

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, May 10, 2018 4:22:45 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, May 10, 2018 4:22 PM
To: Sunset Advisory Commission <Sunset@sunset.texas.gov>
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: OFFICE CONSUMER CREDIT COMMISSIONER OCCC

First Name: Amber

Last Name: Crosby

Title: Director of Dealer Compliance and Education

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City: Austin

State: Texas

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

Thank you for the opportunity to provide input on the Sunset Staff Report on the Office of Consumer Credit Commissioner (OCCC). The Texas Independent Automobile Dealers Association (TIADA) is a statewide trade association of over 1,000 automobile dealers who are unaffiliated with a particular vehicle manufacturer/franchise. A significant majority of our membership holds a motor vehicle sales finance license.

As noted in the staff report, OCCC licenses and regulates over 15,000 entities, including 8,539 Motor Vehicle Sales Finance Providers, by far the largest constituency under Finance Commission's oversight. However, there is only one consumer credit representative on the Finance Commission and there is no industry representative who holds a motor vehicle sales finance license. TIADA would suggest finding a model that better represents the largest licensed bodies.

TIADA agrees with Issue 5 recommendation that OCCC provide biennial license renewals for its licensees. The Texas Department of Motor Vehicles has such a policy and it has proven effective at regulating industry while avoiding unnecessary burden on businesses.

With these comments, TIADA supports the continuation of OCCC for 12 years.

Any Alternative or New Recommendations on This Agency: Create an advisory board made up of consumer credit licensees that reports to the Finance Commission.

My Comment Will Be Made Public: I agree