

From: [Sunset Advisory Commission](#)
To: [Trisha Linebarger](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, December 7, 2020 7:19:52 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Sunday, December 6, 2020 9:03 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: Mark

Last Name: Cooper

Title: owner

Organization you are affiliated with: Comedy Guys Defensive Driving

Email:

City: Garland

State: Texas

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

I have concerns about some of the Sunset Commissions recommended changes to TDLR and its management of driving safety courses.

Recommendation 4.12 removes any need for a driving safety course provider to get a curriculum reviewed and approved before it goes into use. Basically, it means that a course provider would be saying "I promise my curriculum is good enough" and the state agency trusting that it's true. You have to see how this could be abused by disreputable businesses looking to get into driving safety and make a lot of money before they got caught.

Reviewing and approving curriculums must be a great deal of work, but it's important that it be done by some authority that is not directly making money off of that curriculum.

Recommendation 4.5, eliminating driving safety instructor licenses, also relies too much on the honesty and self-policing of schools and course providers. If the schools and only the schools decide who can teach for them, there will be more inappropriate people teaching classes and issuing legal documents in the form of driving safety certificates.

Finally, Recommendation 4.6 would remove the \$25 minimum charge for driving safety classes. As online education goes, twenty-five dollars is not a large amount. But that this minimum charge exists is what makes business possible for the many small businesses that teach so many of the state's driving safety courses, both in-person and online. Eliminating this minimum will drive these "Mom and Pop" operations out of business.

Over the years, the courts and the insurance industry have come to trust our driving safety courses to have a high standard. If these recommendations are approved, we're risking the possibility of the courts and insurance companies withdrawing their acceptance of our state's driving safety certificates. This would not be beneficial to the

public.

Any Alternative or New Recommendations on This Agency: I urge your commission not to approve recommendations 4.5, 4.6, and 4.12 of this report.

My Comment Will Be Made Public: I agree