

**From:** [Sunset Advisory Commission](#)  
**To:** [Trisha Linebarger](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, December 4, 2020 1:51:04 PM

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-----Original Message-----

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission  
Sent: Friday, December 4, 2020 12:47 PM  
To: Sunset Advisory Commission <Sunset@sunset.texas.gov>  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS DEPARTMENT LICENSING AND REGULATION

First Name: Richard

Last Name: Brantley

Title: Mr

Organization you are affiliated with: First Mile Defensive Driving

Email:

City: Midland

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or  
Opposed:

My name is Richard Brantley. I have been a Course Provider for Driving Safety for over 20 years. I would like to express my thoughts and concerns regarding the Sunset Commissions Key Recommendations for the governance of Driving Safety and Education Programs as regulated by the Texas Department of Licensing and Regulation.

Report citation pg 64

"4.5 Eliminate the driving safety instructor license."

Concern: It is not in the best interest of the public and safe driving to eliminate the current licensure requirements. The documented records of an instructors ability to deliver effective classroom instruction is fundamental to the quality and value of driving safety awareness and promotion . The current requirements are necessary to assure that the public is receiving quality information provided by an individual who is proficient in the subject matter. Instructors are not bound to one business or school & likewise neither is the school bound to an instructor. The free market capitalism is well suited to determine who a business or school chooses to employ as an instructor and for whom and instructors chooses to work.

4.6 "Eliminate the minimum fees driving safety course providers must charge consumers."

Concern: Elimination of the required minimum fee will diminish the quality of this program and will cause less accountability of the service providers to this industry resulting in diminished public and judicial trust.

Due in part to the consistent delivery of required and regulated instruction delivered by licensed instructors Texas has experience a 28% (see footnote) decrease in traffic fatalities per miles driven over the past 16 years. This achievement should be strongly considered as well as the growing economic loss from traffic accidents which is currently estimated to be \$39,200,000,000/Year (see footnote) for Texas drivers. The growing Texas population

obviously puts more vehicles on our roads creating a greater and greater risk for every member of the driving public.

Footnote: Citation from: Texas Department of Transportation Report:

"COMPARISON OF MOTOR VEHICLE TRAFFIC DEATHS, VEHICLE MILES, DEATH RATES, AND ECONOMIC LOSS 2003 - 2019

Any Alternative or New Recommendations on This Agency: I believe TDLR does a good job of regulating the Driving Safety and Education Industry.

My Comment Will Be Made Public: I agree