



COPY

The Honorable Brian Birdwell
Chairman, Sunset Advisory Commission
P.O. Box 13066
Austin, TX 78701-3066

Dear Chairman Birdwell:

AT&T Digital Life commends the Sunset Commission Staff for their analysis of and recommendations for improving the Private Security Board provided in Issue 3 of the Staff's Report on the Department of Public Safety. We also appreciate the formal responses submitted by the Public Safety Commission and the Department of Public Safety (DPS) and the testimony at the May 23rd meeting which provided additional helpful clarifications. AT&T Digital Life supports the common goals expressed by the Sunset Commission, Public Safety Commission, and DPS to remove regulatory inefficiencies and streamline regulatory compliance obligations.

AT&T Digital Life agrees with DPS that further clarification regarding the Sunset Commission Staff's recommendation for Issue 3.4 would be beneficial. As DPS noted in both its formal responses and at the hearing, if both companies and individuals are required to be licensed, it is unclear how the requirement that a business that is providing security services be licensed would relate to the requirement that an individual be licensed, especially if the individual is providing security services to the public as a sole proprietor. The question arises whether that individual would be required to comply with any additional requirements applicable to businesses that are licensed in addition to the licensing requirements applicable to individuals. If not, then there could be competitive advantages enjoyed by sole proprietors not available to larger businesses.

To avoid this potential disparate treatment within the industry, AT&T Digital Life recommends that, if there will be regulatory obligations applicable to businesses that are different than those applicable to individuals, then the Commission should maintain the requirement that individuals who engage in private security services be affiliated with licensed companies.

It also is in the public interest to maintain the requirement that individuals who engage in private security services be affiliated with licensed companies. The additional oversight that a licensed company provides its employees not only helps ensure that individuals are well trained in applicable rules and regulations, but also protects customers, for example, by maintaining adequate insurance and providing support for holding individuals accountable if mistakes occur.

AT&T Digital Life appreciates the Commission's considerations of these comments.

Thank you again for your service to the state and efforts to improve this regulatory structure. Please do not hesitate to contact me if you have any questions or need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Riley Fields".

Riley Fields
Regional Compliance Manager
AT&T Digital Life
405-409-0778

1801 VALLEY VIEW LANE, FL. 2
FARMERS BRANCH, TX 75234
972-488-4435

COPY

From: [Sunset Advisory Commission](#)
To: [Trisha Linebarger](#)
Subject: FW: AT&T Digital Life Feedback
Date: Wednesday, May 30, 2018 1:50:06 PM
Attachments: [AT&T Digital Life Sunset Commission Comments.pdf](#)

From: WINBORN, JASON [mailto:jw9825@att.com]
Sent: Wednesday, May 30, 2018 12:58 PM
To: Sunset Advisory Commission <Sunset@sunset.texas.gov>
Cc: FIELDS, RILEY C <rf224z@att.com>
Subject: AT&T Digital Life Feedback

Sunset Commission Staff,

Attached are comments from AT&T Digital Life concerning the recommendations for improving the Private Security Board provided in Issue 3 of the Sunset Commission Staff's Report on the Department of Public Safety. We are very appreciative for allowing us to provide feedback and for your efforts to improve the regulatory framework in the state. Please feel free to contact us if you have any questions.

Jason Winborn
AT&T External Affairs
512-457-2233