

U.S. Department of Transportation
Docket Management System
400 Seventh Street, S.W., Room Plaza 401
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RE: Docket Number TSA-2003-14610
Docket Number FMCSA-2001-11117

This correspondence responds to a request for comments on security threat assessment for individuals applying for a Hazardous Materials endorsement for a Commercial Driver's License.

The Maine Bureau of Motor Vehicles wishes to address two items regarding this interim final rule:

It is apparent to Maine Bureau of Motor Vehicles officials, especially after participation in the American Association of Motor Vehicle Administrators (AAMVA) / Transportation Security Administration (TSA) conference call on June 11, 2003, that the majority of jurisdictions will not be ready for the full implementation of the interim final rule for security threat assessments by November 3, 2003. The lack of answers to questions posed by the jurisdictions to TSA is troubling. Jurisdictions for the most part are left to speculate and try to predict what may occur with this rule. It is wrong to put jurisdictions in this position and will do nothing for homeland security if implemented without the benefit of a proper and reasonable timeframe. The present November 3, 2003 date is not realistic. Maine strongly suggests a date of November 3, 2005 (or later) to ensure a reasonable and affective implemented program.

Maine BMV officials also suggest that the five year assessment be based on the issuance date of a commercial driver's license. Administratively Maine BMV would be greatly burdened if it were handled in any other way. It is our opinion that many other jurisdictions would agree.

The Maine Bureau of Motor Vehicles takes this issue very seriously. We do want to assist in making our land safe. However, more time and thought is essential if this program is to benefit our friends and neighbors.

Thank you for allowing me to give our input on this important issue.

Sincerely,

Robert E. O'Connell Jr.
Director, Driver License Services
Maine Bureau of Motor Vehicles