

Brian Sandoval  
Governor



Terri L. Albertson  
Director

1399 American Pacific Dr.  
Henderson, Nevada 89047

January 29, 2018

### To All Registration Services

Effective March 5, 2018, all Southern Nevada DMV offices will discontinue the registration service Stand-by/Walk up window service. For the time being, those of you who have standing appointments, will still be able to conduct their business during their own appointment time. If you are unable to keep your appointment time, we will no longer allow another service to utilize your appointment time; the vacated appointment time will be utilized to process drop off batches.

Here is what we offer to your business and the several alike across Nevada.

- Mail in Service for batches of titles, to Carson City.
- If available, one 30-minute standing appointment, per business, at the Registration Service appointment window/desk per day. (No new applications for appointments will be accepted.)
- Leaving the transactions at the service window/desk (Batches completed in 5-working day processing).

I encourage you to utilize all of the above mentioned services, so you can have any remaining business done, you are not able to do during regular business hours. We will continue to review how we can serve the public and businesses alike more efficiently.

We ask that you please not schedule appointments via the DMV Website for your Registration Service business, as this will not allow us to accurately capture the amount of resources needed to accommodate Registration Services and ties up spots for customers who are not offered the expanded list of options we have noted above.

Thank you in advance for your cooperation and understanding.

If you have any questions regarding this letter, please do not hesitate to contact me at 702-486-1314.

Sincerely,

Diana Brola  
FSD Supervisor I

Agenda Item: II B (LC)  
Meeting Date: 02-27-18

**From:** Tonya Laney [mailto:TLaney@dmv.nv.gov]  
**Sent:** Friday, February 09, 2018 8:03 AM  
**To:** sarahlee@mycarlady.com  
**Cc:** DMV directorsoffice <DMVdirectorsoffice@dmv.nv.gov>  
**Subject:** Re: Registration Services

Ms. Marks-

Thank you for your correspondence outlining your concerns. I am the Administrator over Field Services, the Division responsible for all 18 offices across Nevada that provide DMV Registration and Licensing services to our residents. My responses to your concerns are on behalf of Field Services and not Motor Carrier as that is not my division. I believe my responses may help you understand our responsibilities as a State agency.

The Nevada DMV is responsible for efficiently assisting the citizens of Nevada in obtaining identity documents, driving privileges, vehicle ownership documents and many other services. We also have staff who work with our customers who are non-English speaking. While we appreciate Registration Services have found a way to get people to pay high fees for services we provide for free with no wait, we cannot base our service model around private for profit companies completing a transaction on behalf of customers who choose to utilize your services.

As we stated in the letter, we currently offer the following avenues to accommodate registration services:

- Mail in Service for batches of titles. (For approx..3 years this has been and will be continue to be done in Carson City where our specialty title printers are located.)
- If available, one 30-minute standing appointment, per business, at a window per day. (No new applications for appointments will be accepted.)
- Leaving the transactions at the service window (Batches completed within 5-working days.) This is done at the office the paperwork is dropped off at by staff as time allows.

The DMV is not legally required to offer these services but we do so as a courtesy. I am uncertain as to how changing this process from the window to a batch drop off with a reasonable turnaround time is a financial burden?

AAA provides over the counter transactions in partnership with DMV. This was well publicized and testified to throughout the entire 2017 Legislative session and is done at zero cost to our citizens or the State of Nevada. AAA provides this service for no fee to not just AAA members, but all citizens of Nevada needing to do a transaction that is offered in their office. Like the DMV, AAA promotes safe roads and drivers and is a partner with a global presence, proven reputation and many years of over the counter DMV transaction processing experience in multiple jurisdictions across the United States.

The Nevada DMV prides itself on offering hundreds of services online to those we serve through A DMV Web Portal account, partner location kiosks and the AAA partnership. When a customer has to come to the DMV an appointment can be made which alleviates wait times . As we expand our service outlets, we will continue to evaluate and eliminate those that are not necessary and reallocate resources to uphold our responsibility to the citizens we serve.

If you have any additional concerns, please feel free to contact me.

Respectfully,

*Tonya R. Laney, CPM*  
Administrator  
Field Services Division  
Nevada Department of Motor Vehicles  
Phone: 775-684-4791  
Fax: 775-684-4933  
tlaney@dmv.nv.gov

Dear Director Teri Albertson and esteemed members of our state legislature,

This letter is to address the DMV's letter indicating the complete elimination of the Business Registration Service and Standby Window (Effective March 5, 2018) at all four DMV offices in the Las Vegas valley. These windows help licensed and bonded registration services such as mine to expedite the completion of titles and a multitude of registration transactions exponentially, while keeping the costs to the state at a minimum.

The production and efficiency of these windows cannot be overlooked. With over 2.1 million residents in Clark county and only 4 main DMV offices to help serve them, processing transactions correctly and as fast as possible is the DMV's main goal as well as mine. The DMV's own transaction records will show the disparity in the number of transactions processed at a Registration Services window (Standby or appointment) in comparison to a regular window assisting the public daily. Since I prepare all the documents and payment arrangements before ever setting foot inside of a DMV office my business has already saved the DMV countless hours that DMV technicians spend just waiting for customers to find the proper paperwork, fill out forms, and process the actual payment for their service. I also provide translation services to my minority customers as well as dedicate the time to properly explain the correct paperwork and the breakdown of costs the DMV will be charging them. This process alone can take anywhere from 15 minutes to 1 hour depending on the transaction. All of this is provided by my business at no cost to the state of Nevada.

If efficiency is the goal, then eliminating the most efficient windows at each office is counterproductive. In the 2 minutes that each DMV technician is required to wait after calling a customer's number from the queue, I have already processed 1-2 transactions at the standby window. With an average technician I can process 12-15 transactions every 30 minutes at the standby window while the average technician at a regular window will process 2-3. This is a 400%-700% increase in efficiency.

The position from the appropriate DMV administrators is "While we appreciate Registration Services have found a way to *GET PEOPLE TO PAY HIGH FEES FOR SERVICES WE PROVIDE FOR FREE WITH NO WAIT* (emphasis is my own), we cannot base our service model around private for profit companies completing a transaction of behalf of customers who choose to utilize your services"

- Tonya R. Laney, CPM

Administrator

Field Services Division

I feel it is an error to conflate the cost of a private business transaction between Nevada citizens as having anything to do with the efficient processing of DMV transactions as that is the DMV's primary responsibility to these same Nevadans. My business is separately licensed by the Nevada Secretary of State's office as well as bonded as a requirement of that license. I am following all the proper requirements to conduct business. I feel that inferring that my business having a cost for a service that we provide is an unethical position is wrong. It also assumes what the priorities of Nevada citizens are.

As an example, the Nevada justice system provides services for free to Nevadans to process traffic violations and other legal matters. Some Nevadans choose to hire representation at varying costs in these matters, so they don't have to show up to court personally. Their time is worth more to them than the cost of the service. My business operates on the same principal. My clients time is worth more than the headache and time spent going to the DMV personally. Retaining a day's wages and paying for a service is more valuable to them in comparison to the alternative of showing up and handling it in person.

I moved from Puerto Rico to Las Vegas when I was six years old. I've grown up and lived in the Las Vegas area my entire life. I graduated from Rancho High school in east Las Vegas and I started my company when I was 23 years old. I have been in the Registration Service business for 10 years. I dedicate over \$8000.00 a year in state/county/city licenses, bonds, insurances to operate legally and protect my business and my clients. That does not including what I pay for rents, taxes, advertising, logistics etc.. I am responsible for the income of 22 employees as well as the financial stability of their dependents. I have multiple locations and I am only one of many services like this in the valley.

I ask for you to make some time out of your busy schedules to meet with me or representatives from my industry to discuss this matter and prevent the catastrophic impact and loss of jobs as a consequence of these policy changes. There are hundreds of jobs and thousands of Nevadans that are impacted by these decisions. Thank you for your time.

Sincerely,

Rafael Arroyo

Smog Plus DMV Services

702-217-2760

smogplusLLC@gmail.com

Good Morning Rafael-

Assemblywoman Carlton has been travelling, but I did touch base with her again yesterday, and she is going to review some communications I have forwarded to her. I have also spoken with Assemblyman Flores who is willing to come to the meetings to offer his assistance as well.

A meeting will not be able to occur until approx. April, at the earliest. In the communication you will receive, we have reiterated that we do not see, or want to see, an impact to the customers. Between the standing appointments, and the drop off service, we will gather data to see how the program can evolve going forward, what staffing needs are necessary on DMV's side, true impacts of the implementation, etc. We need to implement this process and see the impacts to determine future directions of our operations.

In looking at our schedules, you are fortunate to have a standing appointment every day of the week, with multiple appointments on Wednesdays.

The DMV is evolving with technology, and we are encouraging more and more the use of alternate technologies to complete the business that is not required to come into a DMV office. With the change in technologies and service offerings in both the public and private sectors, the DMV must also evolve and change. We would also like to see the services evolve and change to be more modernized, but as we do not regulate this industry, we cannot take that into consideration, only try to work with the industry to understand where DMV is heading and hope they are able to evolve as well.

One point that I would like to make clear, that I'm not sure is realized by the services, or even been communicated appropriately by myself or staff, is that even though the turnaround time to be handed back batch work is up to 5 days, the customer is credited the day of the drop off. We will not be penalizing customers with late fees for requests made on time, that we may not get to until the next business day, etc. to process. This works similarly to when a customer registers their vehicle at an Emissions station. We know they wait till the last day, last minute. They go to the Emissions station, get a passing Smog and register in the same location. They do not have their new sticker or paperwork in hand as they receive it at the address of record once processed with DMV, but they are driving legally. Law Enforcement can also see this on their end, and DMV documents hold up in court for any discrepancies.

With this process, as already proven successful in the North, and with the multiple dealerships we deal with one on one, we have never run into any issues.

Thank you for diligence in following up, and willingness to work together to create a process that benefits our community. I will forward additional communication once the review has been completed.

*Tonya R. Laney, CPM*

Administrator  
Field Services Division  
Nevada Department of Motor Vehicles  
Phone: 775-684-4791  
Fax: 775-684-4933  
tlaney@dmv.nv.gov

Dear Mr. Arroyo Sr.:

February 26, 2018

**Re: Changes for Document Preparation Services at Nevada DMV**

All Interested Parties-

The Nevada DMV has received your correspondence and calls, both indirectly and directly, and have heard your concerns. The DMV respectfully requests that you try the batch drop off service being arranged specifically for your services for a period of at least 30 days. After thorough conversations and research, we see no impact to our customers as their transaction is dated the day of the drop off. As stated in prior communication, we will not be changing your standing appointments, and ask that you arrange your service offerings around your standing appointments in addition to the supplementary options we are offering you. We implemented this process in Northern Nevada, effective January 2, 2018, with notifications going out to the 30 services seen by Carson DMV within the previous 6 month period of the notice date. Out of that 30, 4 services came forward with the same concerns, prior to the effective date of change. After trying the process, to this date, we have received 0 complaints of impact from any of the 30 services.

Throughout this 30 day period, we will be very cognizant of the impact to DMV, Nevada citizens and your services. We will determine future steps necessary while attempting to accommodate both the constituents that we serve and your services, as in most cases we do see efficiencies in the numbers of customers brought forth by your services vs individual customers in our offices.

Nevada DMV is dedicated to continuing these conversations to reach a long term solution. A couple Assembly representatives and I have spoken. They have graciously agreed to dedicate their valuable time to furthering discussions with the DMV and a select group of document preparation services, with all of us together at the same table. These meetings will be held in Las Vegas to allow in person attendance without the financial burden of travel costs. The goal is to begin these discussions after April 5 so statistics and learning experiences from the trial period can be included in the discussions.

Moving forward, these discussions will assist us in creating language to bring forward during the Legislative session to properly put in place regulations that safeguard the integrity of the DMV, document preparation services, and most importantly, the constituents we are responsible for serving and protecting.

*Tonya R. Laney, CPM* Administrator, Field Services Division [tlaney@dmv.nv.gov](mailto:tlaney@dmv.nv.gov)

**TICK SEGERBLOM**  
 SENATOR  
 District No. 3



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## Nevada Senate

SEVENTY-NINTH SESSION

February 26, 2018

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The Honorable Brian Sandoval  
 Governor  
 State of Nevada  
 101 North Carson Street  
 Carson City, Nevada 89701

Dear Governor Sandoval:

I know you have made it a priority of your administration to improve employment prospects in all areas of our great State. Naturally, I admire your drive for creating jobs and expanding opportunities. Unfortunately, the Department of Motor Vehicles (DMV) is eliminating what is known as "standby window" service that may hurt the infant industry of private professional registration services in Nevada just as it starts to grow. It also may harm Nevadans whose busy lives do not allow them the extended time necessary to wait in line at southern Nevada based DMV offices to complete their vehicle transactions. I respectfully request that you ask Terri L. Albertson, Director of the DMV, to delay implementing the new policy concerning how transactions of private professional registration services are handled at the DMV, at least until a proposed meeting of the registration industry, legislators, and the DMV has taken place.

Recently, I learned from business owner Rafael Arroyo that the DMV proposes to abolish the "standby window" at Las Vegas Valley offices where professional DMV service providers could quickly process transactions for their clients. These professionals have the needed forms in order by the time they reach the window and that substantially lowers the amount of time needed to complete the transactions. Not surprisingly, the average Nevadan may only be registering a new vehicle every six or seven years, if that. Papers may not be filled out, payment options not known, or insurance for the vehicle may not be properly documented, all of which takes additional time to sort and further extends the DMV wait time. I do not understand how eliminating the standby windows will do anything but create longer lines. The public may be less inclined to use the professional DMV registration services, which just means larger crowds at already crowded DMV offices.

Governor Sandoval

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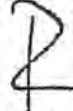
February 26, 2018

I understood that the DMV had agreed to meet with a group of legislators, several providers of DMV registration services, and other affected businesses about eliminating the "standby window." Now it appears that the DMV will still look to have a meeting with these interested parties; however, it will not happen until at least April, well after the March 5, 2018, implementation date. The concerned groups coming together is welcome, as dialogue continues between the industry and DMV solutions may be created that cut wait times without influencing a vital service to southern Nevadans to cut staff or, worse, completely close for business. There may be irreparable harm done to these businesses and the families that count on them for financial support if the policy to close the standby window is implemented prior to receiving the industry's input.

I do applaud the DMV's effort to create a partnership with AAA Northern California, Nevada and Utah (AAA NCNU) allowing more options for people to complete their necessary DMV business. Expansion of choices should be just that—adding to what is already available and not cutting back on what is already in place and seems to be working well. No one is required to use the professional services of Mr. Arroyo or any of the other 38 businesses, including many minority or women owned, that he contacted. These service providers will be negatively affected by the removal of the standby window service at the DMV offices.

Once again, I request your intervention in this matter by asking Director Albertson to postpone eliminating the standby windows permanently until after meeting with the interested stakeholders. Please feel free to use the contact information above should you have any questions or concerns you would like to discuss.

Sincerely,



Tick Segerblom  
Nevada State Senator

TS/tlc:CW180751-1

cc: Director Terri L. Albertson, DMV

~~cc: Director Terri L. Albertson, DMV~~ ✓