

From: [Sunset Advisory Commission](#)
To: [Trisha Linebarger](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, December 7, 2020 8:27:11 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Monday, December 7, 2020 8:26 AM
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: Cooper

Title: Owner

Organization you are affiliated with: A Safer Driver, Inc.

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 to be true.

Although this removes a barrier to entry for new curriculums, it removes the quality control in which Texas has such a good reputation. If quality is not regulated, will courts feel comfortable about the legal certified certificates issued? Will the insurance industry lose its faith in driving safety education? Both scenarios are bad for Texas consumers trying to save money. The Texas public loses because there is no faith in the options the state encourages to improve safety on its roads.

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. Instructors become better instructors through experience and training. We need to remember we are teaching people about operating 2,000 lb or more vehicles. Safety is important and so is education. Would we remove license requirements for our educators in public schools?

****Finally, Recommendation 4.6**** would remove the \$25 minimum charge for driving safety classes. This will

essentially eliminate in-person classes.

Classroom courses are more costly to provide to the public because of the cost of space and having an in-person instructor. Online prices would likely drop, squeezing out the classroom option. The classroom option still has many advantages for the business, instructors, the student and the public:

- In-person courses can provide better, more memorable instruction (particularly for younger less experienced drivers). On many occasions we have parents insisting on in person classes for their children. We need to remember that a good portion of the students are 16 to 25 years of age.
- Provides an option for those without an internet connection.
- Better suited for those with English as a second language.
- Better suited for those with learning disabilities.
- Provide stable jobs for instructors.
- Gives the public a choice to choose the best experience for convenience and/or learning.
- Better options ultimately will lead to more people taking driver education courses which means better drivers on our roads and highways and ultimately less collisions, injuries, and death.

In general, reducing the oversight of driving safety courses will lower the overall quality of the courses and make this step less effective, making driving in Texas more dangerous in the process.

Thank you for your time.

Any Alternative or New Recommendations on This Agency: None at this time.

My Comment Will Be Made Public: I agree