

From: [Elizabeth Jones](#)
To: [Trisha Linebarger](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, November 18, 2020 4:16:31 PM

From: sunset@sunset.texas.gov On Behalf Of Texas Sunset Commission
Sent: Wednesday, November 18, 2020 3:34:38 PM (UTC-06:00) Central Time (US & Canada)
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS DEPARTMENT LICENSING AND REGULATION

First Name: Kerran

Last Name: Fowlkes

Title: President

Organization you are affiliated with: Nationwide Driver Safety Education Company and Sunny Day Defensive Driving

Email:

City: El Paso

State: Texas

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

My name is Kerran Fowlkes and I am the owner of a driving safety course provider and a driving safety school that offers traditional classroom instruction; I have owned and operated these businesses since 2007 (13 years). In that time we have trained over 67,000 students in El Paso, Texas.

Please consider my comments in regard to the recommendations made by the Sunset Advisory Commission (the "Commission") with the weight of my knowledge, involvement, and experience in this industry over the last 13 years.

4.1 - Eliminate the separate drug and alcohol driving awareness course and associated licenses.

I agree.

4.2 - Eliminate the separate specialized driving safety course and associated licenses.

I agree.

4.3 - Eliminate the separate driving safety course for drivers under 25 years old.

I agree. The driving safety course and this course are similar enough in content that there is not a need for a separate course for individuals under the age of 25. However, I believe that strong consideration should be made to require those individuals under the age of 25 to attend an in-person driving safety course. I believe that an in-person course would be far greater in providing higher quality instruction to these individuals. This age group is likely more inclined to "gaming" an online course by utilizing Google to lookup test questions and engaging in other activities on the computer while they are supposed to be taking this course.

4.4 - Eliminate the redundant driving safety school license.

I agree.

4.5 - Eliminate the driving safety instructor license.

I agree.

4.6 - Eliminate the minimum fees driving safety course providers must charge consumers.

Online education and in-person education are not yet equivalent. There is no doubt that as technology improves and as the comfort level of consumers with technology increases, this quality gap will continue to narrow. Having recently completed an online driving safety course I deeply suspect that there remains a large gap in the quality of online courses versus in-person courses.

Removing the price floor will favor online courses to the detriment of in-person providers resulting in lower overall quality. I believe the issue should be re-considered at a later time as the gap between online and in-person education narrows.

The price floor of \$25 has been in place for MANY years now and in truth is a very fair price for a 6 hour driver improvement course. Anything less than \$25 will only serve to degrade this course and industry.

4.11 - Eliminate prescriptive curriculum hours and authorize TDLR to set minimum hours in rule.

I agree.

4.12 - Eliminate costly course approval fees and streamline TDLR's process for approving driver training curricula.

I agree.

4.14 - Direct TDLR to list on its website only licensed instructors and providers, not the specific courses they offer.

I agree.

6.1 - Require TDLR to establish a risk-based approach to inspections.

I agree.

Any Alternative or New Recommendations on This Agency: None.

My Comment Will Be Made Public: I agree