

PETITION FOR RULEMAKING

To the Honorable Chair, North Carolina Locksmiths Board PO Box 10972 Raleigh, NC 27605

Date: August 7th, 2025

Petitioner: Kenneth Wayne

Address: 1403 N. Bragg Blvd. Spring Lake, NC 28390

License Number: 2137

Pursuant to G.S. 150B-20 and 21 NCAC 29 .0601, the undersigned respectfully petitions the North Carolina Locksmiths Board to adopt a new administrative rule as detailed below. This petition seeks one specific change.

I. Proposed New Rule

(a) Citation for Rule to be Adopted: A new rule, tentatively numbered **21 NCAC 29 .010X**, to be added to Section .0100 - General Policies.

(b) Draft of Proposed New Rule:

21 NCAC 29 .010X ISSUANCE OF CREDENTIALS: The Board shall issue the official signed license certificate and the photo identification card simultaneously to each approved licensee. Both legal documents shall be delivered in a single, physical mailing to the licensee's address of record, ensuring a consistent and unified process.

(c) Statement of Effect and Rationale for Proposed Rule:

This proposed rule seeks to streamline the administrative process for issuing locksmith credentials, ensuring a consistent and unified method for all licensees. The official signed license certificate, as defined in **G.S. 74F-4(3)**, shall be mailed simultaneously with the photo identification card, as defined in **G.S. 74F-11**.

Rationale for Proposing the New Rule:

Statutory Distinction and Requirement: North Carolina law clearly distinguishes between a "License" and a "photo identification card." **G.S. 74F-10(a)** explicitly requires that licenses "shall be signed by the chair and one other officer of the Board," while **G.S. 74F-11** defines the separate function of the ID card. The current practice of providing the signed license only as a digital document, separate from the mailed ID card, creates an unnecessary two-step process that deviates from a cohesive, professional standard.

Addressing Historical Procedural Confusion: As evidenced by the NCLLB meeting minutes from February 23, 2011, there has been a documented history of confusion and procedural

changes regarding the format and issuance of licenses. This lack of a public record, combined with the fact that licensees received no information on how to access their legal licenses until recently, is what directly led to this question. The board's recent clarification validates the confusion among licensees who were unaware that the official signed certificate was a separate, digitally-retrievable document. Indeed, many licensees were not even aware that a separate, printable certificate existed at all.

Enhancing Accessibility for all Licensees: The current digital-first approach places a burden on licensees who may not be as technologically proficient. The requirement to navigate a separate website, locate, and print their official license is an unnecessary hurdle. Mailing both the license and the ID card together in one package would ensure that all locksmiths, regardless of their technical ability, receive their complete and legally required credentials in a straightforward manner.

Effect of the Proposed Rule on Existing Rules or Decisions:

This rule would establish a single, clear policy for the issuance of credentials, which would complement the existing statutory requirements of **G.S. 74F-10(a)** and **G.S. 74F-11** without conflicting with them. It resolves the ambiguity of the current process and standardizes the delivery method for all licensees.

Industry or Regulatory Practices Likely to be Affected:

Increased Clarity and Efficiency: This change would eliminate the ambiguity and confusion surrounding what constitutes a valid, posted license and how to obtain it.

Reduced Administrative Burden: A unified mailing process could simplify administrative tasks and reduce the need for licensees to contact the board for clarification on how to retrieve their credentials.

Improved Licensee Service: By providing all credentials in a single, physical mailing, the board would demonstrate a commitment to serving all licensees efficiently and without creating unnecessary technical barriers.

Identification of Persons or Class of Persons Most Likely to be Affected:

North Carolina Licensed Locksmiths would directly benefit from a more consistent and accessible process for receiving their credentials.

The North Carolina Locksmiths Board would administer a more equitable and defensible rule.

This petition is presented not as a criticism of the board's intent, but as a constructive proposal to improve the process for all North Carolina locksmiths, ensuring transparency and ease of compliance with the state's licensing laws.