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K H L Tan  
7 Beechwood Drive  
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CHRISTCHURCH 8051

Dear Mr Tan

Thank you for your recent emails to the NZTA's Media Manager regarding how the licence holder's names are recorded on that person's NZ photo driver licence (PDL).

#### **Evidence of Identity (EOI)**

Any person applying to obtain, replace or renew an NZ driver licence must present EOI. This is legislated for under clause 10 of the Land Transport (Driver Licensing) Rule 1999.

The surname (family name) on the EOI document is recorded in the family name section on the PDL.

Where a person has multiple family names (e.g. a double barrelled surname) then these are recorded on the PDL in the same order as on the EOI document.

The first names (including any middle names) on the EOI document are recorded in the other names section on the PDL.

Where a person has multiple first/middle/other names,) then these are recorded on the PDL in the same order as on the EOI document.

Your current NZ driver licence has your name as Kim Huat Lincoln TAN (where Tan is the family name). The order of the names on your NZ PDL has not changed since your NZ licence was issued 15 years ago and is consistent with your Singapore passport and NZ returning resident's visa.

#### **Evidence of Address (EOA)**

Any person applying to obtain, replace or renew an NZ driver licence must also present EOA. Again, this is legislated for under clause 10 of the Land Transport (Driver Licensing) Rule 1999.

The NZTA is aware that in many instances the names displayed on the EOA will not exactly match the names displayed on the EOI e.g. the EOA might not include the person's middle names. This often occurs because the EOA has not been issued without the issuer having sighted the person's EOI e.g. a person might obtain an electricity account without presenting EOI (e.g. by phoning a call centre), thus the electricity provider would not be aware that the names (or order of names) do not exactly match that on the persons EOI.

For this reason, and because the EOA is not an identity document, the NZTA will accept EOA where the name on that EOA differs slightly from the name on the EOI.

This means that you are able to use EOA with a variety of name formats, for example:

- L TAN
- Lincoln TAN
- K H TAN
- Kim Huat TAN
- K H L TAN
- Kim Huat Lincoln TAN

### **Splitting of Kim Huat**

Section 1 on the PDL shows the licence holder's surname, and your PDL correctly shows "TAN" in this section.

Section 2 on the PDL has two lines/fields for displaying the licence holder's first/middle/other names.

The NZTA's driver licence application forms also include two lines/fields. How the licence applicant completes the application form will determine how the names appear on the PDL. For example:

- If you write "Kim" in the first field and "Huat Lincoln" in the second field, then "Kim" will print on the first line and "Huat Lincoln" will print on the second line in section 2 on the PDL.
- If you write "Kim HUAT" in the first field and "Lincoln" in the second field, then "Kim Huat" will print on the first line and "Lincoln" will print on the second line in section 2 on the PDL.
- If you write "Kim Huat Lincoln" in the first field and leave the second field blank then "Kim Huat Lincoln" will print on the first line and on the second line will be blank in section 2 on the PDL.

I note from your email that you are concerned that your first names of "Kim Huat" has been split over two lines at section 2 on your PDL. When you complete the application form to renew your PDL, you can have this corrected by writing both "Kim" and "Huat" in the same field on the application form.

## **Changing Order of Names on PDL**

If you wish to change your name (including the order of names on your PDL) then you must present acceptable EOI confirming the new name (or new order of existing names).

The requirement to provide EOI confirming name changes is legislated for under clause 10 of the Land Transport (Driver Licensing) Rule 1999.

The NZ Department of Internal Affairs (DIA) has an existing process whereby those born outside NZ can register a name change in NZ. For further information please see the DIA's website [www.dia.govt.nz](http://www.dia.govt.nz).

## **Data Integrity & Fraud Prevention**

The purpose of requiring names to be listed on the PDL in the same order as on the EOA and presenting acceptable name change EOI is to have accurate data on the national driver licence register and to prevent fraud, thus helping to protect the integrity of the NZ driver licensing regime.

If the NZTA were to allow individuals to choose to have their PDL issued with given names in an order different to how they are recorded on their EOI, this would allow individuals to hold driver licences in two (or more) different names, which would enable fraudulent activity as well as compromising road safety by allowing an individual to provide police with different driver licences at the roadside.

Below are three examples of what can happen when robust EOI processes are not in effect or adhered to.

### **Example 1:**

- A person has a passport in the name of John David SMITH.
- The person obtains an NZ PDL in the name of John David SMITH, with the licence number AB123456.
- The person obtains a second NZ PDL in the name of David John SMITH, with the licence number BA654321.
- The person alternates which PDL they present to a Police officer when being ticketed.
- The person accumulates 60 active demerit points on licence number AB123456.
- The person also accumulates 60 active demerit points on licence number BA654321.
- Usually a person has their driver licence suspended for three months if they accumulate 100 active demerit points.
- However, with the demerit points spread over two discrete PDLs, the offender is able to avoid the penalty of having their PDL suspended.

Example 2:

- A person has a passport in the name of John David SMITH.
- The person obtains an NZ PDL in the name of John David SMITH, with the licence number AB123456.
- The person obtains a second NZ PDL in the name of David John SMITH, with the licence number BA654321.
- The person is apprehended drink driving by the Police.
- The person presents licence AB123456 and is disqualified for driving by the courts for six months.
- The person continues to drive using licence BA654321.
- Thus the offender is able to avoid the penalty of being disqualified.

Example 3:

- A person has a passport in the name of John David SMITH.
- The person obtains an NZ PDL in the name of John David SMITH, with the licence number AB123456.
- The person obtains a second NZ PDL in the name of David John SMITH, with the licence number BA654321.
- The PDL is recognised as EOI for a wide range of non-driving purposes including obtaining finance.
- The person obtains finance using the identity for licence AB123456, and then defaults on paying for the goods they have received.
- Usually this would be picked up by credit agencies (e.g. Baycorp) and future credit could be declined.
- The person could then use the identity for licence BA654321 to obtain further credit, which is then defaulted on.
- The cost of defaulted credit (e.g. hire purchase) is then passed on to other customers through higher interest rates etc...

I trust the above helps explain why the legislation (and the subsequent processes the NZTA has in place) is the way it is.

Yours sincerely



**Tony Marlow**

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