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Senator Steve L. Nass
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Representative Adam Neylon
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State Capitol
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Dear Senator Nass and Representative Neylon:

The Wisconsin Department of Transportation (WisDOT) appreciates the opportunity to discuss Clearinghouse Rule 23-042, proposed changes to Administrative Rule Trans 102, about which the department discussed the requested modifications on March 7th, 2025 with the committee. This letter provides a summary of our response to those questions and recommendations contained in the attached "Third Germane modifications".

Changes from Second Germane to Third: The changes the department has made are:

1)

Page 41, Section 32 Second Germane: Trans 102.14 (8) (g) The department shall verify a person's legal presence in the United States collected under s. Trans 102.15 (4) and social security number when renewing or reissuing a REAL ID non-compliant product issued before January 1, 2013, without verifying an applicant's documents or information.

Page 40, Section 32 Third Germane: Trans 102.14 (8) (g) The department may require any person who has previously provided satisfactory proof of U.S. citizenship to provide proof of citizenship or legal presence in the United States when renewing or reissuing a REAL ID non-compliant product issued before January 1, 2013. The department shall require any person who has not provided satisfactory proof of U.S. citizenship for a REAL ID non-compliant product issued before January 1, 2013, to provide proof of the person's legal permanent resident or conditional resident status of the United States, or legal presence in the United States as specified in s. Trans 102.15 (4) when renewing or reissuing a REAL ID non-compliant product. The department shall require all applicants to provide a social security number or the proof specified in s. 343.14(2)(br), Stats., when

renewing or reissuing a REAL ID non-compliant product issued before January 1, 2013.

2)

Page 48, Section 34 Second Germane. Trans 102.15 (5) (a) 4. An applicant's paycheck, stub, or earning statement that includes the employer's name and address. Printouts of electronic documents are acceptable.

Page 47, Section 34 Third Germane. Trans 102.15 (5) (a) 4. An applicant's paycheck, paystub, payroll statement, or earning statement that includes the employer's name and address. Printouts of electronic documents are acceptable.

3)

Page 50, Section 34 Second Germane. Trans 102.15 Identification requirements for products. (6) (a)

(6) (a) The department shall collect a REAL ID compliant product applicant's social security number and verify the social security number with the U.S. social security administration prior to issuance of any product. Nonresidents of the U.S. who lack work authorization and a social security number may provide alternative proof as provided in par. (b) for issuance of a REAL ID, except for a commercial driver license.

Page 49, Section 34 Third Germane. Trans 102.15 Identification requirements for products. (6) (a)

(6) (a) The department shall collect a REAL ID compliant product applicant's social security number and verify the social security number with the U.S. social security administration prior to issuance of any product. Nonresidents of the U.S. who lack work authorization and a social security number may provide alternative proof as provided in par. (b) for issuance of a REAL ID compliant product, except for a commercial driver license.

WisDOT sincerely welcomes the discussions about these proposed changes to Trans 102 included in CR 23-042 that are necessary to bring it into compliance with federal and state law and looks forward to filing and publishing the final rule.

Sincerely,



Kristina Boardman
Secretary