

**From:** [Sunset Advisory Commission](#)  
**To:** [Trisha Linebarger](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Tuesday, May 29, 2018 8:55:52 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Sunday, May 27, 2018 1:51 PM  
To: Sunset Advisory Commission <[Sunset@sunset.texas.gov](mailto:Sunset@sunset.texas.gov)>  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: DEPARTMENT PUBLIC SAFETY DPS

First Name: Debra

Last Name: Coffey

Title: Vice President, Government Affairs

Organization you are affiliated with: Smart Start, LLC.

Email: DCoffey@smartstartinc.com

City: Fort Worth

State: Texas

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

The Honorable Texas Sunset Commission

Chairman Birdwell, Vice Chair Paddie and Distinguished Commission Members:

By way of introduction, my name is Debra Coffey, I am Vice President of Government Affairs, having worked at Smart Start LLC for 20 years. Smart Start is headquartered in Grapevine, Texas. We are a manufacturer and service provider for Breath Alcohol Ignition Interlock Devices, celebrating our 25-year business anniversary in December 2017. Last year we surpassed

our millionth customer; we operate in 46 states and 17 countries. When I joined Smart Start, our company took part in an advisory committee that included the Tx Department of Public Safety Scientific Director and Toxicology staff, Judges, Probation Directors and Prosecutors from throughout Texas. This committee determined that Ignition Interlock standards were necessary for the integrity of interlock programs to strengthen quality operations, consistent device and delivery protocols; regardless of the manufacturer delivering service in the state. These standards and protocols became the first of its kind in the U.S. Over time, states throughout the U.S. complimented Texas by adopting and exceeding our standards and industry oversight for their state. Every state in the U.S. has some form of regulation of Ignition Interlock manufacturer's. One of the last hold outs to add any teeth to their industry regulations has been California, they are now in the process of adopting stronger protocols and oversight of ignition interlock manufacturers, having seen how the lack of standards affects the integrity and safety of an interlock program.

The Texas Department of Public Safety in 2006 and then again in 2016, reduced their oversight and some of these "gold standard "industry protocols on Interlock.

Following are what a few respected organizations have to say about Ignition Interlock Industry oversight:

AAMVA, Ignition Interlock Best Practice Guide, 2016.... states that the key to administering a successful ignition interlock program is having clearly developed regulatory standard. An updated 2018 revision will be released in August 2018. <https://www.aamva.org/best-practices/>

NHTSA, (2013, December) Model Guidelines for State Ignition Interlock Programs, states that Administrative rules and regulations are an essential component of ignition interlock programs to ensure the integrity of the program and protect the State from liability. States should develop program rules and regulations that clarify important administrative and technical features, procedures and practices associated with the ignition interlock program and that designate responsibility for its various operations.

Adequate resources are essential to ensure that administrative rules and regulations are properly implemented. The ignition interlock program authority in the State should:

Establish administrative rules and regulations in cooperation with stakeholders and other agencies involved in the delivery and use of ignition interlocks governing the State ignition interlock program.

<https://www.nhtsa.gov/search?keywords=model+guidelines+for+state+ignition+interlock+programs+&name=>  
Traffic Injury Research Foundation, TIRF USA (2011) developed a publication and guide called: Alcohol Interlock Program: Vendor Oversight <http://tirf.ca/publications/alcohol-interlock-programs-vendor-oversight/>

The Association of Ignition interlock Program Administrators (AIIPA) was formed with the mission of Improving traffic safety through the development & promotion of best practices, enhancement of program management, & provision of technical assistance to the interlock community. They are funded by NHTSA and supplemented with technical assistance by the Traffic Injury Research Foundation.

<http://www.aiipaonline.org/>

For the last 20 years, I dedicated my professional career and credibility making presentations on raising Ignition Interlock Standards throughout the U.S. I would highlight my state, The Great State of Texas, as being the Gold Standard and model for those standards and regulation.

Not having industry oversight is a public safety risk. Interlocks can become easily circumvented, when no established protocols are required. There will be no quality controls of service centers or technicians that service the devices. The public is at risk of devices not being calibrated properly.

Texas will become a home for outdated technology that other states have regulated out because of inferiority of the devices and no industry standards and oversight. Our customers and the citizens of Texas deserve to know that there is integrity and a commitment to standards when they are ordered and mandated by the court or administratively to use a technology that was developed to provide safety and separate drinking from driving.

I recommend and would support a stakeholder's meeting/ council with all stakeholders to find meaningful recommendations and solutions on how best to provide oversight to my industry. There are many best practice resources and professionals that can help guide these conversations. The Coalition of Ignition Interlock Manufacturers in cooperation with the Association of Program Administrators has worked to provide suggestions for self-sustaining programs to states, ensure interlock program integrity, high quality service and consistent delivery of product and services. In 2011, during the 82nd Legislative session, the Coalition of Ignition Interlock Manufacturers provided recommendations on ways to sustain TDPS oversight and provide additional revenue to TDPS.

Removing vendor oversight and standards would be a travesty for Texas, safety and an industry I respect, committed my reputation to, care about deeply and have grown to love. As an Ignition Interlock Industry representative, we are against this recommendation.

If you have any questions or I can provide further information, to you or staff, please feel free to contact me at your convenience.

QUICK FACTS: According to the TDPS website, Texas has 17 certified Manufacturers, 25 certified Ignition Interlock Devices and 560 service centers throughout Texas (2-28-18). Manufacturers reimburse TDPS \$450.00 a visit, every time they inspect an Interlock service center.

Respectfully,  
Debra

Debra Coffey

Debra Coffey, Vice-President, Government Affairs Board of Director, Coalition of Ignition Interlock Manufacturers  
C- 817.307.4992 O- 800.880.3394 ext. 2225 Office Direct- 469.735.4696 DCoffey@smartstartinc.com

Any Alternative or New Recommendations on This Agency:

I recommend and would support a stakeholder's meeting/ council with all stakeholders to find meaningful recommendations and solutions on how best to provide oversight to my industry. There are many best practice resources and professionals that can help guide these conversations. The Coalition of Ignition Interlock Manufacturers in cooperation with the Association of Program Administrators has worked to provide suggestions for self-sustaining programs to states, ensure interlock program integrity, high quality service and consistent delivery of product and services. In 2011, during the 82nd Legislative session, the Coalition of Ignition Interlock Manufacturers provided recommendations on ways to sustain TDPS oversight and provide additional revenue to TDPS.

I provided a matrix to Sunset Staff, providing information what state agencies throughout the U.S. typically has oversight over Ignition Interlock Manufacturers and Service centers. Typically this rests in departments where residents receive their Drivers License. I would support an alternate agency providing oversight, not discontinuing this important regulation and industry oversight.

My Comment Will Be Made Public: I agree

## Debra Coffey

May 23, 2018

Dear Chairman Birdwell, Vice Chair Paddie and Distinguished Committee Members:

By way of introduction, my name is Debra Coffey, I am Vice President of Government Affairs, having worked at Smart Start LLC for 20 years. Smart Start is headquartered in Grapevine, Texas. We are a manufacturer and service provider for Breath Alcohol Ignition Interlock Devices, celebrating our 25-year business anniversary in December 2017. Last year we surpassed our millionth customer; we operate in 46 states and 17 countries. When I joined Smart Start, our company took part in an advisory committee that included the Tx Department of Public Safety Scientific Director and Toxicology staff, Judges, Probation Directors and Prosecutors from throughout Texas. This committee determined that Ignition Interlock standards were necessary for the integrity of interlock programs to strengthen quality operations, consistent device and delivery protocols; regardless of the manufacturer delivering service in the state. These standards and protocols became the first of its kind in the U.S. Over time, states throughout the U.S. complimented Texas by adopting and exceeding our standards and industry oversight for their state. Every state in the U.S. has some form of regulation of Ignition Interlock manufacturer's. One of the last hold outs to add any teeth to their industry regulations has been California, they are now in the process of adopting stronger protocols and oversight of ignition interlock manufacturers, having seen how the lack of standards affects the integrity and safety of an interlock program.

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I recommend and would support a stakeholder's meeting/ council with all stakeholders to find meaningful recommendations and solutions on how best to provide oversight to my industry. There are many best practice resources and professionals that can help guide these conversations. The Coalition of Ignition Interlock Manufacturers in cooperation with the Association of Program Administrators has worked to provide suggestions for self-sustaining programs to states, ensure interlock program integrity, high quality service and consistent delivery of product and services.

Removing vendor oversight and standards would be a travesty for Texas, safety and an industry I respect, committed my reputation to, and care about deeply.

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Respectfully submitted,

  
Debra Coffey



Debra Coffey, Vice-President, Government Affairs  
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500 E. Dallas Road  
Grapevine, Texas 76051



MAY 21 2018

May 16, 2018

The Honorable Ronald G. Steinhart  
Public Member, Texas Sunset Advisory Commission  
P.O. Box 13066  
Austin, Texas 78711

Dear Member Steinhart:

By way of introduction, my name is Debra Coffey, I am Vice President of Government Affairs, having worked at Smart Start LLC for 20 years. Smart Start is headquartered in Grapevine, Texas. We are a manufacturer and service provider for Breath Alcohol Ignition Interlock Devices, celebrating our 25-year business anniversary in December 2017. Last year we surpassed our millionth customer; we operate in 46 states and 17 countries. When I joined Smart Start, our company took part in an advisory committee that included the Tx Department of Public Safety Scientific Director and Toxicology staff, Judges, Probation Directors and Prosecutors from throughout Texas. This committee determined that Ignition Interlock standards were necessary for the integrity of interlock programs to strengthen quality operations, consistent device and delivery protocols; regardless of the manufacturer delivering service in the state. These standards and protocols became the first of its kind in the U.S. Over time, states throughout the U.S. complimented Texas by adopting and exceeding our standards and industry oversight for their state. Every state in the U.S. has some form of regulation of Ignition Interlock manufacturer's. One of the last hold outs to add any teeth to their industry regulations has been California, they are now in the process of adopting stronger protocols and oversight of ignition interlock manufacturers, having seen how the lack of standards affects the integrity and safety of an interlock program.

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The Sunset Commission will hold a hearing next week on Sunset Staff's recommendation to discontinue regulation of ignition interlock vendors. I recommend and would support a stakeholder's meeting/ council with all stakeholders to find meaningful recommendations and solutions on how best to provide oversight to my industry. There are many best practice resources and professionals that can help guide these conversations. The Coalition of Ignition Interlock Manufacturers in cooperation with the Association of Program Administrators has worked to provide suggestions for self-sustaining programs to states, ensure interlock program integrity, high quality service and consistent delivery of product and services.

Removing vendor oversight and standards would be a travesty for Texas, safety and an industry I respect, committed my reputation to, care about deeply and have grown to love. I am reaching out to you and the rest of the Sunset Advisory Commission to inform you that as an Ignition Interlock Industry representative we are against this recommendation. I will be making public and written comment next week at the hearing. If you have any questions or I can provide further information, to you or staff, please feel free to contact me at your convenience.

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