



NATIONAL ARMORED CAR ASSOCIATION, INC.

Richard A. Hertling
Deputy Assistant Attorney General
Office of Legal Policy
4234 Robert F. Kennedy Building
950 Pennsylvania Avenue NW
Washington, DC 20530

RE: Docket No. OLP 100

Dear Mr. Hertling:

The National Armored Car Association (NACA) appreciates the opportunity to comment on the Department's development of the report mandated by Section 6403 of the Intelligence Reform and Terrorism Prevention Act of 2004.

NACA is the trade association of the nation's leading armored car carriers which provide secure transportation of currency for the Federal Reserve, the US Mint, depository institutions, major retailers and other US businesses. Due to the high value of the cargo carried by armored cars, and the need for crewmembers to carry lethal weapons, it is critical that applicants for employment as guards be well screened for criminal histories.

In states where weapons or security permits are required, our crews submit fingerprints for both a state and federal criminal history review. The most significant problem we face in this regard is the length of time it takes for the process to be completed. We understand that with the automation of IAFIS the federal portion of the review is efficient. However, our experience is that in many states, offices reviewing prints are under-funded leading to substantial delays in obtaining criminal history records and the subsequent state permits.

A positive development for this process is the expansion of the electronic submission of prints by states to IAFIS. We are hopeful that those states which do not submit civil prints to IAFIS will be encouraged to do so soon. In addition, when making recommendations to Congress, consideration should be given to providing assistance to states to help them speed the processing of the criminal histories.

Of course, armored car carriers conduct thorough background checks on job applicants and do not rely solely on the screening done as part of the permitting process. We are fully cognizant of the fact that not every courthouse submits records on a timely basis to the federal repository. We do utilize expert private background screening firms which review the courthouse records and obtain details not always available through IAFIS. It is critical that they continue to be able to conduct these criminal history checks. In addition, some of these firms rely on private databases to assist them in determining which courts are in possession of the essential records.

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NACA would be pleased to provide any additional input that may be helpful to the Department. Again, thank you for providing this opportunity.

Sincerely,

Michael Gambrill
President