

# American Association of Motor Vehicle Administrators



Neil D. Schuster  
President and CEO

Charles O'Donnell, Chair of the Board  
Registrar of Motor Vehicles  
New Brunswick Department of Public Safety

January 4, 2010

The Honorable Dee Williams  
Acting Director  
Office of Strategic Planning  
National Highway Traffic Safety Administration  
Room W40-311  
1200 New Jersey Avenue, SE  
Washington, DC 20590

## **Re: Docket # NHTSA-2009-0171 Long Range Strategic Planning**

Dear Mr. Williams:

The American Association of Motor Vehicle Administrators (AAMVA) is filing these formal comments to Docket # NHTSA-2009-0171. AAMVA is a professional and educational organization, founded in 1933, composed of state and provincial officials in the US and Canada who administer and enforce motor vehicle laws. AAMVA supports motor vehicle agencies in a variety of areas, including safety, identification security and law enforcement in North America.

AAMVA believes that the safety mission of NHTSA is closely aligned with the safety mission of the motor vehicle and law enforcement community. As NHTSA develops its long-term strategic plan, AAMVA encourages NHTSA to continue providing the necessary resources to states in order to achieve safety milestones. We believe that the relationship between NHTSA and its state partners benefits from the allocation of resources and funding the agency provides to the states to further cooperative safety goals. AAMVA advocates the continued allocation of funding and resources that allow the states to pursue these goals, but requests that NHTSA continue to allow for flexibility in the application of these resources to states. While uniformity is an important part of any safety initiative, allowing some leeway to states in fulfilling uniform goals assists the states in avoiding bureaucratic exclusion and obstacles to participation. AAMVA also requests that NHTSA include both AAMVA as an organization, as well as its membership, in continued discussions on how best to achieve the national safety goals both NHTSA and AAMVA have an obligation in fulfilling.

AAMVA believes that there are numerous initiatives that will play an instrumental role in defining the future role of safety in America. AAMVA encourages NHTSA to continue to support these programs

and further program outcomes by incorporating them into their long-term strategic plan. These initiatives include:

- **FDR Support** – This program enhances highway safety by providing a Fraudulent Document Recognition (FDR) Model Training Program that jurisdictions may use to train their employees to detect the use of fraudulent documents thereby preventing the issuance of driving credentials to unqualified applicants and the ability of individuals to tamper with properly-issued credentials.
- **Suspended & Revoked Working Group** – This program includes development of a “Best Practices Guide” for use by law enforcement, the courts, and DMV administration when considering suspension or revocation of a driver’s license. The best practices Guide will be distributed to all appropriate stake holders with guidelines on alternatives to suspension for social reasons vs. non-social (highway safety) offenses.
- **Foreign National Driving Credentials** –This program includes development of materials that provide law enforcement personnel with the necessary information to handle foreign national driving credentials with greater knowledge and confidence.
- **Motorcycle Operators Manual** – This program supports the development and on-going maintenance of a new Motorcycle Operators Manual (MOM) and new motorcycle licensing knowledge test question database.
- **DLA Support** – This program supports jurisdictional efforts to implement and become members of the Driver License Agreement (DLA). The task also provides support for AAMVA’s Legal Services Working Group to perform DLA reviews for those jurisdictions working towards adoption of the DLA.
- **Driver Record Data Translation** – This program identifies and promotes procedures DMV’s can utilize to create easily understood driving records for the judiciary and other driving record users.
- **Commercial Vehicle Enforcement on Rural Roads and Work Zones** –These projects enhance highway safety in and around commercial vehicles by the use of non-MCSAP personnel for commercial vehicle and driver enforcement. The projects are designed to increase the contact local law enforcement agencies have with motor carriers and CDL holders. The ultimate goal of the increased contact is to achieve greater reduction in large truck and bus crashes, injuries and fatalities.

AAMVA thanks NHTSA for the opportunity to comment on the development of its long-term strategic plan. We hope that programs outlined above may be adopted as the groundwork for initiatives the states and NHTSA may address and develop together in the coming years. Should you or your staff have any further questions on those projects already underway, or those we plan on developing in the coming

years, please feel free to contact myself or Kevin Lewis, AAMVA's Director, Driver Programs, at (703) 522-4200. Thank you again for the opportunity to provide comments on this important safety plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Neil D. Schuster". The signature is fluid and cursive, with a large loop at the end.

Neil D. Schuster

AAMVA President and CEO