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January 19, 2017

Commissioner Mona Dohman Department of Public Safety 445 Minnesota Street St. Paul, MN 55101-5155

## Dear Commissioner Dohman:

I am writing today on behalf of my 365 franchised new car and truck dealer members to ask that you delay the implementation of MNLARS. We do not have confidence that the system will work as intended, and we believe all the elements of a working title system should be prepared tested and certified as operable before any such system is unleashed on Minnesotans.

As you may know MADA has partnered with Driver and Vehicle Services for decades to help ensure that consumers benefit from as efficient a titling system as possible. In 2008, after working in a deliberate and collaborative fashion, we launched an electronic titling system known primarily by the name of its vendor, CVR. In 2016 CVR processed nearly 82,000 registrations through a paper free efficient manner that allows customers to get their tabs and plates immediately and titles registered within weeks.

Currently the old paper system of title processing is months behind and we have been informed that the CVR process will be turned off at the end of March for an indefinite period of time.

Everyone is aware of the overruns in time and money that have plagued MNLARs. From our standpoint the development of MNLARS has not been a collaborative process. Focus groups that were formed to gain dealer input 4-5 years ago have been abandoned. There is no testing or pilot phase and communication on the project has been scarce and contrary. Meetings with stakeholders are repetitive and unproductive and your consultant leading those efforts has resigned.

The electronic registration vendor CVR has not been allowed to examine the MNLARs structure to give us an assessment on the time it would take to build out a workable application. We are told this is because their contract is overdue for an RFP process and it would give them an unfair advantage. That the contract and the MNLARS transition collided at the same time is simply bad project management and should not be an excuse to interrupt a viable program serving Minnesota consumers. If the MNLARS project had been on time, CVR as the contracted vendor would have developed a product for the new system.

The original CVR program took two years to build. We are now told that it will only be a 10 week delay to build a new system that's adaptable to MNLARs. That any vendor can make an assessment, write and complete a working electronic title solution from a cold start with no prior knowledge of the system in only 10 weeks is incomprehensible. We do not share the confidence DVS has in that plan. We believe

the electronic system will be dark for a very long time to the detriment of Minnesotan's who enjoyed the benefits of the system.

Furthermore, our discussions with various Deputy Registrars have only reinforced our belief that MNLARS will not be ready to launch in 2017.

Please listen to our concerns. We would like to work with the Department of Public Safety and Driver and Vehicle Services to ensure a sound and efficient vehicle title system for Minnesota.

Sincerely,

Scott Lambert

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President

cc:

Representative Torkelson Representative Runbeck Senator Newman