

**From:** [Sunset Advisory Commission](#)  
**To:** [Trisha Linebarger](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, April 30, 2018 12:50:00 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, April 30, 2018 12:26 PM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: DEPARTMENT PUBLIC SAFETY DPS

First Name: Keith

Last Name: Rovell

Title: Gen Mgr

Organization you are affiliated with: Mrh Rider Training

Email:

City: Houston

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or  
Opposed: Regarding the MSU: for those of us in private business, please keep us informed of future directions so we  
can plan accordingly

Any Alternative or New Recommendations on This Agency: n/a

My Comment Will Be Made Public: I agree

**From:** [Sunset Advisory Commission](#)  
**To:** [Trisha Linebarger](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, May 02, 2018 4:20:46 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Wednesday, May 02, 2018 4:09 PM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: DEPARTMENT PUBLIC SAFETY DPS

First Name: Keith

Last Name: Rovell

Title: Gen Mgr.

Organization you are affiliated with: MRH Rider Training

Email:

City: Houston

State: Texas

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

With all due respect, the Sunset Advisory Commission's Findings and Recommendations reflect a profound lack of knowledge about motorcycle training in TX. Private businesses like the one I manage scrape by with very little profit, doing a job that few in the private sector can, or will, do.

Please note that your number of instructors (378) is off by over 100, with the actual number per DPS of 263 at this time. 263 people to train the entire state of TX's aspiring riders! This number, by the way, is down from as many as 700 instructors a decade ago, and more than 500 only two years ago. It is a grueling, thankless job that pays little and demands much.

Almost all instructors are private contractors who teach for multiple providers, often 7 days a week. With the current shortage, they are demanding, and getting, higher pay to teach.

Becoming a motorcycle instructor takes 9 days, at a training facility, and candidates must absorb transportation, lodging, and meal costs in addition to time off (usually vacation days from their primary employment). As those costs can easily surpass \$1500, it is very difficult now to recruit instructors. Make it even less convenient and more expensive and further erosion will occur. Do the math: we've lost 50% of our instructors in the past two years, and folks retire or drop out every year. Only 23 new instructors were trained in 2017. What will be the state's plan to bolster those numbers? What will TX do if not enough instructors exist to meet the needs of the public?

Private businesses must absorb the following costs: rent (both classroom spaces and range spaces), instructor pay, insurance (which rises every year), fuel costs, maintenance costs, and facility costs related to running the business. We are not non-profit, and must generate enough revenue to cover these costs and pay the appropriate taxes, as well as keep a small "rainy day" fund around for the inevitable unexpecteds. Unlike government, we can't overspend. A so-called "profit margin" of 10% is not uncommon.

This past year, for the first time in many years, DPS supplied student handbooks for us. These are purchased from MSF at a cost of \$1.80 each plus shipping, meaning a company such as mine (which trains nearly 3000 students per year) will be looking at additional expense of more than \$5000 in book cost. The now-mandatory eCourse will increase costs to providers by \$3.99 per student, which will hit my bottom line by almost \$12,000. Add in the cost of

insurance, which goes up about 7% per year, and fuel, which is currently at its highest price in years, and you can see that whatever small profit we may generate will quickly be absorbed. Providers that need to purchase motorcycles currently supplied by the state will, if they can afford to do so, have no choice but to deduct the purchase cost from other areas, which usually means maintenance and instructor pay.

Go the route you've recommended and you will put many, if not most, providers out of business if you keep the price cap in place.

You'll need to change rules to allow providers to raise the cost of training to what the market will bear to cover the increased costs. Class costs in many states top \$350, which will probably have to happen in TX under your recommendations. How do you think your constituents will take to that figure, especially since most know about the dedicated motorcycle safety fund, paid into by them and which can ONLY be used to cover motorcycle safety training and awareness? You've just added another tax on the public and hurt private business.

Speaking of the fund 501, exactly WHAT is being saved by these penny-pinching efforts? Since funds cannot be used for other purposes, and since they are constantly refreshed by licensing and registration fees, how is cutting the motorcycle safety unit's operating costs going to save the public anything?

The money was paid by motorcyclists FOR motorcyclists, a compact that has stood in place since 1983. Holding those funds back and starving the motorcycle safety efforts to offset red ink elsewhere in department budgets is not acceptable.

On the subject of the mobile units, since training is mandatory in TX in order to be licensed, it is imperative that the state provide ways to get trained in areas that are not populous enough to support full time training sites. Remote areas will not generate enough students or income to cover a fleet of bikes and all the expenses necessary to keep a training site open.

It is neither reasonable nor considerate to expect people to drive over a hundred miles to get to a training site, spend at least two nights in lodging and cover fuel, etc. to simply get the license necessary to drive their properly licensed vehicle. All you will do is encourage people to ride unlicensed, which places them in peril. Studies consistently show untrained riders to be involved in more, and costlier, crashes, resulting in increased injuries. Unlicensed riders are at danger of not being covered by insurance in the event of crashes, injuries and/or property damage.

I implore you to meet with the people directly responsible for training riders in this state, the providers, before implementing these recommendations. You will be putting businesses at risk, the public at risk and creating a public relations nightmare for state government.

Any Alternative or New Recommendations on This Agency:

Use the fund 501 for what it is intended.

If you take away all help to providers, take away the artificial price cap and allow providers to charge what the market will bear.

Consider keeping the mobile units. Training is mandatory, so folks in remote areas need them to get licensed.

My Comment Will Be Made Public: I agree