

HB

110

9-LS0490F ✓
Ford
3/11/96

CS FOR SPONSOR SUBSTITUTE FOR HOUSE BILL NO. 110(STA)

IN THE LEGISLATURE OF THE STATE OF ALASKA

NINETEENTH LEGISLATURE - SECOND SESSION

BY THE HOUSE STATE AFFAIRS COMMITTEE

**Offered:
Referred:**

Sponsor(s): REPRESENTATIVES BARNES, Green

A BILL

FOR AN ACT ENTITLED

1 "An Act relating to the confidentiality of certain information in motor vehicle
2 records; and providing for an effective date."

3 **BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF ALASKA:**

4 * Section 1. AS 28.05 is amended by adding a new section to read:

5 Sec. 28.05.065. DISCLOSURE OF PERSONAL INFORMATION
6 CONTAINED IN DEPARTMENT RECORDS. (a) Notwithstanding AS 44.99.300
7 and except as provided in this section, the department may not disclose personal
8 information contained in the records of the department.

9 (b) Personal information shall be disclosed for use in connection with matters
10 of motor vehicle or driver safety or theft; motor vehicle emissions; motor vehicle
11 product alterations, recalls, or advisories; performance monitoring of motor vehicles
12 and dealers by motor vehicle manufacturers; and removal of nonowner records from
13 the original owner records of motor vehicle manufacturers as required by federal law.

14 (c) Personal information may be disclosed if the requesting person

1 demonstrates, in a form and manner the department prescribes, that the requesting
2 person has obtained the written consent of the person who is the subject of the
3 information.

4 (d) Personal information may be disclosed by the department upon proof of
5 the identity of the person requesting a record and representation by the requesting
6 person that the use of the personal information is strictly limited to one or more of the
7 following uses:

8 (1) for use by a government agency, including a court or law
9 enforcement agency, in carrying out its functions, or a private person or entity acting
10 on behalf of a government agency in carrying out its functions;

11 (2) for use in the normal course of business by a legitimate business
12 or an agent, employee, or contractor of the business, but only

13 (A) to verify the accuracy of personal information submitted by
14 an individual to the business or an agent, employee, or contractor of the
15 business; and

16 (B) if the information submitted is not correct, to obtain the
17 correct information, but only for the purposes of preventing fraud by pursuing
18 legal remedies against, or recovering on a debt or security interest against, an
19 individual;

20 (3) for use in connection with a civil, criminal, administrative, or
21 arbitration proceeding in a court or government agency or before a self-regulatory
22 body, including the service of process, an investigation in anticipation of litigation, and
23 the execution or enforcement of a judgment or court order;

24 (4) for use in research activities, or in producing statistical reports, if
25 the personal information is not published, redisclosed, or used to contact an individual;

26 (5) for use by an insurer or insurance support organization, or by a self-
27 insured entity, or an agent, employee, or contractor of an insurer, in connection with
28 claims investigation activities, anti-fraud activities, rating, or underwriting;

29 (6) for use in providing notice to the owners of towed or impounded
30 vehicles;

31 (7) for use by a licensed private investigative agency or licensed

1 security service for a purpose permitted under this section;

2 (8) for use by an employer or an agent or insurer of an employer to
3 obtain or verify information relating to a holder of a commercial driver's license that
4 is required under 49 U.S.C. 31101 - 31162 (Commercial Motor Vehicle Safety Act);

5 (9) for use in connection with the operation of private toll
6 transportation facilities;

7 (10) for bulk distribution for surveys, marketing, or solicitations if the
8 department has implemented methods and procedures to ensure that

9 (A) persons are provided an opportunity, in a clear and
10 conspicuous manner, to prohibit uses; and

11 (B) the information will be used, rented, or sold solely for bulk
12 distribution for surveys, marketing, and solicitations, and that surveys,
13 marketing, and solicitations will not be directed at those individuals who have
14 requested in a timely fashion that the material not be mailed to them; and

15 (11) for any other purpose specifically authorized by law that is related
16 to the operation of a motor vehicle or related to public safety.

17 (e) Personal information contained in an individual record may be disclosed,
18 without regard to the intended use of the personal information, if the department
19 provides in a clear and conspicuous manner on forms for issuance or renewal of
20 operator's or driver's licenses, registrations, titles, or identification documents notice
21 that personal information collected by the department may be disclosed to a person
22 making a request for an individual record, and has provided in a clear and conspicuous
23 manner on the forms an opportunity for a person who is the subject of a record to
24 prohibit disclosure.

25 (f) In this section,

26 (1) "disclose" means to engage in a practice or conduct that makes
27 available or makes known personal information contained in records of the department
28 about a person to another person, organization, or entity by any means of
29 communication;

30 (2) "individual record" means a record containing personal information
31 about a designated person who is the subject of the record, as identified in a request

1 for information;

2 (3) "personal information" means information that identifies a person,
3 including an individual's photograph or computerized image, social security number,
4 driver identification number, name, address, telephone number, and medical or
5 disability information, but does not include information on vehicular accidents, driving-
6 or equipment-related violations, driver's license or registration status, or a zip code.

7 * Sec. 2. AS 28.05.061(c) is repealed:

8 * Sec. 3. This Act takes effect immediately under AS 01.10.070(c).

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Ford
3/13/96

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IN THE LEGISLATURE OF THE STATE OF ALASKA

NINETEENTH LEGISLATURE - SECOND SESSION

BY THE HOUSE STATE AFFAIRS COMMITTEE

**Offered:
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Sponsor(s): REPRESENTATIVES BARNES, Green

A BILL

FOR AN ACT ENTITLED

1 "An Act relating to the confidentiality of certain information in motor vehicle
2 records; and providing for an effective date."

3 **BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF ALASKA:**

4 * Section 1. AS 28.10 is amended by adding a new section to read:

5 Sec. 28.10.505. DISCLOSURE OF PERSONAL INFORMATION
6 CONTAINED IN MOTOR VEHICLE RECORDS. (a) Notwithstanding AS 44.99.300
7 and except as provided in this section, the department may not disclose personal
8 information contained in motor vehicle records maintained by the department under
9 this chapter.

10 (b) Personal information shall be disclosed for use in connection with matters
11 of motor vehicle or driver safety or theft; motor vehicle emissions; motor vehicle
12 product alterations, recalls, or advisories; performance monitoring of motor vehicles
13 and dealers by motor vehicle manufacturers; and removal of nonowner records from
14 the original owner records of motor vehicle manufacturers as required by federal law.

1 (c) Personal information may be disclosed if the requesting person
2 demonstrates, in a form and manner the department prescribes, that the requesting
3 person has obtained the written consent of the person who is the subject of the
4 information.

5 (d) Personal information may be disclosed by the department upon proof of
6 the identity of the person requesting a record and representation by the requesting
7 person that the use of the personal information is strictly limited to one or more of the
8 following uses:

9 (1) for use by a government agency, including a court or law
10 enforcement agency, in carrying out its functions, or a private person or entity acting
11 on behalf of a government agency in carrying out its functions;

12 (2) for use in the normal course of business by a legitimate business
13 or an agent, employee, or contractor of the business, but only

14 (A) to verify the accuracy of personal information submitted by
15 an individual to the business or an agent, employee, or contractor of the
16 business; and

17 (B) if the information submitted is not correct, to obtain the
18 correct information, but only for the purposes of preventing fraud by pursuing
19 legal remedies against, or recovering on a debt or security interest against, an
20 individual;

21 (3) for use in connection with a civil, criminal, administrative, or
22 arbitration proceeding in a court or government agency or before a self-regulatory
23 body, including service of process and the execution or enforcement of a judgment or
24 court order;

25 (4) for use in research activities, or in producing statistical reports, if
26 the personal information is not published, redisclosed, or used to contact an individual;

27 (5) for use by an insurer or insurance support organization, or by a self-
28 insured entity, or an agent, employee, or contractor of an insurer, in connection with
29 claims investigation activities, anti-fraud activities, rating, or underwriting;

30 (6) for use in providing notice to the owners of towed or impounded
31 vehicles;

1 (7) for use by an employer or an agent or insurer of an employer to
2 obtain or verify information relating to a holder of a commercial driver's license that
3 is required under 49 U.S.C. 31101 - 31162 (Commercial Motor Vehicle Safety Act);

4 (8) for use in connection with the operation of private toll
5 transportation facilities;

6 (9) for bulk distribution for surveys, marketing, or solicitations if the
7 department has implemented methods and procedures to ensure that

8 (A) persons are provided an opportunity, in a clear and
9 conspicuous manner, to prohibit uses; and

10 (B) the information will be used, rented, or sold solely for bulk
11 distribution for surveys, marketing, and solicitations, and that surveys,
12 marketing, and solicitations will not be directed at those individuals who have
13 requested in a timely fashion that the material not be mailed to them; and

14 (10) for any other purpose specifically authorized by law that is related
15 to the operation of a motor vehicle or related to public safety.

16 (e) Personal information contained in an individual record may be disclosed,
17 without regard to the intended use of the personal information, if the department
18 provides in a clear and conspicuous manner on forms for issuance or renewal of
19 registrations, titles, or identification documents notice that personal information
20 collected by the department may be disclosed to a person making a request for an
21 individual record, and has provided in a clear and conspicuous manner on the forms
22 an opportunity for a person who is the subject of a record to prohibit disclosure.

23 (f) In this section,

24 (1) "disclose" means to engage in a practice or conduct that makes
25 available or makes known personal information contained in records of the department
26 about a person to another person, organization, or entity by any means of
27 communication;

28 (2) "individual record" means a record containing personal information
29 about a designated person who is the subject of the record, as identified in a request
30 for information;

31 (3) "personal information" means information that identifies a person,

1 including a name, address, telephone number, and medical or disability information,
2 but does not include information on vehicular accidents, driving- or equipment-related
3 violations, driver's license or registration status, or a zip code.

4 * Sec. 2. This Act takes effect immediately under AS 01.10.070(c).



Official Business

COMMITTEES
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REPRESENTATIVE
RAMONA L. BARNES
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(907) 337-7737
(907) 258-8163

State Capitol
Juneau, AK 99801-1182
(907) 465-3438

SPONSOR STATEMENT SS HB 110

This legislation was introduced at the request of two of my constituents who had experienced stalking by persons who had obtained their addresses from DMV through license plate information. Additionally, in 1994, confidentiality of license plate information was included in the President's Crime Package.

The intent of the federal legislation (18 U.S.C. 2721) was to protect the personal privacy of persons licensed by states to drive a motor vehicle or persons who register a motor vehicle by prohibiting disclosure of information on drivers maintained by the state. This information is only to be disclosed under permissible uses.

If Alaska is not in compliance with the federal law by September 13, 1997, the DMV could be liable for civil fines of \$2,500.00 per day and the state could be subject to fines of \$5,000.00 per day until compliance is reached.

This bill is supported by the Council on Domestic Violence and Sexual Assault and the Anchorage Police Department.

I appreciate your consideration of this bill and request your support.

HB 210
10/2/97

FISCAL NOTE

STATE OF ALASKA
1995 LEGISLATIVE SESSION

BILL NO: SSHB 110

Revision Date: 03/06/96 Dept. Affected: Public Safety
 Title: An Act relating to confidentiality of information BRU: Motor Vehicles
motor vehicle records... Component: Field Services
 Sponsor: Representative Barnes
 Requestor: H. STA. COMPONENT SERIAL NO. 0502

EXPENDITURES/REVENUES: (Thousands of Dollars) (inflation not included)

OPERATING	FY 97	FY 98	FY 99	FY 00	FY 01	FY 02
PERSONAL SERVICES						
TRAVEL	1.4					
CONTRACTUAL	2.5					
SUPPLIES						
EQUIPMENT						
LAND & STRUCTURES						
GRANTS CLAIMS						
MISCELLANEOUS						
TOTAL OPERATING	3.9	-0-	-0-	-0-	-0-	-0-
CAPITAL EXPENDITURES	-0-	-0-	-0-	-0-	-0-	-0-
CHANGE IN REVENUES ()	(50.0)	(50.0)	(50.0)	(50.0)	(50.0)	(50.0)
<small>Revenue Code</small>						

FUNDING: (Thousands of Dollars)

1002 Federal Receipts						
1003 GF Match						
1004 GF	3.9					
1005 GF/Program Receipts						
1006 GF/MHTIA						
Other						
TOTAL	3.9	-0-	-0-	-0-	-0-	-0-

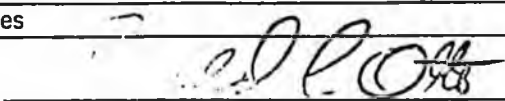
Estimate of current year (FY 95) impact: \$ _____

POSITIONS:

FULL-TIME	0	0	0	0	0	0
PART-TIME	0	0	0	0	0	0
TEMPORARY	0	0	0	0	0	0

ANALYSIS: (Attach a separate page if necessary.)

SEE ATTACHED

Prepared By: Juanita M. Hensley Phone: 465-2650
 Division: Motor Vehicles Date: 03/06/96
 Approved by Commissioner:  Date: _____
 Agency: Ronald L. Otte, Dept. of Public Safety

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FISCAL NOTE

STATE OF ALASKA
1995 LEGISLATIVE SESSION

BILL NO: SSHB 110

Revision Date: 03/06/96 Dept. Affected: Public Safety

ANALYSIS CONTINUED

In 1994 the State received approximately \$150.0 for the sale of vehicle records. This was for individual records at \$5.00 each and for the sale of master file updates to two major vendors at a cost of \$50.00 per 1,000 records. The main use of these records was to determine the address of the individual or, in case of major vendors, to generate mailing lists. It is estimated that \$50.0 of this revenue annually will be lost if the addresses are confidential. It is anticipated that one vendor will not be able to get the records because they make their data base available to everyone and this will be a loss of \$25.0. It is estimated that an additional \$25.0 will be lost from the walk-in customers who will have no legitimate purpose for obtaining the record.

This bill will require the Department to promulgate regulations regarding the release of motor vehicle records. Public hearings will be held in Anchorage, Fairbanks, Soldotna/Kenai and Juneau. Travel = \$980.00 Airfare from Juneau to Anchorage, Anchorage to Fairbanks, Fairbanks to Soldotna/Kenai and return to Juneau. Per-diem = \$336.00, Car Rental in Anchorage, Fairbanks and Soldotna = \$75.00. Total of travel expenses = \$1.4.

Contractual. Publishing cost to publish notice of regulations and public hearings 2 times in 6 different newspapers = \$2.1, Cost of contracting with the Legislative Information Office to hold public hearings are \$25.00 an hour, 4 hours in each location = \$.04. Total cost of contractual is \$2.5.

SEC. 300002. PROHIBITION ON RELEASE AND USE OF CERTAIN PERSONAL INFORMATION FROM STATE MOTOR VEHICLE RECORDS.

(a) In General.--Title 18, United States Code, is amended by inserting after chapter 121 the following new chapter:

CHAPTER 123--PROHIBITION ON RELEASE AND USE OF CERTAIN PERSONAL INFORMATION FROM STATE MOTOR VEHICLE RECORDS

Sec. 2721. Prohibition on release and use of certain personal information from State motor vehicle records

(a) In General.--Except as provided in subsection (b), a State department of motor vehicles, and any officer, employee, or contractor, thereof, shall not knowingly disclose or otherwise make available to any person or entity personal information about any individual obtained by the department in connection with a motor vehicle record.

(b) Permissible Uses.--Personal information referred to in subsection (a) shall be disclosed for use in connection with matters of motor vehicle or driver safety and theft, motor vehicle emissions, motor vehicle product alterations, recalls, or advisories, performance monitoring of motor vehicles and dealers by motor vehicle manufacturers, and removal of non-owner records from the original owner records of motor vehicle manufacturers to carry out the purposes of the Automobile Information Disclosure Act, the Motor Vehicle Information and Cost Saving Act, the National Traffic and Motor Vehicle Safety Act of 1966, the Anti-Car Theft Act of 1992, and the Clean Air Act, and may be disclosed as follows:

(1) For use by any government agency, including any court or law enforcement agency, in carrying out its functions, or any private person or entity acting on behalf of a Federal, State, or local agency in carrying out its functions.

(2) For use in connection with matters of motor vehicle or driver safety and theft; motor vehicle emissions; motor vehicle product alterations, recalls, or advisories; performance monitoring of motor vehicles, motor vehicle parts and dealers; motor vehicle market research activities, including survey research; and removal of non-owner records from the original owner records of motor vehicle manufacturers.

(3) For use in the normal course of business by a legitimate business or its agents, employees, or

contractors, but only--

“(A) to verify the accuracy of personal information submitted by the individual to the business or its agents, employees, or contractors; and

“(B) if such information as so submitted is not correct or is no longer correct, to obtain the correct information, but only for the purposes of preventing fraud by, pursuing legal remedies against, or recovering on a debt or security interest against, the individual.

“(4) For use in connection with any civil, criminal, administrative, or arbitral proceeding in any Federal, State, or local court or agency or before any self-regulatory body, including the service of process, investigation in anticipation of litigation, and the execution or enforcement of judgments and orders, or pursuant to an order of a Federal, State, or local court.

“(5) For use in research activities, and for use in producing statistical reports, so long as the personal information is not published, redisclosed, or used to contact individuals.

“(6) For use by any insurer or insurance support organization, or by a self-insured entity, or its agents, employees, or contractors, in connection with claims investigation activities, antifraud activities, rating or underwriting.

“(7) For use in providing notice to the owners of towed or impounded vehicles.

“(8) For use by any licensed private investigative agency or licensed security service for any purpose permitted under this subsection.

“(9) For use by an employer or its agent or insurer to obtain or verify information relating to a holder of a commercial driver's license that is required under the Commercial Motor Vehicle Safety Act of 1986 (49 U.S.C. App. 2710 et seq.).

“(10) For use in connection with the operation of private toll transportation facilities.

“(11) For any other use in response to requests for individual motor vehicle records if the motor vehicle department has provided in a clear and conspicuous manner on forms for issuance or renewal of operator's permits, titles, registrations, or identification cards, notice that personal information

collected by the department may be disclosed to any business or person, and has provided in a clear and conspicuous manner on such forms an opportunity to prohibit such disclosures.

“(12) For bulk distribution for surveys, marketing or solicitations if the motor vehicle department has implemented methods and procedures to ensure that--

“(A) individuals are provided an opportunity, in a clear and conspicuous manner, to prohibit such uses; and

“(B) the information will be used, rented, or sold solely for bulk distribution for surveys, marketing, and solicitations, and that surveys, marketing, and solicitations will not be directed at those individuals who have requested in a timely fashion that they not be directed at them.

“(13) For use by any requester, if the requester demonstrates it has obtained the written consent of the individual to whom the information pertains.

“(14) For any other use specifically authorized under the law of the State that holds the record, if such use is related to the operation of a motor vehicle or public safety.

“(c) Resale or Redisclosure.--An authorized recipient of personal information (except a recipient under subsection (b)(11) or (12)) may resell or redisclose the information only for a use permitted under subsection (b) (but not for uses under subsection (b) (11) or (12)). An authorized recipient under subsection (b)(11) may resell or redisclose personal information for any purpose. An authorized recipient under subsection (b)(12) may resell or redisclose personal information pursuant to subsection (b)(12). Any authorized recipient (except a recipient under subsection (b) (11)) that resells or rediscloses personal information covered by this title must keep for a period of 5 years records identifying each person or entity that receives information and the permitted purpose for which the information will be used and must make such records available to the motor vehicle department upon request.

“(d) Waiver Procedures.--A State motor vehicle department may establish and carry out procedures under which the department or its agents, upon receiving a request for personal information that does not fall within one of the exceptions in subsection (b), may mail a copy of the request to the individual about whom the information was requested, informing

Motznik Computer Services, Inc.

8301 Briarwood, Suite 100 Anchorage, Alaska 99518
(907) 344-6254

March 9, 1995

Rep. Jeannette James
State Capitol, Room 501
Juneau AK 99801-1182

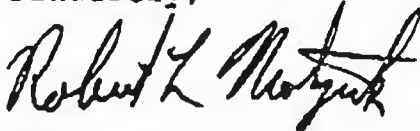
Dear Rep. James:

I will be out of town for the next 2 weeks and I have not had time to write a comprehensive letter in opposition to HB110. Attached is my letter from last March in opposition to 1994 HB526. That bill was almost identical to HB110.

The Department of Motor Vehicles has been trying to make the motor vehicle file confidential for several years. Currently they almost keep it confidential by charging \$45,000 for a copy of the file. I understand that my company and the Polk Directory are the only ones that purchase copies. We put the file on-line as part of our Public Information Access System. There are currently 400 to 500 daily DMV inquiries processed on our system. An inquiry by name on our system costs the customer about 80 cents by using their PC over a phone line to our computer. DMV charges \$5.00 and you have to travel to their office.

If the bill is still in your committee when I return, I will provide more information. Thank you for your time.

Sincerely,



Robert L Motznik

Motznik Computer Services, Inc.

8301 Briarwood Street, Suite 100
Anchorage, Alaska 99518-3332
(907) 344-6254 FAX (907) 344-1759

TO: HOUSE STATE AFFAIRS COMMITTEE

MARCH 16, 1994

FROM: ROBERT MOTZNIK

RE: HOUSE BILL 526

This letter is to register my opposition to House Bill 526. This bill calls for making addresses confidential in the motor vehicle file. The bill also mentions making the phone number confidential, but DMV does not even have a space on the registration form for phone number. There is no phone number in the file to be made confidential.

For six years we have purchased the motor vehicle file and made it available on our Public Information Access System. Hundreds of companies and government agencies access the file daily. A common use of the motor vehicle file is to find addresses.

Attorneys need to find witnesses that have moved; title companies are required to search public files for the last known address of interested parties before foreclosing; towing companies need to notify owners/lienholders before auctioning impounded vehicles; larger companies want to make sure the car left overnight in their parking lot doesn't belong to the boss before they have it towed; community patrols send letters to owners of vehicles that stop at suspected drug houses; companies/government agencies use it to locate people that have bounced checks or have not paid bills. These are some of the exceptions that DMV will have to allow for. DMV does not have the staff or the inclination to help people. The ten dollar fee to register a car in person was designed to keep people out of their office.

HOUSE BILL 526 SHOULD BE REJECTED FOR THE FOLLOWING REASONS:

1. IT WILL NOT DISCOURAGE CRIMINAL ACTIVITY

This bill would make it harder for attorneys, process servers, investigators, banks, title companies and government agencies to perform their jobs. Criminal activity requires privacy. The way to discourage criminal activity is to increase the probability of them being caught.

A criminal at the DMV counter will not be instantly rehabilitated when he is denied the address. He can either choose another victim, or if he is stalking an acquaintance, locate the victim through a different method (friends, relatives, job site, phone directory).

2. PRIVACY WILL HINDER VICTIMS

This bill could prevent stalking victims from finding out in a timely manner who is following them.

3. COSTS WILL INCREASE TO DMV AND THE PUBLIC

If a criminal comes in with a plate number of someone he wants to victimize, he may lie to the clerk as to why he needs the information (some criminals are untruthful). Since there are so many valid reasons for needing the information, how would the requests be screened? Lie-Detectors? Stack of bibles?

DMV will need more clerks to screen information requests.

The civil process will become slower and more expensive.

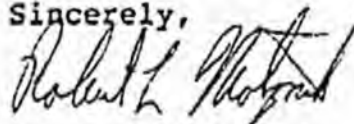
4. THERE IS AN ALTERNATIVE

When a subscriber performs a lookup by plate number in our system, the transaction is logged and the subscriber is warned that the log file will be made available to any law enforcement agency that requests it.

It is my understanding that DMV makes no record of plate numbers that are requested. Checking identification and recording plate inquiries would discourage criminals. DMV could be doing this now.

Thank you for your time. Please call me with your questions.

Sincerely,



Robert L. Motznik

AlaskaUSA
Federal Credit Union

HB 110

March 8, 1996

The Honorable Jeannette James
Alaska State House of Representatives
State Affairs Committee
Juneau, Alaska 99801-1182

Dear Chair James:

We are writing with concerns regarding HB 110 which restricts access to certain records of the Department of Motor Vehicles.

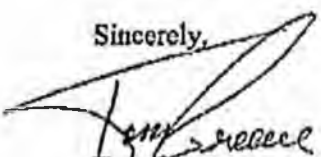
As you know, most financial institutions use DMV records as a source of information to verify automobile ownership, to locate lienholders, and to expedite the financing and titling of automobiles for consumers. Without being substantially more specific, we believe that HB 110 will have three adverse effects. First, it will increase the cost of automobile financing, which is ultimately passed on to the consumer in the form of higher interest rates; second, it will make automobile financing considerably more inconvenient for the consumer since access to immediate information could be delayed; and, thirdly, it could inundate the already strained resources of the Department of Motor Vehicles with individual requests for information.

We recognize that access may still be provided for "legitimate interest;" however, such a phrase leaves too much to interpretation and regulatory prerogative. Responsibly owning and operating a motor vehicle is a privilege, not a right. The use or misuse of a vehicle has substantial impact on a variety of "legitimate interests," including property owners, pedestrians, lienholders, sellers and purchasers. It seems appropriate that each of these interests should be able to rely on the personal accountability of the owner/operator. At a minimum, this accountability should include the ability to contact the responsible individual. It is difficult to imagine a regulation which could anticipate all the "legitimate" uses for this information, or a system which could be efficiently implemented to evaluate such "legitimacy."

We appreciate the sponsors' interest in protecting individuals' privacy; however, the accountability associated with automobile ownership carries a greater public policy interest. Until sufficient clarification is incorporated into the text of the proposed statute, we believe it is premature for the Committee to advance the proposal.

Thank you for the opportunity to comment.

Sincerely,


Tom Greene
Senior Vice President,
Consumer Lending