

JUDICIAL COUNCIL OF CALIFORNIA

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REPORT TO THE JUDICIAL COUNCIL

Item No.: 20-118

For business meeting on: September 25, 2020

Title

Criminal Procedure: Ignition Interlock Forms

Rules, Forms, Standards, or Statutes Affected Revise forms ID-100, ID-110, ID-120, ID-130, ID-140, ID-150

Recommended by

Criminal Law Advisory Committee Hon. J. Richard Couzens, Chair **Agenda Item Type**

Action Required

Effective Date

January 1, 2021

Date of Report

September 25, 2020

Contact

Sarah Fleischer-Ihn, 415-865-7702 Sarah Fleischer-Ihn@jud.ca.gov

Executive Summary

The Criminal Law Advisory Committee recommends revising the criminal forms implementing ignition interlock device requirements to conform to statutory changes on reporting, compliance, and monitoring requirements; increase clarity and usability; and make nonsubstantive technical changes.

Background

In 1993, the Judicial Council adopted six forms to assist courts with ordering and monitoring the use of ignition interlock devices ("IID") in criminal cases. The forms were based on Vehicle Code sections 23575 and 23576. The forms were last amended over 10 years ago and do not reflect statutory changes made by Assembly Bill 762 (Stats. 1998, ch. 756), Senate Bill 485 (Stats. 2001, ch. 473), and Senate Bill 1046 (Stats. 2016, ch. 783). The proposed amendments to the forms reflect the changes in each of these revisions to the statutes.

Historically, Vehicle Code section 23575 outlined the court's role in ordering and monitoring ignition interlock devices, making it optional for the court to order IIDs for persons convicted of

driving under the influence¹ and mandatory for those convicted of driving on a suspended or revoked license.² Senate Bill 1046 (Stats. 2016, ch. 783), established a statewide pilot program from January 1, 2019 to January 1, 2026, and added a separate code section mandating installation of IIDs for persons convicted of driving under the influence.³

The proposed changes to the IID forms comply with the current version of section 23575 with respect to suspended/revoked license referrals, but do not address the pilot program for driving under the influence referrals. Given the limited role of the courts in the pilot program, there is no separate proposed Judicial Council form.

Recommendation

The Criminal Law Advisory Committee recommends that the Judicial Council, effective January 1, 2021, renumber and revise six forms, identified below, addressing ignition interlock devices ordered in criminal cases. The proposed changes would revise the forms to conform to the requirements and language of Vehicle Code sections 23575 and 23576 and increase clarity and usability. The proposed changes would also make nonsubstantive technical changes to all six forms, including adding a field for defendant's email address and fax number, and adding "State" to the address fields.

- 1. Order to Install Ignition Interlock Device (form ID-100)
 - Renumber as **CR-221**;
 - State that the defendant may return a copy of the Department of Motor Vehicle's installation verification form in lieu of the Judicial Council's installation verification form, in order to streamline the process;
 - Conform to updated statutory language in Vehicle Code section 23576 by referencing motor vehicles and replacing "wholly" with "all;"
 - Delete the advisement that failure to comply with any court order is a violation of the order, as unnecessarily broad;
 - Delete the advisement that failure to maintain current license and registration on any vehicle owned by the defendant is a violation of the order, since it is duplicative of language on page 1; and

revert monitoring duties back to the court.

¹ Veh. Code, §§ 23152, 23153.

² Veh. Code, § 14601.2.

³ Section 23575 was amended, effective January 1, 2019, to January 1, 2026, deleting the subdivision applying to driving under the influence but maintaining the subdivision on driving on a suspended or revoked license. The bill added a separate code section, Veh. Code, § 23575.3. Under this statute, courts are required to notify persons convicted of driving under the influence of the requirement to install an IID, but the Department of Motor Vehicles largely monitors installation and maintenance. Under SB 1046, the former version of section 23575 would go back into effect on January 1, 2026. This would again make IID installation for driving under the influence optional and

- Conform to the requirements of Vehicle Code section 23575 through the following:
 - Delete the requirement for installation to occur no later than 30 days from the date of conviction;
 - Delete the advisement that the order is violated if defendant fails to return a completed copy of the verification form to the court or probation within the time limit specified in the order;
 - Delete the advisement that the order is violated if defendant defaults on any payment plan arranged with the installer or ordered by the court, absent a showing in court of good cause;
 - Delete the statement on affirmative defenses to specified violations if the defendant can show that a vehicle was leased, rented, or borrowed for emergency use when no other feasible alternative was available, or for a bona fide business purpose when away from defendant's regular place of business;
 - Delete the "Your Rights" section addressing medical exemptions and the ability to petition the court to review whether continued restrictions are necessary if driving privileges are restored; and
 - o Reflect updated statutory language on recalibration and monitoring requirements.

2. Ignition Interlock Installation Verification (form ID-110)

- Renumber as **CR-222**;
- Delete the statement that the declaration by the installer is under penalty of perjury, as the statute does not require a sworn statement;
- Delete the requirement for the original form to be sent to the court, and add a line directing the defendant to return a completed and signed form to the court; and
- Delete the line stating "Distribution: Court, Manufacturer or Manufacturer's Agent, Defendant, Probation Department," as the distribution requirement appears unnecessary and is not required by statute.

3. Ignition Interlock Calibration Verification and Tamper Report (form ID-120)

- Renumber as CR-223;
- Convert this form to address only calibration verification, and move the tamper report provisions to *Ignition Interlock Noncompliance Report* (form ID-130/proposed form CR-224);
- Delete the statement that the declaration by installer is under penalty of perjury, as the statute does not require a sworn statement;
- Update the notice section to the defendant regarding missed appointments and payments to better reflect existing practice; and
- Delete the line stating "Distribution: Court, Manufacturer or Manufacturer's Agent,
 Defendant, Probation Department," as the distribution requirement appears unnecessary
 and is not required by statute.

- 4. *Ignition Interlock Noncompliance Report* (form ID-130)
 - Renumber as CR-224;
 - Include the tamper report provisions currently in form ID-120;
 - Include a statement for the installer to indicate that the defendant failed to comply with a requirement for the maintenance or calibration of the device on three or more occasions, as required by Vehicle Code section 23575;
 - Include a statement for the installer to indicate signs of removal, attempt to bypass, attempt to remove, or tampering as required by Vehicle Code section 23575; and
 - Delete the statement that the declaration by installer is under penalty of perjury, as the statute does not require a sworn statement.
- 5. Ignition Interlock Removal and Modification to Probation Order (form ID-140)
 - Renumber as CR-225.

Notice to Employers of Ignition Interlock Restriction (form ID-150)

- Renumber as CR-226;
- Conform to Vehicle Code section 23576(a) by specifying that the ignition interlock device be functioning and certified; and
- Conform to Vehicle Code section 23576(b) by adding a provision that a motor vehicle owned by a business entity that is all or partly owned or controlled by the defendant is not a motor vehicle owned by the employer subject to the exemption in Vehicle Code section 23576 (item #4 on proposed form CR-226).

The revised forms are attached at pages 7–13.

Relevant Previous Council Action

In 1993, the Judicial Council adopted six forms to assist courts with ordering and monitoring ignition interlock devices ("IID") in criminal cases, based on Vehicle Code sections 23575 and 23576. The forms were last amended over 10 years ago and do not reflect changes to both statutes.

Analysis/Rationale

The recommended changes to the IID forms comply with the current versions of Vehicle Code sections 23575 and 23576.

The forms are currently identified as "ID" forms. ⁴ The Rules Committee previously recommended shifting the forms to the criminal category, identified with the "CR" designation, which is reflected in the recommended changes.

Policy implications

The revisions are recommended so that the IID forms reflect existing statutory provisions. No further policy implications were discussed by the committee.

Comments

This proposal circulated for comment from April 10 through June 9, 2020, and received comments from two superior courts and a local bar association. Two commenters agreed with the proposal. The Superior Court of Orange County agreed with the proposal if modified, suggesting a nonsubstantive technical change to *Ignition Interlock Noncompliance Report* (form ID-130/CR-224) to avoid confusion in identifying the vehicles involved. The committee agreed with this suggestion, which is reflected in proposed form CR-224 on page 11. The committee's specific responses to each comment are available in the attached comments chart at pages 14–16.

Three of the original forms had required the installer to sign a declaration under penalty of perjury—a requirement which the committee recommends removing because it is not required by Vehicle Code section 23575. There was concern that the absence of a sworn statement could limit the court's ability to fulfill its statutory monitoring requirement, as the court would have limited recourse for a falsified document. Therefore, the proposal that circulated replaced the declaration with a statement of truth and correctness, and specifically sought public comment on the issue. The proposal received no comments expressly objecting to the change and one expressly agreeing with it.

Alternatives considered

The committee conducted an informal survey of courts to determine usage of the forms. Several courts responded that they used the forms, so the committee decided to move forward with the proposed changes.

Fiscal and Operational Impacts

Expected costs are limited to training, possible case management system updates, and the production of new forms. No other implementation requirements or operational impacts are expected.

Attachments and Links

- 1. Forms CR-221, CR-222, CR-223, CR-224, CR-225, and CR-226, at pages 7-13
- 2. Chart of comments, at pages 14–16

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⁴ E.g., forms ID-100 and ID-110.

- 3. Link A: Vehicle Code section 23575, http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=23575.&law_Code=VEH
- 4. Link B: Vehicle Code section 23576, http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=23576.&law_Code=VEH

s	UPERIOR COURT (OF CALIFORNIA, CO	UNTY OF			FOR COURT USE ONLY	
ST	REET ADDRESS:						
MA	AILING ADDRESS:						
	TY:			STATE:	ZIP CODE:	DDAFT	
BF	RANCH NAME:					DRAFT	
	AME OF DEFENDANT:					Not approved by the Judicial Council	
	FREET ADDRESS:					the dudicial council	
	AILING ADDRESS: TY:			STATE:	ZIP CODE:		
	ELEPHONE NO.:			FAX NO.:			
EN	MAIL ADDRESS:						
DF	RIVER'S LICENSE NO.:						
	Ol	RDER TO INSTAI	LL IGNITION I	NTERLOCK	DEVICE	CASE NUMBER:	
	der Vehicle Code erated by defenda		court orders: a	functioning <mark>, c</mark>	ertified Ignition Inter	lock Device installed on the following vehicles	
	<u>Make</u>	Model	Year	Color	License Plate N	o. and/or VIN	
	a						
	b.						
	C.						
1.	Installation of an	<mark>ignition interlock de</mark>	vice on a vehicle	does not allo	w defendant to drive	e without a valid driver's license.	
2.	Installation must	be no later than <mark>(da</mark>	te):				
3.	Defendant must p	present this form to	the installer at th	e time of insta	allation.		
4.		return completed <i>Igi</i> stallation—Ignition II				or the Department of Motor Vehicles	
5 .	Defendant must	take vehicles to the	installer <mark>to recal</mark>	ibrate or moni	tor the device:		
	once every 6	60 days	er (specify freque	ency):		following the date of installation.	
3.	Without a court o	rder, the devices m	ay not be remove	ed prior to <i>(sp</i>	ecify a date no later	than three years from the date of conviction):	
7.	7. Defendant's employer requires defendant to drive a motor vehicle owned by the employer within the course and scope of defendar employment. Defendant must provide the employer with the Notice to Employers of Ignition Interlock Restriction (form CR-226) no later than (specify date): Defendant must keep a copy of the Notice to Employers of Ignition Interlock Restriction in defendant's possession or keep the original or a copy in the employer's vehicle.						
3.		maintain current ins					
9.	Other (specify):						
De	te:				l acknowledge re	ceipt of this order.	
Ja					\	•	
	(TYPE O	R PRINT NAME OF DEFEND	PANT)			(DEFENDANT'S SIGNATURE)	
-			•			•	
Ja	te:					UDICIAL OFFICER OF THE SUPERIOR COURT Page 4 of 2	
					J	ODICIAL OFFICER OF THE SUPERIOR COURT	

ORDER TO INSTALL IGNITION INTERLOCK DEVICE

CASE NUMBER:

What is a violation of this order?

- 1. Failure to have ignition interlock devices installed as ordered.
- 2. Failure to show proof of installation to the court within the time limit specified in this order.
- 3. Failure to comply three or more times with any requirement for the maintenance or calibration of the ignition interlock devices.
- 4. If defendant has a valid driver's license, driving any vehicle without an ignition interlock device except for employer-owned vehicles required to be operated within the course and scope of employment. A motor vehicle owned by a business entity that is all or partly owned or controlled by defendant is not a motor vehicle owned by an employer subject to the exemption.

What will happen if you violate this order?

Under Vehicle Code section 23575, if a defendant fails to comply with this court order the court must notify the Department of Motor Vehicles.

Violation of the following is a misdemeanor and can be punished by imprisonment in the county jail and/or a fine:

- 1. Failure to notify any person who rents, leases, or loans a motor vehicle to defendant of the restriction imposed by this order.
- 2. Requesting or soliciting any person to blow into an ignition interlock device or to start a motor vehicle equipped with the device for the purpose of providing defendant with an operable motor vehicle.
- 3. Operating a vehicle not equipped with a functioning ignition interlock device.
- 4. Removing, bypassing, or tampering with an ignition interlock device.

Defendant: Call the ignition interlock device installer and arrange for the installation of the device(s). The court will provide you with a list of manufacturers certified by the Department of Motor Vehicles. Contact a certified manufacturer to locate an installer.

SUPERIOR COURT OF CALIFOR	FOR COURT USE ONLY				
STREET ADDRESS:					
MAILING ADDRESS:					
CITY:	STATE:	ZIP CODE:			
BRANCH NAME:					
NAME OF DEFENDANT:				DRA	AFT
STREET ADDRESS:	Not appr	oved by			
MAILING ADDRESS:				the Judicia	
CITY:	STATE:	ZIP CODE:			
TELEPHONE NO.:	FAX NO.:				
E-MAIL ADDRESS:					
DRIVER'S LICENSE NO.:					
DATE OF COURT ORDER:					
				CASE NUMBER:	
IGNITION INTE	ERLOCK INSTALLATION	VERIFICATION			
 Manufacturer: Facility Location (addres) Vehicles: 	s):				
<u>Make</u> a. b.	<u>Model</u>	<u>Year</u>	<u>Color</u> <u>l</u>	<u>License Plate No.</u>	<u>VIN:</u>
c.					
4. Serial nos. of units:	a.	b.		C.	
5. Odometer reading:	a.	b.		C.	
6. Date of installation:	a.	b.		C.	
 Date of next monitor check: 	a.	b.		C.	
I declare that the information pr	ovided is true and correct.				
, accidio <mark>and ano anomicano p</mark> i					
Date:					
			•		
(TYPE OR PRINT NAM	IE OF INSTALLER)		<u> </u>	(SIGNATURE OF INSTALLER)
Defendant: return a completed	and signed form to the sou	urt			

Defendant: return a completed and signed form to the court.

For installer use only:

SUPERIOR COURT OF CALIF STREET ADDRESS: MAILING ADDRESS:	FOR COURT USE ONLY		
CITY: BRANCH NAME:	STATE	ZIP CODE:	DRAFT
NAME OF DEFENDANT: STREET ADDRESS: MAILING ADDRESS: CITY: TELEPHONE NO.: EMAIL ADDRESS; DRIVER'S LICENSE NO.: DATE OF COURT ORDER:	STATE FAX N		Not approved by the Judicial Council
	ERLOCK CALIBRATIO	N VERIFICATION	CASE NUMBER:
Defendant's name: Installer's name: Address: City:		State:	Zip Code:
Telephone no.: 3. Vehicles:	Model	Voor Color	
<u>Make</u> a. b. c.	<u>Model</u>	<u>Year</u> <u>Color</u>	<u>License Plate No.</u> <u>VIN:</u>
4. Installation date:	a.	b.	C.
5. Odometer reading:	a.	b.	C.
6. Calibration setting:	a.	b.	C.
7. Unit serial no.:	a.	b.	c.
8. Program to end (date):	<u></u>		
9. The system is in ca	alibration [] a. [een inspected and is functio] bc. ning properlya	□ b. □ c.
11. Payment of \$ a. Credit card	+ sales tax \$	Total collected \$	
I declare that the information	n provided is true and corre	<mark>ct</mark> .	
Date:			<u> </u>
			(SIGNATURE OF INSTALLER)
days after a missed monitor to have your car towed to the Your next payment of \$ payment is not made, the sy	ing check, the system will sine calibration location. You is due at the above mystem may shut down and y	hut down and you will be unal <mark>may also owe a missed appoi</mark> onitoring check. Payment mus	st be made in full before service is performed. If our car. This will result in a service call that will be
I acknowledge receipt of a c	opy of this form.		
Date:			<u> </u>
			(SIGNATURE OF DEFENDANT)

Page 1 of 1

5	SUPERIOR COURT OF CALIFO	RNIA. COUNTY O	F			
	STREET ADDRESS:	,				
N	MAILING ADDRESS:					
	CITY:		STATE:	ZIP CODE:		
	BRANCH NAME:				DRAFT	
1	NAME OF DEFENDANT:				Not approved b	1
	STREET ADDRESS:					
	MAILING ADDRESS:				the Judicial Cour	ncil
	CITY:		STATE:	ZIP CODE:		
-	TELEPHONE NO.:		FAX NO.:			
E	EMAIL ADDRESS:					
[DRIVER'S LICENSE NO.:					
r					CASE NUMBER:	
	IGNITION INT	ERLOCK NON	COMPLIANCE F	REPORT		
L						
1.	Vehicles:					
١.			.,	<u> </u>	<u>icense Plate No.</u>	
	<u>Make</u>	<u>Model</u>	<u>Year</u>	Color a	and/or VIN	
	a.					
	b					
	b.					
	C.					
_						
2.					ion of the ignition interlock device	е
	installed in the vehicle	e indicated below	on three or more	occasions:		
	Vahialaa	Date		Describe N	oncompliance	
	<u>Vehicles</u>	Date		<u>Describe in</u>	oncompliance	
	□ a. □ b. □ c.					
	□ a. □ b. □ c.					
	□ a. □ b. □ c.					
3.	The ignition interlock	device installed in	the vehicle indica	ated below showed evide	nce of:	
٥.						
	<u>Vehicles</u>	<u>Date</u>	Removal	Attempt to bypass	Attempt to remove	Tampering
	□ a. □ b. □ c.					
	□ a. □ b. □ c.					
4	□ a. □ b. □ c.					
4.		<mark>n provided</mark> is true	and correct.			
	□ a. □ b. □ c.					
	a. b. c. I declare that the information					
	a. b. c. I declare that the informatio			<u> </u>	(SIGNATURE OF FACILITY MONITOR)	
	a. b. c. I declare that the informatio			<u> </u>	(SIGNATURE OF FACILITY MONITOR)	
	a. b. c. I declare that the informatio Date:	PRINT NAME)		<u> </u>	(SIGNATURE OF FACILITY MONITOR)	
	a. b. c. I declare that the informatio Date: (TYPE OR	PRINT NAME)		<u> </u>	(SIGNATURE OF FACILITY MONITOR)	
	a. b. c. I declare that the informatio Date: (TYPE OR Name of facility monitor (spe	PRINT NAME)		<u> </u>	(SIGNATURE OF FACILITY MONITOR)	
	a. b. c. I declare that the informatio Date: (TYPE OR	PRINT NAME)		<u> </u>	(SIGNATURE OF FACILITY MONITOR)	
	a. b. c. I declare that the informatio Date: (TYPE OR Name of facility monitor (spe	PRINT NAME)		<u> </u>	(SIGNATURE OF FACILITY MONITOR)	
	a. b. c. I declare that the informatio Date: (TYPE OR Name of facility monitor (spe	PRINT NAME)		<u> </u>	(SIGNATURE OF FACILITY MONITOR)	
	a. b. c. I declare that the informatio Date: (TYPE OR Name of facility monitor (spe	PRINT NAME)		<u></u>	(SIGNATURE OF FACILITY MONITOR)	

Telephone number of facility (specify):

SUPERIOR COURT OF CALIFORNIA,	COUNTY OF			FOR COURT USE ONLY
STREET ADDRESS: MAILING ADDRESS:				
CITY:	STATE	ZIP COD	E:	DRAFT
BRANCH NAME:				Not approved by
NAME OF DEFENDANT:				the Judicial Council
STREET ADDRESS: MAILING ADDRESS:				the Judicial Council
CITY:	STATE	ZIP COD	E:	
TELEPHONE NO.:	FAX NO	D.:		
EMAIL ADDRESS:				
DRIVER'S LICENSE NO.:				CASE MUMBER
	NTERLOCK REMO ION TO PROBATI			CASE NUMBER:
Order to change vehicle:	s . The above-named	defendant has	approval of th	e court to change the ignition interlock device
(system serial number: a. Remove from vehicle:	-) to another ve	
<u>Make</u>	<u>Model</u>	<u>Year</u>	Color	License Plate No. and/or VIN
b. Reinstall in vehicle:				
<u>Make</u>	<u>Model</u>	<u>Year</u>	<u>Color</u>	License Plate No. and/or VIN
Order for additional instance designated below by (date) Make		named defenda Year	ant must install <u>Color</u>	an ignition interlock device on the vehicle <u>License Plate No. and/or VIN</u>
3. Order to remove device.				
Additional orders:				
Date:				I acknowledge receipt of this order.
(TYPE OR PRINT NA	ME)			(SIGNATURE OF DEFENDANT)
Date:				(SIGNATURE OF DEFENDANT)
				JUDICIAL OFFICER OF THE SUPERIOR COURT

Page 1 of 1

SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS:			FOR COURT USE ONLY
MAILING ADDRESS: CITY:	STATE:	ZIP CODE:	
BRANCH NAME: NAME OF DEFENDANT: STREET ADDRESS: MAILING ADDRESS: CITY: TELEPHONE NO.: EMAIL ADDRESS: DRIVER'S LICENSE NO.:	STATE: FAX NO.:	ZIP CODE:	Not approved by the Judicial Council
NOTICE TO EMPLOYERS OF IGNITIO	N INTERLO	OCK RESTRICTION	CASE NUMBER:

INSTRUCTIONS TO DEFENDANT

You are required to provide this notice to any employer who owns a vehicle that you operate in the course and scope of your employment with that employer. You are also required to keep this notice in your possession or with your employer's vehicle.

NOTICE TO EMPLOYER

1.	This is is to inform the employers of the above named defendant that the defendant is required by court order to have install on all vehicles that the defendant owns or operates, an ignition interlock device pursuant to Vehicle Code section 23575 et s			
2.	This court order is effective (date):	and will expire (date):		
3.	Note: Vehicle Code section 23576 provides:			

- "[I]f a person is required to operate a motor vehicle in the course and scope of his or her employment and if the vehicle is owned by the employer, the person may operate that vehicle without installation of a functioning, certified approved ignition interlock device if the employer has been notified by the person that the person's driving privilege has been restricted ... and if the person has proof of that notification in his or her possession, or if the notice, or a facsimile copy thereof, is with the vehicle."
- 4. A motor vehicle owned by a business entity that is all or partly owned or controlled by the defendant is not a motor vehicle owned by the employer subject to the exemption in Vehicle Code section 23576.
- 5. This notice satisfies the requirements of Vehicle Code section 23576.

SPR20-13
Ignition Interlock Forms (Revise forms ID-100, ID-110, ID-120, ID-130, ID-140, ID-150)
All comments are verbatim unless indicated by an asterisk (*).

	Commenter	Position	Comment	Committee Response
1.	Orange County Bar Association by Scott B. Garner, President	A	Does the proposal appropriately address the stated purpose?	
			Yes. The proposed updated forms appropriately conform to the requirements set forth in Vehicle Code sections 23575 and 23576 with the exception of the "under penalty of perjury" declaration by the installer.	No response required.
			Is it sufficient for an IID installer to declare that information provided is true and correct, rather than under penalty of perjury? Does this limit the court's ability to properly monitor the IID installation and maintenance as required by statute?	
			The court should not require the declaration under the penalty of perjury by the installer as the legislature did not provide for such declaration by section 23575. True and correct affirmation is sufficient. The court's ability to properly monitor the IID installation and maintenance as required by statute will not be hampered by a true and correct affirmation. On the other hand, evidentiary issues related to proof of noncompliance or tampering based solely upon the proposed calibration verification or noncompliance report court forms may arise in a hearing for a violation of probation or a new criminal prosecution.	The committee appreciates this input.
2.	Superior Court of Orange County	AM	Does the proposal appropriately address the stated purpose?	

SPR20-13
Ignition Interlock Forms (Revise forms ID-100, ID-110, ID-120, ID-130, ID-140, ID-150)
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Commenter	Position	Comment	Committee Response
		Yes, the recommended modifications to the forms appropriately address the purpose. The proposed changes accommodate the use of the form during and after the pilot program has concluded, however, step 2 of the Ignition Interlock Noncompliance Report is not clear. The use of letters to both list the vehicles and identify which vehicle was being referenced is confusing Perhaps modifying as follows may alleviate some confusion: 2 The defendant tailed to comply with a requirement for the maintenance or calibration of the ignition interlock device installed in the vehicle indicated below on three or more occasions. Is it sufficient for an IID installer to declare that information provided is true and correct, rather than under penalty of perjury? Does this limit the court's ability to properly monitor the IID installation and maintenance as required by statute?	The committee agrees with this suggestion and has modified the proposal to recommend making this change to item 2 on <i>Ignition Interlock Noncompliance Report</i> , form ID-130/CR-224, as well as to item 3 on the same form, for consistency and to further alleviate confusion.
		The phrase "under penalty of perjury" was removed because the statute does not provide for this as a requirement. This appears to be a legal question as to enforceability of the standards and practices of an installer. Would the proposal provide cost savings? If so, please quantify. The proposal will not impact the court. Nonsubstantive changes were made to the form and not the process.	No response required. No response required.

SPR20-13
Ignition Interlock Forms (Revise forms ID-100, ID-110, ID-120, ID-130, ID-140, ID-150)
All comments are verbatim unless indicated by an asterisk (*).

	Commenter		Comment	Committee Response
			What would the implementation requirements be for courts—for example, training staff (please identify position and expected hours of training), revising processes and procedures (please describe), changing docket codes in case management systems, or modifying case management systems? Minimal training would be required to inform staff of the non-substantive modifications made to the form. Would three months from Judicial Council approval of this proposal until its effective date provide sufficient time for implementation? Yes How well would this proposal work in courts of different sizes? As these forms have been in use previously, and the changes are non-substantive, the impact would be minimal.	No response required. No response required.
3.	Superior Court of San Diego County by Mike Roddy, Executive Officer	A	No specific comment	No response required.