

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, May 10, 2018 9:55:38 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, May 10, 2018 9:50 AM
To: Sunset Advisory Commission <Sunset@sunset.texas.gov>
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS DEPARTMENT MOTOR VEHICLES TDMV

First Name: Steven

Last Name: Morgan

Title:

Organization you are affiliated with: Self

Email:

City: Boerne

State: Texas

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

TXDMV has written a revision to the Texas Administrative Code, Title 43, Part 10, Chapter 217, Subchapter A, Rule 217.3, (6), (B) making vehicles designed or determined to be a "Dune Buggy" ineligible for Texas Title, regardless of the vehicles previous title/registration. This is written without benefit of a definition of a Dune Buggy making the terminology dubious in intent.

It seems the intent was to ensure that ATV style dune buggy's should not be street legal vehicles due to safety concerns.

Any Alternative or New Recommendations on This Agency:

The department should come up with a proper definition of the difference between an ATV style Dune Buggy and an automotive (Volkswagon) style dune buggy.

Volkswagon style dune buggy's have a long history of being titled and registered for on road use in Texas as these are essentially Volkswagon beetles with a dune buggy body. All other automotive components and systems of the parent vehicle remain intact.

The department needs to define what type dune buggy is disallowed by the revised administrative code and should also further clarify that automotive dune buggy's in the style of a volkswagon dune buggy or comprised primarily of a parent automobile are exempt from this code revision as long as they meet all requirements of the TXDMV Assembled and Re-Built Vehicle Manual.

This will ensure that safety concerns similar to those imposed on other Texas vehicles are met.

My Comment Will Be Made Public: I agree