines have been met. DOJ will continue to monitor this as we get closer to January 2010.
<b>South Carolina</b>	How will states integrate the new name requirements?	<i>AAMVA</i> : We had hoped to not “store” the name on NMVTIS and allow it to be passed by the state of record to the inquiring entity. For online states, the field already exists as part of the state to state inquiry, but is currently optional. It will have to become mandatory this will then enable “name“ to be shared by online states as part of the state to state inquiry. The issue is how we handle the “name” as part of batch provision. We still need to complete assessment and determine solutions. We expect to work with States as we normally do to find those solutions that would work.
<b>Kansas</b>	Is DOJ willing to work with individual states about an extended implementation date if they have significant hurdles to meeting the implementation date?	<i>DOJ</i> is available to talk one-on-one with states but can make no commitments as the rule sets January 1, 2010 as the required implementation date. DOJ is committed to working collaboratively with any state that has insurmountable barriers.
<b>Massachusetts</b>	Wants to know as soon as possible what will happen if states can not comply with the deadline	<i>DOJ</i> has stated repeatedly that it wants to work collaboratively with states to resolve issues, and has indicated that it would consider all options for achieving compliance. DOJ was asked



American Association of  
Motor Vehicle Administrators

## NMVTIS Conference Call - DOJ

*Tuesday, March 3, 2009*

### *Questions/Answers/Comments*

State	Question	Response
	dates?	what it would do if states simply refused to comply with the January 2010 date and efforts to work collaboratively are not successful. DOJ indicated that it would consider all options, but reinforced again that it wishes to work collaboratively with the states and is focused on supporting states at this time.

State	Comments
<b>Kansas</b>	Volumes are too high for standalone access to be feasible for them (and others); DOJ asked KS to clarify the number of titles issued to out of state vehicles versus all titles issued as an alternative method of assessing suitability for standalone access.
<b>Massachusetts</b>	IT resources are not available. Expectation for January 2010 is unrealistic.
<b>Alaska</b>	Wants to be included in future conversations. Did not get any information on these calls