

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, May 15, 2018 8:06:31 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, May 14, 2018 7:32 PM
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: Chris

Last Name: Urquhart

Title:

Organization you are affiliated with:

Email:

City: Corpus Christi

State: Texas

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

I am writing you in regards to the current 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 group (class) of assembled vehicle is being singled out by the TxDMV on the basis of "safety" yet they admittedly have no statistics of documentation to justify such a restriction. And without any clear definition of "dune buggy" they are denying titles (and revoking) titles of cars "deemed" to be a "dune buggy" (thus the TxDMV has a rather wide stroke here).

While under direction of the TxDMV board a workgroup was formed to review the situation, but progress has ground to a halt with the TxDMV representatives there stating that there would be no leeway or changes made. And as I understand it, this goes against the board's instructions (I watched the board meeting in it's entirety). Most of the board members actually appeared sympathetic to our cause (thus the workgroup) and requested a solution. But we would wish that those in power at TxDMV itself would take a less broad approach to this by not singling out a car based on an extremely vague definition.

Our cars (many of with are worth tens of thousands of dollars and safely driven on Texas streets and highways for many years) deserve a fair shake.

Any Alternative or New Recommendations on This Agency:

Firstly, there needs to be a standing definition of "dune buggy".

Secondly, "Assembled" or "Special Construction" vehicles are no different than a "hotrod", "ratrod", etc which are all of similar construction. I would like to see the TxDMV treat "Assembled Vehicles" in the same manner that the

give to those class vehicles (it is somewhat boggling to me in that the DMV keeps responding to us that "those are a separate class" when the TxDMV itself dictates the classifications).

We have gathered a good deal of information as to how other states (even California) allow such vehicles on the roads as legal.

My hope is that someone will instruct the DMV to approach this from a more open perspective. We are asking your and our legislators assistance in looking into this matter.

Sincerely,

Chris Urquhart

My Comment Will Be Made Public: I agree