



PENNSYLVANIA STATE ASSOCIATION OF TOWNSHIP SUPERVISORS

#2661

April 23, 2008

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APR 30 REC'D

INDEPENDENT REGULATORY
REVIEW COMMISSION

9:06 AM

Ms. Syndi L. Guido, Policy Director
Pennsylvania State Police
1800 Elmerton Avenue
Harrisburg, PA 17110

Dear Ms. Guido:

We have reviewed the proposed regulation #17-75-79 (IRRC #2661), Retired Law Enforcement Officers Identification and Qualification Cards, and have the following concerns that we feel need to be addressed.

The proposal stipulates that the appropriate law enforcement agency shall provide a law enforcement officer who has retired in good standing with an identification card. Our question is whether the law enforcement agency has to reissue the identification cards periodically or only replace lost, stolen, or illegible cards? Not knowing what these cards can be used for other than acquiring a "qualification card" we are concerned that liability may fall on the law enforcement agency and the municipality.

The final issue is whether the law enforcement agency has any obligation to notify the Commission once it has issued a "retired law enforcement identification card." The proposal stipulates that the law enforcement agency must provide the card, yet there may be circumstances that may preclude the issuance of the "qualification card." Is it the law enforcement agency's responsibility to notify the commission and is there any potential liability if they do not?

We appreciate your consideration of our concerns and look forward to your response.

Sincerely,

Elam M. Herr
Asst. Executive Director

EMH:dll

cc: Independent Regulatory Review Commission