American Association of
Motor Vehicle Administrators

OUR VISION
Safe drivers
Safe vehicles
Secure identities
Saving lives!

**The American Association of Motor Vehicle Administrators (AAMVA)**

**Written Testimony Submitted Before the
Pennsylvania House of Representatives
Committee on Transportation**

**"Public Hearing on HB 1247 Providing for Electronic Driver's Licenses"**

**March 5, 2024**

Chairmans Neilson and Benninghoff, thank you for the opportunity to submit written testimony on the important issue of electronic driver's licenses.

The American Association of Motor Vehicle Administrators (AAMVA) is a tax-exempt, nonprofit organization that develops model programs in motor vehicle administration, law enforcement, and highway safety. The association also serves as an information clearinghouse in these areas. Founded in 1933, AAMVA represents the state and provincial officials in the United States and Canada who administer and enforce motor vehicle laws. AAMVA's programs encourage uniformity and reciprocity among the states and provinces.

To support our members evolving role in identity management, AAMVA provides guidance, standards, and best practices for the vetting of identities and issuance of a secure and interoperable identity credential. While AAMVA serves as a national convener of relevant policy issues at the federal level, we understand that each state is unique in its approach to every aspect of constituent services - including those related to the development and issuance of driving credentials. For that reason, we preface our remarks by clarifying that your own, in-state experts within the Pennsylvania Department of Transportation are best served to clarify any specific issues related to digital driver's licenses.

As Pennsylvanians contemplate a digital driver's license solution, AAMVA emphasizes the important role standardization plays in identity management. The development of new standards in the identity space has been spurred by drastic technology change. As the world continues to become more technologically enabled, it is becoming increasingly clear that common standardization facilitating the transition to mobile device identity products is necessary for the interoperation and universal acceptance of these credentials. These two essential aspects of digital identity transformation – interoperability and acceptance - are rooted in the development of standards applicable to the mobile driver's license (mDL) application.

Specifically, AAMVA points the Committee to the most recent addition to the ISO 18013 standard[1] - the Mobile Driving License (mDL) Application. This part provides the interface and data model requirements for safe, secure, trusted, privacy respecting, and interoperable mobile driving licenses and IDs. AAMVA drafted the functional requirements that were used as a basis for the published standard and has served as convenor of the ISO working group for many years. As the Committee and the State of Pennsylvania pursue electronic driving credentials, these standards should serve as the foundation for ensuring your work syncs with the work of the numerous other jurisdictions pursuing similar paths.

In a general sense, AAMVA believes the mDL is a significant improvement over physical credentials which can easily be lost or stolen, become damaged, become outdated as information changes, offer too much information (including personally identifiable information not related to specific transactions), and more easily be replicated by counterfeiters. The mDL offers safe, secure, privacy respecting, and trustable technologies that allow for completely touchless transactions, selective information release, data protection, and so much more. The mDL operates on the premise that the mDL holder is always in full control of what data is shared with the option of only providing those data elements (such as age) that are necessary for that particular use case.

While AAMVA anticipates the mDL will eventually be used as a singular identity credential, we recognize that for the immediate future both the physical card and the mDL must coexist for redundancy and operationally significant reasons. This includes the lack of available readers in all situations, including potential law enforcement interactions (or other unanticipated scenarios where a reader is absent). For these reasons, the mDL is currently viewed as an extension of the physical card rather than an immediate replacement.

As your Committee continues its consideration of the future of identity management and its impact on constituent-government interactions, AAMVA emphasizes trust as the determining factor for success. The Pennsylvania Department of Transportation has worked tirelessly to establish and build that trust with each of

your constituents and knows how to best leverage state assets to meet changing expectations. AAMVA thanks the Subcommittee for the opportunity to submit written testimony and stands ready to continue the important conversation of how we can help further the shared interests of security and identity management.

[1]- *ISO/IEC DIS 18013-5 Personal identification – ISO compliant driving license – Part 5: Mobile driving license (mDL) application. https://www.iso.org/obp/ui/#iso:std:iso-iec:18013:-5:dis:ed-1:v1:en*