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May 10, 2018

Mr. Ken Levine
Director
Sunset Advisory Commission
P. O. Box 13066
Austin, TX 78711

Sent via email: sunset@sunset.texas.gov

Re: Sunset Staff Report
Office of Consumer Credit Commissioner

Dear Director Levine:

Please accept the following comments regarding the 2018 - 2019 Sunset Advisory Commission Staff Report regarding the Office of Consumer Credit Commissioner (OCCC) submitted on behalf of the Texas Automobile Dealers Association (TADA) and its approximately 1,355 franchised motor vehicle and truck dealers in Texas.

TADA recognizes the complexity of the review of the three finance agencies and appreciates the staff's energy and time regarding its review of the Department of Savings and Mortgage Lending, the Texas Department of Banking, and the Office of Consumer Credit Commissioner. TADA is also in agreement with the Sunset staff that the OCCC merits a continuation as a separate agency (Staff Report, at 1).

Staff Recommendation 1.3

Continue the Office of Consumer Credit Commissioner for 12 years.

The recommendation to continue the OCCC for another 12 years is supported by TADA.

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Staff Recommendation 5.2

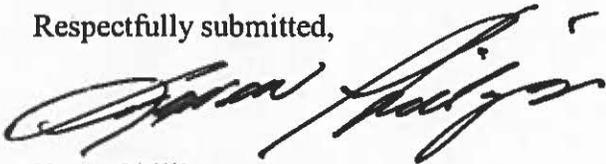
Authorize the agency to provide biennial license renewals for its licensees and registrants.

TADA is in agreement with the staff's recommendation to establish a system for biennial license and registration renewal for all regulated entities. This recommendation should reduce the agency's time spent renewing the approximately twelve types of licenses issued by the OCC¹ in addition to assisting the various licensees in a more expeditious renewal process.

Another benefit of issuing a biennial license and registration renewal may allow for a new license to be issued more readily.

On behalf of the franchised new motor vehicle and truck dealers, TADA looks forward to working with the staff and agency as the review process proceeds.

Respectfully submitted,



Karen Phillips
General Counsel/EVP

¹The types of licenses issued by the OCC include: motor vehicle sales finance providers; regulated lenders; credit access businesses; pawnshops; pawn employees; residential mortgage loan originators (individuals); property tax lenders; commercial motor vehicle sales finance providers; registered creditors; refund anticipation loan facilitators; crafted precious metal dealers; and debt management and settlement providers (Staff Report at 8).