



Minnesota Deputy Registrar's Association

January 23, 2017

Commissioner Ramona Dohman
MN Department of Public Safety
445 Cedar Street, Suite 1000
Saint Paul, MN 55101

Dear Commissioner Dohman,

As you are aware, the members of the Minnesota Deputy Registrars Association (MDRA) act as agents on your behalf in conjunction with the Department's Division of Driver and Vehicle Services (DVS) to assist citizens with their state mandated licensing and registration requirements. The 174 offices that comprise the deputy registrar network are conveniently located across the state to meet the needs of Minnesotans who seek these services. Collectively our offices remit over \$1 billion annually to the State.

In our unique role of serving both the State and the public, we strive to effectively meet the needs and demands of each. This also includes rendering advice when called for. In that capacity, we strongly urge your leadership to address real concerns we have regarding the MNLARS project. This must be addressed and corrected before its proposed launch in March 2017. Failure to do so in our opinion will result in unacceptable outcomes that will hinder our effectiveness to serve those who depend on us.

The following concerns are based on our limited consultations from DVS, and after a recent MNLARS Showcase that was attended by some deputy registrars. We have previously shared these matters with DVS Director Dawn Olson and MNLARS staff as well, but with no resolution to date.

- **Input errors.** There is no method for an office to correct errors inadvertently entered in the MNLARS system by a clerk once the transaction is finalized, and in some cases even prior to its completion (unless caught early, canceled completely and the transaction begun entirely anew which is time consuming). Furthermore, there is no reconciliation option for an office to rectify this at the close of the day before the daily report is finalized and the funds are remitted to DVS. *(A suggestion by DVS to seek out the customer later in these cases for reimbursement is time consuming, difficult to achieve, and satisfaction unlikely to be realized.)*

Failure to instantly address input errors will waste time and money for both deputies and the State (and ultimately the citizen). Deputy registrars have always had the ability to immediately rectify transaction errors (including names and VIN) within the existing licensing system. If the Department desires "instant real time" updates to the system for the benefit of other users (law enforcement, judiciary, insurance providers), it should not thwart our ability with MNLARS to make corrections when these unintended instances occur.

MDRA is a statewide membership organization promoting common interests of deputy registrars in providing professional licensing service to the public and liaison to the State.

- **Pro-rate shortcomings.** The trucking industry enjoys full “pro-rate” services unique to their registration needs at 9 designated deputy registrar locations outstate. All other deputy offices offer limited service for the industry regarding semi-truck transfers and related title only transfers. However, MNLARS will not allow for this limited service to continue due to the absence of a critical calculator component that the existing mainframe does feature. Consequently, truckers will be forced to only use these 9-full service pro-rate deputy offices outstate, or the DVS office in downtown Saint Paul as the only locations to conduct these less complicated transactions. This is a burden and inconvenience for the trucking industry who rely on these services, while stifling our ability to effectively cater to them in these circumstances.
- **Inventory tracking.** Deputy registrars are very concerned that the MNLARS system will not track actual inventories reflective of transactions conducted for the various renewal stickers and all the different types of license plates available at an office. Deputies must be able to search their inventories within MNLARS for internal controls and to best anticipate restocking. This feature exists in the current system and must continue with MNLARS.
- **Title service options.** DVS intends to terminate **expedited title services** in conjunction with the MNLARS rollout. However, this is a critical service that our customers depend upon, especially when the turnaround time for titles from the State continues to average 60-90 days. MNLARS implementation will not instantly eliminate this backlog. It is imperative that DVS retain the “Fast Track” option for us as well as for auto dealers, auctioneers, and citizens who need a more timely response to obtain a title than DVS has historically provided. This also includes the **CVR (Computerized Vehicle Registration)** program that is critical for Minnesota auto dealers and deputy registrars. CVR and expedited titling are very important to Minnesota citizens and businesses. Any pending DVS action affecting these specific programs must be reconsidered to prevent any service disruptions, and phased in gradually once MNLARS is functionally proven.
- **Training.** The “adoption phase” for MNLARS has been shortened considerably, yet without adequate testing or proper training within the deputy registrar network to vet any potential problems. We understand DVS will set up some computers in downtown Saint Paul for deputies to test MNLARS in advance of implementation. However, this is a huge disadvantage for rural deputies to travel to the metro area within a very short time frame. Furthermore, we highly doubt Web-based instruction offered to distant offices will address the vast complexities of issues that we routinely encounter. We have long advocated for ongoing training from DVS even before MNLARS was ever contemplated. Regrettably our repeated requests in this regard continue to be denied on this fundamental accommodation.

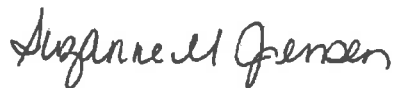
We recognize MNLARS is a critical project and the MDRA truly desires the final product to be successful. However, we strongly suggest that all the following steps be taken to ensure that outcome:

- MNLARS be modified to incorporate solutions to the shortcomings identified above before becoming operational;
- Existing expedited title services and CVR remain as available options to citizens;
- DVS delay full implementation until proper training is accomplished for deputy registrars; and
- MNLARS is piloted prior to full implementation by a few deputy registrars statewide reflecting a diverse sample of rural, urban, large, small, public, and private deputy offices.

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Thank you for your personal attention to these issues that we deem critical to be addressed before MNLARS becomes operational. Furthermore, we stand ready and willing to partner with you at the state legislature to achieve their understanding and acceptance of these sensible solutions.

Very truly yours,

A handwritten signature in cursive script that reads "Suzanne M. Jensen".

Suzanne Jensen
President, Minnesota Deputy Registrars Association

CC: DVS Director Dawn Olson
House Transportation Committee Chair Paul Torkelson
Senate Transportation Committee Chair Scott Newman