



Texas Department *of* Motor Vehicles

HELPING TEXANS GO. HELPING TEXAS GROW.

TxDMV Board Meeting

9:00 a.m.

Thursday, February 12, 2026

AGENDA
BOARD MEETING
TEXAS DEPARTMENT OF MOTOR VEHICLES
4000 JACKSON AVE., BUILDING 1, LONE STAR CONFERENCE ROOM
AUSTIN, TEXAS 78731
PARKING IS AVAILABLE IN THE PARKING LOT ADJACENT TO BUILDING 1
THURSDAY, FEBRUARY 12, 2026
9:00 A.M.

The presiding officer of the Board of the Texas Department of Motor Vehicles (Board) will be physically present at 4000 Jackson Avenue, Austin, Texas 78731. Some Board members may attend via videoconferencing.

Link to February 12, 2026, Board Meeting Documents:
<https://www.txdmv.gov/about-us/txdmv-board-meetings>

All agenda items are subject to possible discussion, questions, consideration, and action by the Board. Agenda item numbers are assigned for ease of reference only and do not necessarily reflect the order of their consideration by the Board. Presentations may be made by the identified staff, Board member, or other personnel as needed. The Board reserves the right to discuss any items in closed session where authorized by the Open Meetings Act.

PAGE

- 1. Roll Call and Establishment of Quorum**
- 2. Pledges of Allegiance - U.S. and Texas**
- 3. Chair's Reports - Chairman Bacarisse (BRIEFING ONLY)**
 - A. Recognition of Former Board Member Stacey Gillman
 - B. Appointments to Board Standing Committees
- 6 4. Executive Director's Reports - Daniel Avitia (BRIEFING ONLY)**
[Recognition of Years of Service](#)

RULE ADOPTIONS

- 7 5. Chapter 206, Management - Clint Thompson (ACTION ITEM)**
Amendments: §206.101
New: §206.102
[\(Relating to Automated Vehicle Regulation Advisory Committee \(AVRAC\)\)](#)
(Published 12/26/25 - 50 TexReg 8519)
 - 13 6. Chapter 217, Vehicle Titles and Registration - Annette Quintero (ACTION ITEM)**
Amendments: §§217.22, 217.26, 217.28, and 217.29
-

(Relating to Personal Identification Requirements for Vehicle Registration under Texas Transportation Code, §502.040)

(Published 12/5/25 - 50 TexReg 7868)

BRIEFING AND ACTION ITEMS

7. Legislative and Public Affairs - Keith Yawn (BRIEFING ONLY)

- 521 A. 89th Legislature, Bill Implementation Updates
- 522 B. Development Schedule for Recommendations to the 90th Legislature

8. Finance and Audit

Internal Audit Division Status Update - Jason Gonzalez (BRIEFING ONLY)

- A. Internal Engagements
- i. Motor Vehicle Crime Prevention Authority (MVCPA) Audit
 - ii. Information Technology Services Division (ITSD) Project Governance Audit Update
 - iii. Finance and Operations (FAO) Accounts Receivable Advisory
 - iv. Internal Audit Peer Review
- B. External Engagement: State Auditor's Office (SAO) Data Governance Audit

CLOSED SESSION

9. The Board may enter into closed session under one or more provisions of the Texas Open Meetings Act, Government Code, Chapter 551, including but not limited to:

Section 551.071 - Consultation with Attorney.

Consultation with and advice from legal counsel regarding:

- pending or contemplated litigation, or a settlement offer;
- a matter in which the duty of the attorney to the government body under the Texas Disciplinary Rules of Professional Conduct of the State Bar of Texas clearly conflicts with Government Code, Chapter 551;
- any item on this agenda; or
- *Lucid Group USA, Inc. vs. Monique Johnston, in her official capacity as Director of the Motor Vehicle Division of the Texas Department of Motor Vehicles, et al.* Court of Appeals Docket No. 25-50319; in the U.S. Court of Appeals for the Fifth Circuit

Section 551.074 - Personnel Matters.

- Deliberation relating to the appointment, employment, evaluation, reassignment, duties, discipline, or dismissal of personnel.
- Hearing a complaint or charge against an officer or employee.
- Performance evaluation of Internal Audit Director, including any modifications to compensation.

Section 551.076 - Deliberation Regarding Security Devices or Security Audits.

Deliberation regarding:

- the deployment, or specific occasions for implementation, of security personnel or devices; or
- a security audit.

Section 551.0761 - Deliberation Regarding Critical Infrastructure Facility.

Deliberation regarding a cybersecurity measure, policy, or contract solely intended to protect a critical infrastructure facility located in Texas.

Section 551.089 - Deliberation Regarding Security Devices or Security Audits.

Deliberation regarding:

- security assessments or deployments relating to information resources technology;
- network security information as described by Government Code, §2059.055(b); or
- the deployment, or specific occasions for implementation, of security personnel, critical infrastructure, or security devices.

10. Action Items from Closed Session

11. Public Comment

12. Adjournment

The Board will allow an open comment period to receive public comment on any agenda item or other matter that is under the jurisdiction of the Board. No action will be taken on matters that are not part of the agenda for the meeting. For subjects that are not otherwise part of the agenda for the meeting, Board members may respond in accordance with Government Code, §551.042 and consider the feasibility of placing the matter on the agenda for a future meeting.

If you would like to comment on any agenda item (including an open comment under the agenda item for Public Comment), you must complete a speaker's form at the registration table prior to the agenda item being taken up by the Board or send an email to GCO_General@txdmv.gov to register by providing the required information prior to the agenda item being taken up by the Board:

1. a completed [Public Comment Registration Form](#); or
2. the following information:
 - a. the agenda item you wish to comment on;
 - b. your name;
 - c. your address (optional), including your city, state, and zip code; and
 - d. who you are representing.

Public comment will only be accepted in person. Each speaker will be limited to three minutes, and time allotted to one speaker may not be reassigned to another speaker

Any individual with a disability who plans to attend this meeting and requires auxiliary aids or services should notify the department as far in advance as possible, but no less than two days in advance, so that appropriate arrangements can be made. Contact the Office of General Counsel by telephone at (512) 465-5665.

I certify that I have reviewed this document and that it conforms to all applicable Texas Register filing requirements.

CERTIFYING OFFICIAL: Laura Moriarty, General Counsel, (512) 465-5665.

Board Meeting Date: 2/12/2026
BRIEFING ITEM

To: Texas Department of Motor Vehicles Board
From: Daniel Avitia, Executive Director
Agenda Item: 4
Subject: Executive Director's Report – Recognition of Years of Service

RECOMMENDATION

Briefing Only.

PURPOSE AND EXECUTIVE SUMMARY

The Executive Director acknowledges employees who have achieved significant state service milestones of 20 years or more and those who have retired from the agency. The Texas Department of Motor Vehicles (TxDMV) recognizes the following individuals:

State Service Milestones:

20 years:

- Veronica Whitaker – Consumer Relations Division

25 years:

- Rhonda Guajardo – Information Technology Services Division
- Lindy Hendricks – Office of Administrative Hearings Division
- Lucie Prieto – Motor Vehicle Division

30 years:

- John Dufour – Enforcement Division
- April Marshall – Vehicle Titles and Registration Division

Retirements:

- Mary Sedillo-Chacon – Information Technology Services Division, 33 years of state service
- Charles Bennett – Enforcement Division, 39 years of state service

FINANCIAL IMPACT

N/A

BACKGROUND AND DISCUSSION

N/A



To: Texas Department of Motor Vehicles Board
From: Clint Thompson, Motor Carrier Division Director
Agenda Item: 5
Subject: Chapter 206, Management
 Amendments: §206.101
 New: §206.102
 (Relating to Automated Vehicle Regulation Advisory Committee (AVRAC))

RECOMMENDATION

Action Item. Adopt proposed amendments and new section in 43 Texas Administrative Code Chapter 206.

PURPOSE AND EXECUTIVE SUMMARY

This rule item would adopt proposed amendments to 43 Texas Administrative Code §206.101 and new §206.102 that are necessary to create an Automated Vehicle Regulation Advisory Committee to assist the Board and the executive director with recommendations regarding the regulation of automated motor vehicles in Texas, including the protection of consumers of automated motor vehicle services.

FINANCIAL IMPACT

There will be no significant fiscal implications due to the proposed amendments.

BACKGROUND AND DISCUSSION

Proposed amendments to §206.101(b)(1) would include the new AVRAC in the list of department advisory committees that receive public comments on matters within the scope of the advisory committee. For the AVRAC, the scope of the advisory committee is set out in proposed new §206.102(a) as “topics related to the regulation of automated motor vehicles.” The proposed new §206.102 creates the AVRAC as a stand-alone advisory committee, and would set in rule the purpose, tasks, reporting requirements and expiration, in accordance with Government Code, Chapter 2110. The department did not receive any comments on this rule proposal.

If the board adopts the amendments during its open meeting on February 12, 2026, staff anticipates:

- Publication of the adoption in the February 27, 2026, issue of the *Texas Register*, and
- An effective date of March 5, 2026.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 2 of 2

Chapter 206 - Management

1 Transportation Code §545.453 and §545.456, as amended by SB 2807. Adopted new §206.102(c) sets the
2 expiration date for the AVRAC as July 7, 2031, to align with the renewal schedule for the other department
3 advisory committees without requiring the department to renew the AVRAC within the next two years.

4 Adopted amendments to §206.101(b)(1) include the new AVRAC in the list of department advisory
5 committees that take public comment on matters within the scope of the advisory committee. For the
6 AVRAC, the scope of the advisory committee is set out in new §206.102(a) as “topics related to the
7 regulation of automated motor vehicles.” At adoption, new §206.102(b) was amended to correct
8 punctuation.

9 **SUMMARY OF COMMENTS.**

10 No comments on the proposed amendments were received.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 1 of 3

Chapter 206 - Management

1 **STATUTORY AUTHORITY.** The department adopts an amendment to §206.101 and adopts new §206.102
2 under Transportation Code, §1001.031, which authorizes the department to retain or establish one or
3 more advisory committees to make recommendations to the board or the executive director;
4 Transportation Code, §1002.001, which authorizes the board to adopt rules that are necessary and
5 appropriate to implement the powers and the duties of the department; Government Code, §2110.005,
6 which requires state agencies establishing advisory committees to make rules stating the purpose and
7 tasks of the committee and describing the manner in which the committee will report to the agency; and
8 Government Code, §2110.008, which allows state agencies establishing advisory committees to designate
9 by rule the date an advisory committee will be abolished.

10 **CROSS REFERENCE TO STATUTE.** Transportation Code Chapters 1001 and 1002; and Government Code
11 Chapter 2110.

12

13 Text.

14 §206.101. Public Access to Advisory Committee Meetings.

15 (a) Posted agenda items. A person may speak before an advisory committee on any matter on a
16 posted agenda by submitting a request, in a form and manner as prescribed by the department, prior to
17 the matter being taken up by the advisory committee. A person speaking before an advisory committee
18 on an agenda item will be allowed an opportunity to speak:

19 (1) prior to a motion by the advisory committee on the item; and

20 (2) for a maximum of three minutes, except as provided in subsections (d)(6) and (e) of
21 this section.

22 (b) Open comment period.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 2 of 3

Chapter 206 - Management

1 (1) At each regular advisory committee meeting, the advisory committee shall allow an
2 open comment period, not to exceed one hour, to receive public comment on any other matter that is
3 within the scope of the specific advisory committee under §206.94(a) of this title (relating to Motor
4 Vehicle Industry Regulation Advisory Committee (MVIRAC)), §206.95(a) of this title (relating to Motor
5 Carrier Regulation Advisory Committee (MCRAC)), §206.96(a) of this title (relating to Vehicle Titles and
6 Registration Advisory Committee (VTRAC)), §206.97(a) of this title (relating to Customer Service and
7 Protection Advisory Committee (CSPAC)), ~~§206.98(a)~~ §206.98(a) of this title (relating to Household Goods Rules
8 Advisory Committee (HGRAC)), or §206.102(a) of this title (relating to Automated Vehicle Regulation
9 Advisory Committee (AVRAC)).

10 (2) A person wanting to make a comment under this subsection shall complete a
11 registration form, as provided by the department, prior to the beginning of the open comment period.

12 (3) Except as provided in subsections (d)(6) and (e) of this section, each person shall be
13 allowed to speak for a maximum of three minutes for each comment in the order in which the requests
14 to speak were received.

15 (c) Disability accommodation. Persons who have special communication or accommodation needs
16 and who plan to attend a meeting, may contact the department's contact listed in the posted meeting
17 agenda for the purpose of requests for auxiliary aids or services. Requests shall be made at least two days
18 before a meeting. The department shall make every reasonable effort to accommodate these needs.

19 (d) Conduct and decorum. An advisory committee shall receive public input as authorized by this
20 section, subject to the following guidelines:

21 (1) questioning of speakers shall be reserved to advisory committee members and the
22 department's administrative staff;

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 3 of 3

Chapter 206 - Management

1 (2) organizations, associations, or groups are encouraged to present their commonly held
2 views, and same or similar comments, through a representative member where possible;

3 (3) comments shall remain pertinent to the issue being discussed;

4 (4) a person who disrupts an advisory committee meeting shall leave the meeting room
5 and the premises if ordered to do so by the acting advisory committee chair;

6 (5) time allotted to one speaker may not be reassigned to another speaker; and

7 (6) the time allotted for comments under this section may be increased or decreased by
8 the acting advisory committee chair, as may be appropriate to assure opportunity for the maximum
9 number of persons to appear.

10 (e) Waiver. Subject to the approval of the acting advisory committee chair, a requirement of this
11 section may be waived in the public interest if necessary for the performance of the responsibilities of the
12 advisory committee or the department.

13

14 §206.102. Automated Vehicle Regulation Advisory Committee (AVRAC).

15 (a) The AVRAC is created to make recommendations, as requested by the department and board,
16 on topics related to the regulation of automated motor vehicles.

17 (b) The AVRAC shall comply with the requirements of §206.93 of this title (relating to Advisory
18 Committee Operations and Procedures).

19 (c) The AVRAC shall expire on July 7, 2031.

20

To: Texas Department of Motor Vehicles Board
From: Annette Quintero, Vehicle Titles & Registration Division Director
Agenda Item: 6
Subject: Chapter 217, Vehicle Titles and Registration
Amendments: §§217.22, 217.26, 217.28, and 217.29
(Relating to Personal Identification Requirements for Vehicle Registration under Texas Transportation Code, §502.040)

RECOMMENDATION

Action Item. Adopt proposed amendments in 43 Texas Administrative Code (TAC) Chapter 217, with an effective date for §217.22 and §217.26 of March 6, 2026, and an effective date for §217.28 and §217.29 of January 1, 2027.

PURPOSE AND EXECUTIVE SUMMARY

The proposed amendments are necessary to ensure the personal identification documents required for vehicle registration under Transportation Code, §502.040 are unexpired and prove that the applicant is legally eligible to reside in Texas.

FINANCIAL IMPACT

The department does not anticipate a significant fiscal impact. Based on department data, only 5.15% of registrants who completed initial registration and titling simultaneously used a passport as their form of identification. Those data are not broken down between the use of foreign passports and United States passports and do not show which foreign passports were supported by valid visas or permanent residence cards. Assuming that half of the passports used were United States passports, and that half of the foreign passports were supported by valid immigration documentation that would meet the requirements of the rule amendments, the department expects that the rule will impact approximately 1.29% of registered vehicles, or about 341,000 vehicles per year, resulting in a reduction in vehicle registration revenue to the state of approximately \$19.5 million per year, or 0.84%. The department expects a reduction in revenue to local government of \$1,731,578 per year statewide, or 0.36%.

BACKGROUND AND DISCUSSION

Transportation Code, §502.040 requires Texas residents to register their motor vehicles. The proposed amendments would restrict the types of personal identification documents that the department will accept from a vehicle owner applying for vehicle registration as a Texas resident under Transportation Code, §502.040. These amendments are necessary to prevent fraud and to prevent applicants who are not legally eligible to reside in Texas from registering vehicles to drive on Texas roads.

At adoption, department staff recommends the following changes from the language that was published as proposed in the *Texas Register* on December 5, 2025:

- **§217.22:**
 - Add definitions for “REAL ID” and “United States birth certificate” to clarify and streamline the usage of those terms in §217.26; and

- Amend the proposed definition of “valid passport” to replace the requirement for a stamp or a mark on the passport with an option for a Form I-94 accompanying a passport, unless the Form I-94 shows that the bearer only has Parole status.
- **§217.26:**
 - Clarify the types of registration to which the more stringent personal identification requirements under §217.26(b) do not apply because they are types of registration generally used for commercial, industrial, or agricultural purposes, or for registration types that are not based on Texas residency, including registration under:
 - Transportation Code, Chapter 502, Subchapters C or I;
 - Transportation Code, §502.146;
 - 43 TAC §217.66 (relating to Specialized License Plate for Registration of Rental Trailers); or
 - a commercial vehicle registration under 43 TAC §217.46(b)(relating to Commercial Vehicle Registration).
 - Allow alternatives to REAL ID for state-issued driver’s licenses and state identification certificates while still ensuring that the allowed personal identification is only issued to individuals who are legally eligible to reside in Texas:
 - Limit the use of identification that complies with REAL ID to only those that are not marked “limited term” or “temporary;”
 - Allow a driver’s license or state identification certificate issued by a state that only issues identification to individuals that are legally present in the United States; and
 - Allow a driver’s license or state identification certificate issued by a state or territory of the United States, accompanied by a United States birth certificate, United States Certificate of Naturalization (N-550 or N-570), or a United States Certificate of Citizenship (N-560 or N-561).
 - Clarify that references to “current photo identification” in amended §217.26(c) refer to the identification requirements under amended §217.26(a).
 - Create exceptions from the personal identification requirements for:
 - Apportioned registration under the International Registration Plan;
 - Exempt vehicle registration under Transportation Code, Chapter 502, Subchapter J, or Transportation Code, §502.0025; or
 - Registration of off-highway vehicles owned by the state, a county, or a municipality under Transportation Code §502.140(c).
- **§217.28 and §217.29:**
 - Delay the effective date of §217.28 and §217.29 to January 1, 2027.
 - Allows time for the department and tax assessor-collectors to improve systems and processes to allow for quick and efficient registration renewal with automated identification verification methods that mitigate the risk of fraud and identity theft.
 - Give lenders and dealers more time to adapt their business processes to account for the application of revised personal identification requirements to registration renewals.
- **§217.29:**
 - Registrations under the following rules and statutes are exempt from the new requirement in §217.26 for the applicant to show personal identification at renewal because the specific qualifying requirements in rule and statute for these types of commercial registrations make them less subject to fraud:
 - 43 TAC §217.66 (relating to Specialized License Plate for Registration of Rental Trailers);



- 43 TAC §217.46(b)(5) (relating to Commercial Vehicle Registration) regarding a forestry vehicle license plate;
- Transportation Code, §§502.0023 (Extended Registration of Commercial Fleet Vehicles); and
- Transportation Code, §502.0024 (Extended Registration of Certain Trailers).

COMMENTS

The proposed rules were published for public comment in the *Texas Register* on December 5, 2025. The written comment period closed on January 5, 2026. The department held a public hearing on January 21, 2026, to collect further public comments.

The department received 268 comments on the proposed amendments. The department received 256 comments against the adoption of the proposed rule amendments from the Independent Bankers Association of Texas, the Texas Bankers Association, the Texas Credit Union Association, the Texas Independent Automobile Dealers Association, AARPTexas, the Texas Automobile Dealers Association, the Houston Automobile Dealers Association, the New Car Dealers of West Texas, the San Antonio Automobile Dealers Association, Inc., the El Paso New Car Dealers Association, the Valley Automobile Dealers Association, the Austin Automobile Dealers Association, the North Texas Automobile Dealers, the Workers Defense Action Fund, the Texas United Auto and Community Alliance, Every Texan, the Tax Assessor-Collectors Association of Texas, the Texas Conference of Urban Counties, the Texas Department of Public Safety, Texas State Senator Juan “Chuy” Hinojosa, Texas State Senator Molly Cook, Texas State Representative Armando Walle, Texas State Representative Terry Canales, Texas State Representative Christina Morales, Texas State Representative Vincent Perez, the Bexar County Tax Assessor-Collector, the Travis County Tax Assessor-Collector, El Paso County, the Webb County Tax Assessor-Collector, and 227 other individuals. The department received comments from 12 individuals in support of adoption of the proposed rules. The department considered all the public comments and staff is recommending changes to the rule text at adoption in response to many of these comments, as described above.

If the board adopts the amendments during its open meeting on February 12, 2026, staff anticipates:

- Publication of the adoption in the *Texas Register* on February 27, 2026,
- An effective date for §217.22 and §217.26 of March 5, 2026, and
- An effective date for §217.28 and §217.29 of January 1, 2027.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 2 of 42

Chapter 217 – Vehicle Titles and Registration

1 certified copy of a government-issued document for a child born abroad to a United States citizen, such
2 as a Consular Report of Birth or a Department of State Certification of Birth. These documents prove that
3 a person has the legal right to reside in Texas.

4 The adopted amendments also include a new §217.22(46), defining “valid passport” as an
5 unexpired passport or passport card that is issued by the United States government, or an unexpired
6 passport that is issued by the government of another country and supported by a Form I-94, a current
7 permanent resident card, or an unexpired immigrant visa issued by the United States Department of
8 Homeland Security, to show that the person has the legal right to reside in the United States. At adoption,
9 the proposed language in the definition of “valid passport” that would have required a stamp or mark on
10 the passport was removed and “Form I-94, unless the Form I-94 shows that the bearer only had Parole
11 status” was added in its place, because the department learned through public comment that the federal
12 government no longer stamps passports but instead uses the Form I-94. The exception for Parole status
13 is necessary because Parole status is a temporary status that can be revoked at any time and without
14 notice by the federal government. The remaining paragraphs in §217.22 are adopted to be renumbered
15 as necessary to accommodate the new definitions. These adopted amendments to §217.22 are necessary
16 to clarify the meaning of terms used in the adopted amendments to §217.26, and to strengthen the
17 document validity requirements for vehicle registration to prevent fraud and to prevent applicants who
18 are not legally eligible to reside in Texas from registering vehicles to drive on Texas roads.

19 The adopted amendments to §217.26 distinguish the personal identification document
20 requirements for registration by type of registration. Under §217.26(a), an applicant for registration needs
21 to provide a “current photo identification,” as defined under §217.22(11), that can be expired by not more
22 than 12 months. While this leeway is appropriate and creates efficiency for vehicle registration types that
23 are generally used for commercial, industrial, or agricultural purposes, or for registration types that are

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 3 of 42

Chapter 217 – Vehicle Titles and Registration

1 not based on Texas residency, it is not appropriate for registrations that require Texas residency under
2 Transportation Code, §502.040 because it invites fraud by individuals using expired, invalid identification
3 documents. Additionally, not all of the identification documents allowed under §217.26(a) prove that an
4 individual is legally authorized to reside in Texas, which is required for vehicle registration as an individual
5 Texas resident under Transportation Code, §502.040. Legal residency is not a static status; it is subject to
6 change, including a change based on federal statutes, regulations, executive orders, or case law. Therefore,
7 the department has amended §217.26(b) to create stricter requirements for the personal identification
8 documents that an individual applicant must present for vehicle registration as a Texas resident requiring
9 a valid, unexpired identification document for individual Texas resident vehicle registrants. Thus, while
10 adopted new §217.26(b) limits the types of personal identification documents the department accepts
11 from applicants seeking vehicle registration as a Texas resident, the adopted amendments to §217.26(a)
12 preserve the existing flexibility in acceptable personal identification for applicants seeking types of
13 registration that either do not require the applicant to be a resident of Texas or are generally used
14 exclusively for commercial, industrial, or agricultural purposes, and are therefore not as subject to fraud.

15 At adoption, §217.26(a) was amended to remove the specific reference to Transportation Code,
16 Chapter 502, to incorporate vehicle registrations under authority in other statutes. Additional
17 amendments to §217.26(a) at adoption added a cross-reference to the specific sections of §217.26 that
18 contain other requirements, or exemptions from requirements, for personal identification, and a
19 reference to the types of registration that are excluded from §217.26(b) to clarify that those registration
20 types are subject to the personal identification requirements of §217.26(a).

21 Under the adopted amendments to §217.26(b), applicants for vehicle registration under
22 Transportation Code Chapter 502 have to show one of five types of identification: (1) a valid, unexpired
23 driver's license or state identification certificate that complies with REAL ID, is not marked "limited term"

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 4 of 42

Chapter 217 – Vehicle Titles and Registration

1 or “temporary,” and was issued by a state or territory of the United States; (2) a valid, unexpired driver’s
2 license or state identification certificate issued by a state that requires proof of legal presence in the
3 United States for issuance; (3) an valid, unexpired driver’s license or state identification certificate issued
4 by a state or territory of the United States, regardless of whether it complies with REAL ID or was issued
5 by a state that requires proof of legal presence, so long as it is accompanied by a United States birth
6 certificate as defined in new §217.22(45), United States Certificate of Naturalization (N-550 or N-570), or
7 a United States Certificate of Citizenship (N-560 or N-561); (4) a valid passport; or (5) a valid, unexpired
8 license to carry a handgun issued by the Texas Department of Public Safety under Government Code,
9 Chapter 411, Subchapter H. All five of these methods of identification provide proof that the applicant is
10 legally eligible to reside in Texas. These adopted amendments are necessary to prevent identity fraud by
11 no longer relying on expired credentials, and to prevent applicants who are not legally eligible to reside
12 in Texas from registering vehicles in Texas.

13 The proposed rule amendments allowed only three types of acceptable identification documents:
14 (1) a driver’s license that complies with REAL ID; (2) a valid passport; or (3) valid, unexpired license to carry
15 a handgun. REAL ID requires that the issuing authority verify the legal presence status of applicants who
16 are not United States citizens. As stated above, the adopted new definition of “valid passport” in
17 §217.22(46) requires that the applicant is legally eligible to reside in Texas. Business and Commerce Code
18 §507.001 (relating to Concealed Handgun License as Valid Proof of Identification), requires that the
19 department accept a Texas handgun license in lieu of a driver’s license; an applicant for a handgun license
20 must provide proof of citizenship or lawful presence.

21 During the public comment process, the department became aware that many individuals that
22 are United States citizens or lawfully present in the United States prefer to obtain driver’s licenses or state
23 identification certificates that do not comply with REAL ID. To address this, the department at adoption

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 5 of 42

Chapter 217 – Vehicle Titles and Registration

1 added two additional forms of acceptable identification documents for registration in §217.26(b)(2) and
2 (3), to allow individuals to use driver's licenses and state identification certificates that do not comply with
3 REAL ID requirements for registration while still ensuring that the identification documents prove that the
4 applicant is legally eligible to reside in Texas.

5 REAL ID is not mandatory under federal law. A majority of the states allow an applicant to obtain
6 a driver's license or state-issued identification certificate that does not comply with the requirements of
7 REAL ID. Only five states require all new driver's licenses and identification certificates they issue to be
8 REAL ID compliant: Texas, Florida, Michigan, Nebraska, and Wyoming. The following additional states all
9 require proof of legal residence prior to issuing a driver's license or a state identification certificate, even
10 when the identification issued does not comply with all the other requirements of REAL ID: Alabama,
11 Alaska, Arizona, Arkansas, Georgia, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Mississippi,
12 Missouri, Montana, New Hampshire, North Carolina, North Dakota, Ohio, Oklahoma, Pennsylvania, South
13 Carolina, South Dakota, Tennessee, West Virginia, and Wisconsin. Under new §217.26(b)(2), which was
14 added at adoption, an applicant can apply for vehicle registration with a driver's license or state-issued
15 identification certificate regardless of whether it complies with the requirements of REAL ID if it was issued
16 by a state that requires proof of legal presence in the United States.

17 New §217.26(b)(3), which was also added at adoption, creates requirements to address the
18 remaining states, which do not check for legal presence in the United States when issuing a driver's license
19 or state-issued identification certificate that does not comply with REAL ID. Adopted new §217.26(b)(3)
20 allows an applicant to provide their unexpired driver's license or state identification certificate from any
21 state or territory of the United States, if it is accompanied by a United States birth certificate as defined
22 in new §217.22(45), a United States Certificate of Naturalization (N-550 or N-570), or a United States
23 Certificate of Citizenship (N-560 or N-561) to prove citizenship. The department also amended

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 6 of 42

Chapter 217 – Vehicle Titles and Registration

1 §217.26(b)(1) at adoption to limit the use of a REAL ID to only those driver’s licenses or state-issued
2 identification certificates that are not marked “limited term” or “temporary,” since these markings are
3 used to denote non-citizens with temporary immigration status. REAL ID-compliant driver’s licenses that
4 are marked “limited term” or “temporary” could only be used by a registration applicant if they met the
5 requirements of §217.26(b)(2) or (3) as amended at adoption. These applicants could also use a valid
6 passport, as defined by adopted new §217.22(46), to register their vehicle. These new amendments at
7 adoption will give Texas residents with a driver’s license from another state more options when registering
8 their vehicles, while still ensuring that all vehicle registrants are legally eligible to reside in Texas.

9 An amendment to §217.26(b) at adoption creates a cross-reference to the specific sections of
10 §217.26 that contain other requirements, or exemptions from requirements, for personal identification.
11 The department also added amendments to §216.26(b) at adoption to clarify that the strengthened
12 identification requirements do not apply to an application for initial registration under Transportation
13 Code, Chapter 502, Subchapters C (Special Registrations) or I (Alternate Registration Fees); §502.146
14 (Certain Farm Vehicles and Drilling and Construction Equipment); a registration under §217.66 of this title
15 (relating to Specialized License Plate for Registration of Rental Trailers); or a commercial vehicle
16 registration under §217.46(b) of this title (relating to Commercial Vehicle Registration). An applicant for
17 registration under one of these provisions must comply with the applicable identification requirements
18 under §217.26(a) or (c), unless the registration falls under new §217.26(h) as explained below. These
19 provisions apply to certain types of registration that do not require the applicant to be a resident of Texas,
20 or certain types of registration that are generally used either (1) by motor carriers or transit authorities;
21 or (2) for soil conservation, farming, ranching, agriculture, drilling water wells, oil well servicing or drilling,
22 and certain other commercial or industrial purposes. These changes at adoption were necessary because
23 these registration types are not generally used by individuals for routine personal vehicle registration and

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 7 of 42

Chapter 217 – Vehicle Titles and Registration

1 are therefore less susceptible to fraud or to misuse by people who are not legally eligible to reside in
2 Texas. For these specific types of registration, the loss of efficiency for commerce and industry that could
3 result from the enhanced identification requirements under new §217.26(b) outweighs the risks of
4 allowing more forms of personal identification for vehicle registration. The remaining subsections of
5 §217.26 are adopted to be re-lettered to accommodate proposed new §217.26(b). At adoption, the
6 department added cross-references to subsections (c), (g), and (h) in §217.26(b) to clarify that §217.26(b)
7 is subject to those exceptions.

8 The department also added cross-references in §217.26(c) at adoption. The department added a
9 cross-reference in §217.26(c)(1) to subsections (a), (b), and (c)(2)-(4), to clarify that those sections contain
10 the personal identification requirements that would apply to the registration of a vehicle with more than
11 one owner, depending on the type of owner and type of registration. The department also added cross-
12 references in §217.26(c)(2) - (4) citing §217.26(a), to clarify which personal identification requirements
13 apply to those specific registration situations. In §217.26(c)(3), the department added “or authorized
14 trustee representative if the trustee is a legal entity” at adoption, to clarify whose personal identification
15 the department requires for registration of a vehicle by a trust.

16 At adoption, the department added new §217.26(h), which exempts the following from the
17 identification requirements under §217.26: apportioned registration under the International Registration
18 Plan (IRP); exempt vehicle registrations under Transportation Code, Chapter 502, Subchapter J, or
19 §502.0025; and registration of off-highway vehicles owned by the state, a county, or a municipality under
20 Transportation Code, §502.140(c).

21 IRP is a vehicle registration reciprocity agreement between the 48 contiguous states of the United
22 States, the District of Columbia, and the Canadian provinces. Texas is a member of IRP, as authorized by
23 Transportation Code, §502.091 and 49 U.S.C. §31704, and must comply with IRP. Sections 305 and 310 of

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 8 of 42

Chapter 217 – Vehicle Titles and Registration

1 IRP authorize a person to register an “apportionable vehicle,” as defined by IRP, in a jurisdiction that is a
2 member of IRP (member jurisdiction) if the person has an “established place of business” in that member
3 jurisdiction as defined by Section 305 of IRP. An “established place of business” is not the same as a
4 residence. If an applicant for apportioned registration does not have an “established place of business” in
5 a member jurisdiction, the applicant may register a vehicle in a member jurisdiction in which the applicant
6 can demonstrate “residence” under the requirements in Section 305 of IRP, which requires a “resident
7 driver’s license or non-driver issued identification.” Apportioned registration in Texas is governed by 43
8 TAC §217.56, rather than §217.26. Also, the identification requirements under §217.26 to establish
9 residence are inconsistent with Section 305 of IRP. It was therefore necessary at adoption to exempt
10 vehicles registered under IRP from the requirements of §217.26.

11 The registration classes under Transportation Code, Chapter 502, Subchapter J, are exempt from
12 registration fees and are used by or for government entities or for a purpose that benefits the public. An
13 example of a vehicle used to benefit the public is a commercial motor vehicle, trailer, or semitrailer owned
14 by a nonprofit disaster relief organization and used exclusively by the organization for activities related to
15 disaster relief. The registration classes under Subchapter J have special application requirements under
16 the relevant statutes to require the applicant to show that the applicant is eligible for one of these classes
17 of registration, and most of these registration classes have special registration requirements under
18 §217.55 of this title (relating to Exempt and Alias Vehicle Registration). Also, the vehicles that are eligible
19 for one of these registration classes must generally display an external indication on the vehicle that
20 indicates its exempt status, such as the name of the governmental agency printed on each side of the
21 vehicle, a license plate that includes the word “exempt,” or a license plate that indicates the specific use
22 of the vehicle such as a license plate that includes the words “Disaster Relief.” Governmental agencies
23 that are required to print the name of the agency and other information on each side of the motor vehicle

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 9 of 42

Chapter 217 – Vehicle Titles and Registration

1 are subject to having their motor vehicle seized by a peace officer under Transportation Code, §502.452(c)
2 if the governmental agency operates the motor vehicle on a public highway when the motor vehicle is not
3 identified by Transportation Code, §502.452(a) or (b), unless the vehicle falls under the exemption
4 provided under Transportation Code, §502.452(f). Therefore, the exempt registration classes under
5 Chapter 502, Subchapter J are less susceptible to fraud or use by individuals who do not have a legal right
6 to reside in Texas, so an amendment at adoption was necessary to exempt these vehicles from individual
7 personal identification registration requirements to avoid waste and inefficiency for the government and
8 non-profit entities that qualify for exempt registration.

9 The registration class under Transportation Code, §502.140(c) is limited to “an off-highway vehicle
10 that is owned by the state, county, or municipality for operation on a public beach or highway to maintain
11 public safety and welfare.” Due to the limitation on the use of such vehicles and the fact that this
12 registration class is limited to an off-highway vehicle owned by the government, the identification
13 requirements under §217.26 are not necessary because there are sufficient protections in place to
14 prevent an individual from obtaining this registration class.

15 Adopted amendments to §217.28(c) and (d) and §217.29(d) and (e) require applicants seeking to
16 renew a motor vehicle registration to provide documents or information to allow the department to verify
17 that the vehicle owner has a personal identification document that meets the requirements of amended
18 §217.26. These changes are necessary to implement the new identification requirements under §217.26
19 for most registered vehicles, including those that were initially registered prior to the effective date of the
20 adopted amendments to §217.26. Paragraphs under §217.28(c) are renumbered to accommodate the
21 addition of the new identification requirements in adopted new §217.28(c)(2). Paragraphs under
22 §217.29(d) and (e) are renumbered to accommodate the addition of the new identification requirements
23 in adopted new §217.29(d)(2) and (e)(4).

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 10 of 42

Chapter 217 – Vehicle Titles and Registration

1 At adoption, the department amended the language of §217.29(d)(2) to exempt the following
2 registrations from the new requirement for the applicant to show personal identification at renewal that
3 meets the applicable requirements under §217.26: registration under §217.66 of this title (relating to
4 Specialized License Plate for Registration of Rental Trailers), §217.46(b)(5) of this title (relating to
5 Commercial Vehicle Registration) regarding a forestry vehicle license plate, Transportation Code,
6 §502.0023 (Extended Registration of Commercial Fleet Vehicles), and Transportation Code, §502.0024
7 (Extended Registration of Certain Trailers). The specific qualifying requirements in rule and statute for
8 these types of registration make them unlikely to be obtained by individual residents. The trailers in the
9 rental fleet under §217.66 must be owned by the same owner and offered for rent or rented without
10 drivers. The forestry vehicle license plate is available only for vehicles that are used exclusively to
11 transport forest products in their natural state, including logs and wood chips. The vehicles that are
12 eligible for extended registration under Transportation Code, §502.0023 are motor vehicles, semitrailers,
13 and trailers in the “commercial fleet,” which is defined in Transportation Code, §502.001 to require the
14 vehicles to be owned, operated, or leased by a business entity and used for the business purposes of that
15 entity. The trailers that are eligible for extended registration under Transportation Code, §502.0024 are
16 trailers, semitrailers, and pole trailers with an actual gross weight or registered gross weight of 7,500
17 pounds or less. While Transportation Code, §502.0024 does not limit the use of these trailers to a business
18 purpose, each of these types of trailers are trailing units, which require a separate registered motor
19 vehicle to pull them before they can go on the road. The truck or tractor pulling the trailers would still be
20 subject to separate registration requirements, including the new identification requirements, so requiring
21 identification at renewal for the unpowered trailers would be redundant and inefficient. Creating these
22 exceptions in §217.29(d)(2) at adoption was necessary because the loss of efficiency for commerce that
23 could come from having to show personal identification at registration renewal outweighed other

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 11 of 42

Chapter 217 – Vehicle Titles and Registration

1 concerns, since these registration types are either: (1) not used by individual Texas residents for personal
2 vehicle registration and are therefore less susceptible to identity fraud, or (2) fall within the category of
3 trailing units that are pulled by a separate motor vehicle, which the owner must register separately.

4 In response to public comments requesting a delay to the implementation of the personal
5 identification requirements for registration renewal under §217.28 and §217.29, the department has
6 delayed the effective date of §217.28 and §217.29 to January 1, 2027. This delay will allow time for the
7 department and tax assessor-collectors to improve systems and processes to facilitate quick and efficient
8 registration renewal with automated identification verification methods that mitigate the risk of fraud
9 and identity theft. The delay will also allow lenders and dealers additional time to adapt their business
10 processes to account for the application of revised personal identification requirements to registration
11 renewals.

12 SUMMARY OF COMMENTS.

13 The department received 268 comments on the proposal.

14 The department received 256 comments against the adoption of the proposed rule amendments
15 from the Independent Bankers Association of Texas (IBAT), the Texas Bankers Association, the Texas
16 Credit Union Association, the Texas Independent Automobile Dealers Association (TIADA), AARPTexas,
17 the Texas Automobile Dealers Association (TADA), the Houston Automobile Dealers Association (HADA),
18 the New Car Dealers of West Texas (NCDWT), the San Antonio Automobile Dealers Association, Inc.,
19 (SAADA), the El Paso New Car Dealers Association (EPNCDA), the Valley Automobile Dealers Association
20 (VADA), the Austin Automobile Dealers Association (AADA), the North Texas Automobile Dealers (NTXAD),
21 the Workers Defense Action Fund (WDAF), the Texas United Auto and Community Alliance (TUACA), Every
22 Texan, the Tax Assessor-Collectors Association of Texas (TACA), the Texas Conference of Urban Counties
23 (TCUC), the Texas Department of Public Safety (TxDPS), Texas State Senator Juan “Chuy” Hinojosa, Texas

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 12 of 42

Chapter 217 – Vehicle Titles and Registration

1 State Senator Molly Cook, Texas State Representative Armando Walle, Texas State Representative Terry
2 Canales, Texas State Representative Christina Morales, Texas State Representative Vincent Perez, the
3 Bexar County Tax Assessor-Collector, the Travis County Tax Assessor-Collector, El Paso County, the Webb
4 County Tax Assessor-Collector, and 227 other individuals. The department received comments from 12
5 individuals in support of adoption of the proposed rules.

6 **Comment.** The department received comments from TIADA, WDAF, TUACA, State Representative Terry
7 Canales, State Representative Armando Walle, State Representative Christina Morales, the Travis County
8 Tax Assessor-Collector, El Paso County, and 124 other individuals in opposition to the proposed
9 amendments because they would have a negative financial impact on businesses that serve immigrant
10 and low-income communities, including car dealerships, title transfer businesses, and lenders. One dealer
11 commented that it had seen a 25%-30% drop in transactions since the identification requirements
12 changed. Another dealer commented that the identification requirements have caused a 50% drop in
13 sales, a 30% decrease in collections, and a 20% increase in repossessions at his dealership. One lender
14 estimated an increase in administrative expenses of \$50,000-\$100,000 per year, and reduced loan volume
15 of 5%-10% per year. Another dealer estimated an annual revenue reduction of approximately \$50 million,
16 a workforce reduction of 100-125 employees, closure of retail locations, and the elimination of all
17 community outreach, charitable events and social responsibility programs that the dealers currently fund.
18 Another dealer stated that it had experienced a 66% drop in sales with the new identification
19 requirements. Still another dealer said that it had lost 75% of its sales due to the new guidance on
20 identification requirements. Another dealer expected a negative impact on sales of 4%-5%. Two dealers
21 commented that each of them had lost 20% of sales due to the new registration identification
22 requirements and expected to lay off employees. A title services business operator stated that her
23 revenue from title transfers had been reduced by 85% in December 2025. Two dealers stated that their

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 13 of 42

Chapter 217 – Vehicle Titles and Registration

1 sales had decreased by more than 50% during the period of November 2025 to January 2026, as compared
2 to the same period in 2024-2025. A dealer feared that the proposed new identification requirements
3 would devalue his dealership to such an extent that he should not pass it on to his children because it
4 would only be a burden. These dealers also stated that customers that only had individual taxpayer
5 identification numbers produced lower loss ratios than customers that were United States citizens.

6 **Response.** The department disagrees. People can continue using foreign passports to obtain legal title to
7 purchased vehicles, so that they can export them to their home country or sell the vehicle if they are
8 unable to use it. Under Transportation Code §502.040, people who are not legally eligible to reside in
9 Texas are not authorized to register vehicles as Texas residents. Dealers and lenders should perform
10 sufficient due diligence to ensure they are doing business with a person who is legally authorized to reside
11 in Texas if the person is requesting to register a vehicle in Texas. The department is not authorized to
12 support business operations inconsistent with state laws.

13 **Comment.** IBAT, TIADA, and 36 individuals commented in opposition to the proposed amendments
14 because people who have purchased vehicles but are unable to register them will be more likely to default
15 on car loans. IBAT, TIADA, and 10 individuals noted that the Consumer Financial Protection Bureau and
16 the U.S. Department of Justice issued guidance in October 2023 cautioning creditors against denying
17 credit based solely on immigration status when applicants are otherwise qualified, which caused lenders
18 to lend without looking into immigration status. IBAT commented that the proposed identification
19 requirements are inconsistent with the federal Customer Identification Program requirements that
20 dictate the information a bank must obtain from an individual opening an account. IBAT and an individual
21 commented that if buyers fail to register their vehicles out of fear that they will not be able to provide the
22 necessary personal identification documents, it will make locating and repossessing collateral more
23 difficult and expensive for banks in the event of default. An individual commented that vehicles that are

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 14 of 42

Chapter 217 – Vehicle Titles and Registration

1 unable to be registered will be uninsurable, which will increase risk to lenders of losing their collateral.
2 TIADA and 16 individuals requested that the department amend §217.26(b) at adoption to create a
3 grandfathering provision to allow people to renew registration for vehicles with existing registration
4 without providing identification, so as to prevent the defaults and losses for lenders.

5 **Response:** The department disagrees. Under Transportation Code, §502.040, people who are not legally
6 eligible to reside in Texas are not authorized to register vehicles as Texas residents. Dealers and lenders
7 should perform sufficient due diligence to ensure they are doing business with people who are legally
8 authorized to reside in Texas. Many of the financial concerns raised are not within the scope of the rule
9 proposal. It is the responsibility of Texas businesses to appropriately manage their operations within the
10 requirements of numerous local, state and federal regulations which do not always fully align in
11 application or intent. However, to mitigate these concerns, the department has delayed the effective date
12 of §217.28 and §217.29 to January 1, 2027. This delay will allow lenders and dealers more time to adapt
13 their business processes to account for the application of revised personal identification requirements to
14 registration renewals.

15 **Comment.** TACA, TUACA, the Webb County Tax Assessor-Collector, the Travis County Tax Assessor-
16 Collector, El Paso County, State Senator Juan “Chuy” Hinojosa, State Representative Terry Canales, State
17 Representative Christina Morales, and 57 individuals commented in opposition to the proposed
18 amendments because the rule would significantly reduce state revenue, both from lost registration fees
19 and lost sales tax revenue. The Webb County Tax Assessor-Collector estimated that 40%-60% of vehicle
20 purchasers in Webb County will not meet the proposed new identification requirements, resulting in a
21 reduction of between \$15.2 million and \$22.8 million in vehicle sales taxes. One individual commented
22 that if 40% of an estimated 1.58 million undocumented adults in Texas do not register vehicles, the state
23 of Texas would lose \$1.8 billion annual in sales tax revenue. TACA, TUACA, Every Texan, El Paso County,

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 15 of 42

Chapter 217 – Vehicle Titles and Registration

1 State Senator Juan “Chuy” Hinojosa, and two individuals stated that the proposed changes would cause
2 individuals to register in other states. One commenter noted a Texas Department of Transportation study
3 prior to 2009 that found Texas was already losing as much as \$70 million per year in fees to neighboring
4 states. A dealer commented that it expected sales tax and title fees from its dealership alone to be reduced
5 by \$2 million per year; another estimated sales tax payments would decline \$1.2 million per year. One
6 individual commented that the department does not have data on the number of vehicles registered with
7 each type of permitted identification documents or the amount of tax collected annually based on those
8 registrations with each type of identification document, and does not have data on how many vehicles
9 dealers in Harris, Dallas, Tarrant, Bexar and Travis Counties have registered using driver’s licenses or
10 foreign passports.

11 **Response.** The department disagrees. Based on data the department has recently identified, only 5.15%
12 of registrants who completed initial registration and titling simultaneously used a passport as their form
13 of identification. Those data are not broken down between the use of foreign passports and United States
14 passports and do not show which foreign passports were supported by valid visas or permanent residence
15 cards. Assuming that half of the passports used were United States passports, and that half of the foreign
16 passports were supported by valid immigration documentation that would meet the requirements of the
17 rule amendments, the department expects that the rule will impact approximately 1.29% of registered
18 vehicles, or about 341,000 vehicles per year, resulting in a reduction in vehicle registration revenue to the
19 state of approximately \$19.5 million per year, or 0.84%. The department expects a reduction in revenue
20 to local government of \$1,731,578 per year statewide, or 0.36%.

21 **Comment.** The department received comments from 11 individuals in opposition to the proposed
22 amendments because they felt that the rule was discriminatory and racially motivated. State
23 Representative Vincent Perez commented that the proposed amendments suggest that the department

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 16 of 42

Chapter 217 – Vehicle Titles and Registration

1 is “willing to use routine government processes to signal exclusion, to remind certain Texans that their
2 participation is conditional.”

3 **Response.** The department disagrees. The identification requirements apply equally to all persons,
4 regardless of race or ethnicity.

5 **Comment.** One individual commented in opposition to the proposed amendments that required the
6 department to request passports with visas for registration renewal because it was too much personal
7 information.

8 **Response.** The department disagrees. The department has been charged with issuing vehicle registration
9 to residents under Transportation Code, §502.040, which requires that the application for vehicle
10 registration be accompanied by personal identification. The proposed rule amendments tighten the
11 identification requirements to ensure that the identification presented for vehicle registration is valid and
12 proves that the applicant for registration is legally eligible to reside in Texas.

13 **Comment.** TACA, the Travis County Tax Assessor-Collector, and one individual commented in opposition
14 to the proposed amendments because the Texas by Texas online system requires a vehicle registrant to
15 provide too much personal information when it makes a user provide a social security number and other
16 personal information to create an account. TACA and the Travis County Tax Assessor-Collector believe
17 that this will cause fewer people to renew online, leading to more mail-in and in-person registration
18 renewals that will increase costs for tax offices.

19 **Response.** The department disagrees. This comment is outside the scope of this rulemaking. The
20 department does not set the website account requirements for Texas by Texas, which is overseen by the
21 Department of Information Resources. Individuals concerned by having to provide information required
22 to use Texas by Texas have other vehicle registration options available to them.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 17 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Comment.** Three individuals commented in opposition to the proposed amendments because the
2 proposed new personal identification requirements could cause people to become victims of fraudulent
3 schemes as they seek ways to get vehicle registration.

4 **Response.** The department disagrees. Fraud is a pervasive issue in modern society and a constant threat
5 that everyone should remain vigilant against at all times. It is not isolated to or exacerbated by the specific
6 types of identification the department requires for vehicle registration. Personal identification is regularly
7 required by businesses, social media and entertainment platforms, nonprofit organizations, community
8 groups, and numerous other entities.

9 **Comment.** The TxDPS and one individual commented in opposition to the proposed amendments because
10 the amended rules would prevent people who had moved to Texas from other states from being able to
11 register their vehicles, which would prevent them from being able to apply for a Texas driver's license.
12 The TxDPS DL-14a form asks first-time applicants whether they have a motor vehicle that is required to
13 be registered in Texas, based on the requirement under Transportation Code, §521.144 that a new
14 resident of Texas must register his or her motor vehicles in Texas before applying for a Texas driver's
15 license. TxDPS commented that this would result in more unlicensed drivers and unregistered vehicles.
16 TxDPS also commented that the rule amendments would increase staff processing time requirements for
17 TxDPS, leading to additional delays. TxDPS requested that the department allow applicants to present
18 United States birth certificates as proof of citizenship for individuals that do not have a driver's license or
19 identification certificate that meets the requirements of REAL ID.

20 **Response.** The department agrees. At adoption, changes to the proposed text allow applicants to provide
21 a birth certificate in addition to a driver's license or state identification card, if the license or state
22 identification card does not comply with REAL ID.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 18 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Comment.** TADA, WDAF, State Senator Juan “Chuy” Hinojosa, State Senator Molly Cook, State
2 Representative Terry Canales, State Representative Christina Morales, the Travis County Tax Assessor-
3 Collector, the Bexar County Tax Assessor-Collector, El Paso County, and 43 other individuals commented
4 in opposition to the proposed amendments because the amended rules would make Texas roads more
5 dangerous by reducing the number of insured drivers. The department received comments from 12
6 individuals who estimated that the reduction in insured drivers could cost the remaining insured drivers
7 in Texas more in higher insurance premiums and create instability in the insurance market; one
8 commenter estimated a cost of \$1.5-3 billion per year in increased premiums. Another individual noted
9 that when New Mexico restricted vehicle registration, it led to a spike in the number of uninsured drivers.
10 An individual commenter estimated that the change in registration identification requirements would
11 result in a \$1 billion loss for insurance companies. Another individual commenter stated that uninsured
12 drivers are more likely to hit-and-run if they get into an accident, which will drive up repair costs for the
13 other drivers they hit and for the companies that insure those drivers.

14 **Response.** The department disagrees. The department does not expect a significant impact on the number
15 of uninsured drivers as a result of the proposed rules because the department’s data suggests that only
16 1.29% of registrants, or approximately 341,000 individuals, are registering vehicles with foreign passports
17 that would not meet the requirements of the proposed new rules.

18 **Comment.** The department received comments from 62 individuals in opposition to the proposed
19 amendments because the amended rules would create a dangerous environment and decrease road
20 safety.

21 **Response.** The department disagrees. The department does not expect that the proposed amendments
22 will make Texas or its roads more dangerous. To the extent that these comments refer to uninsured
23 drivers, the department does not expect a significant impact on the rate of insured drivers as a result of

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 19 of 42

Chapter 217 – Vehicle Titles and Registration

1 the proposed rules because the department’s data suggests that only 1.29% of registrants, or
2 approximately 341,000 vehicles, are registering with foreign passports that would not meet the
3 requirements of the proposed new rules.

4 **Comment.** TADA, TIADA, TACA, TUACA, El Paso County, State Senator Juan “Chuy” Hinojosa, State Senator
5 Molly Cook, and 13 other individuals commented that the proposed rules would result in the government
6 and law enforcement having less accurate, up-to-date information on vehicles and their owners. TADA
7 and Senator Hinojosa commented that the inaccurate registration information could create problems for
8 vehicle manufacturers in getting recall notices to the actual vehicle owners.

9 **Response.** The department disagrees. The department does not expect a significant impact on the
10 accuracy of the vehicle information database, because the department’s data suggests that only 1.29% of
11 registrants, or approximately 341,000 vehicles, are registering with foreign passports that would not meet
12 the requirements of the proposed new rules. Personal vehicle ownership is not the only form of
13 transportation available to Texans.

14 **Comment.** The department received comments from El Paso County, State Representative Christina
15 Morales, WDAF, and 101 individuals in opposition to the proposed rule amendments because they would
16 cause reduced economic productivity in Texas when workers are unable to get transportation. One
17 individual stated that the proposed rules would “kill the Texas miracle.”

18 **Response.** The department disagrees. The department does not expect a significant impact on economic
19 productivity, because the department’s data suggests that only 1.29% of registrants, or approximately
20 341,000 vehicles, are registering with foreign passports that would not meet the requirements of the
21 proposed new rules. Personal vehicle ownership is not the only form of transportation available to Texans.

22 **Comment.** Six individuals commented in opposition to the proposed rule amendments, stating that Texas
23 should introduce a limited-purpose driver’s license, similar to California’s AB60, to allow undocumented

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 20 of 42

Chapter 217 – Vehicle Titles and Registration

1 residents to obtain a state-issued ID with proof of residency and identity, required biometric background
2 checks, and markings stating “driving privilege only” to distinguish it from other licenses. TxDMV could
3 then use this special ID as the basis for vehicle registration.

4 **Response.** The department disagrees. This comment is outside the scope of both this rulemaking and the
5 department’s rulemaking authority. The department does not have legal authority over driver’s license
6 programs in Texas. The Department of Public Safety issues driver’s licenses.

7 **Comment.** Two individuals commented in opposition to the proposed amendments because limiting
8 vehicle registration could result in issues for vehicle sellers when the purchaser of their vehicle does not
9 register it, such as continuing toll charges.

10 **Response.** The department disagrees. The department works with customers and the toll authorities to
11 identify vehicles that have been sold. Filing a vehicle transfer notice with the department protects a
12 vehicle seller from incurring future toll charges, even if the new owner does not register it immediately.

13 **Comment.** Three individuals commented in opposition to the proposed rules because the change in
14 registration requirements could lead to increased isolation among immigrant families, which could in turn
15 lead to increased healthcare costs that one commenter estimated at \$1 billion in added healthcare
16 spending for 632,000 impacted adults.

17 **Response.** The department disagrees. Individuals that are unable to register vehicles are still able to use
18 other forms of transportation.

19 **Comment.** Two individuals commented in opposition to the proposed amendments because if the
20 changed identification requirements result in 632,000 households being unable to travel, it will result in
21 similar spending reductions as experienced during COVID, resulting in sales tax losses from the decrease
22 in spending.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 21 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Response.** The department disagrees. Individuals that are unable to register vehicles are still able to use
2 other forms of transportation.

3 **Comment.** Two individuals commented in opposition to the proposed amendments because Arizona has
4 instituted restrictions in vehicle registration, which led to Arizona losing sales tax, car dealer sales revenue,
5 insurance stability, and consumer spending, while other surrounding states gained as Arizona residents
6 registered their vehicles in other states. The commenter urged that Texas should not repeat this costly
7 error.

8 **Response.** The department disagrees. The experiences of other states in this area are not necessarily
9 directly relevant to the structures and operations in place in Texas. It is important that the identity
10 documents for vehicle registration be valid so that people who are not legally eligible to reside in Texas
11 are not allowed to register vehicles as Texas residents. The department does not expect a significant
12 impact on sales tax, car dealer sales revenue, insurance stability, and consumer spending, because the
13 department's data suggests that only 1.29% of registrants, or approximately 341,000 vehicles, are
14 registering vehicles with foreign passports that would not meet the requirements of the rules.

15 **Comment.** One individual commented in opposition to the proposed amendments, without further
16 elaboration.

17 **Response.** The department disagrees. It is important that the identity documents for vehicle registration
18 be valid, so that people who are not legally eligible to reside in Texas are not allowed to register vehicles
19 as Texas residents.

20 **Comment.** Two individuals commented in opposition to the proposed amendments because insurance
21 companies are willing to insure motorists on the basis of foreign passports without visa or immigration
22 documentation, so the rules would create a disparity between the requirements for insurance and the
23 requirements for vehicle registration.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 22 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Response.** The department agrees that there is a difference between insurance requirements and
2 registration requirements. However, the business practices of insurance companies are not equivalent to
3 the policy considerations of state government. The department disagrees with the commenters that the
4 proposed rules should not be adopted because it is important that the identity documents for vehicle
5 registration be valid, so that people who are not legally eligible to reside in Texas are not allowed to
6 register vehicles as Texas residents.

7 **Comment.** One individual commented in opposition to the proposed amendments because Texas issues
8 limited-term driver's licenses to immigrants with lawful presence that expire when the lawful presence
9 ends, and that all professional licenses issued by the state to immigrants should similarly be termed to
10 end when the immigrant's lawful presence ends.

11 **Response.** The department disagrees. This comment is outside the scope of this rulemaking and beyond
12 the scope of the department's jurisdiction.

13 **Comment.** AARPTexas and four individuals commented in opposition to the proposed amendments,
14 requesting that the proposed amendments be changed at adoption to allow a non-owner who has
15 possession or control of a vehicle with the owner's permission to register the vehicle, and noted that this
16 is allowed in other states.

17 **Response.** The department disagrees. Transportation Code, §502.001(31) defines "owner" for purposes
18 of vehicle registration under §502.040 to include not only the person who holds the legal title to the
19 vehicle, but also any person that has "the legal right of possession of a vehicle" or "the legal right of control
20 of the vehicle." The department already allows owners to designate other people with legal rights of
21 control or possession of the vehicle to register it. The proposed rules would not impact the definition of
22 "owner" or the process for registration by people with legal rights of possession or control over a vehicle.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 23 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Comment.** The department received comments from 82 individuals in opposition to the proposed
2 amendments, stating that the proposed rules would prevent children from getting to school if their
3 parents were unable to register their cars.

4 **Response.** The department disagrees. Individuals that are unable to register vehicles are still able to use
5 other forms of transportation, including bus services offered by public school districts.

6 **Comment.** IBAT, the Texas Bankers Association, the Texas Credit Union Association, TCUC, TIADA, the
7 Travis County Tax Assessor-Collector, and 11 individuals commented in opposition to the proposed
8 amendments, with concern that there had been insufficient opportunity for public input on the rules due
9 to department's implementation of the new identification document policies through guidance to the tax
10 assessor-collectors and dealers and by proposing a rule without a board meeting. The commenters
11 requested that the department rescind its guidance until the rulemaking process is complete. An
12 individual commented that the "democratically elected lawmakers" should be involved in a change of this
13 magnitude involving private property. Another individual noted that the fast implementation had led to
14 consumer confusion about identification requirements, and a reduction in consumer confidence with
15 respect to car buying.

16 **Response.** The department disagrees. The department has provided the notice and opportunity for
17 comment required by Texas Government Code, Chapter 2001, including a public hearing on January 21,
18 2026, to receive additional public comment and an open meeting on February 11, 2026, where the
19 department's board will consider adoption of the proposed amendment. To propose the rule for public
20 comment without holding a board meeting, the department relied on authority under Transportation
21 Code §§502.0021, 502.040, and 502.043 that is vested in the department rather than the TxDMV board.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 24 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Comment.** Two individuals commented in opposition to the proposed amendments because they would
2 impact the Hispanic community that pays taxes, has car insurance, and complies with the law, but would
3 not address undocumented immigrants driving without license plates, insurance or valid registration.

4 **Response.** The department disagrees. The identification requirements apply equally to all persons.
5 Individuals who refuse to abide by the law are subject to criminal penalties as enforced by state and local
6 law enforcement agencies.

7 **Comment.** TADA, HADA, NCDWT, SAADA, EPNCDA, VADA, AADA, NTXAD, and two individuals commented
8 that the federal government does not stamp passports and instead uses Form I-94.

9 **Response.** The department agrees. At adoption, additional amendments to the proposed rule language
10 remove the stamp requirement and allow an applicant for vehicle registration to use a valid Form I-94
11 that is not Parole status, accompanied by a valid foreign passport.

12 **Comment.** IBAT, TACA, TIADA, TUACA, TxDPS, El Paso County, State Senator Juan “Chuy” Hinojosa, and
13 23 other individuals commented in opposition to the proposed amendments because the change in
14 identification requirements would cause people who need to register vehicles but do not have acceptable
15 identification to resort to illegal solutions, such as falsifying driver’s license applications, paying third
16 parties to register vehicles in someone else’s name, or creating fraudulent registration stickers.

17 **Response.** The department disagrees. Individuals that are unable to register vehicles are still able to use
18 other forms of transportation. Fraud and other criminal activity are constant threats, regardless of which
19 specific identification documents the department requires. Individuals who refuse to abide by the law are
20 subject to criminal penalties as enforced by state and local law enforcement agencies.

21 **Comment.** One individual commented in opposition to the proposed amendments because the defined
22 term “current photo identification” in §217.22(11), which allows photo identification that has been
23 expired for not more than 12 months, conflicts with the requirements of the proposed new definition of

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 25 of 42

Chapter 217 – Vehicle Titles and Registration

1 “valid passport” and of the proposed amendments to §217.26(b), which require that the identification
2 documents be unexpired. The commenter requests that §217.22(11) be amended to require a current
3 photo identification to be unexpired.

4 **Response.** The department disagrees. The defined term “current photo identification” is not used in
5 proposed amended §217.26(b), though it is used in proposed amended §217.26(a). This distinction is
6 intentional, to allow leeway in expiration for the commercial, industrial and governmental registration
7 types that fall under proposed amended §217.26(a), for which identity fraud is more difficult and less
8 common, while tightening the identification requirements for the registrations for individual Texas
9 residents that fall under proposed amended §217.26(b).

10 **Comment.** AARPTexas, TACA, TIADA, TADA, HADA, NCDWT, SAADA, EPNCDA, VADA, AADA, NTXAD, TCUC,
11 State Senator Juan “Chuy” Hinojosa, State Representative Christina Morales, the Travis County Tax
12 Assessor-Collector, El Paso County, and three other individuals commented in opposition to the proposed
13 amendments because applicants renewing their vehicle registration by mail or over the internet should
14 not have to provide proof of unexpired identification, because it will create a risk of identity theft and
15 fraud. TACA, TCUC, and Representative Morales commented that the requirement to provide a copy of
16 identification will disproportionately impact out-of-state military members, the elderly, and the disabled,
17 who may have difficulty getting access to a copier to make copy of their identification. TCUC requested
18 that the department create a secure, centralized system to store identification information, to remove
19 from the counties the risk of that information being compromised, and commented that the requirement
20 to mail a copy of identification will cause more people to visit the county tax offices in person, raising
21 costs for the counties.

22 **Response.** The department disagrees. Proposed amended §217.28 allows a registrant to provide
23 information necessary to verify that the vehicle owner has an identification document that meets the

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 26 of 42

Chapter 217 – Vehicle Titles and Registration

1 requirements of proposed amended §217.26, as an alternative to providing the identification documents
2 themselves. Personal identification is regularly required by businesses, social media and entertainment
3 platforms, nonprofit organizations, community groups, and numerous other entities as a routine part of
4 operations. However, the department has delayed the effective date of §217.28 and §217.29 to January
5 1, 2027. This delay will allow time for the department and tax assessor-collectors to improve systems and
6 processes to allow for quick and efficient registration renewal with automated identification verification
7 methods that mitigate the risk of fraud and identity theft.

8 **Comment.** One individual commented in opposition to the proposed amendments because law
9 enforcement does not pursue violations of expired registration, and that the Texas Legislature should
10 establish enforceable and harsh laws to address expired registration violators.

11 **Response.** The department disagrees. This comment is outside the scope of the department's rulemaking,
12 and outside the department's jurisdiction.

13 **Comment.** One individual commented in opposition to the proposed amendments because the proposed
14 rule amendments will make it more difficult for women and transgender individuals to vote.

15 **Response.** The department disagrees. The amendments in this rulemaking address identification
16 requirements for vehicle registration, not voter registration. The department does not have jurisdiction
17 over voter registration policies or operations in Texas.

18 **Comment.** Four individuals commented in opposition to the proposed amendments because immigration
19 is a federal issue that is not within the department's jurisdiction and should be left to the federal
20 government to address.

21 **Response.** The department disagrees. It is the department's responsibility and within the department's
22 jurisdiction to ensure that individuals registering vehicles as Texas residents under Transportation Code
23 §502.040 are who they say they are and have a legal right to reside in Texas.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 27 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Comment.** The department received comments from 12 individuals in support of the proposed rule
2 amendments.

3 **Response.** The department agrees.

4 **Comment.** TADA, HADA, NCDWT, SAADA, EPNCDA, VADA, AADA, NTXAD, State Senator Juan “Chuy”
5 Hinojosa, State Representative Vincent Perez, and one other individual commented in opposition to the
6 proposed rules because the current list of identity documents required for vehicle registration under
7 unamended §217.26(a) is sufficient to verify a buyer’s identity and are appropriate for titling and
8 registration for both Texas residents and for non-residents, because the state’s primary interests in titling
9 and registration of vehicles is the prevention of theft and the importation of stolen vehicles, and the
10 perfection of the vehicle’s security interests.

11 **Response.** The department disagrees. Titling and registration identification requirements are not
12 identical. While the goals of vehicle titling may be those identified by the commenters, vehicle registration
13 confers on a Texas resident the privilege of driving on Texas roads and should be limited to lawful Texas
14 residents. The proposed amendments do not alter the identification requirements for titling purposes.

15 **Comment.** TIADA, TADA, HADA, NCDWT, SAADA, EPNCDA, VADA, AADA, NTXAD, TACA, and TCUC
16 commented in opposition to the proposed rules because there is no need to provide previously provided
17 identification documents at registration renewal.

18 **Response.** The department disagrees. There is a need to ensure that those who registered vehicles prior
19 to the implementation of the new identification requirements comply with the new enhanced
20 requirements at renewal. Additionally, the department has a need to verify that the identification
21 document is valid throughout the registration period and that the individual’s status as a lawful Texas
22 resident has not changed.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 28 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Comment.** TADA, HADA, NCDWT, SAADA, EPNCDA, VADA, AADA, NTXAD, State Senator Juan “Chuy”
2 Hinojosa, and 17 individuals commented in opposition to the proposed rules because dealers are not able
3 to verify the validity of a passport, immigration documentation, driver’s license, state identification
4 certificate, or concealed handgun license. Four individuals noted that if a dealer incorrectly evaluates the
5 validity of a client’s identification and it later turns out that the identification was invalid or fraudulent,
6 the dealer would have to bear the burdens of retrieving vehicles from buyers, refunding fees and
7 payments, negotiating with lenders about returning payments to the lender and titles to the dealer,
8 negotiating with manufacturers regarding rebates, voiding plate assignments, getting bonded titles if the
9 evidence of ownership had been stamped “surrendered,” and defending themselves from allegations that
10 they violated state law by failing to transfer ownership timely. The individual stated that dealers would
11 be tempted to engage in illegal actions, such as processing sales to Texas residents as “out of state” to
12 avoid registration requirements and not collecting sales taxes on those sales, which would leave the dealer
13 open to legal liability or disciplinary action on their license by the department.

14 **Response.** The department disagrees. The state understands that dealers processing vehicle registration
15 transactions are not experts in identifying fraudulent or counterfeit documents. Identifying professionally
16 counterfeited documents is the purview of law enforcement; the standard for daily government
17 transactions has always been a good faith, common sense effort. Workers who deal with these documents
18 on a daily basis develop a sense for how they look and feel. If issues are identified in the future, the
19 department will work with the county or dealer to identify correctable errors in process and educate their
20 staff on how to improve their processes to comply with state regulations.

21 **Comment.** AARPTexas, TACA, TIADA, TADA, HADA, NCDWT, SAADA, EPNCDA, VADA, AADA, and NTXAD
22 and nine individuals commented in opposition to the proposed rules because the department should not
23 require the driver’s license or state identification certificate to comply with REAL ID. The commenters

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 29 of 42

Chapter 217 – Vehicle Titles and Registration

1 noted that other entities, such as TSA, accept other forms of identification. TIADA, AARPTexas, and three
2 individuals commented that many people who are legally present in the United States, including United
3 States citizens, have driver's licenses and identification cards that are not REAL ID-compliant. Another
4 individual noted that the banking, insurance or healthcare industries are not requiring REAL ID, so the
5 proposed rules would create a disproportionate impact on the automotive financing industry. TIADA
6 commented that the REAL ID requirement could result in people registering vehicles in states other than
7 Texas. One dealer noted that 5% of its customers who completed a purchase did not have REAL ID-
8 compliant identification despite being United States citizens and requested that the proposed rules be
9 amended at adoption to allow a person with state identification document that does not comply with
10 REAL ID to present their valid social security number along with the state identification.

11 **Response.** The department agrees. At adoption, additional amendments added the following
12 identification documents for vehicle registration: (1) a driver's license or state-issued identification
13 certificate that does not comply with the requirements of REAL ID if it was issued by a state that requires
14 proof of legal presence, and (2) a United States birth certificate, United States Certificate of Naturalization
15 (N-550 or N-570), or a United States Certificate of Citizenship (N-560 or N-561) accompanied by a driver's
16 license or identification certificate issued to by a state that does not require proof of legal presence for
17 identification issuance.

18 **Comment.** State Senator Juan "Chuy" Hinojosa, State Senator Molly Cook, State Representative Terry
19 Canales, State Representative Vincent Perez, and seven other commenters opposed the proposed
20 amendments because owning a vehicle in Texas is a necessity to get to work, school, medical
21 appointments, or to participate in daily life. One commenter stated that preventing immigrants from
22 registering vehicles was akin to preventing immigrants from purchasing food or shelter, because people
23 need transportation to survive.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 30 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Response.** The department disagrees. Individuals that are unable to register vehicles are still able to use
2 other forms of transportation.

3 **Comment.** TUACA, WDAF, State Representative Terry Canales, State Representative Christina Morales,
4 the Bexar County Tax Assessor-Collector, El Paso County, and 11 individuals commented in opposition to
5 the proposed amendments because the increased documentation requirements in the proposed rule
6 amendments would reduce registration compliance and result in more unregistered vehicles on Texas
7 roads.

8 **Response.** The department disagrees. Under the proposed amendments, all Texas residents are still
9 required by statute to register their vehicles and are still subject to being pulled over and cited by law
10 enforcement if they fail to register a vehicle.

11 **Comment.** Two individuals commented in opposition to the proposed amendments because the proposed
12 identification requirements may increase administrative and enforcement burdens on both the
13 department and law enforcement.

14 **Response.** The department disagrees. The rules prior to the proposed amendments required
15 identification to register a vehicle, and law enforcement already enforces penalties for expired
16 registrations.

17 **Comment.** The department received comments from 17 individuals in opposition to the proposed
18 amendments because dealers should not be in the position of evaluating a customer's immigration status.

19 **Response.** The department disagrees. Dealers have a statutory obligation under Transportation Code,
20 §520.0055 to submit a title and registration application in the name of the vehicle purchaser, so dealers
21 must ensure that their customers can fulfill the application requirements for vehicle registration.

22 **Comment.** Two individuals commented in opposition to the proposed rules, requesting that the
23 department limit the new identification requirements only to new registrations, and not require

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 31 of 42

Chapter 217 – Vehicle Titles and Registration

1 identification at renewal because the department has not historically required identification for
2 registration renewal.

3 **Response.** The department disagrees. Allowing registration renewal without identification would enable
4 unqualified persons and identity fraudsters who have registered vehicles under the previous identification
5 requirements to continue registering their vehicles.

6 **Comment.** One individual commented in opposition to the proposed rules because immigration status
7 does not make a person into a more dangerous driver.

8 **Response.** The department agrees that being an immigrant does not make a person a dangerous driver.
9 However, the proposed rules are not based on the dangerousness of drivers, but instead on insuring that
10 the vehicle registrants have a legal right to reside in Texas and are presenting valid identification. The
11 department disagrees that the proposed rules, as amended, should not be adopted.

12 **Comment.** One individual commented in support of the proposed rules and stated that resistance to the
13 proposed rules from dealers comes primarily from dealers who rely on questionable business and sales
14 practices.

15 **Response.** The department agrees that the proposed rules should be adopted. The department does not
16 have any evidence to question categorically the business practices of dealers making public comments in
17 opposition to the proposed rules.

18 **Comment.** One individual commented in opposition to the proposed rule because while unsafe driving is
19 not limited to illegal immigrants, they are more likely to have difficulty obtaining insurance, are more likely
20 to leave the scene of an accident, and more likely to drive without a license.

21 **Response.** The department disagrees. The department does not have any data to suggest that immigrants
22 are more likely to have difficulty obtaining insurance, are more likely to leave the scene of an accident or
23 are more likely to drive without a license.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 32 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Comment.** Four individuals commented in opposition to the proposed rules because the proposed rule
2 amendments would create more traffic stops and escalate conflicts between law enforcement and the
3 public. One individual commented that the proposed rules would give cover to racial profiling by law
4 enforcement in traffic stops.

5 **Response.** The department disagrees. Law enforcement already enforces penalties for expired
6 registrations. The department is not aware of any data that suggests the proposed amendments would
7 lead to an increase in traffic stops.

8 **Comment.** Three individuals commented in opposition to the proposed amendments, and requested that
9 the department amend the proposed rule at adoption to allow foreign passports accompanied by valid I-
10 94 documents as identification for vehicle registration, so that Canadian “winter Texans” would be able
11 to register vehicles.

12 **Response.** The department agrees. Amendments at adoption to §217.22(46) allow an applicant for
13 registrant to use a foreign passport with a valid I-94 that does not indicate Parole status.

14 **Comment.** TIADA, the Travis County Tax Assessor-Collector, State Senator Juan “Chuy” Hinojosa, State
15 Representative Christina Morales, and two other individuals commented in opposition to the proposed
16 amendments because requiring tax assessor-collectors to review mailed-in identification documents for
17 registration renewal is an unfunded mandate that county offices will have to fulfill using limited staff and
18 budgets.

19 **Response.** The department disagrees. County funding and budget decisions are local determinations
20 outside the scope of this rule proposal. However, the department has delayed the effective date of
21 §217.28 and §217.29 to January 1, 2027, to allow the department and tax assessor-collectors time to
22 improve systems and processes to allow for quick and efficient registration renewal with automated
23 identification verification methods that mitigate the risk of fraud and identity theft.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 33 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Comment.** TACA, TADA, HADA, NCDWT, SAADA, EPNCDA, VADA, AADA, NTXAD, TIADA, Every Texan,
2 TCUC, the Bexar County Tax Assessor-Collector, State Representative Christina Morales, and one
3 individual commented in opposition to the proposed amendments because county tax office staff cannot
4 verify personal identification documents from photocopies, and that the rule should specify the means of
5 verification for consistent outcomes across counties. The commenters stated that county staff are not
6 trained and have no expertise in identifying fraudulent documents, which will create an avenue for fraud
7 by individuals presenting fake identification documents and will create inconsistency between how
8 counties determine document validity. One commenter stated that requiring county staff to determine
9 whether identification documents are valid will increase wait time in tax offices and decrease efficiency.

10 TADA, HADA, NCDWT, SAADA, EPNCDA, VADA, AADA, NTXAD, and TCUC requested that only law
11 enforcement be responsible for determining the validity of personal identification documents. TACA and
12 TCUC requested that an automated means of verification be built into the department's Registration and
13 Titling System as the department has done for insurance and inspections. One individual commenter
14 requested that the department publish training for counties on how to determine whether personal
15 identification documents meet the requirements of the amended rules, and should specify for online
16 renewals what data elements are required to verify identification, how the county verifies those elements,
17 what documents must be uploaded, document retention and information security standards, and
18 alternate pathways for those who are unable to renew online.

19 **Response.** The department disagrees. The state understands that county employees processing vehicle
20 registration transactions are not experts in identifying fraudulent or counterfeit documents. Identifying
21 professionally counterfeited documents is the purview of law enforcement; the standard for daily
22 government transactions has always been a good faith, common sense effort. Workers who deal with
23 these documents on a daily basis develop a sense for how they look and feel. If issues are identified in the

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 34 of 42

Chapter 217 – Vehicle Titles and Registration

1 future, the department will work with the county or dealer to identify correctable errors in process and
2 educate their staff on how to improve their processes to comply with state regulations. Additionally,
3 proposed amended §217.28 allows a registrant to provide information necessary to verify that the vehicle
4 owner has an identification document that meets the requirements of proposed amended §217.26, as an
5 alternative to providing the identification documents themselves. Individuals who are unable or unwilling
6 to send the documents necessary for registration or renewal by mail or online can bring their registration
7 applications to county tax assessor-collectors in person for processing.

8 **Comment.** TIADA and two individuals commented in opposition to the proposed amendments, requesting
9 a more thorough fiscal and economic impact analysis that accounts for reduced registration renewal rates,
10 fiscal impact on counties, collateral impairment for lenders on vehicles owned by people who can no
11 longer register them, and reduced registration and titling in Texas by people who do not have REAL ID.
12 One individual requested an economic impact analysis to assess the impacts of the proposed rules on
13 border-region employment and financial institutions. Another individual requested that the department
14 conduct a study of the potential impact of the proposed amendments on property ownership and revisit
15 its analysis of the economic impact on small and micro-businesses, rural communities, and the overall
16 economy.

17 **Response.** The department disagrees. The department's data suggests that only 1.29% of registrants are
18 registering vehicles with foreign passports that may not meet the requirements of the proposed new
19 rules. The costs to comply with the proposed rules are at most \$165 to attain a United States passport,
20 and less to obtain a state identification document. The department therefore believes the proposed rules
21 will not have a material impact on any single entity or system affected by the change.

22 **Comment.** WDAF and eight individuals commented in opposition to the proposed amendments because
23 the proposed rules would create unnecessary stress, fear, and financial strain for families who are already

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 35 of 42

Chapter 217 – Vehicle Titles and Registration

1 navigating economic uncertainty, and make it more difficult for these people to work and care for their
2 families.

3 **Response.** The department disagrees. The costs to comply with the proposed rules are at most \$165 to
4 attain a United States passport, and less to obtain a state identification document. Under Transportation
5 Code, §502.040, people who are not legally eligible to reside in Texas are not authorized to register
6 vehicles as Texas residents.

7 **Comment.** State Representative Christina Morales and two other individuals commented that the
8 proposed rules would prevent Texans from having vehicles to attend to their medical needs.

9 **Response.** The department disagrees. Individuals that are unable to register vehicles are still able to use
10 other forms of transportation, including emergency transportation services.

11 **Comment.** TACA, TCUC, the Travis County Tax Assessor-Collector, the Bexar County Tax Assessor-
12 Collector, El Paso County, and one individual commented in opposition to the proposed amendments
13 because requiring people who renew their registration by mail to send in identification documents will
14 cause counties to incur additional costs. The commenters noted that counties will have to pay for costs to
15 return the renewal paperwork to the applicant by mail if an applicant does not include adequate
16 identification documents. The commenters stated that the counties' reimbursement of \$2.30 per
17 registration renewal is already not sufficient to cover the actual cost of processing registrations, and will
18 be further diminished by these increased costs associated with identification requirements at renewal.
19 TCUC stated that these increased costs could lead to an increase in property taxes to cover the costs.
20 Additionally, both TACA and State Senator Juan "Chuy" Hinojosa commented in opposition to the
21 proposed amendments because counties will not be able to use their Rapid Processing Systems efficiently,
22 because the applicant's identification information will have to be input manually, creating a large increase
23 in employee work time for renewal processing.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 36 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Response.** The department disagrees. Proposed amended §217.28 allows a registrant to provide
2 information necessary to verify that the vehicle owner has an identification document that meets the
3 requirements of proposed amended §217.26, as an alternative to providing the identification documents
4 themselves. The department will work with the tax assessor-collectors to revise the registration renewal
5 letters to ensure that the identification requirements are clear so as to avoid returned mail. To further
6 mitigate the tax assessor-collectors' concerns, the department has delayed the effective date of §217.28
7 and §217.29 to January 1, 2027. This delay will allow time for the department and tax assessor-collectors
8 to improve systems and processes to allow for quick and efficient registration renewal with automated
9 identification verification methods that mitigate the risk of fraud and identity theft.

10 **Comment.** AARPTexas and five individuals commented in opposition to the proposed amendments
11 because the difficulty and delay currently involved in getting driver's license appointments with TxDPS
12 will cause people to be unable to register their vehicles through no fault of their own.

13 **Response.** The department disagrees. Every driver in Texas has a legal obligation to keep their driver's
14 license or state identification certificate valid. The department does not have jurisdiction over driver's
15 license programs, which are administered by TxDPS.

16 **Comment.** The Webb County Tax Assessor-Collector commented in opposition to the proposed
17 amendments because they would restrict or limit the ability of vehicle owners to secure proper title and
18 registration for their vehicles.

19 **Response.** The department disagrees. The amendments do not impact the identification requirements for
20 vehicle titling. For vehicle registration, the amendments only restrict vehicle owners' access to vehicle
21 registration as appropriate to ensure that the owner's identity can be confirmed and that people who are
22 not legally eligible to reside in Texas are not allowed to register vehicles as Texas residents.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 37 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Comment.** Three individuals commented in opposition to the proposed rules, and requested that the
2 department should accept more types of personal identification documents, including foreign passports,
3 consular IDs, ITIN documentation, and other secure forms of identification. The Webb County Tax
4 Assessor-Collector commented that tax assessor-collectors should have authority to accept foreign
5 passports if they are accompanied by a government employee identification issued by the United States
6 Government.

7 **Response.** The department disagrees. These forms of identification are not sufficient to provide proof
8 that a person is legally eligible to reside in Texas.

9 **Comment.** One individual commented in opposition to the proposed amendments and requested that
10 implementation of the new identification requirements be delayed in border regions.

11 **Response.** The department disagrees. People who are not legally eligible to reside in Texas should not be
12 allowed to register vehicles as Texas residents, regardless of where they live in Texas.

13 **Comment.** One individual commented in opposition to the proposed amendments and requested that
14 the department provide materials and assistance in Spanish.

15 **Response.** The department agrees that Spanish translations are helpful and provides Spanish translations
16 of many communications, materials and trainings when necessary to properly communicate information
17 consistently throughout the state. The department disagrees that the proposed rules should not be
18 adopted.

19 **Comment.** One individual commented in opposition to the proposed amendments because the
20 department should charge a higher fee to issue registration for individuals with foreign passports, expired
21 driver's licenses or other forms of identification, and use the funds for Texas roads, establishing a fraud
22 division within the department, to target fraudulent online vehicle sales, or to develop a database with
23 vehicle identification data.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 38 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Response.** The department disagrees. People who cannot prove their identity through verifiable
2 documents or are not legally eligible to reside in Texas should not be allowed to register vehicles in Texas,
3 no matter how much they are willing to pay.

4 **Comment.** Texas State Representative Armando Walle, State Representative Christina Morales, the Travis
5 County Tax Assessor-Collector, TUACA, and three individuals commented in opposition to the proposed
6 rules and requested that the department withdraw the proposed identification requirements until after
7 the upcoming 90th Legislative Session.

8 **Response.** The department disagrees. Under Transportation Code, §502.040, people who are not legally
9 eligible to reside in Texas should not be allowed to register vehicles as Texas residents. Knowing that there
10 are potential issues with the existing process, the department must take action to prevent people from
11 registering their vehicles if they are not legally eligible to reside in Texas in accordance with state law. The
12 department will implement any changes to law the legislature chooses to enact during a future session.

13 **Comment.** One individual commented in opposition to the proposed rules because Florida has
14 implemented similar identification documentation requirements, but that it only resulted in operational
15 gridlock in the form of widespread transaction delays, dealer backlogs, confusion among tax collectors,
16 and post-implementation revisions to the rules. The commenter stated that Florida's experience
17 demonstrates that rigid identification requirements disproportionately affect lawful consumers and small
18 businesses without meaningfully improving enforcement outcomes.

19 **Response.** The department disagrees. The experiences of other states in this area are not necessarily
20 directly relevant to the structures and operations in place in Texas. However, in response to stakeholder
21 feedback, amendments at adoption to §217.26(b) allow more types of identification documentation for
22 vehicle registration. People who cannot prove their identity through verifiable documents or are not

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 39 of 42

Chapter 217 – Vehicle Titles and Registration

1 legally eligible to reside in Texas should not be allowed to register vehicles in Texas, even if the new
2 identification requirements make the registration process less efficient.

3 **Comment.** One individual commented in opposition to the proposed amendments because the cost of
4 obtaining a REAL ID-compliant identification for those that do not have one would be an additional tax on
5 top of the registration fees. Another commenter stated that the costs to obtain a REAL ID-compliant
6 identification include lost work time required to visit TxDPS offices, lost transportation, costs of expired
7 registration, and costs to repeatedly visit county offices due to inconsistent interpretation.

8 **Response.** The department disagrees. Amendments at adoption to §217.26(b) provide alternatives to a
9 REAL ID, including any driver's license or state identification certificate from a state that verifies legal
10 presence to issue identification, and a driver's license or state identification card accompanied by a United
11 States birth certificate, United States Certificate of Naturalization (N-550 or N-570), or a United States
12 Certificate of Citizenship (N-560 or N-561). These amendments will allow more people to use their current
13 identification documents without any cost to attain new or additional documents. The costs to acquire an
14 identification allowed under the amended rules are offset by the need to prevent people who cannot
15 prove their identity through verifiable documents or are not legally eligible to reside in Texas from
16 registering vehicles in Texas.

17 **Comment.** Two individuals commented in opposition to the proposed amendments because law
18 enforcement could use automated license plate readers to identify every vehicle without registration to
19 charge legal residents with unregistered vehicle fees and fines, which could cause economically
20 disadvantaged people to struggle financially.

21 **Response.** The department disagrees. The department does not have jurisdiction over law enforcement,
22 its use of license plate readers, or the imposition of criminal penalties. Law enforcement already enforces
23 penalties against unregistered vehicles, regardless of the proposed rule amendments.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 40 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Comment.** One individual commented in opposition to the proposed amendments, and noted that
2 proposed §217.26(c) states that if a motor vehicle is titled in more than one name, only one of the named
3 owners must show identification for registration. The commenter asked that the department confirm that
4 this applies to registration renewal.

5 **Response.** The department agrees that under the proposed amendments to §217.26(c), §217.28, and
6 §217.29, only one owner of a car titled to multiple people must provide identification for registration,
7 whether at initial application or upon renewal. The department disagrees that the proposed rules should
8 not be adopted.

9 **Comment.** TACA commented in opposition to the proposed rules because under the proposed
10 amendments, government- and business-owned vehicles will no longer be able to renew vehicle
11 registrations online, which TACA believes will increase traffic into county tax offices.

12 **Response.** The department agrees. Amendments at adoption to §217.29 exempt from the requirement
13 to show personal identification at renewal commercial vehicle registrations, rental trailer registrations,
14 registrations of vehicles with forestry license plates, registrations of commercial fleet vehicles under
15 Transportation Code, §502.0023, and registrations of trailers under Transportation Code, §502.0024.
16 Amendments at adoption also create exceptions for apportioned registration under the International
17 Registration Plan, exempt vehicles, and off-highway vehicles owned by states, counties or municipalities.
18 These amendments allow the government- and business-owned vehicles described above to use the
19 department's existing online systems to renew vehicle registration without having to show identification
20 at renewal. Additionally, the department has delayed the effective date of §217.28 and §217.29 to January
21 1, 2027, to allow the department and tax assessor-collectors time to improve systems and processes to
22 allow for quick and efficient registration renewal.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 41 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Comment.** The Webb County Tax Assessor-Collector commented in opposition to the proposed rules,
2 stating that the proposed rule changes amounted to a governmental taking without due process.

3 **Response.** The department disagrees. The proposed changes have not altered any of the rules regarding
4 vehicle titling, so people can still own and sell vehicles by acquiring title or transferring title to vehicles
5 without any change to the required personal identification for those transactions. Moreover, the
6 registration requirements do not prevent Texas residents from registering their vehicles, so long as they
7 are legally authorized to live in Texas. Individuals who are not legally authorized to live in Texas will still
8 be able to own and export vehicles without any changes.

9 **Comment.** Texas State Representative Vincent Perez, the Travis County Tax Assessor-Collector, and one
10 individual commented in opposition to the proposed rules because the department had misinterpreted
11 Transportation Code, §502.040, which only uses the word “resident” and not “legal resident,” and
12 therefore had exceeded its statutory authority.

13 **Response.** The department disagrees. The department has the authority to determine by rule the
14 personal identification required for vehicle registration under Transportation Code, §502.040, the
15 authority to make rules to prescribe the required information that an applicant for vehicle registration
16 must submit, including current personal identification as determined by the department in rule under
17 Transportation Code, §502.043, and the authority under Transportation Code, §502.0021 to adopt any
18 rules necessary to administer Transportation Code, Chapter 502.

19 **Comment.** Texas State Representative Vincent Perez and the Bexar County Tax Assessor-Collector
20 commented in opposition to the proposed rules because while the department says the rule amendments
21 are necessary to address fraud, it has not shown any data to show significant levels of fraud or to support
22 the assumption that people who are not legally present in Texas are more likely to commit fraud. The
23 commenters stated that rulemaking should be based on data, not assumptions.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 42 of 42

Chapter 217 – Vehicle Titles and Registration

1 **Response.** The department disagrees that the rulemaking is intended to address fraud by undocumented
2 immigrants. Instead, the rulemaking is intended to prevent people who are not legally present in Texas
3 from registering vehicles in Texas, and separately, to address the potential for fraud caused by expired or
4 unsubstantiated personal identification documents.

5 **Comment.** One individual commented in opposition to the proposed rules because farm equipment
6 should not be subject to the proposed new personal identification requirements.

7 **Response.** The department agrees. An amendment at adoption exempts vehicle registrations under
8 Transportation Code, §502.146 (Certain Farm Vehicles and Drilling and Construction Equipment) from the
9 new personal identification requirements under adopted amended §217.26(b), so that those registrants
10 only have to provide one of the types of identification listed in adopted amended §217.26(a).

11

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 2 of 16

Chapter 217 – Vehicle Titles and Registration

1 (1) Affidavit for alias exempt registration--A form prescribed by the director that must be
2 executed by an exempt law enforcement agency to request the issuance of exempt registration in the
3 name of an alias.

4 (2) Agent--A duly authorized representative possessing legal capacity to act for an
5 individual or legal entity.

6 (3) Alias--The name of a vehicle registrant reflected on the registration, different than the
7 name of the legal owner of the vehicle.

8 (4) Alias exempt registration--Registration issued under an alias to a specific vehicle to be
9 used in covert criminal investigations by a law enforcement agency.

10 (5) Axle load--The total load transmitted to the road by all wheels whose centers may be
11 included between two parallel transverse vertical planes 40 inches apart, extending across the full width
12 of the vehicle.

13 (6) Border commercial zone--A commercial zone established under Title 49, C.F.R., Part
14 372 that is contiguous to the border with Mexico.

15 (7) Bus--A motor vehicle used to transport persons and designed to accommodate more
16 than 10 passengers, including the operator; or a motor vehicle, other than a taxicab, designed and used
17 to transport persons for compensation.

18 (8) Carrying capacity--The maximum safe load that a commercial vehicle may carry, as
19 determined by the manufacturer.

20 (9) Character--A numeric or alpha symbol displayed on a license plate.

21 (10) County or city civil defense agency--An agency authorized by a commissioner's court
22 order or by a city ordinance to provide protective measures and emergency relief activities in the event
23 of hostile attack, sabotage, or natural disaster.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 3 of 16

Chapter 217 – Vehicle Titles and Registration

1 (11) Current photo identification--a government-issued photo identification that is
2 currently valid or is expired not more than 12 months, or a state-issued personal identification certificate
3 issued to a qualifying person if the identification states that it has no expiration.

4 (12) Digital license plate--As defined in Transportation Code, §504.151.

5 (13) Digital license plate owner--A digital license plate owner is a person who purchases
6 or leases a digital license plate from a department-approved digital license plate provider.

7 (14) Director--The director of the Vehicle Titles and Registration Division, Texas
8 Department of Motor Vehicles.

9 (15) Division--Vehicle Titles and Registration Division.

10 (16) Executive administrator--The director of a federal agency, the director of a Texas
11 state agency, the sheriff of a Texas county, or the chief of police of a Texas city that by law possesses the
12 authority to conduct covert criminal investigations.

13 (17) Exempt agency--A governmental body exempted by statute from paying registration
14 fees when registering motor vehicles.

15 (18) Exempt license plates--Specially designated license plates issued to certain vehicles
16 owned or controlled by exempt agencies.

17 (19) Exhibition vehicle--

18 (A) An assembled complete passenger car, truck, or motorcycle that:

19 (i) is a collector's item;

20 (ii) is used exclusively for exhibitions, club activities, parades, and other
21 functions of public interest;

22 (iii) does not carry advertising; and

23 (iv) has a frame, body, and motor that is at least 25-years old; or

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 4 of 16

Chapter 217 – Vehicle Titles and Registration

- 1 (B) A former military vehicle as defined in Transportation Code, §504.502.
- 2 (20) Fire-fighting equipment--Equipment mounted on fire-fighting vehicles used in the
3 process of fighting fires, including, but not limited to, ladders and hoses.
- 4 (21) Foreign commercial motor vehicle--A commercial motor vehicle, as defined by 49
5 C.F.R. §390.5, that is owned by a person or entity that is domiciled in or a citizen of a country other than
6 the United States.
- 7 (22) GPS--A global positioning system tracking device that can be used to determine the
8 location of a digital license plate through data collection by means of a receiver in a digital license plate.
- 9 (23) Highway construction project--That section of the highway between the warning
10 signs giving notice of a construction area.
- 11 (24) International symbol of access--The symbol adopted by Rehabilitation International
12 in 1969 at its Eleventh World Congress of Rehabilitation of the Disabled.
- 13 (25) Legend--A name, motto, slogan, or registration expiration notification that is
14 centered horizontally at the bottom of the license plate.
- 15 (26) Make--The trade name of the vehicle manufacturer.
- 16 (27) Metal license plate--A non-digital license plate issued by the department under
17 Transportation Code Chapter 502, 503, or Chapter 504.
- 18 (28) Nonprofit organization--An unincorporated association or society or a corporation
19 that is incorporated or holds a certificate of authority under the Business Organizations Code.
- 20 (29) Nominating State Agency--A state agency authorized to accept and distribute funds
21 from the sale of a specialty plate as designated by the nonprofit organization (sponsoring entity).

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 5 of 16

Chapter 217 – Vehicle Titles and Registration

1 (30) Optional digital license plate information--Any information authorized to be
2 displayed on a digital license plate in addition to required digital license plate information when the
3 vehicle is in park, including:

4 (A) an emergency alert or other public safety alert issued by a governmental
5 entity, including an alert authorized under Subchapter L, M, or P of Government Code Chapter 411;

6 (B) vehicle manufacturer safety recall notices;

7 (C) advertising; or

8 (D) a parking permit.

9 (31) Park--As defined in Transportation Code, §541.401.

10 (32) Political subdivision--A county, municipality, local board, or other body of this state
11 having authority to provide a public service.

12 (33) Primary region of interest--The field on a metal or digital license plate with
13 alphanumeric characters representing the plate number. The primary region of interest encompasses a
14 field of 5.75 inches in width by 1.75 inches in height on metal license plates manufactured for motorcycles,
15 mopeds, golf carts, or off-highway vehicles. The primary region of interest encompasses a field of 8.375
16 inches in width by 2.5625 inches in height on metal license plates manufactured for all other vehicles.

17 (34) REAL ID--The minimum document requirements and issuance standards for federal
18 recognition under the REAL ID Act of 2005, Public Law 109-13.

19 (35) [(34)] Registration period--A designated period during which registration is valid. A
20 registration period begins on the first day of a calendar month and ends on the last day of a calendar
21 month.

22 (36) [(35)] Required digital license plate information--The minimum information required
23 to be displayed on a digital license plate: the registration expiration month and year (unless the vehicle is

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 6 of 16

Chapter 217 – Vehicle Titles and Registration

1 a token trailer as defined by Transportation Code, §502.001), the alphanumeric characters representing
2 the plate number, the word "Texas," the registration expiration notification if the registration for the
3 vehicle has expired; and the legend (if applicable).

4 (37) [~~(36)~~] Secondary region of interest--The field on a metal or digital license plate with
5 the word "Texas" centered horizontally at the top of the plate. The secondary region of interest
6 encompasses a field of 2.5 inches in width by 0.5625 inches in height on metal license plates manufactured
7 for motorcycles, mopeds, golf carts, or off-highway vehicles. The secondary region of interest
8 encompasses a field of 6 inches in width by 1.9375 inches in height on metal license plates manufactured
9 for all other vehicles.

10 (38) [~~(37)~~] Service agreement--A contractual agreement that allows individuals or
11 businesses to access the department's vehicle registration records.

12 (39) [~~(38)~~] Specialty license plate--A special design license plate issued by the department.

13 (40) [~~(39)~~] Specialty license plate fee--Statutorily or department required fee payable on
14 submission of an application for a specialty license plate, symbol, tab, or other device, and collected in
15 addition to statutory motor vehicle registration fees.

16 (41) [~~(40)~~] Sponsoring entity--An institution, college, university, sports team, or any other
17 non-profit individual or group that desires to support a particular specialty license plate by coordinating
18 the collection and submission of the prescribed applications and associated license plate fees or deposits
19 for that particular license plate.

20 (42) [~~(41)~~] Street or suburban bus--A vehicle, other than a passenger car, used to transport
21 persons for compensation exclusively within the limits of a municipality or a suburban addition to a
22 municipality.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 7 of 16

Chapter 217 – Vehicle Titles and Registration

1 (43) [(42)] Tandem axle group--Two or more axles spaced 40 inches or more apart from
2 center to center having at least one common point of weight suspension.

3 (44) [(43)] Unconventional vehicle--A vehicle built entirely as machinery from the ground
4 up, that is permanently designed to perform a specific function, and is not designed to transport property.

5 (45) United States birth certificate--An original or certified copy of a birth certificate
6 issued by the appropriate vital statistics agency of a United States state, territory, or the District of
7 Columbia indicating birth in the United States; or an original or a certified copy of a United States
8 government-issued document indicating birth of a child born abroad to a United States citizen, including
9 a Consular Report of Birth or Department of State Certification of Birth issued to a U.S. Citizen born abroad
10 (FS 240, DS-1350, or FS 545).

11 (46) Valid passport--

12 (A) An unexpired passport or passport card issued by the United States
13 government; or

14 (B) An unexpired passport issued by the government of another country
15 accompanied by one of the following documents issued by the United States Department of Homeland
16 Security:

17 (i) Form I-94, unless the Form I-94 shows that the bearer only has Parole
18 status;

19 (ii) a current permanent resident card; or

20 (iii) an unexpired immigrant visa issued by the United States Department
21 of Homeland Security.

22 (47) [(44)] Vehicle classification--The grouping of vehicles in categories for the purpose of
23 registration, based on design, carrying capacity, or use.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 8 of 16

Chapter 217 – Vehicle Titles and Registration

1 (48) [(45)] Vehicle description--Information regarding a specific vehicle, including, but not
2 limited to, the vehicle make, model year, body style, and vehicle identification number.

3 (49) [(46)] Vehicle identification number--A number assigned by the manufacturer of a
4 motor vehicle or the department that describes the motor vehicle for purposes of identification.

5 (50) [(47)] Vehicle registration insignia--A license plate, symbol, tab, or other device
6 issued by the department evidencing that all applicable fees have been paid for the current registration
7 period and allowing the vehicle to be operated on the public highways.

8 (51) [(48)] Vehicle registration record--Information contained in the department's files
9 that reflects, but is not limited to, the make, vehicle identification number, model year, body style, license
10 number, and the name of the registered owner.

11 (52) [(49)] Volunteer fire department--An association that is organized for the purpose of
12 answering fire alarms, extinguishing fires, and providing emergency medical services.

13

14 §217.26. Identification Required.

15 (a) Except as stated in subsections (b), (c), (g) and (h) of this section, an [Añ] application for initial
16 registration - including registration under Transportation Code, Chapter 502, Subchapters C or I; §502.146;
17 a registration under §217.66 of this title (relating to Specialized License Plate for Registration of Rental
18 Trailers); or a commercial vehicle registration under §217.46(b) of this title (relating to Commercial Vehicle
19 Registration) - is not acceptable unless the applicant presents a current photo identification of the owner
20 containing a unique identification number and expiration date. The current photo identification must be
21 a:

22 (1) driver's license or state identification certificate issued by a state or territory of the
23 United States;

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 9 of 16

Chapter 217 – Vehicle Titles and Registration

- 1 (2) United States or foreign passport;
- 2 (3) United States military identification card;
- 3 (4) North Atlantic Treaty Organization identification or identification issued under a Status
- 4 of Forces Agreement;
- 5 (5) United States Department of Homeland Security, United States Citizenship and
- 6 Immigration Services, or United States Department of State identification document; or
- 7 (6) license to carry a handgun issued by the Texas Department of Public Safety under
- 8 Government Code, Chapter 411, Subchapter H.
- 9 (b) Except as stated in subsections (c), (g) and (h) of this section, - an application for initial
- 10 registration under Transportation Code, Chapter 502- other than registration under Subchapters C or I of
- 11 Chapter 502; §502.146; a registration under §217.66 of this title (relating to Specialized License Plate for
- 12 Registration of Rental Trailers); or a commercial vehicle registration under §217.46(b) of this title (relating
- 13 to Commercial Vehicle Registration) - is not acceptable unless the applicant presents one of the following
- 14 for the owner of the vehicle:
- 15 (1) a valid, unexpired driver's license or state identification certificate that complies with
- 16 REAL ID and is not marked "limited term" or "temporary," issued by a state or territory of the United
- 17 States;
- 18 (2) a valid, unexpired driver's license or state identification certificate issued by a state
- 19 that issues driver's licenses and state identification certificates only to individuals who are legally present
- 20 in the United States;
- 21 (3) a valid, unexpired driver's license or state identification certificate issued by a state or
- 22 territory of the United States, accompanied by a United States birth certificate, United States Certificate
- 23 of Naturalization (N-550 or N-570), or a United States Certificate of Citizenship (N-560 or N-561);

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 10 of 16

Chapter 217 – Vehicle Titles and Registration

- 1 (4) a valid passport; or
- 2 (5) a valid, unexpired license to carry a handgun issued by the Texas Department of Public
- 3 Safety under Government Code, Chapter 411, Subchapter H.
- 4 (c) ~~(b)~~ If the motor vehicle is titled in:
- 5 (1) more than one name, then the identification of one owner under subsections (a), (b),
- 6 or (c)(2)-(4) of this section, as applicable, must be presented;
- 7 (2) the name of a leasing company, then:
- 8 (A) proof of the Federal Employer Identification Number/Employee Identification
- 9 Number (FEIN/EIN) of the leasing company must be submitted, written on the application, and can be
- 10 entered into the department's titling system. The number must correspond to the name of the leasing
- 11 company in which the vehicle is being titled; and
- 12 (B) the leasing company may submit:
- 13 (i) a current photo identification, required under subsection (a) of this
- 14 section, of the lessee listed as the registrant; or
- 15 (ii) a current photo identification, required under subsection (a) of this
- 16 section, of the employee or authorized agent who signed the application for the leasing company, and the
- 17 employee's or authorized agent's employee identification, letter of authorization written on the lessor's
- 18 letterhead, or a printed business card. The printed business card, employee identification, or letter of
- 19 authorization written on the lessor's letterhead must contain the name of the lessor, and the employee's
- 20 or authorized agent's name must match the name on the current photo identification;
- 21 (3) the name of a trust, then a current photo identification, required under subsection (a)
- 22 of this section, of a trustee, or authorized trustee representative if the trustee is a legal entity, must be
- 23 presented; or

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 11 of 16

Chapter 217 – Vehicle Titles and Registration

1 (4) the name of a business, government entity, or organization, then:

2 (A) proof of the Federal Employer Identification Number/Employee Identification
3 Number (FEIN/EIN) of the business, government entity, or organization must be submitted, written on the
4 application, and can be entered into the department's titling system. The number must correspond to the
5 name of the business, government entity, or organization in which the vehicle is being titled;

6 (B) the employee or authorized agent must present a current photo identification,
7 required under subsection (a) this section; and

8 (C) the employee's or authorized agent's employee identification; letter of
9 authorization written on the business', government entity's, or organization's letterhead; or a printed
10 business card. The printed business card, employee identification, or letter of authorization written on
11 the business', government entity's, or organization's letterhead must contain the name of the business,
12 governmental entity, or organization, and the employee's or authorized agent's name must match the
13 name on the current photo identification.

14 (d) [~~(e)~~] Within this section, an identification document such as a printed business card, letter of
15 authorization, or power of attorney, may be an original or photocopy.

16 (e) [~~(d)~~] A person who holds a general distinguishing number issued under Transportation Code,
17 Chapter 503 is exempt from submitting to the county tax assessor-collector, but must retain:

18 (1) the owner's identification, as required under this section; and

19 (2) authorization to sign, as required under this section.

20 (f) [~~(e)~~] A person who holds a general distinguishing number issued under Transportation Code,
21 Chapter 503 is not required to submit photo identification or authorization for an employee or agent
22 signing a title assignment with a secure power of attorney.

23 (g) [~~(f)~~] This section does not apply to non-titled vehicles.

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 12 of 16

Chapter 217 – Vehicle Titles and Registration

1 (h) This section does not apply to:

2 (1) apportioned registration under the International Registration Plan;

3 (2) exempt vehicle registration under Transportation Code, Chapter 502, Subchapter J, or
4 Transportation Code, §502.0025; or

5 (3) registration of off-highway vehicles owned by the state, a county, or a municipality
6 under Transportation Code §502.140(c).

7

8 §217.28. Vehicle Registration Renewal.

9 (a) To renew vehicle registration, a vehicle owner must apply to the tax assessor-collector of the
10 county in which the owner resides or a county tax assessor-collector who is willing to accept the
11 application.

12 (b) The department will send a registration renewal notice, indicating the proper registration fee
13 and the month and year the registration expires, to each vehicle owner prior to the expiration of the
14 vehicle's registration.

15 (c) The registration renewal notice should be returned by the vehicle owner to the county tax
16 assessor-collector in the county in which the owner resides or a county tax assessor-collector who is
17 willing to accept the application, or to that tax assessor-collector's deputy, either in person or by mail,
18 unless the vehicle owner renews via the Internet. The renewal notice must be accompanied by the
19 following information, documents and fees:

20 (1) registration renewal fees prescribed by law;

21 (2) documents or information necessary to verify that the vehicle owner has a personal
22 identification document that meets the applicable requirements of §217.26 of this title (relating to
23 Identification Required);

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 13 of 16

Chapter 217 – Vehicle Titles and Registration

1 (3) [(2)] any local fees or other fees prescribed by law and collected in conjunction with
2 registration renewal; and

3 (4) [(3)] evidence of financial responsibility required by Transportation Code, §502.046,
4 unless otherwise exempted by law.

5 (d) If a registration renewal notice is lost, destroyed, or not received by the vehicle owner, the
6 vehicle may be registered if the owner presents personal identification that meets the applicable
7 requirements of §217.26 of this title [~~acceptable to the county tax assessor-collector or via the Internet~~].

8 Failure to receive the notice does not relieve the owner of the responsibility to renew the vehicle's
9 registration.

10 (e) Renewal of expired vehicle registrations.

11 (1) If the owner has been arrested or cited for operating the vehicle without valid
12 registration then a 20% delinquency penalty is due when registration is renewed, the full annual fee will
13 be collected, and the vehicle registration expiration month will remain the same.

14 (2) If the county tax assessor-collector or the department determines that a registrant has
15 a valid reason for being delinquent in registration, the vehicle owner will be required to pay for 12 months'
16 registration. Renewal will establish a new registration expiration month that will end on the last day of
17 the eleventh month following the month of registration renewal.

18 (3) If the county tax assessor-collector or the department determines that a registrant
19 does not have a valid reason for being delinquent in registration, the full annual fee will be collected and
20 the vehicle registration expiration month will remain the same.

21 (4) Specialty license plates, symbols, tabs, or other devices may be prorated as provided
22 in §217.45(d)(2) of this title (relating to Specialty License Plates, Symbols, Tabs, and Other Devices).

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 14 of 16

Chapter 217 – Vehicle Titles and Registration

1 (5) Evidence of a valid reason may include receipts, passport dates, and military orders.

2 Valid reasons may include:

3 (A) extensive repairs on the vehicle;

4 (B) the person was out of the country;

5 (C) the vehicle is used only for seasonal use;

6 (D) military orders;

7 (E) storage of the vehicle;

8 (F) a medical condition such as an extended hospital stay; and

9 (G) any other reason submitted with evidence that the county tax assessor-
10 collector or the department determines is valid.

11 (6) The operation of a vehicle with an expired registration that has been stored or
12 otherwise not in operation that is driven only to an inspection station for the purpose of obtaining an
13 inspection, if applicable, required for registration, will not affect the determination of whether the
14 registrant has a valid or invalid reason for being delinquent.

15 (f) For purposes of Transportation Code §502.407(c), the county tax assessor-collector's office of
16 the county in which the owner resides is closed for a protracted period of time if the county tax assessor-
17 collector's office has notified the department that it is closed or will be closed for more than one week.

18

19 §217.29. Vehicle Registration Renewal via Internet.

20 (a) Internet registration renewal program. The department will maintain a uniform Internet
21 registration renewal process. This process will provide for the renewal of vehicle registrations via the
22 Internet and will be in addition to vehicle registration procedures provided for in §217.28 of this title

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 15 of 16

Chapter 217 – Vehicle Titles and Registration

1 (relating to Vehicle Registration Renewal). The Internet registration renewal program will be facilitated by
2 a third-party vendor.

3 (b) County participation in program. All county tax assessor-collectors shall process registration
4 renewals through an online system designated by the department.

5 (c) Eligibility of individuals for participation. To be eligible to renew a vehicle's registration via the
6 Internet, the vehicle owner must meet all criteria for registration renewal outlined in this subchapter and
7 in Transportation Code, Chapter 502.

8 (d) Information to be submitted by vehicle owner. A vehicle owner who renews registration via
9 the Internet must submit or verify the following information:

10 (1) registrant information, including the vehicle owner's name and county of residence;

11 (2) information necessary to verify that the vehicle owner has a personal identification
12 document that meets the applicable requirements of §217.26 of this title (relating to Identification
13 Required), unless the vehicle owner is renewing a registration under §217.66 of this title (relating to
14 Specialized License Plate for Registration of Rental Trailers), §217.46(b)(5) of this title (relating to
15 Commercial Vehicle Registration) regarding a forestry vehicle license plate, and Transportation Code,
16 §§502.0023 and 502.0024;

17 (3) [(2)] vehicle information, including the license plate number of the vehicle to be
18 registered;

19 (4) [(3)] insurance information, including the name of the insurance company, the name
20 of the insurance company's agent (if applicable), the telephone number of the insurance company or
21 agent (local or toll free number serviced Monday through Friday 8:00 a.m. to 5:00 p.m.), the insurance
22 policy number, and representation that the policy meets all applicable legal standards;

TITLE 43. TRANSPORTATION

Adopted Sections

Part 10. Texas Department of Motor Vehicles

Page 16 of 16

Chapter 217 – Vehicle Titles and Registration

1 (5) [(4)] credit card information, including the type of credit card, the name appearing on
2 the credit card, the credit card number, and the expiration date; and

3 (6) [(5)] other information prescribed by rule or statute.

4 (e) Duties of the county. A county tax assessor-collector shall:

5 (1) accept electronic payment for vehicle registration renewal via the Internet;

6 (2) execute an agreement with the department as provided by the director;

7 (3) process qualified Internet registration renewal transactions as submitted by the third-
8 party vendor;

9 (4) verify that the vehicle owner's personal identification document meets the applicable
10 requirements of §217.26;

11 (5) [(4)] communicate with the third-party vendor and applicants via email, regular mail,
12 or other means, as specified by the director;

13 (6) [(5)] reject applications that do not meet all requirements set forth in this chapter, and
14 in Transportation Code, Chapter 502; and

15 (7) [(6)] register each vehicle for a 12-month period.

16 (f) Duties of the department. For vehicle registration renewals that are submitted via the Internet,
17 the department and its centralized third-party vendor shall promptly facilitate and mail vehicle
18 registration insignias to applicants.

19



Texas Department of Motor Vehicles

HELPING TEXANS GO. HELPING TEXAS GROW.

TEXAS DEPARTMENT OF MOTOR VEHICLES PUBLIC HEARING

REGISTRATION FORM REQUEST TO SPEAK OR PROVIDE WRITTEN COMMENTS ON AGENDA ITEM

Proposed Amendments to 43 Texas Administrative Code, Chapter 217, Vehicle Titles and Registration, §§217.22, 217.26, 217.28, and 217.29 relating to Personal Identification Requirements for Vehicle Registration Under Transportation Code, §502.040

You **MAY** submit this form prior to the agenda item being taken up by the department staff. Send comments to GCO_General@txdmv.gov.

I wish to appear before the department to:

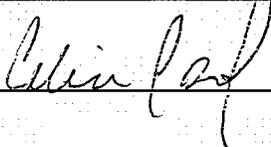
Speak and/or Provide written comments

Se solicita la traducción de un comentario verbal del español al inglés.
(Translation of Verbal Comment from Spanish to English Requested)

My testimony will: Support Oppose Provide Info Other

Registrant Information: *Please PRINT clearly*

| | | |
|--|--------|------|
| Name: Celia Israel | | |
| Address (optional) ¹ : | | |
| City: | State: | Zip: |
| Representing: Travis County Tax Office | | |

Signature: 

Date: 01/20/26

To Comment:

1. Wait for the department staff to call on you.
2. Limit your comments to three minutes.
3. Individuals cannot accumulate time from other speakers.

¹ You are not required to provide your address. The department may use your address for the purposes of responding to your questions or following up with you regarding your comment.

CELIA COMMENTS

JANUARY 21, 2026

Thank you Chair Bacarisse, Vice Chair McRae and board members.

My name is Celia Israel and I currently serve as the Tax Assessor-collector for Travis county. I've been in this role for all of one year. Previously, I served for 9 years in the Texas House of Representatives and many of those years were spent on the House transportation committee and on legislation involving the transportation code.

I'm entering my full written comments for the record and here's the short version of those comments. At a time when the State of Texas should be focused on safe driving which includes making automobile insurance accessible to more motorists, ensuring emissions tests are conducted and conducted legally and helping more Texans access our public offices to take care of their vehicle transactions – were are engaging in policies that will strain local resources and make us less safe as a driving community.

As a Latina – I'm hearing members of the latino community are already fearful of coming to our offices to conduct their business. I believe if you move forward with these proposed rules you will be doing harm without improving the process. Without making Texas safer or making Texas friendlier.

- The TxDMV directed the implementation of the rule wrongfully without any prior notice to the public and without being voted on by the TxDMV Board.
- The proposed rule attempts to change the language from a “resident” having the ability to complete renewals or registrations to only a “legal resident.” The Transportation Code clearly states we must determine residency – without any mention of “legal” residency.

- Drivers who are already leery of coming to my office may consider underground, illegal “black market” resources to help them. As a result, the proposed rule can lead to an increase in uninsured and unregistered motorists who cannot renew their registration.

As Texans move about Texas to take care of their families and one another, I ask you to consider the unlawfulness of this action and the negative consequences that will result.

The Travis County Tax Office has and always will comply with the law, but I wholeheartedly disagree with this rule and will not enforce this rule until it is properly authorized.

I strongly recommend the TxDMV board vote this rule down.”

Thank you for your service to Texas and thank you for listening to my concerns.

**CELIA ISRAEL**TAX ASSESSOR-COLLECTOR
TRAVIS COUNTY2433 RIDGEPOINT DRIVE
AUSTIN, TEXAS 78754
(512) 854-9473

December 31, 2025

Texas Department of Motor Vehicles
Office of General Counsel
4000 Jackson Avenue
Austin, Texas 78731Send via email: rules@txdmv.gov**Re: Comments on proposed rules regarding identification requirements for motor vehicle registration; published at 50 Tex. Reg. 7868 (Dec. 5, 2025) (the “proposal” or “proposed rules”)**

The Travis County Tax Assessor-Collector’s office provides the following comments on the referenced rule proposal. Initially our office would like to note that the proposed rules do not appear to have been considered and voted upon by the Board of the Texas Department of Motor Vehicles (TxDMV) in an open meeting. It is unusual for the Board to allow staff to simply propose rules without some prior public notice and a Board directive to publish. Please provide a justification for the rush to publish these rules without due consideration by the full TxDMV Board, as well as any documentation of the basis for the directive to staff to publish rules prior to consideration by the Board.

I’m writing this in the spirit of mindfulness around the impact to our taxpayers who appreciate clear and constant communication, as well as a significant portion of our business community who operate in and around vehicle sales. We share common goals as we serve the public, and we value our partnership to keep Texans safe as they drive our highways – my hope is that this input is accounted for as you consider rule changes.

Legal Basis

The premise of the rule – and indeed its entire basis – is that the revised identification requirements are necessary to demonstrate that “the applicant is **legally eligible** to reside in Texas.”¹ The rule proposal appears to be solely based on the statute at Tex. Trans. Code §502.040, which states that a person must register a vehicle “[n]ot more than 30 days after . . . becoming a resident of this state.” The statute goes on to say that “[t]he application must be accompanied by personal

¹ Proposed rule preamble “Introduction” at 7868 (emphasis added).

identification as determined by department rule and made in a manner described by the department through: (1) the county assessor-collector of the county in which the owner resides....”

There are several issues with using this statutory section to justify this rule. First, the rule clearly speaks to initial registration, not renewals of a registration. With this rule proposal, TxDMV is “bootstrapping” the identification requirement into registration renewals. This is an expansion of the statutory wording by both extending the reach of the statute and by giving TxDMV rulemaking authority it does not possess under the law.

The second issue with using this statute to justify the rulemaking is that the term “resident” as used in the statute is not preceded by the term “a legal”, which has been summarily added by TxDMV in the proposed rule. The term “resident” does not automatically imply legal residency. Using standard canons of statutory construction in Texas courts and the Texas Code Construction/Construction of Laws Acts, if a term is not defined in a statute it should be construed according to its “common” or “usual and customary” meaning.² Black’s Law Dictionary defines “resident” as: “1. A person who lives in a particular place; 2. Someone who has a home in a particular place. **In [this] sense, a resident is not necessarily either a citizen or a domiciliary.**”³ Webster’s defines resident as “one who resides in a place: one who dwells in a place for a period of some duration.”⁴ Neither of these definitions implies a prior legal determination of the legal immigration or citizenship status of a person in order for them to be a “resident.” Under the U.S. Constitution the courts have consistently stated that the enumeration called for in the decennial census means simply that the person’s primary residence is in that state.⁵

Further, the Legislature has used the precise term “legal resident” when it is the intent of a statute to prove that a person availing themselves of benefits of the state has appropriate documentation of their legal status in the state.⁶ Texas caselaw holds that where the Legislature includes a provision or word in one statute, and omits it in another, that silence is presumed to be exactly what the Legislature intended.⁷ In fact, the Legislature was quite precise in this very statute in §502.145. In that section, “nonresident” is defined (as distinguished from “resident”) as follows: “a resident of a state or country other than this state whose presence in this state is as a visitor and who does not engage in gainful employment or enter into business or an occupation, except as may otherwise be provided by any reciprocal agreement with another state or country.”⁸ This definition

² Tex. Gov’t Code §§311.011(a), 312.002; *TGS-NOPEC Geophysical Co. v. Combs*, 340 S.W.3d 432, 439 (Tex. 2011); *FKM P’ship v. Bd. of Regents*, 255 S.W.3d 619, 633 (Tex. 2008); *City of Rockwall v. Hughes*, 246 S.W.3d 621, 625 (Tex. 2008); *Geters v. Eagle Ins. Co.*, 834 S.W.2d 49, 50 (Tex. 1992).

³ BLACK’S LAW DICTIONARY (9th Ed.) p. 1424 (emphasis added).

⁴ WEBSTER’S THIRD NEW WORLD DICTIONARY (UNABRIDGED), p. 1931.

⁵ *Reynolds v. Sims*, 377 U.S. 533 (1964); *Franklin v. Massachusetts*, 505 U.S. 788 (1992).

⁶ See, e.g., Tex. Civ. Prac. & Rem. Code §71.051(e); Tex. Health & Safety Code §403.001(a); Tex. Gov’t Code §§411.172(a)(1), 411.173(a).

⁷ This doctrine is referred to as *expressio unius est exclusio alterius*, or “the expression of one thing is the exclusion of another.” See generally, *Peerless Carbon Black Co. v. Sheppard*, 113 S.W.2d 996, 997–98 (Tex. Civ. App.—Austin 1938, writ ref’d); *Fireman’s Fund Cnty. Mut. Ins. Co. v. Hidi*, 13 S.W.3d 767, 769 (Tex. 2000) (per curiam); *Laidlaw Waste Sys. v. City of Wilmer*, 904 S.W.2d 656, 659 (Tex. 1995).

⁸ Tex. Trans. Code §502.145(a).

clearly implies that the Legislature considers someone a “resident” of Texas if they are gainfully employed here and are not a “visitor.” Further, the Legislature was even clearer in the Transportation Code chapter regarding driver licensing. In that chapter, the statute speaks to issuance of state identification cards to a “a citizen, national, or **legal permanent resident of the United States** or a refugee or asylee lawfully admitted into the United States.”⁹ When speaking to eligibility for issuance of a driver license, the statute is also abundantly clear: “Each original driver's license, provisional license, learner license, or occupational driver's license issued to an applicant who is a **citizen, national, or legal permanent resident of the United States** or a refugee or asylee lawfully admitted into the United States expires as follows...”¹⁰

Further, on the rationale for these rules, TxDMV states that: “These changes [requiring ID for registration renewals] are necessary to implement the new identification requirements for all registered vehicles, including those that were initially registered prior to the effective date of these proposed amendments.” This logic is circular in that it implies the rule is necessary to correct the fact that the rule did not exist previously. An alternative reading is that the rule is necessary to correct fraudulent registrations that occurred under existing ID rules since identification has always been needed for initial registration. Neither justification is sufficient to support adding the identification requirement, especially when lacking specific legislative direction to do so.

Finally, in the “Explanation” section of the proposed rule on pages 7868-7869, the wording of the preamble contradicts language provided by TxDMV staff in their guidance of November 25, 2025. Initial and subsequent communications by TxDMV staff have stated that a stamp or mark from US Department of Homeland Security (DHS) is necessary, however, the guidance issued by TxDMV on November 25th states it is not.¹¹

Fiscal Note

In the proposed rule’s Fiscal Note on p. 7869, the TxDMV states their position that the rule will not result in “significant fiscal impact to state or local governments as a result of the enforcement or administration” of the new rule. The Travis County Tax Assessor-Collector categorically rejects that assertion. The determination relies on a statement from the TxDMV Chief Financial Officer that “the department’s data shows that the vast majority of applicants for registration have been presenting the department with personal identification documents that will meet the requirements of the amended rules.” This is false considering registration renewals had not, before these proposed rules, been required to be accompanied by identification. The factual premise for the Fiscal Note is fundamentally flawed.

⁹ *Id.* §521.271(a) (emphasis added).

¹⁰ *Id.* §521.271(a) (emphasis added).

¹¹ Text from November 25, 2025 TxDMV staff guidance: “This message provides clarification on previously distributed communications related to acceptable identification for customers presenting a foreign passport. For purposes of vehicle registration by Texas residents under Transportation Code §502.040, a foreign passport is an unexpired passport issued by the government of another country, accompanied by a current permanent resident card or unexpired immigrant visa issued by the United States Department of Homeland Security (DHS).”

There will also be impact for counties having to see customers multiple times due to the confusing and contradictory guidance of TxDMV on identification requirements. Additionally, the transition to an online system requiring increasingly complex layers of identification and confirmation (Texas By Texas), rather than the existing simple online registration renewal system, will require significantly more transactions to be processed in person. This fact alone will cause increased costs for the County. Additionally, this unfunded mandate forces counties to absorb payroll and postage costs because every transaction—whether in-person or by mail—triggers a grueling cycle of receipt, review, rejection, and return before it can even be processed. We anticipate a significant strain on County payroll and operational budgets because the rule and corresponding TxDMV guidance have been so haphazard and inconsistent. If the guidance is so byzantine and contradictory that TxDMV staff and officers are seemingly unable to send out consistent guidance, then county Tax Assessor-Collector offices, let alone members of the public, cannot be expected to make sense of the new rules either. There is also the likely loss of local fees for those who cannot renew under the new rule.

Public Benefit and Cost Note

The Public Benefit and Cost Note include assertions on p. 7869 that state the new rule will reduce the risk of fraud and “prevent people who are not legally eligible to reside in Texas from attaining registration to drive on Texas roads.” As stated previously in these comments, that regulatory outcome is not within the language of the sole statutory section cited as the basis for adoption of these rules. The Note also ignores the impact on applicants who will have to pay additional fees (late registration penalties, fees associated with obtaining a Texas drivers license or US passport, additional postage fees, additional expense of printing copies of IDs), plus the time needed to return to our office more than once due to this abrupt rule change. Adopting these rules may also lead to an increase in uninsured motorists as some previous applicants may no longer be able to renew their registration, a task where their insurance would have been verified. Finally, the Note ignores the very real risk of requiring customers to send IDs and payments through the mail (untracked), to and from the County Tax Office, which could result in identity theft or revealing bank information. These rules subject taxpayers to a cycle of rejected mail and repeated office visits, turning a simple renewal into a bureaucratic ordeal. These avoidable delays don't just frustrate the public—they force residents back into long lines, ultimately punishing otherwise law-abiding drivers by forcing them into a cycle of expired tags and resultant police citations.

Economic Impact Statement

The TxDMV completely ignores the likely impact of the proposed rules on dealer sales, full-service deputies, and limited-service deputies in the Economic Impact Statement on p. 7869. All of these businesses will suffer from the same customer service difficulties as the TAC offices mentioned above.

The TxDMV Board Should Reject These Proposed Rules

The public ought to know the justification for the unusual nature by which this rule came to be and deserves more transparency and deliberation around this directive. The Travis County Tax

Assessor-Collector requests the TxDMV Board reject, or at a minimum delay implementation of, these proposed rules and seek guidance in the 90th Session of the Texas Legislature in 2027.

Thank you,

A handwritten signature in black ink, appearing to read "Celia Israel". The signature is written in a cursive, flowing style.

Celia Israel



Terry Canales District 40

Permanent Standing Subcommittee on Transportation Funding, Chair • Calendars • Homeland Security, Public Safety & Veterans' Affairs • Transportation

Wednesday, December 31, 2025

Delivered via email to rules@txdmv.gov

Office of the General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, TX 78731

RE: Opposition Comment to the Texas Department of Motor Vehicles adopting changes to rules proposed on Dec. 5, 2025

To whom it may concern,

As the Chairman of the Texas House Subcommittee on Transportation Funding, I submit this comment in opposition to the Texas Department of Motor Vehicles adopting any of the following four changes to rules proposed on December 5, 2025: 217.22 (definitions), 217.26 (identification required), 217.28 (vehicle registration renewal), and 217.29 (vehicle registration renewal via internet).

I strongly believe that this new and retroactive standard for eligibility to purchase, own, and register a vehicle in Texas will have a deep effect not only on our South Texas communities but the entire state of Texas. The DMV's attempt to force this rule change will have a catastrophic economic impact on the overall states' economy by potentially eliminating millions of dollars in state taxes from vehicle purchases directly affecting business, hurting lawful Texas drivers, in addition to jeopardizing highway safety by rendering vehicles as undrivable and increasing the number of uninsured and unregistered vehicles on the road.

As you are aware the state of Texas is a major commuting state with over 90% of Texans using their vehicles to get to and from work, school and daily responsibilities. By changing the rule and imposing stricter identification requirements for registration and renewals, we are creating hurdles, delays and adding further burdens on businesses and most importantly families. As a state we have more to loose than to gain from this rule change.

I urge the DMV to be more responsible with your agenda and recognize the negative economic impact, the increased administrative burden and above all the public safety risk that imposing this rule change will have on our great state. Thank you for your time and I look forward to a favorable decision for the betterment of our state. If you have any questions, or if I can be of assistance to you, please do not hesitate to contact my office.

Very truly yours,

Terry Canales
Chairman, Texas House Subcommittee on Transportation Funding

CC:
Charles Bacarisse, Texas DMV Board Chairman
Daniel Avitia, Texas DMV Executive Director





January 21, 2026

Public Comment for the Texas Department of Motor Vehicles Board

RE: 43 Texas Administrative Code (TAC) Subchapter B, Motor Vehicle Registration, §§217.22, 217.26, 217.28, and 217.29 to limit the types of personal identification documents that an applicant can use to register a vehicle in Texas under Transportation Code, §502.040

Dear Members of the Board of Directors of the Texas Department of Motor Vehicles,

On behalf of El Paso County, we respectfully request that the recently published bulletin with proposed changes to identification requirements for motor vehicle registration renewals and initial title applications published in the Texas Register on December 5, 2025, be reconsidered and revised prior to its potential implementation.

The proposed rules present significant challenges to our County Tax Assessor Collector's daily operations, adding unnecessary burdens and expenses to our residents and taxpayers. These new requirements will increase cost and time of processing renewals, create substantial barriers for workers with foreign passports, subject taxpayers to possible identity theft and financial fraud, among other negative implications for our state's economy.

Both mailed and online renewals will become targets for identity theft and financial fraud. By forcing Texans to mail or upload a copy of their identity paired with a check or payment form, the state is putting them at risk with this new requirement. Bad actors may further exploit the situation by creating fraudulent Immigration Documents, and ID's to register and title their vehicles for residents without valid and unexpired forms of identification. Law enforcement and County Tax Assessor Collectors will face new challenges to address this ghost Identification problem, and more uninsured or unregistered vehicles will be inevitably using our roadways.

Additionally, the Tax Office will incur higher expenses in labor, postage, and significant delays to return those registration renewals to the motor vehicle owner and exempt agencies. County office fees for registration renewals do not reflect actual processing costs and have not kept pace with labor and postage increases, these additional requirements will further widen the gap between reimbursement and actual expenses. As a result, counties will be increasingly undercompensated for each renewal processed.

Maintaining an efficient Tax office work force in vehicle titling and registration, is critical to protecting public safety, and safeguarding state revenue. When vehicles are properly titled and registered, ownership records remain accurate and current, enabling law enforcement to quickly identify vehicles and owners during traffic stops, crash investigations, and criminal inquiries. Comprehensive insurance coverage ensures that motorists can meet financial responsibility requirements, reducing uncompensated losses for accident victims and limiting the public burden associated with uninsured motorists. Collectively, strong participation in these systems promotes roadway safety, regulatory compliance, and fiscal stability.

These new requirements will cause a significant drop in auto sales in our state, adversely affecting auto dealers and consequently impacting the state's revenue. Vehicle owners will now be incentivized to title and register their motor vehicles in bordering states that have less strict requirements and more favorable tax implications. Our community will lose considerably more funding in fees due to Texas residents registering vehicles in bordering states such as New Mexico.

For these reasons, we respectfully urge the Texas Department of Motor Vehicles Board to reconsider the proposed rules and conduct a comprehensive assessment of their potential impact on taxpayers prior to implementation. Should the Rule be approved for implementation statewide, we suggest having a period of "implementation and education" to adequately communicate and train all affected citizens, military, border residents, businesses, dealers, exempt agencies, and County Tax Offices. We suggest a 30-to-45-day grace period from the effective date of rule approval to allow time for community education and proper implementation. We appreciate the opportunity to provide input on these important matters and remain available to answer any questions or collaborate further with the Texas Department of Motor Vehicles.

Sincerely,

Elisa Tamayo
Governmental Affairs Manager
El Paso County



January 21, 2026

Public Comment for the Texas Department of Motor Vehicles Board

RE: 43 Texas Administrative Code (TAC) Subchapter B, Motor Vehicle Registration, §§217.22, 217.26, 217.28, and 217.29 to limit the types of personal identification documents that an applicant can use to register a vehicle in Texas under Transportation Code, §502.040

Dear Members of the Board of Directors of the Texas Department of Motor Vehicles,

On behalf of El Paso County, we respectfully request that the recently published bulletin with proposed changes to identification requirements for motor vehicle registration renewals and initial title applications published in the Texas Register on December 5, 2025, be reconsidered and revised prior to its potential implementation.

The proposed rules present significant challenges to our County Tax Assessor Collector's daily operations, adding unnecessary burdens and expenses to our residents and taxpayers. These new requirements will increase cost and time of processing renewals, create substantial barriers for workers with foreign passports, subject taxpayers to possible identity theft and financial fraud, among other negative implications for our state's economy.

Both mailed and online renewals will become targets for identity theft and financial fraud. By forcing Texans to mail or upload a copy of their identity paired with a check or payment form, the state is putting them at risk with this new requirement. Bad actors may further exploit the situation by creating fraudulent Immigration Documents, and ID's to register and title their vehicles for residents without valid and unexpired forms of identification. Law enforcement and County Tax Assessor Collectors will face new challenges to address this ghost Identification problem, and more uninsured or unregistered vehicles will be inevitably using our roadways.

Additionally, the Tax Office will incur higher expenses in labor, postage, and significant delays to return those registration renewals to the motor vehicle owner and exempt agencies. County office fees for registration renewals do not reflect actual processing costs and have not kept pace with labor and postage increases, these additional requirements will further widen the gap between reimbursement and actual expenses. As a result, counties will be increasingly undercompensated for each renewal processed.

Maintaining an efficient Tax office work force in vehicle titling and registration, is critical to protecting public safety, and safeguarding state revenue. When vehicles are properly titled and registered, ownership records remain accurate and current, enabling law enforcement to quickly identify vehicles and owners during traffic stops, crash investigations, and criminal inquiries. Comprehensive insurance coverage ensures that motorists can meet financial responsibility requirements, reducing uncompensated losses for accident victims and limiting the public burden associated with uninsured motorists. Collectively, strong participation in these systems promotes roadway safety, regulatory compliance, and fiscal stability.

These new requirements will cause a significant drop in auto sales in our state, adversely affecting auto dealers and consequently impacting the state's revenue. Vehicle owners will now be incentivized to title and register their motor vehicles in bordering states that have less strict requirements and more favorable tax implications. Our community will lose considerably more funding in fees due to Texas residents registering vehicles in bordering states such as New Mexico.

For these reasons, we respectfully urge the Texas Department of Motor Vehicles Board to reconsider the proposed rules and conduct a comprehensive assessment of their potential impact on taxpayers prior to implementation. Should the Rule be approved for implementation statewide, we suggest having a period of "implementation and education" to adequately communicate and train all affected citizens, military, border residents, businesses, dealers, exempt agencies, and County Tax Offices. We suggest a 30-to-45-day grace period from the effective date of rule approval to allow time for community education and proper implementation. We appreciate the opportunity to provide input on these important matters and remain available to answer any questions or collaborate further with the Texas Department of Motor Vehicles.

Sincerely,

Elisa Tamayo
Governmental Affairs Manager
El Paso County

CFPB and Justice Department Issue Joint Statement Cautioning that Financial Institutions May Not Use Immigration Status to Illegally Discriminate Against Credit Applicants

Borrowers report being denied loans because of their immigration status

OCT 12, 2023

WASHINGTON, D.C. – The Consumer Financial Protection Bureau (CFPB) and Justice Department today issued a joint statement that reminds financial institutions that all credit applicants are protected from discrimination on the basis of their national origin, race, and other characteristics covered by the Equal Credit Opportunity Act, regardless of their immigration status. The CFPB and Justice Department are issuing this statement because consumers have reported being rejected for credit cards as well as for auto, student, personal, and equipment loans because of their immigration status, even when they have strong credit histories and ties to the United States and are otherwise qualified to receive the loans.

While the Equal Credit Opportunity Act allows a creditor to consider an applicant's immigration status when necessary to ascertain the creditor's rights regarding repayment, creditors should be aware that unnecessary or overbroad reliance on immigration status, including when that reliance is based on bias, may run afoul of the law.

"Fair access to credit is crucially important for building wealth and strengthening household financial stability," said CFPB Director Rohit Chopra. "The CFPB will not allow companies to use immigration status as an excuse for illegal discrimination."

"Lenders should not deny people the opportunity to take out a loan to buy a home, build their businesses or otherwise pursue their financial goals because of unlawful bias and without regard to their actual ability to repay," said Assistant Attorney General Kristen Clarke of the Justice Department's Civil Rights Division. "This guidance reminds lenders that denying someone access to credit based solely on their actual or perceived immigrant status may violate federal law."

Some financial institutions have maintained blanket policies denying credit to individuals based on their immigration status, regardless of their personal circumstances and demonstrated ability to repay, arguing that the Equal Credit Opportunity Act, and the regulation that implements it, protect them whenever they consider immigration status in making a credit decision. Others have incorrectly claimed that the Act shields lenders from liability under other federal and state civil rights laws that bar discrimination on the basis of someone's status as an immigrant or noncitizen.

The joint statement explains that while the Equal Credit Opportunity Act allows creditors to consider immigration status when necessary to ascertain the creditor's rights regarding repayment, unnecessary or overbroad reliance on immigration status may violate the Act's prohibition of discrimination on the basis of national origin, race or another prohibited basis. The joint statement also confirms that neither the Equal Credit Opportunity Act nor its regulations provide companies a safe harbor with respect to other laws barring discrimination on the basis of immigration status.

<https://www.consumerfinance.gov/about-us/newsroom/cfpb-and-justice-department-issue-joint-statement-cautioning-that-financial-institutions-may-not-use-immigration-status-to-illegally-discriminate-against-credit-applicants/>



Texas Department of Motor Vehicles

HELPING TEXANS GO. HELPING TEXAS GROW.

TEXAS DEPARTMENT OF MOTOR VEHICLES PUBLIC HEARING

REGISTRATION FORM REQUEST TO SPEAK OR PROVIDE WRITTEN COMMENTS ON AGENDA ITEM

Proposed Amendments to 43 Texas Administrative Code, Chapter 217, Vehicle Titles and Registration, §§217.22, 217.26, 217.28, and 217.29 relating to Personal Identification Requirements for Vehicle Registration Under Transportation Code, §502.040

You MAY submit this form prior to the agenda item being taken up by the department staff. Send comments to GCO_General@txdmv.gov.

I wish to appear before the department to:

Speak and/or Provide written comments

Se solicita la traducción de un comentario verbal del español al inglés.
(Translation of Verbal Comment from Spanish to English Requested)

My testimony will: Support Oppose Provide Info Other

Registrant Information: *Please PRINT clearly*

| | | |
|--|------------------|-------------------|
| Name: Katie Robertson | | |
| Address (optional)¹: | | |
| City: Plano | State: TX | Zip: 75025 |
| Representing: Kanda Motors (Dallas, TX) | | |

Signature: Katie Robertson Date: 1/20/2026

To Comment:

1. Wait for the department staff to call on you.
2. Limit your comments to three minutes.
3. Individuals cannot accumulate time from other speakers.

¹ You are not required to provide your address. The department may use your address for the purposes of responding to your questions or following up with you regarding your comment.

Impact of TxDMV Rule Change on Small Business and Community

Introduction

My name is Katie Robertson. I am a small business owner, a mother, a Texas resident and property owner, a registered voter in 75025, and a proud U.S. citizen. I would like to express my deep concern over the recent rule change by the Texas Department of Motor Vehicles (TxDMV), which now requires foreign passport holders to provide proof of lawful presence to purchase and register a vehicle. This sudden change has had an immediate and severe impact on my business, my employees, our customers, and our family's livelihood.

We respectfully urge the TxDMV to reconsider this rule. It is harming honest, tax-paying Texas businesses and hardworking families across our state. At minimum, we ask that businesses and consumers be given a meaningful transition period—similar to the approach taken with the Blue Laws—so that we can adapt responsibly. Our dealership has already seen sales decline by 35% because we are forced to turn away qualified customers who can no longer meet the new identification requirement.

Background of Our Business

My husband, Alex, and I founded Kanda Motors in 2019 to build a future for our family and serve our community by offering reliable, affordable used vehicles to people in the Dallas metroplex. We pride ourselves on transparency, trust, and helping families gain access to transportation—a basic necessity in Texas.

To launch this business, Alex left an eight-year banking career, and I stepped away from my position as a global analyst at an international investment firm. We invested our savings, time, and energy into building Kanda Motors from the ground up. Over six years, we've earned the trust of our customers and their families—many of whom return to us for their second or third vehicles.

In 2022, we expanded our mission by introducing in-house financing programs to serve customers unable to qualify for traditional bank loans. These Buy Here Pay Here (BHPH) and external financing options have allowed families to build credit while accessing the transportation they need for work, school, and independence. The new TxDMV identification rule disproportionately affects these customers—and, in turn, our ability to sustain the business we have built through hard work and integrity.

Sales Data and Impact Analysis

In 2024, Kanda Motors sold 200 vehicles, generating \$2.4 million in sales. Of those, 71 buyers presented valid foreign passports—representing over \$817,000 in sales. We financed 59 of those vehicles in-house for a total of more than \$638,000. Another 22 sales involved customers with Limited Term driver's licenses, many of whom may not be able to

renew their ID under the current political climate. Together, these groups made up 46.5% of our sales and 67.5% of the loans we financed in 2024.

Between January 2024 and November 2025, we sold 385 vehicles, 121 of which involved passport-holding customers—sales that accounted for nearly \$1.6 million in revenue. The rule change directly threatens this segment, which represents 31.5% of our recent business. Since the change, we have been turning away roughly one out of every three customers, not because of creditworthiness or willingness to pay, but simply because they can't meet a new documentation rule that wasn't in effect when they first became our customers.

Active Accounts and Financial Losses

We currently have 46 active financing accounts—representing \$588,000 in vehicle sales—that would be blocked from renewing registrations or trading in their vehicles. These customers are responsible, hardworking individuals who make their payments faithfully. Already, three have had to surrender their vehicles due to expired registrations, resulting in heavy financial losses for both them and us.

As a small family-run business, losses like these are devastating. Multiply our story by the almost 26,000 licensed dealerships across Texas, and the ripple effect on small businesses statewide becomes undeniable. The new rule took effect without sufficient notice, consultation, or a plan to help small businesses mitigate the consequences.

Broader Economic and Community Impact

The harm goes far beyond individual dealerships. According to a recent report, approximately 300,000 Texas drivers could lose the ability to register their vehicles under this new rule. That translates to an estimated \$22 million in lost registration revenue for the state—not including lost emissions inspection fees, sales taxes, or associated small business income.

Moreover, restricting lawful vehicle purchases could unintentionally lead to more straw purchases, uninsured drivers, and unsafe vehicles on our roads. By excluding members of our community who have been legitimate, tax-paying consumers, this policy not only disrupts commerce but jeopardizes public safety and undermines trust in state institutions.

Local mechanics, insurance agents, body shops, and inspection stations—all pillars of our small-business economy—depend on a healthy auto marketplace. When dealerships like ours are forced to turn away reliable customers, those losses ripple throughout every level of our local economy.

Request for Policy Reconsideration

On behalf of small businesses, families, and community members across Texas, we respectfully urge the TxDMV to repeal or revise this identification rule. If a full rollback is not possible immediately, we ask for a 10-year transition period to allow fair preparation and education on compliance requirements.

This rule change—though perhaps well-intentioned in some way—has delivered real harm to real Texans. We ask you to stand with small businesses, working families, and responsible community members by restoring fairness, stability, and common sense to the process.

Sincerely,

A handwritten signature in cursive script that reads "Katie Robertson".

Katie Robertson, PhD

Registered Voter in 75025

Kanda Motors, Dallas, TX

To Whom it May Concern

From: Leal Used Cars
344 W.Mount Houston Rd.
Houston, Tx. 77037.

Date: January 21, 2026.

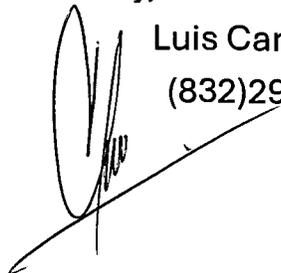
Subject: Business at risk.

The proposed amendments to 43 Texas Administrative Code, Chapter 217, Vehicle Titles and Registration, §§217.22, 217.26, 217.28, and 217.29, would set new requirements for the personal identification documents that an applicant must provide for vehicle registration as a Texas resident under Texas Transportation Code §502.040.

We have been serving our community for 27 years, and this new change to only accept Texas Id's would be devastating, since 80% of my clients use a passport. The customers finance through our business, so with the new proposed amendments it will negatively impact our business and decrease our customer base as a result.

What will happen when they return the cars to me because I Can't get the registration in the coming years?

Sincerely,

 Luis Carlos Leal
(832)292-7757



Christina Morales

State Representative • District 145
Harris County

January 21, 2026

Texas Department of Motor Vehicles
Office of General Counsel
4000 Jackson Avenue
Austin, TX 78731

Re: Public Comment on Proposed Amendments to 43 Texas Administrative Code, Chapter 217, Vehicle Titles and Registration, §§217.22, 217.26, 217.28, and 217.29

To Whom It May Concern:

I am writing to oppose the proposed amendments to the Personal Identification Requirements for Vehicle Registration under Transportation Code §502.040. While I support accurate and secure vehicle registration, these changes create confusion, impose new costs, and raise serious public-safety and economic concerns.

As the Texas State Representative for House District 145, I have heard from constituents and businesses already affected by the guidance issued in November. The proposed rules disproportionately impact seniors, individuals with disabilities, rural residents, and other law-abiding Texans who rely on mail-in renewals and may struggle to obtain the required identification. Requiring these populations to mail copies of sensitive documents increases the risk of identity theft and fraud and may prevent them from renewing registrations needed for work, medical care, and daily transportation.

The amendments also create an unfunded mandate on Texas counties and strain county tax assessor-collectors who lack the training and resources to verify identification documents. Businesses—particularly small automobile dealers and insurers—are already reporting increased loan delinquencies, vehicle returns, and lost sales. These impacts threaten state and local revenue while increasing the likelihood of uninsured and unregistered vehicles on Texas roads.

For these reasons, I respectfully request that the Texas Department of Motor Vehicles delay implementation until after the 90th Legislative Session, provide clearer guidance, and remove the proposed identification requirements for registration renewals.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Christina Morales". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Representative Christina Morales
Texas House of Representatives
HD 145



TEXAS DEPARTMENT OF MOTOR VEHICLES PUBLIC HEARING

REGISTRATION FORM REQUEST TO SPEAK OR PROVIDE WRITTEN COMMENTS ON AGENDA ITEM

Proposed Amendments to 43 Texas Administrative Code, Chapter 217, Vehicle Titles and Registration, §§217.22, 217.26, 217.28, and 217.29 relating to Personal Identification Requirements for Vehicle Registration Under Transportation Code, §502.040

You MAY submit this form prior to the agenda item being taken up by the department staff. Send comments to GCO_General@txdmv.gov.

I wish to appear before the department to:

Speak and/or Provide written comments

Se solicita la traducción de un comentario verbal del español al inglés.
(Translation of Verbal Comment from Spanish to English Requested)

My testimony will: Support Oppose Provide Info Other

Registrant Information: *Please PRINT clearly*

| | | | |
|---------------------|------------------------------|--------|-------|
| Name: | Yvonne Munoz | | |
| Address (optional): | 11601 Bell Ave. | | |
| City: | Austin | State: | TX |
| | | Zip: | 78759 |
| Representing: | Representative Vincent Perez | | |

Signature:  Date: 1/21/24

To Comment:

1. Wait for the department staff to call on you.
2. Limit your comments to three minutes.
3. Individuals cannot accumulate time from other speakers.

¹ You are not required to provide your address. The department may use your address for the purposes of responding to your questions or following up with you regarding your comment.



TEXAS HOUSE of REPRESENTATIVES



Vincent Perez

State Representative, District 77

January 21, 2026

DMV Rules Committee
Texas Department of Motor Vehicles

Re: Comments on Proposed Amendments to 43 TAC §§217.22, 217.26, 217.28, and 217.29

Dear Members of the DMV Rules Committee:

I submit these comments in opposition to the proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29. While framed as fraud-prevention measures, these rules do little to meaningfully address the problem they purport to solve and instead continue a pattern of State action that signals that certain communities matter less to the State of Texas.

Existing statutes on the matter require Texas residency, not proof of citizenship or federal immigration status, to register a vehicle. The Department has failed to demonstrate that the system is currently failing, or that fraud is occurring at such a level that would justify modifying and narrowing the list of acceptable documents. In the absence of such evidence, the proposed changes appear performative rather than practical and more about sending a message than solving a legitimate administrative problem. Instead, the rule affects countless Texans who already face systemic barriers to accessing government-issued identification. Texans who have lived, worked and created jobs via small and micro-business in our state may suddenly find themselves excluded from compliance through no fault of their own.

More than two decades ago, United States Supreme Court Justice Sandra Day O'Connor, a proud Texan appointed by President Reagan, warned that state action cannot rest on disapproval, stigma or political distaste for a group. In her opinion for the majority in *Lawrence v. Texas*, she emphasized that laws that appear neutral but operate to burden vulnerable communities undermine equal treatment under the law, as well as public confidence in government. Her caution remains incredibly relevant here.

This proposal does not meaningfully improve roadway safety nor increase administrative efficiency. These amendments reinforce the fact that the State is willing to use routine government processes to signal exclusion, to remind certain Texans that their participation is conditional. Registering a vehicle is a basic interaction between residents and the State, essential to accessing work, school, healthcare and general family life. Rules governing this process should encourage compliance and fairness, not cement barriers that deepen mistrust and division.

For these reasons, I respectfully urge the DMV Rules Committee not to adopt the proposed amendments and to retain the current identification framework, which already allows the Department to administer registration requirements without unnecessarily excluding Texas residents.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "Vince Perez". The signature is stylized with a large, looped "V" and "P".

Representative Vince Perez
Texas House of Representatives



TEXAS DEPARTMENT OF MOTOR VEHICLES PUBLIC HEARING

REGISTRATION FORM REQUEST TO SPEAK OR PROVIDE WRITTEN COMMENTS ON AGENDA ITEM

Proposed Amendments to 43 Texas Administrative Code, Chapter 217, Vehicle Titles and Registration, §§217.22, 217.26, 217.28, and 217.29 relating to Personal Identification Requirements for Vehicle Registration Under Transportation Code, §502.040

You **MAY** submit this form prior to the agenda item being taken up by the department staff. Send comments to **GCO_General@txdmv.gov**.

I wish to appear before the department to:

Speak and/or Provide written comments

Se solicita la traducción de un comentario verbal del español al inglés.
(Translation of Verbal Comment from Spanish to English Requested)

My testimony will: Support Oppose Provide Info Other

Registrant Information: *Please PRINT clearly*

| | | |
|---|---------------------|-------------------|
| Name: Lauren Hadley | | |
| Address (optional)¹: | | |
| City: Austin | State: Texas | Zip: 78711 |
| Representing: Senator Molly Cook (SD 15) | | |

Signature: _____ Date: 1/21/26

- To Comment:
1. Wait for the department staff to call on you.
 2. Limit your comments to three minutes.
 3. Individuals cannot accumulate time from other speakers.

¹ You are not required to provide your address. The department may use your address for the purposes of responding to your questions or following up with you regarding your comment.



CAPITOL OFFICE:
P.O. Box 12068
AUSTIN, TEXAS 78711
OFFICE: (512) 463-0115

DISTRICT OFFICE:
4808 GIBSON ST. STE. 210
HOUSTON, TEXAS 77007
OFFICE: (713) 864-8701

MOLLY COOK, R.N.

STATE SENATOR
DISTRICT 15

January 21, 2026

To the Members of the Texas Department of Motor Vehicles Board:

Thank you for scheduling a hearing on the proposed rule amendments to 43 Texas Administrative Code Subchapter B, Motor Vehicle Registration, Sections 217.22, 217.26, 217.28, and 217.29 to limit the types of personal identification documents that an applicant may use to register a vehicle in Texas under Transportation Code, Section 502.040. As stated in my letter requesting a public hearing, I believe that public engagement is imperative to shaping sound public policy. I hope that you all receive valuable insights today from the many stakeholders this proposed rule amendment would affect, and I hope that this hearing informs your decision on how you will ultimately vote on this proposed change.

While my work in Houston prevents me from being in Austin today, I wanted to share additional thoughts on the proposed rule change. In my letter requesting a public hearing, I stated several concerns I have with this proposed amendment, including public safety, state and county budgeting, and workforce disruptions. I also want to take the time to highlight how this proposed change would unnecessarily target undocumented residents in this state. An estimated 1.7 million undocumented immigrants live in Texas, and this change has the potential to disrupt their daily life, from going to school or to work or to the doctor, and *with no known benefit*. There is no known benefit with this proposed rule amendment. It certainly won't make our communities any safer and instead will only lead to more uninsured vehicles on our roadways and will likely hinder law enforcement's ability to maintain accurate ownership information for every vehicle in the state.

My office has been made aware of additional concerns from major players in this field including Texas Automobile Dealers Association, Independent Bankers Association of Texas, Texas Bankers Association, Texas Credit Union Association, Texas Independent Automobile Dealers Association, and the Tax Assessor-Collector Association of Texas. Again, I hope these concerns are taken seriously with the ultimate goal of adopting a policy that is influenced by facts, data, and lived experiences rather than viral social media posts by my misinformed colleagues.

Thank you again for taking the time to hold this hearing. Please don't hesitate to reach out to my office if we can be of further assistance.

Sincerely,

A handwritten signature in black ink that reads "Molly Cook".

Molly Cook
State Senator, District 15

Mr. Daniel Avitia
Executive Director
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, Texas 78731

Dear Mr. Avitia,

I am writing to raise serious concerns about the recent changes implemented by the Texas Department of Motor Vehicles regarding what constitutes valid identification for vehicle registrations and purchases. As the owner of a used car dealership in Laredo, TX, I have seen firsthand how these DMV changes are causing unnecessary hardship for customers and severe disruptions to our daily operations. The new DMV identification rules are hindering legitimate business, blocking lawful transactions, and damaging customer confidence. These policies place unreasonable restrictions on acceptable forms of ID; restrictions that do not reflect the realities of commerce in Laredo or the needs of the people we serve.

This city relies heavily on cross-border relationships, workers who regularly commute between countries, and long-standing residents whose identification documents may not adhere to the DMV's new criteria. Under these new rules, customers who have safely and legally purchased vehicles for years are suddenly being told their identification is no longer valid - despite no change in their legal status or documentation history.

This has led to real, measurable harm:

- Sales are being delayed or lost entirely because our customers cannot meet the DMV's new ID requirement.
- A large percentage of our paying customers use a foreign passport as a form of identification
- A large percentage of our customers who financed a car and used a foreign ID/ passport are still paying off their vehicle note and because of this new law, they will not pay.
- Customers will not be able to renew their vehicle registration, leaving them unable to drive.

These are some of the ways on how these changes affect our business. These changes will ultimately affect many more around the state of Texas. County tax assessor collectors and thousands of auto dealers around the state. Even Texans that we share the road with everyday. These policies could lead to an increase in unregistered vehicles on the road, ghost titles, and law enforcement challenges in being able to trace and identify offenders based on fake registration. These are all public safety concerns. Additionally, these changes require proper notice to elected officials and impacted business owners. No such notice was provided. The change was unjust and did not follow the proper rule-making process.

These rules do not enhance security. They choke commerce. They do not prevent fraud. They punish law-abiding buyers and businesses. They do not reflect Texas values of economic freedom, fairness, or support for local enterprise.

I strongly urge your office to review and address the impact of these changes. The business community, especially in border regions, needs a system that is practical, flexible, and aligned with the real-world

Thank you for your time and for your attention to issues that will continue to hurt local commerce every single day they remain in place.

Thank you,

Ricardo Neira

Owner

JL & R Auto Sales LC

1615 S. Zapata Hwy

Laredo, TX 78046

From: [Mario Motors](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Concern About Proposed ID Rule – Independent Dealer Perspective
Date: Monday, January 5, 2026 4:35:07 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Dear TxDMV board,

I'm writing as an independent car dealer here in Texas who works directly with local families every day. I want to express my concern about the proposed rule that would limit the types of IDs people can use to register a vehicle.

This change would make it harder for a lot of my customers to get transportation legally — especially folks who may not have a Texas driver's license or a green card, but do have valid passports or other documentation. Many of my clients are here on valid status or awaiting immigration processing, and they rely on their foreign passports as their only form of ID.

If those passports are no longer accepted, it would prevent good, hard-working people from registering vehicles legally — and would hurt my ability to serve them as a licensed dealer. These are families who live, work, and contribute to the community, and transportation is essential to their livelihood.

I understand the need for security and standardization, but I urge the Board to reconsider this rule or include more flexibility in the list of acceptable IDs. The impact on small businesses and local communities would be significant.

Sincerely,
Albert Ghattas
Mario Motors
South Houston, Texas

From: 552.137
To: [Zz - Resource - GCO Rules](#)
Subject: Nov 18th Rule Changes
Date: Tuesday, December 23, 2025 11:24:58 AM
Attachments: [image003.png](#)
[image004.png](#)

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Please reconsider the proposed rule changes affecting vehicle registration for immigrant families.

The legalization process often takes many years—frequently ten or more. Many of these individuals are trying to do the right thing by complying with the law and paying their fair share.

As an insurance agent with over 45 years of experience, my immediate concern is the liability exposure placed on previous vehicle owners. If vehicles cannot be properly registered, they are likely to remain in the prior owner's name for extended periods. Should one of these vehicles be involved in an accident—particularly a hit-and-run—the former owner could potentially be held liable. This is unacceptable.

This is just one example of how these changes could negatively impact the general public and ultimately lead to higher insurance rates to offset the risks of uninsured or unregistered vehicles. These individuals should be allowed to continue taking responsibility by maintaining proper registration and liability coverage, rather than shifting the burden onto others.

Thank you for your consideration.

Alex Hernandez
The Insurance Shop

Tyler, Longview and Henderson
Phn. 903.509.9779
Fax 903.509-9778
www.insuranceshoptx.com

Become a fan of The Insurance Shop!



Strength for TODAY Brings Hope for TOMORROW

Confidentiality Notice: The information contained in this email message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential, privileged, and proprietary information of The Insurance Shop. Any unauthorized use, disclosure, distribution, or copying of this message, including any attachments, is strictly prohibited. If you are not the intended recipient, or an agent responsible for delivering it to the intended recipient, please immediately notify the sender by reply email and delete the message, including any attachments, and destroy all copies thereof.

From: [amir mohammadi](#)
To: [Zz - Resource - GCO Rules](#)
Subject: ID Requirements
Date: Monday, January 5, 2026 2:26:08 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

We're writing to bring to your attention the significant impact the new law regarding green cards and vehicle registration is having on our business. Since the law went into effect, our sales have slowed dramatically, and we're seeing a surge in customers returning their vehicles due to registration issues.

Many of our customers are struggling to obtain the required documentation, and as a result, they're unable to register their vehicles. This is not only affecting our business but also causing undue hardship for our customers.

We understand the importance of ensuring compliance with immigration laws, but we'd like to respectfully request that you consider the unintended consequences of this law on businesses like ours. We're eager to work with you to find a solution that balances the need for compliance with the needs of our customers and our business.

If this new law is approved, I'll close my business soon.

Fiesta Auto Finance
fiestaautofinance@hotmail.com
Office (713) 692-2886
Fax (713) 691-6625

CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. This email is intended to be reviewed by only the individual or organization named above. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, use or copying of this email and its attachments, if any, or the information contained herein is prohibited.



Think GREEN. Please consider the environment before printing this email

From: sufamiliacarsandtrucks@gmail.com
To: [Zz - Resource - GCO Rules](#)
Subject: Public Comment on Proposed Texas DMV Vehicle Registration Rule Changes
Date: Tuesday, December 23, 2025 11:06:26 AM
Attachments: [image001.png](#)
[image002.png](#)

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Dear Sir or Madam,

I am writing to submit a public comment regarding the proposed changes to Texas vehicle registration and renewal rules.

I am the Office Manager of Su Familia Cars & Trucks, a small used-car dealership that serves working-class and immigrant families in Texas. On a daily basis, I assist customers with vehicle purchases, title transfers, and registration processes. Based on our experience, I am very concerned about the real-world impact these proposed changes are already having and will continue to have on both families and small businesses.

Since these rule changes were announced, we have experienced customers being turned away or delayed in registering vehicles due to documentation requirements that go beyond proof of ownership, insurance, and payment. Many of these customers are hardworking individuals who depend on their vehicles to get to work, transport their children, and meet essential obligations. When they are unable to complete registration, they are left without reliable transportation through no fault of their own.

These delays and denials directly affect our business as well. We have had vehicle sales postponed or canceled because customers were unsure whether they would be able to register their vehicle. This results in lost sales, increased inventory holding costs, and additional administrative burdens for our dealership. As a small, family-run business, we do not have the resources to absorb these losses the way large corporate dealerships can.

Independent used-car dealerships like ours play a critical role in providing affordable transportation to communities that are often underserved. Policies that unintentionally

restrict access to vehicle registration create financial harm for small businesses while placing additional strain on families who are simply trying to comply with the law.

I respectfully urge the Texas Department of Motor Vehicles to reconsider or revise these proposed rules to ensure they are fair, clearly defined, and do not disproportionately impact immigrant families, working Texans, or small independent dealerships. Reasonable flexibility and practical implementation are essential to avoid unnecessary hardship while still meeting regulatory goals.

Thank you for reopening the public comment period and for considering the experiences of those directly affected by these proposed changes.

Sincerely,

Angely Lopez

6914 North Freeway Houston, TX 77076

Phone: 713-694-6000 | Fax: 832-581-3860

sufamiliacarsandtrucks@gmail.com

<https://www.sufamiliacarsandtrucks.com>

This communication may contain privileged and/or confidential information. It is intended solely for the use of the addressee. If you are not the intended recipient, you are strictly prohibited from disclosing, copying, distributing, or using any of this information. If you have received this communication in error, please contact the sender immediately and destroy the material in its entirety, whether electronic or hardcopy. This communication may contain non-public information about individuals and businesses subject to restrictions of the Gramm-Leach-Bliley Act. You may not directly or indirectly reuse or re-disclose such information for any purpose other than to provide the services for which you are receiving the information.



December 16, 2025

Dear Laura Moriaty,

Coast to Coast Motors has been in business for nearly ten years and currently employs 141 people, 91 of whom are based in Houston, Texas. We operate in both Texas and Oklahoma and specialize in providing vehicles to customers who do not qualify for traditional bank financing. Our business model is commonly referred to as Buy Here Pay Here, meaning we act as the lender for our customers and collect payments directly.

Some Buy Here Pay Here dealers rely on banks or financial institutions to fund their loans, while others are self-funded. Our portfolio consists of approximately 5,000 active loans, totaling just over \$95 million in accounts receivable. Roughly 35% of these loans are lightly documented customers.

Under the proposed rule, these customers would be unable to renew their vehicle registrations. While I understand the intent behind the rule, I believe it will create several unintended and serious consequences.

First, lightly documented individuals will not stop driving. Instead, they are likely to have another person purchase and register the vehicle on their behalf. This creates significant insurance risks, including confusion over whose name is on the policy versus who is actually operating the vehicle. In the event of an accident, determining liability becomes far more complicated.

Second, law enforcement will face increased challenges. Vehicles will be registered in one individual's name while being driven by another, making it more difficult to determine true ownership. Additionally, if lightly documented customers cannot obtain registration renewals, many will continue driving with expired registrations. This raises the question: do we want law enforcement resources focused on expired registration enforcement, or on addressing serious criminal activity?

Third, this rule is likely to encourage the production and use of fake identification and fraudulent documentation as individuals attempt to work around the system to purchase vehicles.

There is also a significant financial impact to the state that must be considered. Sales tax is collected and remitted on every vehicle sale. Reducing legitimate vehicle transactions will result in lost tax revenue, a meaningful source of income for the state.

In closing, I do not believe this law will prevent undocumented individuals from driving vehicles. Transportation is essential for work, family responsibilities, and daily survival. Rather than stopping vehicle use, this rule will push individuals toward informal, riskier, and less



transparent alternatives. The result will be increased insurance complications, enforcement burdens, fraud, and lost state revenue without achieving the intended goal.

Respectfully,

April Hanson
Market Director
Coast to Coast Motors, LLC.

From: [Armando Rodriguez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: New Rule In Place
Date: Monday, January 5, 2026 3:46:01 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whom it concerns,

Just wanted to say it affects future customers and current customers. It also affects us as dealers in many ways. It will also affect Texas in Taxes. I hope you guys can come out with an agreement for our future customers. People work hard for their vehicles and depend on them to go to work.

*Thank you,
Armando Rodriguez
Alaniz Auto Ranch
1144 E Irving Blvd
Irving, TX 75060
Phone: 972-554-7100
Fax: 972-554-7133*

Comment Letter to TxDMV (Proposed 43 TAC §§217.22, 217.26, 217.28, 217.29)

1) Executive summary

Greater Texas Federal Credit Union appreciates the opportunity to comment on TxDMV's proposed amendments to Chapter 217, Subchapter B, including the additions and revisions affecting §§217.22, 217.26, 217.28, and 217.29. TxDMV requests information related to the cost, benefit, or effect of the proposed amendments, including applicable data, research, or analysis, from persons required to comply with the proposed rule.

Greater Texas FCU supports TxDMV's stated public goals of reducing fraud in vehicle registration and ensuring that Texas registration is issued consistent with state residency-related requirements. However, the proposed changes-particularly the narrowed definition of "valid passport" and the extension of ID verification to registration renewals, including Internet renewals-create material operational and credit-risk consequences for Texas consumer vehicle finance providers, credit unions, and their members.

We respectfully request that TxDMV (i) adopt clarifying guidance and implementation safeguards to reduce unintended harms to lawful consumers and lienholders, (ii) standardize renewal and Internet renewal processes to ensure consistent statewide administration, and (iii) implement a transition approach to reduce sudden renewal failures for vehicles registered prior to the effective date.

2) About Greater Texas Federal Credit Union and our auto lending model

Greater Texas FCU is a federally insured, not-for-profit financial cooperative serving Texans across multiple markets. We operate a substantial consumer vehicle lending program, with originations primarily through indirect lending (dealer-originated retail installment contracts) and a smaller portion through direct-to-consumer channels (branch/digital/call center). Because indirect loans are consummated at the dealership, the titling and initial registration workflow is commonly performed by dealers and third-party title service providers, with the credit union relying on timely and accurate completion of title and registration to protect security interest and ensure lienholder rights.

Greater Texas FCU also serves borrowers who lawfully use an Individual Taxpayer Identification Number (ITIN) in lieu of a Social Security Number. We maintain robust Bank Secrecy Act/Anti-Money Laundering compliance, including customer identification program controls and address discrepancy resolution.

3) Overview of the proposal as it affects vehicle financing and collateral

TxDMV proposes amendments to limit the types of personal identification documents an applicant can use to register a vehicle in Texas under Transportation Code §502.040. Proposed §217.26(b) would require applicants for Texas-resident registration to present a REAL ID-compliant driver license/state ID, a "valid passport" (as newly defined), or a Texas license to carry.

The proposal also extends ID verification into registration renewals, requiring “documents or information necessary to verify” that the owner has identification meeting §217.26 requirements, including via Internet renewal systems.

TxDMV’s proposed definition of “valid passport” narrows the treatment of foreign passports and requires (among other items) a DHS admission stamp/mark and either a current permanent resident card or an unexpired immigrant visa.

4) Benefits of the proposal (from a lender and member perspective)

Greater Texas FCU recognizes the following potential benefits:

- Reduced registration fraud/improved document validity. TxDMV anticipates that benefits include reducing fraud risk in vehicle registration.
- Clearer statewide standard for Texas-resident registration. A uniform identification standard, if implemented consistently across counties and online channels, can reduce inconsistent outcomes and administrative errors.

Greater Texas FCU supports these objectives and is prepared to coordinate member and dealer education aligned with TxDMV’s final requirements.

5) Costs and adverse effects (with quantification framework)

TxDMV’s Public Benefit and Cost Note anticipates that individuals without a valid, unexpired driver’s license or unexpired passport may incur direct costs to obtain such documents (e.g., \$33 or less for a Texas driver’s license and \$165 or less for a U.S. passport). Greater Texas FCU believes this direct-cost estimate materially understates the full cost and effect on consumers and lienholders.

A. Direct consumer costs beyond fees (not reflected in fee-only estimates)

In our member base, the most significant burdens are frequently:

- time away from work to visit DPS/passport facilities,
- transportation constraints for individuals who depend on a vehicle for employment,
- delay costs (late fees, expired registration penalties, inability to legally drive pending resolution),
- administrative complexity and repeated county office visits due to inconsistent interpretation.

These costs will be concentrated among consumers who do not already hold REAL ID–compliant identification, and consumers whose foreign passport documentation does not align cleanly to the proposed “valid passport” definition.

B. Portfolio-level lender impacts (collateral, credit, and operational)

As a secured auto lender, Greater Texas FCU expects measurable impacts in the following areas:

- Increased delinquency/default risk - Borrowers unable to renew registration may experience vehicle-use disruption (employment access, commuting), which can

increase delinquency risk. This becomes a portfolio-level effect because the renewal requirements apply broadly, including vehicles initially registered prior to the effective date.

- Collateral maintenance and loss severity - Vehicles with lapsed registration can present increased repossession, storage, and remarketing friction. Even when lienholder rights are preserved, the practical costs of liquidation can increase.
- Indirect channel disruption and contract unwinds - In indirect lending, registration failures often surface after delivery and may cause contract unwinds, repurchases, or extended title work cycles. These outcomes create costs for dealers, lenders, and consumers.
- Operational and compliance burden Credit unions will need to implement:
 - dealer-facing education and controls,
 - staff training,
 - underwriting/closing scripts and disclosures,
 - servicing outreach related to renewals,
 - exception and escalation workflows.

These are real costs that may not be reflected in TxDMV's expectation of "no significant fiscal impact" or "no measurable effect" on local economy.

6) Recommendations to improve effectiveness and reduce unintended consequences

Greater Texas FCU respectfully requests that TxDMV incorporate the following into final rule text, official guidance, or implementation plans:

Recommendation 1 - Clarify and operationalize the "valid passport" definition to prevent inconsistent county-by-county outcomes

The proposed definition of "valid passport" is narrow for foreign passports and may be interpreted inconsistently by local offices and vendor-supported Internet renewal processes.

TxDmv should publish a plain-language implementation guide (examples of acceptable "stamp or mark," how immigrant visas are validated, how expired-but-recently-valid documents are treated if applicable, etc.) to reduce erroneous rejections and repeated visits.

Recommendation 2 - Implement a transition/grace mechanism for renewals to avoid sudden, widespread renewal failures

Because the proposal explicitly extends ID verification to renewals and is intended to apply to vehicles registered prior to the effective date, a transition plan is essential.

Options include:

- a phased implementation period,

- a temporary renewal window for owners who can prove they are actively obtaining qualifying identification,
- a cure process that permits continued processing while documentation is corrected (without forcing immediate lapse).

Recommendation 3 - Standardize Internet renewal verification requirements and protect consumer privacy

The proposed Internet renewal rule requires submission/verification of “information necessary” to verify qualifying identification and requires counties to verify the owner’s identification meets §217.26.

TxDMV should specify:

- what data elements are required,
- how the vendor/county verifies those elements,
- what documentation must be uploaded (if any),
- retention/security standards,
- and an alternative pathway for consumers unable to complete online verification.

Clarity here reduces fraud risk while preventing disparate, unpredictable outcomes.

Recommendation 4 - Confirm the “one-owner” rule for multi-owner titles and extend clarity to renewal/titling transactions where applicable

Proposed §217.26(c)(1) states that if a motor vehicle is titled in more than one name, “the identification of one owner must be presented.”

TxDMV should explicitly confirm how this applies in renewal contexts and related transactions to reduce confusion and to prevent unintended barriers (e.g., requiring all co-owners to appear in situations where the rule does not require it).

Recommendation 5 - Add stakeholder outreach specific to dealers, title service providers, and lienholders

Because indirect lending relies on dealer/title service execution, implementation success will depend on dealer education and standardized processes. TxDMV should coordinate outreach materials and county-office training before the effective date to minimize post-sale disruptions and unwinds.

7) Conclusion

Greater Texas FCU supports TxDMV’s efforts to reduce fraud and improve document validity in Texas vehicle registration. At the same time, the proposed amendments as drafted are likely to impose meaningful consumer, dealer, and lender costs beyond the fee-only compliance costs described in the proposal. The most significant impacts will stem from

renewal friction applied broadly (including to vehicles registered prior to the effective date) and from inconsistent implementation across counties and online renewal channels.

We respectfully request that TxDMV incorporate the clarifications and transition safeguards described above to achieve the proposal's anti-fraud objectives while minimizing unintended harm to lawful consumers and secured lenders.

Benjamin A. Teske
EVP & Chief Lending Officer
Greater Texas Federal Credit Union
E: [REDACTED] 552.137
P: (512) 323-4749

1/5/2025

To Whom It May Concern,

I am writing to strongly oppose the Texas Department of Motor Vehicles' proposed rule requiring proof of immigration status for vehicle registration. This change is already causing significant and immediate harm to my business, my customers, and the local economy.

I run a used car dealership in Houston, Texas, focused on helping working families who need dependable vehicles for their jobs, education, and everyday needs. Most of our clients are Latino, and many use valid foreign passports—documents that have traditionally been accepted for buying, financing, and registering vehicles.

According to the proposed rule, many current customers cannot renew their vehicle registration or get a new registration sticker, even though they have valid financing and insurance. This puts them in a tough spot: they are required to keep paying for vehicles they cannot legally drive. Because of this, families are facing financial difficulties, and small businesses like mine are seeing more defaults, repossessions, and financial losses.

This proposed rule is expected to affect approximately 95% of our sales. Such a significant impact presents considerable challenges to long-term sustainability. The regulation poses risks to the viability of small auto dealerships, as well as finance, insurance, and construction companies, particularly where workers depend on vehicles to reach job sites—as well as other related service providers. Additionally, it may lead to reductions in tax revenue and overall economic activity within our community. Houston relies heavily on vehicles for people to take part in the economy, so limiting legal vehicle registration can make it harder for workers to stay employed and can affect public safety.

In addition to its economic impact, this proposal would introduce obstacles that especially hinder immigrant communities, who play a significant role in Texas's economy. Stopping people from registering their vehicles does not remove their need for transportation; instead, it leads to more cars on the road without registration or insurance.



Brenda I Garcia Salazar,
Owner of Piolin Auto Sales.
Houston, Tx.

From: [cami agudelo](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Public Comment on Proposed Identification Requirement Rule
Date: Monday, January 5, 2026 2:40:44 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To Whom It May Concern,

I am writing on behalf of Auto Icon, a Texas motor vehicle dealer that primarily serves working-class small business owners and contractors throughout our community.

A significant portion of our customers rely on valid foreign passports and consular identification to legally purchase and register work vehicles in Texas. These individuals are essential contributors to the local economy — they operate construction, landscaping, logistics, cleaning, and service businesses that depend on having reliable transportation to perform their jobs.

The proposed identification requirement rule would create a substantial barrier for these workers. Many face financial and logistical challenges when it comes to renewing foreign identification documents, and restricting acceptable forms of ID would prevent otherwise qualified buyers from registering vehicles necessary for their livelihood.

Over the past several months, we have already observed increased hesitation and fear among members of our community, resulting in delayed or abandoned vehicle purchases. This has had a direct and measurable impact on our business operations and sales volume. More importantly, it threatens the ability of hardworking individuals to maintain employment and provide services that Texas businesses and residents rely on daily.

Without access to a properly registered work vehicle, many of these individuals cannot reach job sites, fulfill contracts, or sustain their businesses. The ripple effects extend beyond dealerships and directly affect the broader Texas economy, including employers, consumers, and local industries.

We respectfully urge the Texas Department of Motor Vehicles to consider the unintended consequences of this rule and to maintain reasonable flexibility in acceptable identification documents. Doing so will help protect small businesses, support essential workers, and preserve economic stability within our communities.

Thank you for the opportunity to submit public comment and for your consideration of these concerns.

Sincerely,
Auto Icon
Houston, Texas

**C&D AUTO SALES LLC
4226 W. DAVIS ST SUITE 31
DALLAS TX 75211**

**January 5, 2026
Dallas, Texas**

TO WHOM IT MAY CONCERN.

We are C&D AUTO SALES LLC, with the license number P-155713, and I am writing this letter to respectfully state our institutional position regarding the lawful sale of motor vehicles to people with foreign passports in the State of Texas and how this affects our business.

The 75 percent of our clients count only on their foreign passport and they pay their (vehicle taxes, state inspection, and registration)

90% of our clients with foreign passport always end up paying off their vehicle without any issues.

All of our clients with foreign passports get valid vehicle insurance which is a benefit for us and the state.

With our sales dropping due to the fact that we are turning away almost 80% of our clients with foreign passport, we are starting to see the financial impact on our business which is affecting the income we depend on to keep our business running.

Thank you for your attention to this matter. We remain available to cooperate in any effort that promotes lawful vehicle sales, regulatory compliance, and public safety throughout the State of Texas.

RESPECTFUL

Carlos Almeida



Carlos Ido

Owner / Operator

Carnival Auto Credit

December 21, 2025

Laura Moriarty

Texas Department of Motor Vehicles

Rules@txdmv.gov

Re: Public Comment on Proposed Vehicle Registration and Renewal Rule Changes

Dear Ms. Moriarty,

Summary of Operational and Policy Considerations

- Increased documentation thresholds may unintentionally reduce overall registration compliance
- Greater procedural complexity is likely to increase unregistered and uninsured vehicle operation
- Reduced registration participation may negatively impact state and local revenue collection
- Additional requirements may increase administrative and enforcement burdens on TxDMV staff and law enforcement
- Indirect evaluation of legal status by dealers or agency staff raises operational and jurisdictional concerns

I am submitting this letter as formal public comment regarding proposed changes to vehicle registration and renewal requirements under the Texas Department of Motor Vehicles' rule making authority.

I am an owner and operator of Carnaval Auto Credit, a family-owned used-vehicle dealership that has continuously operated in the Dallas–Fort Worth area for nearly 26 years. Our dealership is fully licensed and compliant under Texas law and is directly involved in vehicle titling, registration processing, insurance verification, and long-term in-house financing.

A significant portion of our customer base consists of working-class Texans employed in construction, landscaping, warehousing, transportation, and other essential industries. Because we finance vehicles in-house, we maintain multi-year relationships with customers and actively monitor insurance coverage, registration compliance, and overall performance throughout the life of each contract. This operational model provides direct, longitudinal insight into real-world compliance behavior.

Based on this experience, the vast majority of customers maintain valid insurance and current vehicle registration when administrative processes are accessible, predictable, and clearly defined. Regulatory changes that materially increase procedural complexity or documentation thresholds—while well-intentioned—risk producing unintended and counterproductive outcomes.

While I support strong identification standards and agree that passports or other identification documents used for registration should be valid and unexpired, additional or expanded requirements may result in increased numbers of unregistered or improperly registered vehicles in active use; greater reliance on proxy or third-party titling arrangements; higher incidence of uninsured vehicle operation; decreased registration and tax revenue; and increased enforcement and administrative burden.

Transportation access is essential for employment continuity. When lawful registration becomes materially more difficult, vehicle operation often shifts outside the formal compliance system.

Additionally, expanded registration requirements may place dealerships, lenders, insurers, and TxDMV personnel in the position of indirectly evaluating legal or immigration status—an area outside the traditional scope of state motor vehicle administration.

From a policy perspective, maintaining high participation rates in vehicle titling, registration, and insurance coverage best serves public safety, law enforcement effectiveness, and state revenue objectives.

Thank you for the opportunity to provide public comment.

Respectfully,

Carlos Ido

Owner / Operator

Carnaval Auto Credit

11663 Harry Hines Blvd.

Dallas, Texas 75229

552.137

Direct (214) 535-5520

Laura Moriaty
General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, TX 78731

Re: Public Comment on Proposed Amendments to 43 TAC §§217.22, 217.26, 217.28, and 217.29

Dear Ms. Moriaty,

Thank you for the opportunity to provide comments regarding the Texas Department of Motor Vehicles' proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29, relating to personal identification requirements for vehicle registration under Transportation Code §502.040. I write to share how these changes would affect my dealership, our employees, and our customers, and to highlight unintended consequences that should be carefully considered before these rules are finalized.

I am the owner/operator of an independent automobile dealership in Texas. Our business was built under the existing registration framework and employs Texas residents, serves local families and small businesses, and supports the state economy through payroll, taxes, financing activity, and vehicle sales. We operate in good faith and comply with all existing state and federal requirements governing vehicle sales, titling, registration, and lending.

Operational Impact and Unintended Consequences

First, requiring customers to obtain new or replacement identification through DPS will inevitably delay vehicle sales due to appointment backlogs that are already well known across the state. These delays disrupt time-sensitive transactions, financing approvals, lien recordings, and customer mobility—often for customers who are clearly eligible but lack a specific form of identification at the time of purchase.

Second, these changes risk preventing otherwise qualified customers—who are not undocumented and who have successfully completed transactions under existing rules—from registering vehicles due solely to documentation technicalities. This creates confusion, frustration, and inequitable outcomes without advancing public safety.

Third, the proposed rules effectively require dealers to review and interpret immigration-related or lawful-presence documents. Dealers are not trained, licensed, or authorized to make such determinations, nor have we historically been required to do so. This places

dealers in an inappropriate role and exposes businesses to compliance errors and liability.

Finally, these requirements raise concerns under federal fair-lending laws. In October 2023, the Consumer Financial Protection Bureau and the U.S. Department of Justice issued guidance cautioning creditors against denying credit based solely on immigration status when applicants are otherwise qualified. Overly broad reliance on immigration-related documentation increases the risk of inconsistent treatment and potential claims of unlawful discrimination, despite a dealer's best efforts to comply with the law.

Our dealership has made significant investments—facilities, inventory, employees, lending relationships, and community engagement—based on the prior regulatory framework, which did not require dealers to inquire into or evaluate lawful presence for vehicle registration. Sudden changes to these requirements disrupt settled expectations and impose new risks and costs on independent dealers.

Request for Consideration

I respectfully request that TxDMV revise the proposed rules to provide a safe harbor for dealers, such as exempting vehicles with active liens or dealer-financed transactions from these new identification requirements, or returning the rule to its prior form and reserving lawful-presence verification exclusively for state agencies with the appropriate expertise and authority.

Thank you for considering the perspective of independent Texas dealers who serve their communities every day. I appreciate the opportunity to participate in the rulemaking process.

Respectfully submitted,

Cesar Leyva
Owner
Grapeland Autos LLC
Conroe, Texas
(936)777-5904

552.137

From: [Chassity McAtee](#)
To: [Zz - Resource - GCO Rules](#)
Subject: URGENT - New ID Requirements for Vehicle Registration
Date: Monday, January 5, 2026 4:21:41 PM
Importance: High

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Texas DMV Rules Committee,

I am a Dealer Services Analyst for an auto finance company based in Dallas, Texas. I have over 23 years of experience in the auto finance industry. Our company has operated in this state for nearly fourteen years, employs approximately twenty people, and has never laid off an employee. We take deep pride in doing business in Texas and contributing to the local economy.

Unfortunately, the newly implemented identification requirements for vehicle registration place our company - and many others in the auto industry - in a very difficult position. Based on our customer and historical transaction data, this rule is expected to immediately reduce our revenue by approximately 20%. Such a reduction would likely force workforce reductions, an outcome that benefits no one.

While I support reasonable and thoughtful improvements to immigration policy, these new ID requirements are extreme, unnecessary, and misguided. Requiring dealerships and finance companies to verify Department of Homeland Security admission stamps, permanent resident cards, or unexpired immigration visas for non-U.S. passport holders is well outside the scope of our role. We are not immigration officials, and private businesses should not be tasked with enforcing or interpreting immigration documentation. This policy places businesses in an untenable position and exposes them to significant operational and legal risk.

The financial impact of this rule will be severe. For many auto lenders and dealerships, it will eliminate roughly one-fifth of their business overnight. The result will be lost jobs, reduced tax revenue, and widespread economic disruption across Texas. Importantly, most ITIN customers are hardworking, reliable individuals who consistently meet their financial obligations and contribute positively to their communities. In our own portfolio, ITIN borrowers demonstrate lower loss ratios than U.S. citizens, making them stable and responsible customers.

I also urge you not to allow the highly publicized TriColor case to distort this discussion. That company's failure stemmed from internal management fraud, not from the performance or

reliability of ITIN borrowers. Beyond the auto industry, this decision will have ripple effects across Texas's housing, construction, agriculture, and service sectors. Reliable transportation is essential for working families. When people cannot get to work, labor shortages increase, production slows, and costs rise - further worsening affordability challenges Texans are already facing. This policy moves the state in the wrong economic direction.

For these reasons, I respectfully but firmly request that this rule be reconsidered and reversed. If it remains in place, the consequences will include job losses, reduced tax revenue, higher consumer costs, and increased strain on Texas businesses and families.

Texas succeeds when its policies promote growth, responsibility, and opportunity. This rule does the opposite.

Respectfully,

Chass McAtee

Dealer Services Analyst

First Texas Auto Credit

3501 Olympus Blvd Suite 170

Dallas, TX 75019

469-637-0100 (main)

469-637-0104 (direct)

469-637-0110 (fax)

552.137



From: [Johnson, Cheryl E](#)
To: [Zz - Resource - GCO Rules](#)
Cc: [Johnson, Cheryl E; McRae, Tammy](#)
Subject: Comments Regarding Proposed Rule Change Relating to Personal ID Requirements for Vehicle Registration Under Transportation Code 502.040
Date: Wednesday, December 17, 2025 11:03:51 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Good morning.

I wish to formally submit the following comments regarding the proposed rule change:

1. At 217.22(11) current photo identification is defined as currently valid or expired not more than 12 months, etc. This will result in confusion since it does not conform to the proposed change at 217.22(44) or 217.26(b)(1), (2) and (3) which specifically address valid as unexpired.

In order to avoid confusion, there should be one acceptable status – unexpired. Therefore, please revise 217.22(11) to conform to the remainder of the proposed rule changes.

2. The proposal at 217.28(c) states the renewal notice must be accompanied by documents necessary to verify the owner has an ID that is not expired whether the renewal is in person or sent via the mail. This rule should be amended to remove the requirement from mailed registrations to provide proof of unexpired ID. The risk to customers, as well as the 254 county tax offices who will be responsible for managing retention and security of these documents is unreasonable. The effect will likely result in a tremendous increase in in-person transactions when people begin to realize the risk of identify fraud. This is an impractical and unreasonable government directive which will unnecessarily place individuals at risk and greatly increase the workload of the TxDMV Tax Office stakeholders.

Generally speaking, if the purpose of this rule change is to prevent fraud and noncitizens from titling and registering vehicles in Texas, without full support of law enforcement it is meaningless. For instance, in counties such as Harris, law enforcement does NOT pursue violations of expired registration nor do they impound untitled vehicles. This matter should be remanded back to the Texas Legislature to establish enforceable and harsh laws to bring a meaningful end to the problem.

Cheryl E. Johnson, PCC, CTOP
Galveston County Tax Assessor Collector
(409) 765-3277 (office)
(409) 392-5457 (mobile)
www.galcotax.com

"Be the change you want to see in the world." Gandhi

Full Time GCTO Office Hours Effective 7.31.2025
Monday-Thursday 7:30 am - 5:30 pm, Friday 8 am - Noon
Galveston Courthouse, 722 21st Street/Moody, Galveston
Texas City Annex, 2916 Texas Avenue, Texas City
West County Annex, 11730 Highway 6, Santa Fe
Monday-Friday 8:00 am to 5:00 pm
North County Annex, 174 Calder, League City
Satellite Office Hours Effective 7.31.2025 (closed Noon - 1:00 pm for lunch)
946 Noble Carl Rd, Crystal Beach 3rd Tuesday 7:30 am-4:30 pm
910 S Friendswood Dr., Friendswood Thursday, Friday 8am-5pm

From: [Conner Atkinson](#)
To: [Zz - Resource - GCO Rules](#)
Cc: [REDACTED] 552.137
Subject: Changes to Texas DMV Identification Requirements
Date: Thursday, December 18, 2025 11:22:09 AM
Attachments: [image001.png](#)

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Good day,

I hope this email finds you well. I am reaching out to you to protest the upcoming changes to the TX DMV Identification requirements. These changes that are proposed would reduce the income that is earned by fees and taxes from titling and purchasing vehicles. If people are not able to register their vehicle without new forms of identification, there will be a reduction in the amount of people who are purchasing vehicles. The 6.25% charged for Tax, Title, and License as well as the registration fees itself are a constant source of income as more people move to Texas and have to register their vehicles here. While I understand the change is for increased documentation and accountability, the negative impact to the economy outweighs the benefit of increased documentation. In 2024 the total Motor vehicle sales and rental tax revenue was \$6.84 billion according to <https://comptroller.texas.gov/> and that does not include the registration fees earned. I urge you to reconsider where Texas will make up the money from when a good portion of it's residents lose the right to drive vehicles legally.

**Conner Atkinson | Consumer Lending
Member Service Specialist**
University Federal Credit Union
(512) 467-8080



This email and any attachments are intended for the designated recipient(s) only. If you have received this email in error, please delete this message. However, if you have obtained this email via electronic eavesdropping, you are in violation of the Electronic Communications Privacy Act. Furthermore, disclosure, copying, distribution or taking of any action in reliance on the contents hereof is strictly prohibited without the explicit consent of UFCU.

From: [Derek Landry](#)
To: [Zz - Resource - GCO Rules](#)
Cc: [REDACTED] 552.137; [Todd Gaudin](#)
Subject: Impact of Changes to Texas DMV Identification Requirements
Date: Monday, January 5, 2026 1:06:20 PM
Attachments: [image001.png](#)
Importance: High

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Good afternoon,

I'm writing today to comment on the changes to the Identification Requirements.

Our local DMV (Jefferson County) put this change into effect on November 18th 2025 and we have already started to feel the effects of the new ID requirements.

We currently have loans that we cannot perfect our lien on. It is also beginning to impact our existing loans as members cannot renew their registrations. This puts the credit union at higher risk as these loans are basically unsecured, without our lien, and these vehicles could be sold or damaged without our knowledge. Over time, this could also raise concerns during audits and exams since it will affect how we are able to secure our collateral. In addition, these changes also pose a reputation risk as members may blame the credit union for these delays in registering their vehicle which will cause a drop in loan volume as many of our members fall into the group most affected by these new requirements.

We ask that you reconsider your changes and the impacts it will cause both the residents of this state and the financial institutions to enable their borrowers to drive reliable transportation.

Sincerely,
Derek J. Landry
NMLS #609669
Executive Vice President & Chief Lending Officer
(409) 984-7434



Confidentiality Notice: This email and any associated attachments are intended only for the person or entity to which it is addressed and may contain confidential and/or privileged information, and may be legally protected from disclosure. Dissemination, distribution or copying of this communication and any accompanying attached information by anyone other than the intended recipient(s), or an employee or agent acting on behalf of the intended recipient, is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to this message, and then delete it from your computer.

From: [Diandra](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Written Comment- Opposition to Proposed Registration ID Changes
Date: Tuesday, December 9, 2025 11:11:01 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whom it may concern,

I am submitting comments regarding the proposed changes to Texas ID requirements for vehicle registration and renewal.

As a licensed Texas dealer serving a diverse customer base and as someone who has worked on both the dealership and lender side of the auto industry. I am deeply concerned about the significant operational and financial impact these rule changes would create. My background gives me firsthand visibility into how registration compliance affects not only customers, but also dealership operations, loan performance, risk management, and the stability of portfolios held by lenders across the United States.

Under the proposed requirements, many existing customers who legally purchased their vehicles and have consistently complied with the current rules may suddenly become unable to renew their registration. This would disrupt their ability to drive legally, jeopardize their employment, and put their families at risk. It would also immediately destabilize their auto loans, increasing delinquencies and defaults through no fault of the customer.

From the dealership and lender perspective, this rule introduces unnecessary risk and would create significant collateral and collection challenges. Registration compliance is a foundational expectation in underwriting, servicing, and repossession prevention. Changing identification eligibility in the middle of active loan terms forces both dealers and lenders into avoidable losses and operational chaos.

Additionally, this rule disproportionately affects immigrant customers who acted in good faith and followed every requirement presented at the time of purchase. Retroactively changing their eligibility is harmful, unfair, and inconsistent with the standards under which their loans and registrations were originally approved.

For these reasons, I respectfully request that TxDMV reconsider or revise the proposed changes, create clear and fair transition guidelines for existing customers, and continue working with industry stakeholders to avoid unintended harm to consumers, dealerships, and financial institutions across Texas.

Thank you for the opportunity to provide input on this matter. I appreciate your consideration and look forward to continued collaboration to ensure Texas maintains a fair, consistent, and stable registration system.

Respectfully,

Recaman Auto Group
Diandra Recaman
C: 469.442.5441
O: 214.699.4888



12/12/2025

Laura Moriaty
General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, Texas 78731

Re: Impact of Proposed TxDMV Rule on Vehicle Registration Identification Requirements

Thank you for the opportunity to provide comments regarding the Texas Department of Motor Vehicles' proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29, relating to personal identification requirements for vehicle registration and renewal.

I submit these comments as the owner of a Texas-based auto dealership and finance company that will be directly affected by this proposal, and as a former member of the Texas Department of Motor Vehicles Board, on which I served for more than six years. In that role, I became familiar with the Department's rulemaking process and the importance of transparency, consistency, and stakeholder input when implementing policies with statewide impact.

One area of concern is the **process by which this policy has evolved**. Prior to formal publication of the proposed rule, elements of the policy were communicated to county tax assessor-collectors through a memorandum. While I recognize the Department's need to provide guidance to local officials, this approach created the perception that a substantive policy change was being implemented before completion of the formal rulemaking process. In addition, it is my understanding that the proposed rule was published without a formal vote of the TxDMV Board. Given the scope and potential impact of the changes, Board consideration would have provided an additional level of review and assurance that the policy aligns with legislative intent and operational realities.

My more significant concern relates to the **economic impact of the proposed rule**, particularly on finance companies, banks, and credit unions operating in Texas. By imposing new identification requirements on registration renewals, the rule will prevent some existing vehicle owners from renewing their license plates—even if they have lawfully registered and renewed in prior years. When a customer is unable to renew a vehicle registration, the practical result is often that the vehicle can no longer be used, which in turn increases the likelihood that the borrower will stop making loan payments.

This outcome creates avoidable risk for lenders, increases defaults and losses, and ultimately restricts access to vehicle financing. These effects extend well beyond individual registrants and may be more significant than reflected in the Department's economic impact analysis.

I respectfully encourage your office to consider both the procedural history of this proposal and its unintended economic consequences before the rule is finalized. I believe additional review and stakeholder engagement could help ensure that the Department's objectives are achieved without unnecessary disruption to Texas consumers and financial institutions.

Thank you for your time and consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "Blake Ingram". The signature is fluid and cursive, with a large initial "B" and a long, sweeping underline.

Blake Ingram
President
Auto City



December 20, 2025

Texas Department of Motor Vehicles
Attn: Laura Moriaty
4000 Jackson Avenue
Austin, TX 78731

Re: Registration ID Requirements

Dear Ms. Laura Moriaty and Texas Department of Motor Vehicles Board:

Chacon Autos was started by my grandfather in 1958. Over almost 70 years my family, along with our great team of employees have worked hard to grow from one location in Dallas to nine locations throughout the state. We have approximately 150 employees and sold almost 6,000 vehicles last year. I mention those two numbers because I think it highlights the impact that Chacon Autos has on our community. In Texas, having a vehicle is essential for most families. The vehicles we sell are used by Texans to get to work, to the grocery store, to doctor's appointments, to daycare, to church, to school, etc. Without their vehicle, these individuals and families would face real challenges in their daily lives. Likewise, the 150 jobs that we have are good paying jobs. In many cases this is the most money they have ever made, and because of this we have many long-term employees. In fact, just the past week, I attended a party for one of our employees who was retiring after 30 years of working here.

The sweeping nature of the new ID rules for vehicle registrations is very concerning for us. The new rules go well beyond prohibiting the use of foreign passports to sell someone a vehicle who may be in the country illegally and will cause two large problems for us. First, applying the new ID requirements to registration renewals may cause individuals to abandon their vehicles. We made loans when these vehicles were purchased using the ID rules at the time. If the customer/vehicle owner cannot renew their registration, they may choose to simply stop paying on their loan and give up their vehicle. This would cause us to incur millions of dollars in losses when these loans default.

Secondly, we've already seen how the new ID rules are hurting ordinary Texans. We had a retired man who wanted to buy a car so that his children and caregivers could drive him to his doctor's appointments. He had an ID card issued by Texas DPS that had an INDEF expiration date. It did not meet the RealID requirements so we could not sell him a vehicle. We've seen several times where a parent wants to co-sign on the loan to help their adult child buy their first vehicle. It's pretty sad to have to tell a parent that they can't help their child because their license is expired by a week or it doesn't meet the RealID requirements.

In all of these examples, I do not feel like I am doing good for the community or making the state safer. I am mostly just adding unnecessary hardship onto Texas families. If Chacon Autos sells less cars, that

means we don't help as many Texans get access to transportation that is essential for them. Unfortunately, if we don't sell as many cars and we take millions of dollars in losses because of the existing loans that default; we will have to make hard choices about how many employees we can still afford to keep.

Our request is that the Texas Department of Motor Vehicles develop ID rules that specifically address the issue and limit the impact on everyone else. Please consider adopting a rule that a foreign passport must include the current visa documentation (which would demonstrate legal status in the country) for new title transfers only. All other rules would remain the same as they were prior to 11/19/2025.

Thank you for your consideration and attention to this important matter.

Respectfully,



Greg Chaney, CEO



January 5, 2026

Laura Moriaty
General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, TX 78731

Re: Comments to Proposed Amendments to 43 Texas Administrative Code Chapter 217, Vehicle Titles and Registration (Non-Emergency) (proposing amendments to §§217.22, 217.26, 217.28, and 217.29)

Dear Ms. Moriaty:

The Texas Independent Automobile Dealers Association (TIADA) appreciates the opportunity to submit comments on the Texas Department of Motor Vehicles' (TxDMV's) proposed amendments to 43 Texas Administrative Code Chapter 217. TIADA represents more than 1,000 independent automobile dealers across Texas. Our members sell vehicles to consumers and finance transactions through a range of models, including direct dealer financing and financing arranged through third-party lenders—each of which depends on timely and predictable title and registration processing for lawful vehicle operation and loan performance.

TIADA appreciates TxDMV's decision to move the Board meeting originally scheduled for January 6. With comments closing at 5:00 p.m. on January 5, this adjustment provides additional time for TxDMV to review the public comment record and brief the Board, helping avoid the perception that public input could not be meaningfully considered before Board action.

After careful review, TIADA respectfully urges TxDMV to withdraw the proposed amendments in their entirety and to defer adoption until TxDMV can further evaluate implementation feasibility, operational impacts, and downstream consequences for dealers, consumers, and county tax offices. However, if TxDMV elects to proceed, TIADA offers the alternative recommendations below as practical alternatives to reduce disruption, mitigate unintended harms, and improve administrability while still supporting TxDMV's stated objectives.

I. Loans Influenced by Federal ECOA Guidance and the Need to Grandfather Existing Vehicle Registrations with Liens

TIADA recommends revising proposed §217.26(b) to include a grandfathering provision that preserves eligibility to renew registration for vehicles with a recorded lien as of the effective date of the rule for at least five years. Transition relief is necessary because many outstanding dealer-financed loans were originated under a federal enforcement posture that discouraged creditors from using immigration status as a categorical disqualifier, and those loans remain secured by vehicles already registered with recorded lienholders.

TIADA Comments to TxDMV – 43 TAC Chapter 217

January 5, 2026

Page | 2 of 10

In October 2023, the Consumer Financial Protection Bureau (CFPB) and the U.S. Department of Justice issued a Joint Statement interpreting the Equal Credit Opportunity Act (ECOA) and warning that the use of immigration status in credit decisions could constitute unlawful discrimination if used as a proxy for national origin absent a legitimate business necessity.[1] That interpretation created substantial legal uncertainty for dealers and heightened enforcement risk for creditors that treated immigration status as a categorical basis for denial. As a practical matter, dealers were strongly discouraged from adopting blanket policies that would deny credit based on immigration status alone.

TIADA understands that TxDMV has stated the amendments are intended to ensure that applicants present valid personal identification and are legally eligible to reside in Texas. TIADA believes that, once adopted, the rules can provide a clear, state-based compliance framework that dealers and lenders may rely on when structuring transactions around the borrower's ability to register and renew registration. This forward-looking framework should reduce uncertainty and support consistent compliance in future transactions, including if federal fair-lending interpretations of immigration status shift again under a future administration.

However, without a grandfathering provision, the proposed rule would materially impair existing secured loans by preventing renewal of registration for vehicles that were already financed and are readily identifiable because they have recorded liens on the title. In these cases, the collateral is already pledged and the loan is already outstanding. Blocking renewal does not merely create a transition issue—it increases the likelihood that the vehicle cannot be lawfully operated, maintained, or insured, which predictably increases delinquency and default risk and accelerates depreciation and loss severity. Because these are secured loans tied to recorded liens, dealers cannot mitigate the impact through simple operational workarounds; the transaction has already been consummated and the dealer's exposure is fixed.

These concerns are not hypothetical. TIADA members report that since TxDMV issued Registration and Title Bulletin #001-25 effective November 18, 2025, renewal failures and transaction breakdowns have increased, contributing to higher delinquencies, more vehicle returns, and abandonments.[2] These default-driven losses and collateral impairment effects are not reflected in the proposal's Public Benefit/Cost Note, as discussed further in Section IV.[3]

Federal guidance on this issue has also shifted, reinforcing the need for a clear transition rule. The National Independent Automobile Dealers Association (NIADA)—the national trade association representing independent dealers on federal policy and compliance issues—has reported that the federal government has withdrawn the 2023 Joint Statement.[4] NIADA welcomed the withdrawal because clear, consistent guidance enables dealers to maintain compliance and operate with confidence, and TIADA supports NIADA's efforts to unwind the prior federal posture and restore a workable framework for independent dealers nationwide.[4] However, the loans originated under the prior posture remain outstanding today and are secured by vehicles already registered with recorded liens—making transition relief essential to avoid retroactive impairment.

TIADA Comments to TxDMV – 43 TAC Chapter 217

January 5, 2026

Page | 3 of 10

For these reasons, TIADA respectfully submits that TxDMV should adopt a clear and administrable transition rule by grandfathering all vehicles with a recorded lien as of the effective date of the rule for at least five years. This approach allows existing portfolios to amortize and roll off, prevents sudden impairment of secured collateral, and avoids disproportionate harm to independent dealers—many of which operate with smaller portfolios of loans and lack the scale to absorb sudden losses.

Therefore, TIADA requests that TxDMV add a grandfathering provision to proposed §217.26(b) providing that:

Vehicles with a lien recorded on the title or registration on or before the effective date of this rule remain eligible for registration renewal for five years, regardless of the registrant's ability to satisfy amended personal identification requirements.

II. Mail-In Renewals, Fraud Concerns, and the Unfunded Mandate on Tax Offices and Dealers' Customers

TIADA recommends removing the proposed requirement that motor vehicle owners renewing registration by mail must submit photocopies of valid, unexpired personal identification documents. Personal identification is already required at initial registration under §217.26, and Texas has already issued registration for these vehicles based on the identification and documentation required at the time of issuance. TxDMV states that the renewal requirements are intended to apply the new identification standards to all registered vehicles, including vehicles initially registered prior to the effective date of the amendments. TIADA respectfully submits that applying the new identification regime at renewal through mail-in photocopy submission and county-level "verification" is not a workable mechanism to achieve that objective and will predictably increase rework, delays, and fraud risk without materially improving document validity.

TxDMV has stated that the amendments are intended to ensure personal identification documents are valid and that applicants are legally eligible to reside in Texas.[3] However, requiring photocopied identification submissions by mail is not a reliable or administrable mechanism to achieve that objective, and it imposes significant operational burdens and fraud-related risks on the public and on county tax offices. The proposal's Public Benefit/Cost Note focuses on the anticipated cost for individuals who must obtain compliant identification, but it does not address the additional operational burdens and downstream transaction failures that the mail-copy requirement will impose on county offices, dealers, and renewing customers, as discussed further in Section IV.[3] Although the proposal describes these requirements as enabling eligibility verification, the renewal procedures place the primary operational burden on county tax assessor-collector offices that receive and process renewal submissions rather than on TxDMV.

First, mail renewals are a high-volume, time-sensitive channel, and this requirement will predictably increase rejected renewals, follow-up correspondence, and in-person visits to resolve renewal failures. County offices must absorb that work using the same limited staffing needed to process dealer-submitted title and registration

TIADA Comments to TxDMV – 43 TAC Chapter 217
January 5, 2026
Page | 4 of 10

transactions, resulting in longer delays for dealers' customers in completing transactions, taking delivery, obtaining plates, and maintaining lawful vehicle operation.

Second, the requirement imposes an unfunded mandate on county tax offices. Requiring staff to receive, handle, and manually review photocopied identification documents diverts limited resources from core processing and will predictably increase queues, rework, and processing times—delays borne directly by Texans seeking timely completion of legitimate dealer and consumer transactions.

Third, the requirement offers little meaningful fraud-prevention value. Photocopies of identification documents are easily altered or falsified and lack the security features and tactile elements used to detect tampering. Even trained professionals reviewing original documents cannot reliably catch all fraudulent credentials, and dealers routinely encounter altered identification and fabricated documents despite in-person review. Expecting county offices to detect fraud from photocopies—often without specialized tools or training—adds burden without producing reliable fraud-control outcomes.

Fourth, the proposal imposes an unworkable “verification” expectation on county tax offices. Proposed §§217.28 and 217.29 require county tax assessor-collectors to “verify” personal identification documents submitted in person, by mail, or electronically. Verifying authenticity is inherently difficult even with original documents and appropriate tools and is often not feasible when reviewing photocopies or electronic uploads. Without standardized resources or verification systems, county tax offices are likely to produce inconsistent results and renewal failures, creating only an illusion of fraud control. [5]

Fifth, the proposal does not define the scope or method of “verification,” identify any standardized tools or databases available to county tax assessor-collectors, or provide a safe harbor for counties acting in good faith. Without clear standards, “verification” will predictably produce inconsistent outcomes across counties, increased rework, and avoidable renewal failures, while raising concerns that similarly situated applicants will be treated differently depending on county resources and subjective determinations. [5]

Sixth, the requirement increases identity theft risk for Texans. The U.S. Postal Inspection Service warns consumers about safeguarding personal information and identifies the U.S. Mail as a common vector for identity theft-related crime. Requiring Texans to routinely mail copies of identification increases the volume of sensitive identifying information moving through the mail stream and increases the likelihood that stolen mail results in identity theft and related fraud. [6]

Finally, TIADA recognizes the requirement may reduce a targeted risk related to individuals who are not legally present. However, TIADA believes any such gains are more than offset by the broader risks created for all Texans—both by increasing identity theft opportunity through routine mailing of sensitive identifying information and by worsening county office backlogs that delay legitimate transactions statewide. [6]

For these reasons, TIADA recommends revising proposed §§217.28 and 217.29 to eliminate any requirement that mail-in renewals include photocopies of identification documents. To the extent TxDMV determines

TIADA Comments to TxDMV – 43 TAC Chapter 217

January 5, 2026

Page | 5 of 10

additional verification is necessary, it should be implemented through clear standards, feasible expectations, and appropriate tools that support consistent outcomes statewide—rather than manual review of copied documents by county offices.

III. REAL ID, Neighboring-State Licensing Practices, and Ineffective Policy Outcomes

TIADA recommends revising proposed §217.26(b) to strike the phrase “that complies with the minimum document requirements and issuance standards for federal recognition under the REAL ID Act of 2005, Public Law 109-13;” so that the rule allows acceptance of any valid, current, unexpired state-issued driver’s license or identification card, regardless of REAL ID status.[3] The federal REAL ID Act establishes minimum standards for state-issued identification for federal purposes, but it does not prohibit states from issuing non-REAL ID credentials under state authority.[7]

TxDMV asserts that each of the three permitted identification categories provides proof that the applicant is legally eligible to reside in Texas. TxDMV has stated that the proposed amendments are intended to ensure personal identification documents are valid and that applicants for registration under Transportation Code §502.040 are legally eligible to reside in Texas.[3] However, conditioning acceptable state-issued credentials on REAL ID compliance is likely to impose significant transaction friction for legitimate applicants while shifting a portion of titling and registration activity out of Texas—without meaningfully advancing that stated objective.[3]

Although the proposal is framed as implementing Transportation Code §502.040’s residency requirement, conditioning acceptance of state-issued credentials on REAL ID compliance does not function as a residency verification mechanism. Instead, it operates as a credential-type restriction that will primarily increase transaction friction for lawful applicants and shift titling and registration activity outside Texas.[8]

Dealers across Texas routinely encounter valid, current, unexpired out-of-state credentials that are not REAL ID-compliant in ordinary retail transactions. This is especially true for “Cali-Texans”—new Texas residents relocating from California—because California DMV reporting indicates that REAL ID credentials comprise only about 55% of issued California driver’s licenses and identification cards, meaning roughly 45% are not REAL ID-compliant.[9] Now that federal REAL ID enforcement is in effect for air travel, consumer awareness may increase over time. However, the current volume of valid, non-REAL ID credentials remains substantial and will continue to appear in routine dealer transactions for the foreseeable future.[9]

In addition, the proposal’s Public Benefit/Cost Note anticipates that individuals who do not have acceptable identification will incur costs to obtain compliant documents, but it does not account for displacement effects—where otherwise compliant customers are pushed into out-of-state titling and registration pathways—creating additional transaction costs and foregone Texas revenue, as discussed further in Section IV.[3]

TIADA Comments to TxDMV – 43 TAC Chapter 217

January 5, 2026

Page | 6 of 10

For applicants who would otherwise title and register in Texas—most commonly military families, new Texans, and seasonal residents—the REAL ID condition will predictably push more transactions into out-of-state titling and registration channels, increasing rework, documentation troubleshooting, and delays.[10]

In addition, the REAL ID condition is unlikely to produce the intended compliance outcome because many states have affirmatively chosen to issue driver's licenses or driving privilege credentials regardless of immigration status by issuing credentials that are not REAL ID-compliant.[11] For individuals who possess valid out-of-state credentials, the issuing state often provides a practical alternative pathway: titling and registration can often be completed and maintained under that state's processes, including mail-based renewal options and commonly used national service providers.[12] As a result, the REAL ID condition does not eliminate access to vehicle registration; it primarily relocates registration activity outside Texas in many instances.

Policies that increase registration friction and shift titling and registration out of Texas can also undermine public safety and consumer-protection functions supported by state registration databases, including manufacturer and distributor recall notification and completion of safety repairs.[13]

For these reasons, TIADA recommends revising proposed §217.26(b) to accept any valid, current, unexpired state-issued driver's license or identification card, without conditioning acceptance on REAL ID compliance.[3]

IV. Request for a More Comprehensive Economic Analysis (Cross-referencing Sections I–III)

TIADA respectfully submits that a more comprehensive fiscal, operational, and economic impact analysis is warranted before the proposed amendments are finalized. While TxDMV's fiscal and economic impact determinations address certain direct costs, they do not fully account for foreseeable renewal failure rates, rework burdens, county processing impacts, collateral impairment effects, and displaced titling and registration activity described in Sections I–III.[14]

TxDmv's analysis relies in part on the conclusion that the vast majority of applicants already present identification that will satisfy the amended rules and therefore the proposal will not materially change economic conditions.[14] The proposal also anticipates that individuals who do not have acceptable identification will incur costs to obtain compliant documents.[3] TIADA respectfully submits that these determinations materially understate the operational burdens and downstream economic impacts that will be triggered by renewal failures, rework, and displaced titling and registration activity described in Sections I–III.

Even assuming TxDMV is correct that most applicants already present compliant identification, the impacts of the proposed amendments must be evaluated in light of the size of the Texas vehicle fleet and the volume of renewal transactions processed each year. TxDMV's Fiscal Year 2024 Vehicle Registration Report reflects 25,965,558 vehicles currently registered in Texas.[15] In a system of this scale, even modest increases in renewal failures, re-submissions, or in-person follow-up translate into large statewide burdens. For example, a 1% increase in rejected renewals or rework would affect approximately 260,000 transactions statewide, and a

TIADA Comments to TxDMV – 43 TAC Chapter 217

January 5, 2026

Page | 7 of 10

2% increase would affect more than 500,000 transactions. These examples are illustrative, but they demonstrate why small percentage changes in rework rates can create material operational burdens and costs—regardless of whether most applicants ultimately can satisfy the identification requirements.

Because TxDMV relies heavily on the conclusion that the vast majority of applicants already present compliant identification, TIADA respectfully requests that TxDMV disclose the underlying data and methodology supporting that conclusion, including how compliance was measured across renewal channels (mail, internet, and in-person) and across counties. Absent that transparency, TxDMV should adopt a phased implementation schedule or pilot period to validate rejection rates, rework burdens, and county processing impacts before statewide adoption.[16]

As discussed in Section I, renewal failures for vehicles securing existing loans materially impair collateral value and increase delinquency and default risk. These impacts are immediate and predictable for independent dealers—particularly micro-businesses that carry smaller portfolios and lack the capital reserves to absorb sudden impairment of secured collateral.[2]

As discussed in Section II, the mail-copy requirement and the proposed “verification” expectations will predictably increase rejected renewals, follow-up correspondence, and in-person visits to resolve renewal failures—work that county tax offices must absorb using the same limited staffing required to process dealer-submitted title and registration transactions. These operational effects impose real costs on local governments and on the public through delays, rework, and transaction breakdowns, even if TxDMV anticipates limited incremental costs for most applicants.[6]

As discussed in Section III, the REAL ID condition is likely to shift a portion of titling and registration activity out of Texas rather than prevent registration altogether. That displacement carries foreseeable fiscal effects, including displaced registration and sales tax revenue and increased administrative burdens on county offices.[11] Texas agencies have long recognized that registration evasion and non-registration impose meaningful fiscal losses, and TxDOT has undertaken initiatives intended to reduce those losses. For example, the Texas State Auditor’s Office reported that a TxDOT-commissioned survey estimated annual lost revenue from unregistered vehicles at approximately \$95 million (based on 2004 data) and described TxDOT’s plans and contracting efforts intended to reduce registration evasion. [17]

Although TIADA has not identified a more recent statewide estimate that is directly comparable to that survey, Texas’s population and vehicle fleet have grown substantially since 2004. In the absence of offsetting improvements, the magnitude of potential losses today would be expected to be higher than the 2004-based estimate—underscoring the importance of avoiding policies that increase registration friction and push titling and registration activity out of Texas.

More broadly, well-established economic analysis recognizes that regulation imposes direct, indirect, and opportunity costs; as the U.S. Chamber of Commerce explains, “one way to think about the costs regulations

TIADA Comments to TxDMV – 43 TAC Chapter 217

January 5, 2026

Page | 8 of 10

impose on the economy is to sort them into ... indirect costs, direct costs and opportunity costs.”[18] The proposed amendments exhibit these characteristics: dealers face direct losses from increased defaults and returned vehicles, indirect costs from delayed transactions and impaired tax office processing, and opportunity costs as capital is tied up in unproductive or stranded collateral.

Empirical research also demonstrates that immigration-related regulatory restrictions imposed at the local or state level are associated with measurable negative economic effects, including statistically significant declines in employment levels and aggregate payroll.[19] While TIADA recognizes TxDMV’s policy objective, these findings reinforce that restrictions affecting access to lawful vehicle registration can carry broader economic impacts beyond the individuals directly targeted.

Given these foreseeable impacts, TIADA respectfully submits that TxDMV’s fiscal and economic impact determinations warrant reconsideration. At a minimum, TxDMV should withdraw the proposal and defer adoption until TxDMV can conduct and publish a meaningful economic and operational impact analysis that accounts for renewal failure rates, rework burdens, county processing impacts, collateral impairment effects, and the risk of displaced titling and registration activity discussed in Sections I–III.

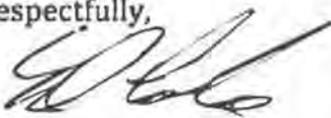
Conclusion

TIADA appreciates the opportunity to comment on TxDMV’s proposed amendments. For the reasons described above, TIADA respectfully urges TxDMV to withdraw the proposed amendments in their entirety until TxDMV can conduct and publish an economic impact analysis that accounts for renewal failure rates, rework burdens, county processing costs, collateral impairment effects, and displaced titling and registration activity.

If TxDMV elects to proceed rather than withdraw the proposal, TIADA respectfully requests that TxDMV incorporate the revisions recommended in these comments—including transition relief for existing liened vehicles, removal of the mail-renewal photocopy requirement, removal of the REAL ID–compliance condition, and revision of the document “verification” provisions to provide clear standards, feasible expectations, and uniform application without requiring county tax offices to authenticate copied or uploaded identification documents—to reduce disruption, mitigate unintended consequences, and improve administrability.

TIADA appreciates TxDMV’s consideration and remains available to assist TxDMV in developing workable solutions that advance public safety and system integrity without imposing unnecessary burdens on Texans.

Respectfully,



Earl Cooke
Director of Regulatory Affairs

552.137

TIADA Comments to TxDMV – 43 TAC Chapter 217

January 5, 2026

Page | 9 of 10

Endnotes

- [1] Consumer Fin. Prot. Bureau & U.S. Dep’t of Justice, Joint Statement on Fair Lending and Credit Opportunities for Noncitizen Borrowers Under the Equal Credit Opportunity Act (Oct. 12, 2023), <https://www.consumerfinance.gov/about-us/newsroom/joint-statement-on-fair-lending-and-credit-opportunities-for-noncitizen-borrowers-under-the-equal-credit-opportunity-act/>; Notice of Joint Statement, 88 Fed. Reg. 71,636 (Oct. 18, 2023), <https://www.federalregister.gov/documents/2023/10/18/2023-22968/joint-statement-on-fair-lending-and-credit-opportunities-for-noncitizen-borrowers-under-the-equal>.
- [2] Texas Department of Motor Vehicles, Registration and Title Bulletin #001-25, Revised Initial Registration and Renewal Identification Requirements (Nov. 18, 2025) (effective immediately), available at: https://www.txiada.org/Files/Industry%20Email/TxDMV%20Bulletin%2011_18_25.pdf.
- [3] Texas Department of Motor Vehicles, Proposed Changes to 43 Texas Administrative Code Chapter 217 (Non-Emergency), https://www.txdmv.gov/sites/default/files/body-files/Chap_217_Non-Emergency_-_Prop.pdf.
- [4] National Independent Automobile Dealers Association (NIADA), Guidance withdrawn: use of immigration status in credit decisions (Dec. 23, 2025), <https://niada.com/dashboard/guidance-withdrawn-use-of-immigration-status-in-credit-decisions/>.
- [5] Texas Department of Motor Vehicles, Proposed Changes to 43 Texas Administrative Code Chapter 217 (Non-Emergency) (proposed amendments to §§217.28 and 217.29 requiring county tax assessor-collectors to “verify” identification documents submitted in person, by mail, or electronically), https://www.txdmv.gov/sites/default/files/body-files/Chap_217_Non-Emergency_-_Prop.pdf.
- [6] U.S. Postal Inspection Service, Identity Theft – Tips & Prevention, <https://www.uspis.gov/tips-prevention/identity-theft>; U.S. Postal Inspection Service, Identity Theft: Safeguard Your Personal Information (Publication 280), https://about.usps.com/publications/pub280/pub280_v05_revision_102019_tech_001.htm.
- [7] REAL ID Act of 2005, Pub. L. No. 109-13, div. B, 119 Stat. 231 (codified at 49 U.S.C. § 30301 note); U.S. Department of Homeland Security, REAL ID, <https://www.dhs.gov/real-id>.
- [8] Texas Department of Motor Vehicles, Proposed Rules, 43 TAC §§217.22, 217.26, 217.28, 217.29, 50 TexReg 7868–7874 (Dec. 5, 2025), <https://www.sos.state.tx.us/texreg/archive/December52025/Proposed%20Rules/43.TRANSPORTATION.html>.
- [9] California Department of Motor Vehicles, **REAL ID** (issuance data/reporting indicating REAL ID credentials comprise roughly 55% of issued cards), <https://www.dmv.ca.gov/portal/driver-licenses-identification-cards/real-id/>.

TIADA Comments to TxDMV – 43 TAC Chapter 217

January 5, 2026

Page | 10 of 10

[10] Military ID copying concerns: Although the proposed rule allows an applicant to provide a copy of a U.S. military identification card as an acceptable document, TIADA members report that many servicemembers are reluctant to allow dealers (or third-party processors) to photocopy or scan military identification cards, in part due to concerns regarding 18 U.S.C. § 701.

[11] National Conference of State Legislatures (NCSL), States Offering Driver's Licenses to Immigrants, <https://www.ncsl.org/immigration/states-offering-drivers-licenses-to-immigrants>.

[12] Examples of national multi-state title and registration service providers (illustrative only): AutoData Direct, <https://www.autodatadirect.com/>; Dealertrack Registration and Title Solutions, <https://www.dealertrack.com/>.

[13] National Highway Traffic Safety Administration (NHTSA), Recalls (consumer information and recall lookup resources), <https://www.nhtsa.gov/recalls>.

[14] Texas Department of Motor Vehicles, Proposed Changes to 43 Texas Administrative Code Chapter 217 (Non-Emergency) (Fiscal Note; Local Employment Impact Statement; Government Growth Impact Statement; and related determinations regarding fiscal impact and local employment/economic effects), https://www.txdmv.gov/sites/default/files/body-files/Chap_217_Non-Emergency_-_Prop.pdf.

[15] Texas Department of Motor Vehicles, Fiscal Year 2024 Vehicle Registration Report (County Totals showing 25,965,558 vehicles currently registered for Sept. 1, 2023 through Aug. 31, 2024), https://www.txdmv.gov/sites/default/files/report-files/FY-2024_Vehicles_Registered_and_License_Fees_by_County_and_Regional_Office.pdf.

[16] Texas Department of Motor Vehicles, Proposed Changes to 43 Texas Administrative Code Chapter 217 (Non-Emergency) (Fiscal Note and supporting analysis relying on the conclusion that the vast majority of applicants already present identification meeting the amended rules), https://www.txdmv.gov/sites/default/files/body-files/Chap_217_Non-Emergency_-_Prop.pdf.

[17] Texas State Auditor's Office, *An Audit Report on the Texas Department of Transportation's Motor Vehicle Registration and Titling System*, Report No. 06-007 (reporting that a 2004 TxDOT-commissioned survey estimated lost revenue from unregistered vehicles was approximately \$95 million annually and describing TxDOT efforts intended to reduce registration evasion), https://texashistory.unt.edu/ark:/67531/metapth517452/m2/1/high_res_d/06-007.pdf.

[18] U.S. Chamber of Commerce, How Excessive Regulation Hurts the Economy, <https://www.uschamber.com/report/how-excessive-regulation-hurts-the-economy>.

[19] Sisk, The Economic Impact of Local Immigration Regulation: An Empirical Analysis, *Cardozo Law Review*, Texas A&M Law Scholarship (2020), <https://scholarship.law.tamu.edu/facscholar/43/>.



**ENFY AUTO SALES 1 LLC
4226 W DAVIS ST STE 29
DALLAS TEXAS 75211**

**January 5, 2026
Dallas, Texas**

WHOM IT MAY CONCERN.

We are Enfy Auto sales 1 LLC, with the license number P-156732, and I am writing this letter to respectfully state our institutional position regarding the lawful sale of motor vehicles to people with foreign passports in the State of Texas and how this affects our business.

We are a family business that started 16 years ago, and the growth of our business has been boosted by sales of customers who only have a foreign passport as identification.

In 2025 we had 290 BHPH sales, of which the majority had foreign passports.

90% of our clients with foreign passports always end up paying off their vehicle without any issues. These clients get valid vehicle insurance which is a benefit for us and the state.

With our sales dropping because we are turning away customers with foreign passports, we are starting to see the financial impact on our business which is affecting the income we depend on to keep our business going.

Thank you for your attention to this matter. We remain available to cooperate in any effort that promotes lawful vehicle sales, regulatory compliance, and public safety throughout the State of Texas.

RESPECTFULLY,

ENFY AUTO SALES 1 LLC

From: [Landa Auto Sales](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Support for TXDMV Rule Requiring Valid Identification
Date: Tuesday, December 23, 2025 2:27:37 PM

ATTENTION: This email originated from outside of TXDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Dear Texas Department of Motor Vehicles,

I am writing as a licensed Texas dealer to express my full support for the new rule requiring dealers to obtain valid identification from buyers.

Dealers opposing this rule are, in my opinion, contributing to practices that harm consumers and damage the reputation of our industry. Ethical dealers who price fairly, follow the law, and prioritize public safety should finally be put ahead of the game. The pushback against this rule appears to be coming primarily from dealers who cut corners, overcharge customers, or rely on questionable practices. That concern is already evident among certain dealers in the San Antonio area, and based on my familiarity with how some of these businesses operate, their resistance is not surprising. TXDMV is absolutely doing the right thing by standing firm.

As dealers, we are placing individuals into vehicles that weigh thousands of pounds and carry real public safety implications. This responsibility should not be taken lightly. While unsafe driving is not limited to any single group, undocumented drivers can present higher risk factors, including difficulty obtaining insurance, a greater likelihood of leaving accident scenes, and increased instances of vehicles being driven by unlicensed individuals. These realities directly impact roadway safety.

This rule is not discriminatory—it is about accountability, lawful conduct, and protecting the public. TXDMV should not reward unethical dealers or enable unlawful behavior at the expense of consumer trust and safety.

Now is the time to raise standards across the industry. I strongly encourage TXDMV to maintain this rule and continue prioritizing integrity, safety, and compliance.

Thank you for your time and for your commitment to protecting both consumers and the integrity of the Texas motor vehicle industry.

Respectfully,

Estela Hernandez,
Landa Auto Sales
267 Landa St., Suite B, New Braunfels, Texas 78130
210-861-4997

landaautosales267@gmail.com
www.landaautosales.com

Thank you for the opportunity to provide comments regarding the Texas Department of Motor Vehicles Proposed amendments to 43 Texas Administrative code 217.22, 217.26, 217.28, and 217.29, relating to personal identification requirements for vehicle registration under Transportation code 502.040. I write to share how these changes affect my business, employees, and customers, and to highlight unintended consequences that should be considered before the rules are finalized.

My Name is Felix Alday, Owner of Any Cars Incorporated. Me and my wife Susy Alday have been operating this business since 2017. We have attended all the years to all the seminars that Transportation had before the Pandemic. I owned Dallas Onestop Auto LLC company from 2014-2017, we incorporated with Any Cars Inc. We are a Buy Here-Pay Here Used Car lot, that serves the Grand Prairie, Arlington, Irving, Dallas, Community; we have been in business since February 7, 2017 (8years 10 months). We are located by a Flea Market Called Traders Village; Traders Village has been Opened Since 1973 (52years). Traders Village is our landlord, 70% of the Hispanic community go to Traders Village, to have fun, buy products, buy food and buy cars. I was a salesman for different car companies which gave me the knowledge that I have to open our own Car lot. I have been in the car industry since 2001, that's 24 years, before I graduated Skyline High School I was a Salesperson for a Used Car lot that had \$499 Down Vehicles, how the cars Industry has evolved is amazing. Now days with Electric Vehicles. I love what I do, I like to give my customers that happy feeling of driving home a used car, to them sometimes it was their first and new car! I have been thru tough times, in 2015 where a Dealer I used to work for defrauded me and my family for \$50k, we filed a lawsuit against him, but unfortunately, he declared bankruptcy and we were left with Debt, loss of time, and with Nothing. We managed to survive having 2-3 Jobs to be able to keep up with our Dealership. In 2020 The pandemic started and we continued to sell cars, at least 1 per week to continue with our Dealership. At the Auctions cars were at their lowest Value. The Hispanic Community helped us to Maintain our books. 80% of the time we sold Cash cars with foreign Passport. It takes about 30-40 min. to do a deal thru Frazer. When we do a deal we ask for an application to be filled out, Drivers License, ID or Passport, 2 Check Stubs, and 2 Utility bills. We do not ask, if they are here legally or if they have papers because we are not trained and are not USCIS officials, and we do not discriminate. We are not trained to verify legal status of anyone in the united states. About a year later, prices of the Vehicles were at their Max, Franchise Dealers were going out of inventory with Chip Shortage. We Sold about 70% of our inventory, it was hard to go back to auction and buy cars, they where at their max value. We have build our portfolio with Integrity, and hard work! We Depend on all of our customers to make their payments and stay current. We do not depend on Banks, and we do not sell our notes to third party companies. Our customers bring other friends, co-

workers, family members and repeat customers. 60% of our customers have a foreign passport, and now are facing hardships trying to renew their registration. I do not agree with the new ID requirement that took effect on November 18, 2025. I ask for this rule to be returned to its prior form.

This new ID Rule has put my business in a very Difficult hardship, on December 1, 2025 had a Customer in my office trying to buy a \$20K truck and had to turn him away because of him not having a proper ID. And me following the new Rule had to take a loss. On December 6, 2025 I took a Deposit of \$5,000 for a 2024 Mazda CX-30, and had to refund him \$5,000 back on December 14, 2025 for not having a Proper ID. Took another Loss and a big hit, and hopefully we do not get a lawsuit for Deceptive Trade Practices. The declaration of Independence clearly states "All men are created equal, that they are endowed by their Creator with certain unalienable rights, that among these are life, Liberty and the pursuit of Happiness" In our Portfolio we have estimate 40 Customers that have foreign passport on file. We ask that the rule be returned to its prior form. This will allow us to continue to pay our city, state and local taxes on time, like we have been doing for the past 8 years. Not able to renew registration, Our Customers will not able to drive, therefore not able to go to work, nor take their kids to school, not able to go anywhere. Therefore We will not receive payments for our vehicles, having that issue customers will be forced to turn in vehicles or We would need to Repossess all of those vehicles, Having already paid 50% of more of their contract, customers can also hide or take vehicles to other states or another country that would help them, and we would end up with cars being lost or stolen and not able to collect our part of the contract, we would be facing some serious problems and economic hardship to my business. I have worked hard to comply with city, state, local, laws to be a legitimate business, and will continue to work hard because this is my patrimony for my family. I ask for this this New Rule to be returned to its prior form.

We attend yearly seminars to stay informed and to stay in regulations with State, City, Local, IRS, OCCC, TIADA meetings to stay trained, and this new Rule Just Hit us from one day to another. I recently went to auction before this new rule, purchased 10 cars and trucks and have made monetary investment in our company to continue our growth and to continue to serve our community by selling dependable , reliable, used cars at an affordable price. If we do not sell anycars because of this new rule, I would end up with all of my 60 cars in inventory stored and depreciation of my inventory would be a financial hadship loss that I could possibbly be closing my business down. We carry Carfax reports on all of our inventory, and sell 3rd party warranty packages to our customers for peace of mind. Now this new Rule has a tremendous Hardship to my business. The generation of Hispanic Community has shown strong financial commitment to my business. Hispanic community has a Cultural grandfather habits of being Financial Commitment of paying

what they owe, and not having debt, others try to avoid banks because of their untrust of financial institutions. There will be tremendous amount of loss with the State Comptroller not collecting taxes for cars not being sold with this new Rule. There will be also a tremendous amount of financial loss with Tarrant County Tax Assessor not collecting sales tax for no cars being sold with this new rule, And not to mention our Tremendous loss, and Financial Hardship we will suffer if this New rule Continues. We ask that this Rule be returned to its prior form. We are not Licensed nor have any expertise in Immigration laws for us to be asking for additional documents to see if the person is here legally. In October 2023 we received Guidance warning from U.S. Department of justice and the Consumer Financial Protection Bureau that Us as creditors can not deny credit solely based on immigration status when an applicant is otherwise qualified. Reliance on immigration status can expose my business to claims of unlawful discrimination. This Topic was explained in our TIADA meetings. I have attached my December 2023 Dealers Motor Vehicle Inventory Tax Statement witch we sold 8 Vehicles. December 2024 Report We sold 7 Vehicles. November 2025 We sold 4 Vehicles Prior to the new rule. I also included December 26, 2025 Report and we have sold 0 Cars. As you can see It does have a 100% Negative Impact on my business. I put my faith in the hands of our lord, and trust that we can come to a safe harbor and work together for the new rule to be returned to its prior Form, in peace and in a Safe harbor. Thank you for your time.

Felix Alday -Owner

214-715-8856

Any Cars Inc. P138245

Dealer's Motor Vehicle Inventory Tax Statement

CONFIDENTIAL

DECEMBER
Reporting Month2023
Year

Page 1 of pages 3

Tarrant Tax Assessor Collector
100 E Weatherford St Fort Worth, Tx 76196

Send Original to: County Tax Office Name and Address

817-884-1111

Phone (area code and number)

Tarrant County Appraisal District
2500 Handley Ederville Rd Fort Worth, Tx 76118

Send Copy to: Appraisal District Name and Address

817-284-0024

Phone (area code and number)

GENERAL INSTRUCTIONS: This inventory tax statement must be filed by a dealer of motor vehicles pursuant to Tax Code Section 23.122. This statement is filed together with an amount equal to the total amount of the unit property tax assigned to all motor vehicles sold in the preceding month. File a separate statement for each business location and retain documentation relating to the disposition of each vehicle.

ALTERNATIVE ELECTION: Effective Jan. 1, 2014, certain dealers of motor vehicle inventory may elect to file renditions under Tax Code Chapter 22, rather than file declarations and tax statements under Tax Code Chapter 23. Tax Code Section 23.121(a)(3) allows a dealer to make this election if it (1) does not sell motor vehicles that are self-propelled and designed to transport persons or property on a public highway; (2) meets either of the following two requirements: (a) the total annual sales from the inventory, less sales to dealers, fleet transactions, and subsequent sales, for the preceding tax year are 25 percent or less of the dealer's total revenue from all sources during that period, or (b) the dealer did not sell a motor vehicle to a person other than another dealer during the preceding tax year and the dealer estimates that the dealer's total annual sales from the dealer's motor vehicle inventory, less sales to dealers, fleet transactions, and subsequent sales, for the 12-month period corresponding to the current tax year will be 25 percent or less of the dealer's total revenue from all sources during that period; (3) files with the chief appraiser and the tax collector by Aug. 31 of the preceding tax year on a form prescribed by the Comptroller a declaration that the dealer elects not to be treated as a dealer under Tax Code Section 23.121 in the current tax year; AND (4) renders the dealer's motor vehicle inventory in the current tax year by filing a rendition with the chief appraiser in the manner provided by Tax Code Chapter 22. A dealer who makes this election must file the election annually with the chief appraiser and the tax collector by Aug. 31 of the preceding tax year, so long as the dealer meets the eligibility requirements of law.

FILING INSTRUCTIONS: This document and all supporting documentation must be filed with the appraisal district office and the county tax assessor-collector's office in the county in which the business is located. Do not file this document with the Texas Comptroller of Public Accounts. A directory with contact information for appraisal district and tax offices may be found on the Comptroller's website.

STATEMENT DEADLINES: Except as provided by Tax Code Section 23.122(g), a statement and prepayment of taxes must be filed on or before the 10th day of each month.

PENALTIES: A dealer who fails to file a statement as required commits a misdemeanor offense punishable by a fine not to exceed \$100. Each day during which a dealer fails to comply is a separate violation. In addition to other penalties provided by law, a dealer who fails to file or timely file a statement must forfeit a penalty of \$500 for each month or part of a month in which a statement is not filed or timely filed after it is due. A tax lien attaches to the dealer's business personal property to secure payment of the penalty. In addition to other penalties provided by law, an owner who fails to remit unit property tax due must pay a penalty of 5 percent of the amount due. If the amount due is not paid within 10 days after the due date, the owner must pay an additional 5 percent of the amount due. Unit property taxes paid on or before Jan. 31 of the year following the date on which they are due are not delinquent.

OTHER IMPORTANT INFORMATION

The chief appraiser or collector may examine documents held by a dealer in the same manner and subject to the same conditions as provided by Tax Code Section 23.121(g) and 23.122(f).

STEP 1 Dealer Information

Any Cars Inc

Name of Dealer

2602 MAYFIELD RD

Mailing Address

GRAND PRAIRIE, TX 75052

City, State, ZIP Code

214-715-8856

Phone (area code and number)

Felix Gomez

Name of Person Completing Statement

President

Title

RECEIVED

JAN 10 2024

TARRANT COUNTY TAX
ASSESSOR-COLLECTOR

Texas Comptroller of Public Accounts

Dealer's Motor Vehicle Inventory Tax Statement

CONFIDENTIAL

DECEMBER
Reporting Month2024
Year

Page 1 of pages 3

Tarrant Tax Assessor Collector
100 E Weatherford St Fort Worth, Tx 76196

Send Original to: County Tax Office Name and Address

817-884-1111

Phone (area code and number)

Tarrant County Appraisal District
2500 Handley Ederville Rd Fort Worth, Tx 76118

Send Copy to: Appraisal District Name and Address

817-284-0024

Phone (area code and number)

GENERAL INSTRUCTIONS: This inventory tax statement must be filed by a dealer of motor vehicles pursuant to Tax Code Section 23.122. This statement is filed together with an amount equal to the total amount of the unit property tax assigned to all motor vehicles sold in the preceding month. File a separate statement for each business location and retain documentation relating to the disposition of each vehicle.

ALTERNATIVE ELECTION: Effective Jan. 1, 2014, certain dealers of motor vehicle inventory may elect to file renditions under Tax Code Chapter 22, rather than file declarations and tax statements under Tax Code Chapter 23. Tax Code Section 23.121(a)(3) allows a dealer to make this election if it (1) does not sell motor vehicles that are self-propelled and designed to transport persons or property on a public highway; (2) meets either of the following two requirements: (a) the total annual sales from the inventory, less sales to dealers, fleet transactions, and subsequent sales, for the preceding tax year are 25 percent or less of the dealer's total revenue from all sources during that period, or (b) the dealer did not sell a motor vehicle to a person other than another dealer during the preceding tax year and the dealer estimates that the dealer's total annual sales from the dealer's motor vehicle inventory, less sales to dealers, fleet transactions, and subsequent sales, for the 12-month period corresponding to the current tax year will be 25 percent or less of the dealer's total revenue from all sources during that period; (3) files with the chief appraiser and the tax collector by Aug. 31 of the preceding tax year on a form prescribed by the Comptroller a declaration that the dealer elects not to be treated as a dealer under Tax Code Section 23.121 in the current tax year; AND (4) renders the dealer's motor vehicle inventory in the current tax year by filing a rendition with the chief appraiser in the manner provided by Tax Code Chapter 22. A dealer who makes this election must file the election annually with the chief appraiser and the tax collector by Aug. 31 of the preceding tax year, so long as the dealer meets the eligibility requirements of law.

FILING INSTRUCTIONS: This document and all supporting documentation must be filed with the appraisal district office and the county tax assessor-collector's office in the county in which the business is located. Do not file this document with the Texas Comptroller of Public Accounts. A directory with contact information for appraisal district and tax offices may be found on the Comptroller's website.

STATEMENT DEADLINES: Except as provided by Tax Code Section 23.122(g), a statement and prepayment of taxes must be filed on or before the 10th day of each month.

PENALTIES: A dealer who fails to file a statement as required commits a misdemeanor offense punishable by a fine not to exceed \$100. Each day during which a dealer fails to comply is a separate violation. In addition to other penalties provided by law, a dealer who fails to file or timely file a statement must forfeit a penalty of \$500 for each month or part of a month in which a statement is not filed or timely filed after it is due. A tax lien attaches to the dealer's business personal property to secure payment of the penalty. In addition to other penalties provided by law, an owner who fails to remit unit property tax due must pay a penalty of 5 percent of the amount due. If the amount due is not paid within 10 days after the due date, the owner must pay an additional 5 percent of the amount due. Unit property taxes paid on or before Jan. 31 of the year following the date on which they are due are not delinquent.

OTHER IMPORTANT INFORMATION

The chief appraiser or collector may examine documents held by a dealer in the same manner and subject to the same conditions as provided by Tax Code Section 23.121(g) and 23.122(f).

STEP 1 Dealer Information

Any Cars Inc
Name of Dealer2602 MAYFIELD RD
Mailing AddressGRAND PRAIRIE, TX 75052
City, State, ZIP CodeFelix Gomez
Name of Person Completing Statement

214-715-8856

Phone (area code and number)

President
Title

Texas Comptroller of Public Accounts

STEP 2 Business Name and Physical Address and Business Location

Provide the appraisal district account number if available or attach tax bill or copy of appraisal or tax office correspondence concerning your account.

ANY CARS INC
 Name of Business
2602 MAYFIELD RD
GRAND PRAIRIE, TX 75052
 Address, City, State, ZIP Code

14540792
 Account Number

Business Start Date, if Not in Business on Jan. 1

P138245
 General Distinguishing Number (GDN)

STEP 3 Vehicle Sale Information

Provide the following information about each motor vehicle sale during the reporting month. Continue on additional sheets if necessary. In lieu of filling out the information in this step, you may attach separate documentation setting forth the information required. All such information must be separately identified in a manner that conforms to the column headers used in the table below. See last page for additional instructions and footnotes.

| Description of Vehicle Sold | | | | Purchaser's Name | Type of Sale ¹ | Sales Price ² | Unit Property Tax ³ |
|-----------------------------|------------|----------------------|-------------------------------|--------------------|---------------------------|--------------------------|--------------------------------|
| Date of Sale | Model Year | Make | Vehicle Identification Number | | | | |
| 12/01/24 | 2013 | HONDA PILOT | 5FNYP3H57DB028064 | [REDACTED] 552.130 | MV | 12,900.00 | 28.04 |
| 12/14/24 | 2022 | CHEVROLET EQUINOX | 3GNAXKEV7NL198318 | | MV | 26,000.00 | 56.52 |
| 12/15/24 | 2022 | MITSUBISHI OUTLANDER | JA4J3UA84N2028534 | | MV | 32,900.00 | 71.52 |
| 12/15/24 | 2018 | GMC SIERRA | 3GTP1NEC5JG267269 | | MV | 25,000.00 | 54.35 |
| 12/16/24 | 2009 | HONDA ACCORD | 1HGCP36819A011430 | | MV | 12,900.00 | 28.04 |
| 12/19/24 | 2012 | CHEVROLET TAHOE | 1GNSCBE07CR328124 | | MV | 12,900.00 | 28.04 |
| 12/22/24 | 2015 | FORD FIESTA | 3FADP4EJ4FM184991 | | MV | 11,900.00 | 25.87 |

RECEIVED JAN 08 2025

Total Unit Property Tax⁴ 292.38

0.002174
 Unit Property Tax Factor

Texas Comptroller of Public Accounts

STEP 4: Total Units Sold and Total Sales

Number of units sold for reporting month:

| | | | |
|-------------------------|--------------------|--------------|------------------|
| 7 | 0 | 0 | 0 |
| Motor Vehicle Inventory | Fleet Transactions | Dealer Sales | Subsequent Sales |

Sales amounts for reporting month:

| | | | |
|-------------------------|--------------------|--------------|------------------|
| \$ 134,500.00 | \$ 0.00 | \$ 0.00 | \$ 0.00 |
| Motor Vehicle Inventory | Fleet Transactions | Dealer Sales | Subsequent Sales |

STEP 5: Signature and Date

Signature required on last page only.

print here

Felix Alday
Print Name

Manager
Title

sign here

Felix Alday
Authorized Signature

1/8/25
Date

If you make a false statement on this report, you could be found guilty of a Class A misdemeanor or a state jail felony under Penal Code Section 37.10

Dealer's Motor Vehicle Inventory Tax Statement

CONFIDENTIAL

NOVEMBER
Reporting Month

2025
Year

Page 1 of pages 3

Tarrant Tax Assessor Collector
100 E Weatherford St Fort Worth, Tx 76196

Send Original to: County Tax Office Name and Address

817-884-1111

Phone (area code and number)

Tarrant County Appraisal District
2500 Handley Ederville Rd Fort Worth, Tx 76118

Send Copy to: Appraisal District Name and Address

817-284-0024

Phone (area code and number)

GENERAL INSTRUCTIONS: This inventory tax statement must be filed by a dealer of motor vehicles pursuant to Tax Code Section 23.122. This statement is filed together with an amount equal to the total amount of the unit property tax assigned to all motor vehicles sold in the preceding month. File a separate statement for each business location and retain documentation relating to the disposition of each vehicle.

ALTERNATIVE ELECTION: Effective Jan. 1, 2014, certain dealers of motor vehicle inventory may elect to file renditions under Tax Code Chapter 22, rather than file declarations and tax statements under Tax Code Chapter 23. Tax Code Section 23.121(a)(3) allows a dealer to make this election if it (1) does not sell motor vehicles that are self-propelled and designed to transport persons or property on a public highway; (2) meets either of the following two requirements: (a) the total annual sales from the inventory, less sales to dealers, fleet transactions, and subsequent sales, for the preceding tax year are 25 percent or less of the dealer's total revenue from all sources during that period, or (b) the dealer did not sell a motor vehicle to a person other than another dealer during the preceding tax year and the dealer estimates that the dealer's total annual sales from the dealer's motor vehicle inventory, less sales to dealers, fleet transactions, and subsequent sales, for the 12-month period corresponding to the current tax year will be 25 percent or less of the dealer's total revenue from all sources during that period; (3) files with the chief appraiser and the tax collector by Aug. 31 of the preceding tax year on a form prescribed by the Comptroller a declaration that the dealer elects not to be treated as a dealer under Tax Code Section 23.121 in the current tax year; AND (4) renders the dealer's motor vehicle inventory in the current tax year by filing a rendition with the chief appraiser in the manner provided by Tax Code Chapter 22. A dealer who makes this election must file the election annually with the chief appraiser and the tax collector by Aug. 31 of the preceding tax year, so long as the dealer meets the eligibility requirements of law.

FILING INSTRUCTIONS: This document and all supporting documentation must be filed with the appraisal district office and the county tax assessor-collector's office in the county in which the business is located. Do not file this document with the Texas Comptroller of Public Accounts. A directory with contact information for appraisal district and tax offices may be found on the Comptroller's website.

STATEMENT DEADLINES: Except as provided by Tax Code Section 23.122(g), a statement and prepayment of taxes must be filed on or before the 10th day of each month.

PENALTIES: A dealer who fails to file a statement as required commits a misdemeanor offense punishable by a fine not to exceed \$100. Each day during which a dealer fails to comply is a separate violation. In addition to other penalties provided by law, a dealer who fails to file or timely file a statement must forfeit a penalty of \$500 for each month or part of a month in which a statement is not filed or timely filed after it is due. A tax lien attaches to the dealer's business personal property to secure payment of the penalty. In addition to other penalties provided by law, an owner who fails to remit unit property tax due must pay a penalty of 5 percent of the amount due. If the amount due is not paid within 10 days after the due date, the owner must pay an additional 5 percent of the amount due. Unit property taxes paid on or before Jan. 31 of the year following the date on which they are due are not delinquent.

OTHER IMPORTANT INFORMATION

The chief appraiser or collector may examine documents held by a dealer in the same manner and subject to the same conditions as provided by Tax Code Section 23.121(g) and 23.122(f).

STEP 1 Dealer Information

Any Cars Inc

Name of Dealer

2602 MAYFIELD RD

Mailing Address

GRAND PRAIRIE, TX 75052

City, State, ZIP Code

214-715-8856

Phone (area code and number)

Felix Gomez

Name of Person Completing Statement

President

Title

STEP 4: Total Units Sold and Total Sales

Number of units sold for reporting month:

| | | | |
|-------------------------------------|--------------------------------|--------------------------|------------------------------|
| <u>4</u> Motor Vehicle Inventory | <u>0</u> Fleet Transactions | <u>0</u> Dealer Sales | <u>0</u> Subsequent Sales |
|-------------------------------------|--------------------------------|--------------------------|------------------------------|

Sales amounts for reporting month:

| | | | |
|--|--------------------------------------|--------------------------------|------------------------------------|
| <u>\$ 33,965.38</u> Motor Vehicle Inventory | <u>\$ 0.00</u> Fleet Transactions | <u>\$ 0.00</u> Dealer Sales | <u>\$ 0.00</u> Subsequent Sales |
|--|--------------------------------------|--------------------------------|------------------------------------|

STEP 5: Signature and Date

Signature required on last page only.

| | |
|---|-------------------------|
| print here → <u>Felix Alder</u> Print Name | <u>12/5/25</u> Title |
| sign here → <u>Felix Alder</u> Authorized Signature | <u>Manager</u> Date |

If you make a false statement on this report, you could be found guilty of a Class A misdemeanor or a state jail felony under Penal Code Section 37.10

RECEIVED DEC 05 2025

Dealer's Motor Vehicle Inventory Tax Statement

CONFIDENTIAL

DECEMBER
Reporting Month

2025
Year

Page 1 of pages 3

Tarrant Tax Assessor Collector
100 E Weatherford St Fort Worth, Tx 76196

Send Original to: County Tax Office Name and Address

817-884-1111

Phone (area code and number)

Tarrant County Appraisal District
2500 Handley Ederville Rd Fort Worth, Tx 76118

Send Copy to: Appraisal District Name and Address

817-284-0024

Phone (area code and number)

GENERAL INSTRUCTIONS: This inventory tax statement must be filed by a dealer of motor vehicles pursuant to Tax Code Section 23.122. This statement is filed together with an amount equal to the total amount of the unit property tax assigned to all motor vehicles sold in the preceding month. File a separate statement for each business location and retain documentation relating to the disposition of each vehicle.

ALTERNATIVE ELECTION: Effective Jan. 1, 2014, certain dealers of motor vehicle inventory may elect to file renditions under Tax Code Chapter 22, rather than file declarations and tax statements under Tax Code Chapter 23. Tax Code Section 23.121(a)(3) allows a dealer to make this election if it (1) does not sell motor vehicles that are self-propelled and designed to transport persons or property on a public highway; (2) meets either of the following two requirements: (a) the total annual sales from the inventory, less sales to dealers, fleet transactions, and subsequent sales, for the preceding tax year are 25 percent or less of the dealer's total revenue from all sources during that period, or (b) the dealer did not sell a motor vehicle to a person other than another dealer during the preceding tax year and the dealer estimates that the dealer's total annual sales from the dealer's motor vehicle inventory, less sales to dealers, fleet transactions, and subsequent sales, for the 12-month period corresponding to the current tax year will be 25 percent or less of the dealer's total revenue from all sources during that period; (3) files with the chief appraiser and the tax collector by Aug. 31 of the preceding tax year on a form prescribed by the Comptroller a declaration that the dealer elects not to be treated as a dealer under Tax Code Section 23.121 in the current tax year; AND (4) renders the dealer's motor vehicle inventory in the current tax year by filing a rendition with the chief appraiser in the manner provided by Tax Code Chapter 22. A dealer who makes this election must file the election annually with the chief appraiser and the tax collector by Aug. 31 of the preceding tax year, so long as the dealer meets the eligibility requirements of law.

FILING INSTRUCTIONS: This document and all supporting documentation must be filed with the appraisal district office and the county tax assessor-collector's office in the county in which the business is located. Do not file this document with the Texas Comptroller of Public Accounts. A directory with contact information for appraisal district and tax offices may be found on the Comptroller's website.

STATEMENT DEADLINES: Except as provided by Tax Code Section 23.122(g), a statement and prepayment of taxes must be filed on or before the 10th day of each month.

PENALTIES: A dealer who fails to file a statement as required commits a misdemeanor offense punishable by a fine not to exceed \$100. Each day during which a dealer fails to comply is a separate violation. In addition to other penalties provided by law, a dealer who fails to file or timely file a statement must forfeit a penalty of \$500 for each month or part of a month in which a statement is not filed or timely filed after it is due. A tax lien attaches to the dealer's business personal property to secure payment of the penalty. In addition to other penalties provided by law, an owner who fails to remit unit property tax due must pay a penalty of 5 percent of the amount due. If the amount due is not paid within 10 days after the due date, the owner must pay an additional 5 percent of the amount due. Unit property taxes paid on or before Jan. 31 of the year following the date on which they are due are not delinquent.

OTHER IMPORTANT INFORMATION

The chief appraiser or collector may examine documents held by a dealer in the same manner and subject to the same conditions as provided by Tax Code Section 23.121(g) and 23.122(f).

STEP 1: Dealer Information

Any Cars Inc

Name of Dealer

2602 MAYFIELD RD

Mailing Address

GRAND PRAIRIE, TX 75052

City, State, ZIP Code

214-715-8856

Phone (area code and number)

Felix Gomez

Name of Person Completing Statement

President

Title

STEP 4: Total Units Sold and Total Sales

Number of units sold for reporting month:

| | | | |
|-------------------------|--------------------|--------------|------------------|
| 0 | 0 | 0 | 0 |
| Motor Vehicle Inventory | Fleet Transactions | Dealer Sales | Subsequent Sales |

Sales amounts for reporting month:

| | | | |
|-------------------------|--------------------|--------------|------------------|
| \$ 0.00 | \$ 0.00 | \$ 0.00 | \$ 0.00 |
| Motor Vehicle Inventory | Fleet Transactions | Dealer Sales | Subsequent Sales |

STEP 5: Signature and Date

Signature required on last page only.

print here

Felix Alday
Print Name

Owner
Title

sign here

Felix Alday
Authorized Signature

12/26/25
Date

If you make a false statement on this report, you could be found guilty of a Class A misdemeanor or a state jail felony under Penal Code Section 37.10

Houston Texas

January 5, 2026

Texas Department of Motos Vehicles
4000 Jackson Avenue
Austin Texas 78731

To Whom It May Concern,

I am writing to formally oppose the proposed **Texas Department of Motor Vehicles** rule and to submit a Request for a Public Hearing regarding the *Texas Administrative Code, Title 43, Sections 217.22, 217.26, 217.28, and 217.29*. I oppose the proposal and would like to share my concerns in a public forum before it is adopted.

I am the owner of a Used Auto Sales business located in Houston, Texas. Our business serves working families who depend on reliable transportation to maintain employment and meet daily obligations. The majority of our customers are Latinos, and many rely on **valid foreign passports** that have historically been accepted for vehicle purchases, financing, insurance, and registration.

This proposed rule has already begun to create serious harm. Many of our customers with active finance accounts are now unable to renew their vehicle registration or obtain a registration sticker. These customers are being forced into an unfair and unsustainable situation: continuing to make payments on vehicles they cannot legally operate. As a result, families face financial hardship, and small businesses like mine face increased defaults, repossessions, and financial losses.

Approximately 90% of our sales are impacted by this proposal. Such a drastic effect threatens the viability of small auto dealers, finance companies, and related service providers. Additionally, this rule will negatively affect the broader economy by reducing vehicle sales, tax revenue, and insurance participation in a city like Houston, where personal transportation is essential. Restricting access to vehicle registration does not eliminate the need for transportation. Instead, it increases the likelihood of unregistered and uninsured vehicles on Texas roads, undermining public safety and compliance goals.

For these reasons, I respectfully urge the Texas Department of Motor Vehicles to halt, reconsider, and ultimately reverse this proposed rule. I also respectfully request that a public hearing be granted so that affected business owners, customers, and community members may provide testimony before any final decision is made.

Thank you for your time and consideration.

Sincerely,

Felix Vina
Mi Garage Auto Sales LLC.
Manager

From: [fredy.corea](#)
To: [Zz - Resource - GCO Rules](#)
Subject: DRIVER LICENSE NEW REQUIREMENT
Date: Tuesday, December 9, 2025 5:44:11 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Para el representante del dmv que me lee este mensaje quisiera decirle que esta nueva propuesta implementada sin ningun aviso previo lo unico que a causado es matar la poca economia que tenemos en el estado, con el costo tan alto de vida y el alto costo de los automobiles ,lo unico que nos va traer es mas pobreza y posible el cierre de negocios en masa ya que las personas que mas compran autos ,son las personas que tienen su pasaporte y son los que las entidades financieras prefieren debido a la alta responsabilidad que tienen la competencia en el negocio de los automobiles es alta y ahora con esta propuesta se desminuye

a mas del 50%,no solo causara el cierre de negocios como el mio,si no tambien el estado dejara de recibir esos fondos de impuestos sobre ventas que son altisimos,el estado perdera millones de dolares en impuestos,las aseguradoras perderan miles de dolares,algunos dealers tendran que cerrar,las tiendas que venden partes de autos venderan menos ,el consumo gas sera mucho menos ,la taza de desempleo sera mas alto

y por lo tanto esto generara un caos que ya se esta sintiendo especialmente en mi negocio pienso que requerir documentos como el pasaporte vigente es necesario ningun documento vencido sea aceptado ,propuestas como la que esta implementada lo unico que trae es pobreza, ojala y los lideres del estado,el congreso hagan algo mejor para mejorar la economia del estado y los ciudadanos del estado,se trata de mejorar en todo y no de hacerle dificil la vida a los ciudadanos

gracias por su atencion

--

Blessed Motors Sales
5407 Chippewa Blvd
Houston Tx 77086
281-223-9565

To the representative of the dmv who reads this message I would like to tell you that this new proposal implemented without any prior notice the only thing it has caused is to kill the little economy that we have in the state, with the high cost of living and the high cost of cars, the only thing that will bring us is more poverty and possible the closure of businesses en masse since the people who buy the most cars, They are the people who have their passport and they are the ones that financial institutions prefer due to the high responsibility they have

Competition in the automobile business is high and now with this proposal it is diminishing At more than 50%, not only will it cause businesses like mine to close, but also the state will stop receiving those sales tax funds that are sky-high, the state will lose millions of dollars in taxes, insurers will lose thousands of dollars, some dealers will have to close, stores that sell auto parts will sell less, gas consumption will be much less, the unemployment rate will be higher

and therefore this will generate chaos that is already being felt especially in my business

I think that requiring documents such as a valid passport is necessary

no expired document is accepted, proposals such as the one that is implemented the only thing it brings is poverty,

Hopefully and the leaders of the state, the Congress will do something better to improve the economy of the state and the citizens of the state, it is about improving in everything and not about making life difficult for the citizens

Thank you for your attention

--

Blessed Motors Sales
5407 Chippewa Blvd
Houston Tx 77086
281-223-9565



Dated: December 30th, 2025

To the Honorable Texas DMV Board Members.

Dear Board Members,

As CEO and President of Southern Auto Finance Co (SAFCO), I am writing to formally express our concerns regarding the proposed revisions to identification requirements for vehicle registration.

43 Texas Administrative Code, Chapter 217, relating to personal identification requirements for vehicle registration

While we understand the Department's objectives, the retroactive application of these rules poses a significant and avoidable threat to the stability of the vital non-prime auto finance industry in Texas.

SAFCO has proudly operated in Texas since 2004. With over \$100 million in outstanding loans across the state, primarily originated through franchised dealerships and major public chains. Texas represents one of our largest markets. Like our industry peers, we have consistently operated in good faith, relying on the identification standards established by the Texas DMV over the past decades. SAFCO, like its many peers has no specific way to know exactly which of our Texas loans are to individuals who cannot meet the proposed identification requirements.

The proposed rule, in its current retroactive form, creates several critical liabilities for lenders who have strictly followed state and federal law:

- **Unmitigated Financial Risk:** Lenders extended private capital based on state-sanctioned identification. Retroactively invalidating that identification creates a government-induced default risk that no lender could have predicted or mitigated.
- **Collateral and Liability Concerns:** Vehicles that lose registration will inevitably become uninsurable. This exposes lenders to massive losses through unrecoverable collateral and introduces significant legal liability should these uninsured vehicles be involved in accidents.



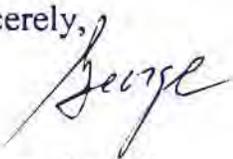
- **Regulatory Conflict:** Under federal law (specifically CFPB guidance), lenders are restricted from considering immigration status during the loan process. Consequently, we have no way of identifying which existing loans are now at risk until a catastrophic event—such as a default or uninsured accident—occurs.
- **Industry-Wide Disruption:** This rule effectively penalizes the finance industry for complying with previous state standards, potentially forcing a contraction of available credit for Texas consumers.

Proposed Solution We respectfully request that the Board reconsider the retroactive application of this rule. To achieve the Department’s goals without destabilizing the finance market, **we suggest a "grandfather" clause or a phased implementation period of 3–4 years for registration renewals.** This would allow the current loan portfolio to reach maturity under the rules that existed at the time of origination.

We have attached supporting documentation, (See Attached) including relevant CFPB guidance and data regarding the impact of uninsured vehicles and a finance industry snapshot, for your review.

Thank you for your time and for considering the long-term economic impact of this proposal on the Texas financial sector.

Sincerely,



George Fussell
CEO/President Southern Auto Finance Co

Risk of Uninsured Motorist

In Texas, an estimated 14.1% of motorists are uninsured—slightly higher than the national average. In Texas, 1 in 5 vehicles is uninsured. Texas ranked dead last—50th in the nation—for the highest share of uninsured population.

With an estimated 17 million registered vehicles in Texas, adding 500,000 uninsured drivers would increase the uninsured rate from approximately 20% to nearly 23%. Texas' rock-bottom ranking for uninsured population creates a cascade of problems for accident victims.

Texas Auto Loan Data

Texas Has the HIGHEST Average Auto Loan Balance in the Nation
At \$29,760, no other state sported a larger average auto balance in 2024—. This is 22.5% HIGHER than the national average of \$24,297.

Texas's Share of National Auto Debt:

With national auto debt at \$1.66 trillion:

- Texas likely represents 15-18% of total U.S. auto loan debt
- This is proportionally higher than Texas's ~9% of U.S. population

Why Texas has higher auto loan balances:

- Truck culture (pickups cost more)
- Sprawling cities requiring vehicles
- Long commute distances
- Higher vehicle dependency

Source AI Chat GTP, December 14th, 2025

From: [nirav.gunes](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Act Now on Proposed Texas ID Requirement Changes
Date: Thursday, December 18, 2025 12:15:56 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whom it may concern,

We sincerely appreciate TIADA's continued advocacy on behalf of Texas independent automobile dealers. TIADA plays a critical role in representing our interests at the state level, providing clear guidance, education, and a strong voice when regulatory changes impact day-to-day operations. Independent dealers rely on TIADA's leadership to ensure that policy decisions consider real-world business realities, and we are grateful for the organization's ongoing efforts to protect and support our industry.

As a Texas independent motor vehicle dealer, I want to express serious concern regarding the recent tightening of photo-ID requirements related to vehicle title and registration processing. While we support reasonable verification standards and compliance with state law, the immediate implementation and narrow interpretation of acceptable identification has created material disruptions across the retail automotive ecosystem and beyond.

From a dealer standpoint, the most immediate impact is **transaction friction**. Customers who are otherwise qualified buyers are being delayed or unable to complete title and registration due to ID technicalities that often have nothing to do with fraud or intent. This results in postponed deliveries, increased unwind risk, delayed funding, and additional administrative costs for dealers—especially small, independent operators who do not have the staffing or legal resources of large dealer groups.

These disruptions extend well beyond dealerships. Construction companies and fleet operators rely on timely vehicle registration to keep work trucks on the road. Delivery drivers and gig-economy workers depend on registered vehicles to earn income. Families across Texas—particularly elderly residents, mixed-status households, and individuals waiting on ID renewals—are facing unexpected barriers to maintaining legally registered vehicles. When vehicles cannot be registered or renewed, the economic impact cascades into lost productivity, lost wages, and increased non-compliance risk.

Most critically, these changes are likely to **negatively impact state and local tax collections**. Motor vehicle sales tax is only reliably collected when a transaction successfully clears the title and registration process. Increased friction increases the likelihood of delayed, abandoned, or informal transactions, reducing not only sales tax receipts but also title and registration fee revenue. Any policy that reduces the number of successfully completed transactions ultimately undermines the very revenue streams that fund Texas infrastructure

and public services.

We urge TIADA to advocate for:

- Clear, consistent statewide guidance on acceptable identification
- Reasonable transitional periods for newly enforced requirements
- Practical flexibility for edge cases that pose no fraud risk
- Collaboration between TxDMV, county tax offices, and dealers to avoid unintended economic harm

Independent dealers are compliance-focused small businesses that serve a broad cross-section of Texans. Policies that unintentionally restrict lawful vehicle transactions harm businesses, consumers, and state revenue alike. We believe a balanced approach can achieve verification goals without disrupting commerce across Texas.

We look forward to continued collaboration with TIADA and appreciate the opportunity to share feedback as these changes are evaluated. With TIADA's leadership and engagement, we are confident that practical, balanced solutions can be developed that protect compliance while allowing independent dealers to continue serving Texas consumers and contributing to the state's economy.

Sincerely,

H. Giray Gunes

SFG AUTO LLC

210-589-2915

From: [Greg Reine](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Public Comment on Proposed Amendments to 43 TAC §§217.22, 217.26, 217.28, and 217
Date: Tuesday, December 30, 2025 3:15:42 PM
Attachments: [image001.png](#)

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Thank you for the opportunity to provide comments regarding the Texas Department of Motor Vehicles' proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29, relating to personal identification requirements for vehicle registration under Transportation Code §502.040.

I am an independent automobile dealer in Texas, and my business provides reliable transportation and financing options to customers who often cannot obtain credit through traditional lenders. Our dealership supports local jobs, provides loans to working Texans, and operates under strict state and federal compliance requirements.

While we understand and support efforts to prevent fraud and ensure valid identification, the proposed rules raise serious concerns and create unintended consequences for both dealers and customers. In practice, these changes will delay vehicle registrations and sales due to DPS appointment backlogs, leaving customers without transportation for work and family obligations. We have already seen how difficult it is for customers to obtain replacement or updated identification in a timely manner—even when they are clearly eligible to reside and work in Texas. This proposed amendment would affect approximately 20% of our current business and some where near the same for new business going forward. This will have a large impact on our bottom line, as well as our ability to serve our community with transportation needs.

Additionally, these rules place independent dealers in the position of reviewing and interpreting immigration-related documentation, which we are neither trained nor legally equipped to do. This exposes dealerships to compliance risk and potential conflicts with federal fair-lending laws, including guidance from the CFPB and DOJ cautioning against denying credit based solely on immigration status when an applicant is otherwise qualified.

Our business investments, staffing, and lending practices were made under prior rules that did not require citizenship or lawful presence determinations at the dealership level. Changing these requirements after the fact creates operational uncertainty and financial risk for small businesses like ours.

My request is that TxDMV return the rule to its prior form or provide a clear safe harbor for dealers, including exempting transactions with active liens or grandfathering existing loans. This approach would allow TxDMV to address fraud concerns without shifting inappropriate responsibility

to dealers or disrupting access to transportation for qualified Texas residents.

Thank you for considering the real-world impact these proposed changes will have on independent dealers, our employees, and the communities we serve.

Sincerely,

Greg Reine

972-354-7610



From: [Houston Baker](#)
To: [Zz - Resource - GCO Rules](#)
Cc: [JERRY BAKER; Juanita Palomares; Jessica Hernandez](#)
Subject: Proposed rule change 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29, relating to personal identification requirements for vehicle registration under Transportation Code §502.040
Date: Friday, December 19, 2025 11:08:13 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

TO: General Council
Texas Department of Motor Vehicles

I would like to provide a comment regarding the proposed rule change regarding registration of vehicles in Texas regarding identification documents. These proposed rules require dealerships to ensure customers have a US ID or a valid current passport with visa/permanent residency card. We understand that this proposal is an attempt to prevent undocumented immigrants from registering vehicles. However, we feel it is misguided and suggest further study including working with stakeholders such as the TIADA before implementing this or any other changes.

As background, our family has been in the car business in Houston since 1957. My father started his own business, Liberty Auto Sales, in 1981 and we are still going strong after almost 45 years. We have never seen the disruption and confusion as we have witnessed since this rule change was announced.

First, customers have asked us to provide immigration advice and review immigration documents, and many are confused because the rule does not account for people who have already purchased cars who need to keep their registration current. If the current state holds, the state will see a dramatically increased number of unregistered vehicles on the road in Texas for a significant amount of time.

Secondly, the state of Texas expects the dealer to become immigration experts with this change. Our employees are not trained to examine immigration documents and make judgements about who is or is not here legally. Neither the DMV nor any other agency has provided us with training regarding this change, and the sudden nature of it is simply adding a burden to our ability to conduct business and provide customers with the best service possible.

Third, the rule change will create unintended consequences that will not reduce undocumented immigration but will create confusion regarding who owns a vehicle and where to find the owner of a vehicle. If an undocumented immigrant desires to purchase a vehicle in the future, will they not recruit their friends who have the required documents to stand in for them as a proxy, increasing the uncertainty regarding where that vehicle will be in the future. This will create problems for the dealer if the customer fails to pay as we will be unable to locate the collateral or the person who has actual possession of the vehicle. It is easy to see cascading effects of this beyond car transactions with law enforcement and credit reporting. Another concern is the creation of a black market of car transactions, resulting in an explosion of unregistered vehicles resulting from under the table sales by individuals rather than dealers.

Finally, I would like to address the moral, legal and ethical concerns for this rule change. As of now, unless an immigrant is from a hostile country, it is wholly legal for them to purchase real property in Texas. Likewise, other than firearms, immigrants are not prevented from purchasing any type of personal property. Why are vehicles being singled out when immigrants can purchase every other type of property. From an ethical standpoint, many immigrants require transportation to survive. This rule change is akin to preventing immigrants from purchasing food or shelter. Furthermore, the federal guidance under the Consumer Financial Protection Bureau (CFPB) and the U.S. Department of Justice warns that creditors may not deny credit solely based on immigration status when an applicant is otherwise qualified, rendering the rule change highly

questionable on a legal basis. Federally, creditors may not deny credit solely based on immigration status when an applicant is otherwise qualified. This rule change opens the dealers and state up to needless lawsuits based on discriminatory lending.

Our business creates millions of dollars for the economy of Texas. Of course, with each of the hundreds of cars we sell per year, our business pays 6.25% of the vehicle purchase to the state in sales tax. Not only will this rule change create negative ramifications for safety and business disruption, it will rob the state of significant revenue. Why are we being asked to take on an administrated burden that will not decrease immigration, hinder safety and business requirements, open us up to lawsuits, and hurt not only our business but the business of the state of Texas?

Sincerely,

Houston E. Baker

CEO, Liberty Auto Sales

www.libertyautosales.com

512-226-3585

From: [Jennifer Beals](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Public comment on TXDMV ID Rule Changes
Date: Tuesday, December 30, 2025 3:13:10 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Thank you for allowing public comments on the proposed changes to vehicle registration identification requirements.

I work at an independent car dealership in Texas and deal directly with customers every day. My job is to help people get into vehicles so they can get to work, take their kids to school, and handle daily life. Many of our customers already struggle with transportation, and even small delays can cause big problems for them.

From what I see on a daily basis, these new ID rules would make our jobs much harder and create a lot of frustration for customers. Many people already have trouble getting DPS appointments to replace or update their IDs. If they can't get an appointment quickly, they can't register their vehicle, even if everything else is in order. This can leave them without transportation through no fault of their own.

We are also worried about being expected to review immigration or legal documents. That is not something we are trained to do, and it puts employees like me in an uncomfortable position. We don't want to make mistakes or treat customers unfairly—we just want to help them complete their paperwork correctly and legally.

I like my job and take pride in helping people. These rule changes would slow everything down, confuse customers, and make it harder for dealerships and employees to do our work properly.

I ask that TxDMV keep the rules as they were before or create a safe exception for dealers so customers with active loans or liens are not affected. This would help prevent unnecessary delays and keep people working and driving legally.

Thank you for taking the time to consider how this affects everyday dealership employees and the customers we serve.

Sincerely,

Jennifer Beals
Payment Center Director



39670 Lyndon B. Johnson Fwy
Dallas, Tx 75237

From: [Jenissa Rice](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Public Comment on Proposed TxDMV Identification Rule Changes
Date: Tuesday, December 30, 2025 3:22:05 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Thank you for the opportunity to submit comments regarding the Texas Department of Motor Vehicles' proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29 related to vehicle registration identification requirements.

I am the operator of an independent automobile dealership in Texas. This is not a corporate operation—we work directly with our customers every day. We know their families, their jobs, and how critical reliable transportation is to their ability to live and work in our communities. For many of our customers, losing access to a vehicle even temporarily can mean losing employment or the ability to care for their children.

We fully support preventing fraud and ensuring valid identification. However, based on what we see daily at the dealership level, these proposed rules will create serious unintended consequences. DPS appointment backlogs are already causing long delays for customers trying to replace or update identification. Under these changes, customers who are otherwise clearly eligible and qualified could be unable to complete a vehicle registration simply because they cannot obtain an appointment in a reasonable timeframe.

As dealers, we are also deeply concerned about being placed in the position of reviewing and interpreting immigration-related documents. That is not our role, and we are not trained or legally equipped to make those determinations. This creates compliance risk for small businesses like ours and puts us in conflict with federal fair-lending guidance warning against decisions based solely on immigration status when customers otherwise qualify.

Our dealership has invested in Texas—employees, inventory, facilities, and customer financing—under the rules as they previously existed. We built our business on those standards, not on acting as immigration or legal reviewers. Changing these requirements after the fact puts unnecessary strain on small dealers and the communities we serve.

I respectfully ask that TxDMV return the rule to its prior form or establish a clear safe harbor for dealers, such as exempting vehicles with active liens or grandfathering existing loans. This would allow the state to address fraud concerns without disrupting legitimate transactions or placing inappropriate responsibilities on independent dealers.

Thank you for considering the perspective of those of us on the front lines, working directly with Texas families and small businesses every day.

Sincerely,

Jenissa Rice

Auto Liquidators, Inc.
972-354-7608

From: [Jim Hardick](#)
To: [Zz - Resource - GCO Rules](#)
Subject: TADA
Date: Monday, December 22, 2025 9:57:52 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Board of Directors of the Texas Department of Motor Vehicles,

My organization Moritz Dealerships fully supports TADA and echoes their response from Karen Phillips. It is costing us business from people that are hard working and pay for their cars.

Respectfully,

Jim Hardick
Managing Partner
Moritz Dealerships

December 19, 2025

Texas Department of Motor Vehicles
Motor Vehicle Division
4000 Jackson Avenue
Austin, TX 78731

Subject: Public Comment on Proposed Amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29 – Personal Identification Requirements under Transportation Code §502.040

Dear TxDMV Dealer Services,

I am writing to formally express my concerns regarding the proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29, relating to personal identification requirements for vehicle registration. While I understand and respect the intent to ensure compliance and integrity within the registration process, I am deeply concerned that these changes will have serious and unintended consequences for small, independent dealerships particularly Buy Here Pay Here dealers who finance and hold their own notes.

My family has proudly operated J&H Auto Sales since 1988, when my parents founded this business with the goal of serving hardworking Texans who often lack access to traditional financing. Over the past several decades, our dealership has grown steadily, built on trust, long-term customer relationships, and strict compliance with existing Texas laws and regulations.

I have since taken over the business and am now the sole owner, continuing my parents' legacy. This dealership is not just a business, but it represents decades of family investment, personal sacrifice, and commitment to our community. We serve customers who rely on dependable transportation to get to work, care for their families, and contribute to the Texas economy.

The proposed identification requirements will significantly disrupt our operations and directly harm both our business and our customers.

As a Buy Here Pay Here dealership, we finance vehicles in-house and maintain long-term relationships with our customers. Under these new rules, customers who have previously purchased vehicles in good faith—under rules that did not require citizenship or additional identification inquiries—may now be unable to register or renew registration on their vehicles. This creates a situation where customers may be forced to turn in vehicles, not due to payment default, but due to new regulatory barriers.

This outcome harms everyone involved:

- Customers lose reliable transportation through no fault of their own.
- Employees face reduced sales, increased conflict, and job insecurity.
- Dealerships suffer financial losses on vehicles and notes that were lawfully originated.

Additionally, the amendments appear to place dealers and county offices in the position of reviewing and evaluating personal identification or immigration-related documents, which is well outside our training, authority, and expertise. This exposes small businesses to compliance with risks, liability concerns, and inconsistent interpretation of documents—none of which serve the public or the state.

These rules may be unintentional:

- Reduce vehicle sales and registrations.
- Increase vehicle repossessions unrelated to credit risk.
- Push customers toward unregulated or unsafe alternatives.
- Disproportionately harm small, independent, family-owned dealerships while larger entities may be better positioned to absorb the impact.

Our dealership has invested heavily in Texas under the existing regulatory framework:

- We employ local Texans.
- We provide in-house financing to customers who otherwise would not qualify.
- We pay taxes, fees, and comply with all state requirements.
- We have built our business model based on rules that did not require citizenship inquiries or expanded ID verification for vehicle registration.

These investments were made in good faith under long-standing policies. Sudden changes place an unfair burden on small businesses that lack the resources to rapidly restructure operations or absorb significant losses.

I respectfully urge the Texas Department of Motor Vehicles to reconsider or revise these proposed amendments, particularly as they apply to vehicle registration and small Buy Here Pay Here dealerships. At a minimum, I ask that TxDMV consider alternative approaches, exemptions, or guidance that prevent the disruption of existing lawful contracts and protect small businesses and Texas consumers.

Thank you for the opportunity to provide public comments and for your continued service to the State of Texas. I would welcome the opportunity to participate in further discussion or provide additional insight from the perspective of a small, family-owned dealership that has served Texans for nearly four decades.

Respectfully,

Sincerely,
Jorge Hernandez
President
J&H Auto Sales

From: [Ariel Casanova](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Letter of Request Against the Proposed Vehicle Registration Law
Date: Wednesday, December 10, 2025 2:17:31 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Jose Casanova

TWT Transport LLC

8515 City Park Loop, Houston, Texas, 77013

552.137

305-833-6104

To the Attention of: Officials and Stakeholders of the Texas Department of Motor Vehicles (TxDMV) G

Dear TxDMV Officials and Stakeholders:

I am writing to you, as a citizen and small business owner in Texas, to express my profound concern regarding the proposed legislation that seeks to prevent individuals who possess a passport without a legal entry stamp from registering vehicles. I urgently request that you consider the serious economic and social consequences this measure would unleash across the state and, therefore, **that it not be implemented.**

The adoption of this law will have an immediate and massive negative impact for the following reasons:

1. **Humanitarian and Family Impact:** Thousands of Texas residents rely on their vehicles for essential daily activities, such as commuting to work, taking their children to school, and accessing medical services. Eliminating their ability to register a vehicle is tantamount to stripping them of their means to **sustain their families and maintain their basic economic stability.**
2. **Devastation of the Automotive Industry:** Texas is home to **over 20,000 vehicle dealerships**, many of which substantially rely on this customer category. The loss of this segment will result in numerous dealerships losing over **90% of their sales**, leading to massive closures, bankruptcies, and a significant loss of jobs in this sector.
3. **Risk to Small Businesses:** In my particular case, my business, **TWT Transport LLC**, specializes in title transfers for this very population. The approval of this law would cause a near-total loss of my clientele, forcing me to close a small business that is just

starting, negatively affecting my ability to support myself and my family.

This proposal does not only affect a specific population but will significantly destabilize the Texas economy by impacting small businesses, established dealerships, and thousands of working families.

I earnestly appeal to you to reconsider this proposal, recognizing the ripple effect it will have on our economic and social fabric. I trust that you will make a decision that protects the workers and businesses of Texas.

Thank you for your time and consideration on this matter of vital importance.

Sincerely,

Jose Casanova Owner of TWT Transport LLC

From: [Jose Castro](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Identification requirement rule
Date: Monday, January 5, 2026 11:42:25 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hello,

The new rule enforced for Identification requirement, has a huge effect on current good customers that have followed rules and regulations to have vehicles registered. I agree with the current passport and current ID, and not accepting expired IDs or passports. The passport can be issued from your local country consulate, and be an active passport holder. I disagree with the passport having to be stamped by immigration; there is a huge amount of customers that have an active passport from your local country consulate issued here in Texas. (ex. Dallas, Texas).

As a 25 year old buy here pay here dealer, 75% of customers that buy throughout the year are passport only customers. Current customers that have purchased in the past with passport id, and have a current passport to renew a yearly vehicle registration should not be punished with this new rule. The current vehicle owners not being able to renew registration will create a big problem for expired registrations, and also for us dealers, customers not wanting to purchase vehicles which would have a major impact on business. This will have an effect on future buying customers, and current paying customers.

Please take this into consideration, for business and for current paying vehicle owners that follow rules and regulations.

Thank you,

Jose Castro

Alaniz Auto Ranch
1144 E. Irving Blvd.
Irving Texas, 75060

Phone: 972-554-7100
Fax: 972-554-7133

From: [ROUTE 77](#)
To: [Zz - Resource - GCO Rules](#)
Subject: New ID Requirements
Date: Thursday, January 1, 2026 1:15:55 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Dear Texas Department of Motor Vehicles,

I am writing as a licensed Texas motor vehicle dealer to respectfully request reconsideration of the recently implemented identification requirements for individuals registering vehicles in their own name without legal U.S. status.

We fully understand and respect the State of Texas's efforts to address illegal immigration and strengthen compliance with federal and state laws. However, we are already seeing significant unintended consequences that affect public safety, tax compliance, and consumer protection.

A large portion of our customer base consists of individuals who, while lacking legal status, have historically complied with Texas vehicle laws by registering vehicles, maintaining insurance, and paying sales tax, title, and registration fees. Under the new requirements, many of these customers are now unable to register vehicles in their own names. As a result, we are seeing an increase in customers bringing third parties to register vehicles on their behalf.

This creates several concerns:

- Vehicles are being operated daily by individuals who are not the legal owners.
- Registered owners may have no actual control over the vehicle.
- Insurance coverage and liability become unclear and potentially invalid.
- Consumers may be pushed toward informal or street vehicle purchases to avoid registration altogether.
- The state risks reduced collection of sales tax, title fees, and registration revenue.
- More unregistered and uninsured vehicles may be operating on Texas roads.

Our concern is that these outcomes undermine the very goals of regulation, safety, and accountability that TxDMV works to uphold. Dealers are being placed in a difficult position where compliance with the new rules may inadvertently encourage unsafe and non-compliant behavior.

We respectfully ask TxDMV to consider alternative solutions or clarifications that would

allow individuals to continue registering vehicles in their own names while maintaining compliance, accountability, and public safety. We would welcome guidance, dialogue, or participation in any stakeholder discussion to help find a practical path forward.

Thank you for your time and consideration. We appreciate the work TxDMV does to serve Texas motorists and businesses and hope a balanced solution can be reached.

Respectfully,

Jose Miguel Ramirez

Route 77 Auto Sales

4027 E Expressway 83

Weslaco, TX 78599

956-854-4078

From: [Judy Deharo](#)
To: [Zz - Resource - GCO Rules](#)
Cc: [REDACTED] 552.137
Subject: Request for Comments :Changes to Texas DMV Identification Requirements
Date: Friday, January 2, 2026 6:04:37 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Position Statement on Proposed Texas DMV Amendments to Vehicle Registration Requirements

FirstLight Federal Credit Union serves a diverse membership base in El Paso County, Texas, and Doña Ana County, New Mexico—regions with significant Hispanic and migrant populations. We are committed to promoting financial inclusion and mobility for all members. After reviewing the proposed amendments requiring REAL ID-compliant identification for vehicle registration, we have identified substantial concerns regarding financial impact, operational risk, and community well-being.

Our Position

FirstLight Federal Credit Union opposes the proposed amendments in their current form due to their disproportionate impact on border communities and unintended consequences for financial institutions and consumers.

Key Concerns

1. Financial Impact

- **Loan Volume Reduction:** Restrictive ID requirements will reduce auto loan originations by an estimated 5–10% annually in affected counties.
- **Operational Costs:** Compliance efforts, member education, and process adjustments could increase administrative expenses by \$50,000–\$100,000 annually.
- **Default Risk:** Members unable to register vehicles may default on loans, increasing charge-offs and repossession costs.

2. Long-Term Risk Exposure

- **Credit Risk:** Higher delinquency rates due to loss of transportation and employment.
- **Reputational Risk:** Perceived exclusion of Hispanic and migrant communities could harm trust and membership growth.
- **Regulatory Risk:** Increased audit exposure and compliance complexity.

3. Program Adaptation

- Lending programs would require stricter ID verification, reducing approvals and creating friction for members.
- Alternative products may need development, such as secured personal loans or mobility financing.

4. Compliance Implications

- Enhanced verification processes and staff training will be necessary.
- Increased documentation requirements for audits and regulatory reviews.

5. Contractual Obligations

- Existing loan agreements assume vehicle registration and insurance. If members cannot register vehicles, collateral value and repossession processes are compromised.
- Dealer partnerships may require renegotiation due to delays in vehicle delivery.

6. Unintended Consequences

- Community Impact: Hispanic and migrant populations may face mobility restrictions, job loss, and economic instability.
- Market Distortion: Increased reliance on unregistered vehicles or informal transportation, raising safety and liability concerns.

Recommendations

- Allow Alternative IDs: Accept consular IDs, ITIN documentation, and other secure forms of identification.
- Implement Grace Periods: Provide transitional timelines for compliance in border regions.
- Bilingual Outreach: Ensure DMV materials and assistance are available in Spanish.
- Economic Impact Analysis: Conduct a study to assess effects on border-region employment and financial institutions.

Conclusion

While we support efforts to enhance security and prevent fraud, the proposed amendments will unintentionally harm the communities we serve and increase risk for financial institutions. We urge the Texas DMV to adopt inclusive policies that balance security with accessibility.

Sincerely,

Judy M. DeHaro | CLO

FirstLight Federal Credit Union | Improve Lives. Achieve Dreams.

D: 915.564.3333 | E:  552.137

9983 Kenworthy St. El Paso, TX 79924 | firstlightfcu.org

Note: This email and any files transmitted with it may be confidential and are intended solely for the use of the individual or entity to which they are addressed. If you have received this email in error please notify the sender by replying to the message and delete it from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.



1108 Lavaca, Suite 800
Austin, Texas 78701
Phone: 512-476-2686
www.tada.org

December 18, 2026

Office of General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, TX 78731

Sent via email: rules@txdmv.gov

Proposed Rules. Chapter 217. Vehicle Titles and Registration
Subchapter B. Motor Vehicle Registration
43 TAC §§217.22, 217.26, 217.28, 217.29

Dear Ms. Moriarty:

The proposed rules published in the *Texas Register* on December 5, 2025, discuss amendments to the personal identification requirements for motor vehicle registration and registration renewal. The Texas Automobile Dealers Association (TADA), the Houston Automobile Dealers Association (HADA), the New Car Dealers of West Texas (NCDWT), the San Antonio Automobile Dealers Association, Inc., (SAADA), the El Paso New Car Dealers Association (EPNCDA), the Valley Automobile Dealers Association (VADA), the Austin Automobile Dealers Association (AADA), and the North Texas Automobile Dealers (NTXAD) submit the following comments in response to the published proposal, 50 *TexReg* 7868 - 7874.

43 TAC §217.26. Identification Required

43 TAC §217.28. Vehicle Registration Renewal.

As identification is currently required at initial registration under §217.26, to require a vehicle owner to continue to show their identification year after year to the tax assessor collector (TAC) is an unnecessary requirement and allows an effortless

means for identification theft to occur as a person's personal and confidential information will now be readily accessible when it is mailed or electronically provided along with payment to the TAC.

Today, the vehicle renewal registration process entails a vehicle owner returning their registration renewal form, paying the required fees, and providing evidence of financial responsibility to the county TAC in which the owner resides or to a county TAC willing to accept the renewal. A vehicle owner may renew in person, by mail, or through the Internet.

The proposal requires the vehicle owner to submit identification documents that comply with the initial identification documents outlined in §217.26 in addition to returning the registration renewal form, paying the necessary fees, and showing evidence of financial responsibility.

For a vehicle's initial registration, §217.26(a) and (b) propose to divide the acceptable documents into two categories:

1. Documents for a registration class under Transportation Code, Chapter 502, that do not require the owner of the vehicle to be a resident of Texas;¹ and,
2. Documents in a registration class under Transportation Code, Chapter 502, that require the owner of the vehicle to be a resident of Texas.²

¹An owner of a motor vehicle who is not required to be a Texas resident, must submit a current photo ID with a unique ID number and expiration date and include:

1. A DL or state ID certificate issued by a state or territory of the U.S.;
2. U.S. or foreign passport;
3. U.S. military ID card;
4. NATO ID or ID issued under a Status of Forces Agreement;
5. U.S. Department of Homeland Security, U.S. Citizenship & Immigration Services, or U.S. Department of State ID document; or,
6. TX DPS license to carry a handgun.

²An owner of a motor vehicle who is required to be a TX resident must present one of the following:

1. A valid, unexpired DL or state ID certificate issued by a state or U.S. territory that complies with the federal REAL ID Act;
2. A valid passport; or,
3. TX DPS license to carry a handgun.

The current list of documents in §217.26(a) for vehicle registration should stand for a vehicle owner who is a resident as well as for a non-resident. Financial responsibility and ownership information in addition to the prevention of theft and the importation of stolen vehicles as well as the perfection of a vehicle's security interest, is the State's central goal with respect to the titling and registering of a motor vehicle driven on the State's public roads. The State's interest is effectuated by the requirement that not more than 30 days after purchasing a vehicle or becoming a resident of Texas, the owner of a motor vehicle, trailer, or semitrailer applies for registration.³

A state's registration list is also oftentimes used by a motor vehicle manufacturer and distributor for motor vehicle recall notices—a safety measure for all motor vehicle owners and drivers. For example, the National Highway Traffic Safety Administration (NHTSA) reports that approximately 67 million Takata air bags have been recalled (*See Exhibit 1*). There is a public policy requirement for any vehicle to have a manufacturer/distributor recall repair.

In addition, there is no need annually to provide to the local TAC previously provided identification documents for a vehicle registration renewal and more importantly, to require a vehicle owner to provide such through the mail or over the internet invites identification theft. It is requested that the proposed amendments to §217.26 and §217.28 not go forward for adoption.

§217.29. Vehicle Registration Renewal via Internet.

If a vehicle owner is renewing their vehicle registration through an online system, the proposed amendments require a vehicle owner to submit their personal identification documents as required by §217.26, via the Internet.

Submitting copies of a driver's license, passport, or a license to carry a handgun over the internet along with credit card information, provides an easy target for cyber theft. An individual's personal confidential information should not be readily available for others, including other countries, to appropriate or misuse and the proposal allows for such ready-made identification theft through cyber and computer breaches by requiring them for a motor vehicle registration renewal.

³TEX. TRANSP. CODE ANN., §502.040(a) (Vernon 2022).

The proposed amendments to §217.29 are requested to be rescinded because, as previously stated, to require such documentation is unnecessary for a vehicle registration renewal and provides an easy target for identification thieves to prey on Texas vehicle owners.

Verification of Documents

Determining an illegitimate or fake passport, driver's license, state identification certificate, or handgun license should rest with the professional law enforcement community.

The proposed amendments discuss the requirement that an owner must present a "valid" passport as defined in proposed §217.22(44); a "valid" unexpired driver's license or state identification certificate; and a "valid" unexpired handgun license (proposed §217.26(b)).

The proposal also requires a TAC to "verify" the listed §217.26 personal identification documents that are submitted either in person or by mail (proposed §217.28(c)(2)) as well as to "verify" the vehicle owner's personal identification documents submitted via the Internet (proposed §217.29(e)(4)). Submitting "by mail" or "via the Internet" necessarily means a copy of a license or passport will be sent by the motor vehicle owner.

Verifying the validity of a state or federal document and especially having to verify a copy of any such document, may not be possible. Such a requirement is a high hurdle with which to comply as fraudulent licenses and passports become more common and less onerous to fabricate.

An additional concern is fraudulent registration stickers that may become readily available if the proposal is adopted. As the paper tags are no longer used on a motor vehicle with the expectation that metal plates will stem fraudulent paper tags, fraudulent Texas license plates continue to be available for purchase.⁴

⁴https://www.etsv.com/listing/1771222346/texas-license-plate-free-shipping-in-usa?ls=s&ga_order=most_relevant&ga_search_type=all&ga_view_type=gallery&ya_search_query=registration+sticker+texas&ref=sr_gallery-1-1&sr_prefetch=0&pl_from=market&frs=1&sts=1&content_source=4c802321-fdbc-42d5-bb60-c8f67ac0789a%253ALT72e0382c56e2ecd1bde5c1ee0b0c4167694d5b46&organic_search_click=1&logging_key=4c802321-fdbc-42d5-bb60-c8f67ac0789a%3ALT72e0382c56e2ecd1bde5c1ee0b0c4167694d5b46

Law enforcement are the trained professionals with the expertise to identify and distinguish fraudulent documents—not employees at the TAC office nor personnel at a dealership.

TADA requests that the responsibility to determine or “verify” “valid” identification documents remain with and be the responsibility of trained law enforcement when issuing a driver’s license so that the proposal does not impose the responsibility to verify and validate identification documents or a copy of an identification document upon sellers who comply with Transportation Code §501.0234 nor upon the TACs who receive copies of such documents.

Certain Proposed Required Documentation

A “valid” driver’s license or state identification certificate is proposed to be a driver’s license that is compliant with the REAL ID Act of 2005; however, not all states and not all valid driver’s licenses or identification certificates have converted to the REAL ID Act of 2005.

The official purpose covered by the REAL ID Act is to access certain federal facilities; to board Federally regulated commercial aircraft; and, to enter nuclear power plants.

In addition, the Transportation Security Administration (TSA) accepts other forms of identification in addition to a driver’s license that complies with the REAL ID Act of 2005. The list of TSA acceptable forms of ID is requested to be considered for motor vehicle registration in addition to a driver’s license that is compliant with the REAL ID Act of 2005.

<https://www.etsv.com/shop/LicensePlatesAreUs>

https://www.amazon.com/Authentic-License-Plate-Territories-Decoration/dp/B0DWVB9LXF/ref=sr_1_5?crid=NHF50781HPXKT&dib=evJ2ljoimSJ9.pl_KYYJCV6v_R47i9qaUyWV6cwUfxBEj9PYexf4BGDNhWSgR0ih5VqX6skfjcUfKIDA69L-LhO3w2a_x1aVZqBrq634ReimsttszzETM34PUOBKxVGBZEeNS07adztH5MvTPIp9NbtPbWkINpC4qgWcA_q6R-TmA_9nV7OZyh7Wu4hepEILrrPgsvwpzEONLSJI52d8PbtsjczSLogJ7R-IQD_lgcZ0a.InbCG-RHkwiKsFa8zVGKuSChv5_CmCTeEP7zO2j86ZrVPitw2xwISeAtZx_isvZGYcAYEZxkOUA-UyjIUAK-Uml-tf9sA0QIVilFjgzdOKgmRI3wSJA7O&dib_tag=se&keywords=Texas%2BLicense%2BPlate&qid=1765396672&sprefix=texas%2Blicense%2Bplate%2Caps%2C117&sr=8-5&th=1

<https://adhesivereplica.com/texas-license-plate-replica>

The TSA announced December 1, 2025, that it will refer all passengers who do not present the acceptable ID and who still want to fly, to pay a \$45 fee to use an alternative identity verification system, TSA ConfirmID, to establish identity at security checkpoints beginning February 1, 2026.

- A traveler will be able to pay \$45 to use TSA ConfirmID for a 10-day travel period.
- Acceptable forms of ID include⁵:
 1. REAL ID driver's license or other state photo identity cards;
 2. State-issued Enhanced Driver's License or Enhanced ID;
 3. U.S. passport;
 4. U.S. passport card;
 5. DHS trusted traveler card (Global Entry, NEXUS, SENTRI, FAST);
 6. U.S. Department of Defense ID, including IDs issued to dependents;
 7. Permanent resident card;
 8. Border crossing card;
 9. An acceptable photo ID issued by a federally recognized Tribal Nation/Indian Tribe, including Enhanced Tribal Cards;
 10. HSPD-112 PIV card;
 11. Foreign government-issued passport;
 12. Canadian provincial driver's license or Indian and Northern Affairs Canada card;
 13. Transportation Worker Identification Credential;
 14. U.S. Citizenship and Immigration Services Employment Authorization Card (I-766);
 15. U.S. Merchant Mariner Credential; and,
 16. Veteran Health Identification Card.
- TSA is also accepting Digital Identification from Apple Digital ID, Clear ID, and Google ID Pass.
- TSA currently accepts expired IDs up to two years after expiration for the above-listed forms of identification.

As TSA accepts forms of identification that go beyond a REAL ID driver's license and passport, including IDs up to two years after expiration, the State of Texas is requested to consider many of the same above-listed documents for motor vehicle registration, such as an acceptable photo ID issued by a federally recognized Tribal

⁵<https://www.TSA.gov/travel/security-screening/identification>

Nation/Indian Tribe.

Another concern regarding the definition of “valid passport” in proposed §217.22(44) is one in which a stamp or mark is required to be affixed by the United States Department of Homeland Security onto the passport to evidence and authorize lawful admission into the United States and a current permanent resident card or unexpired immigrant visa issued by the United States Department of Homeland Security.

However, the use of a stamp or mark affixed onto the passport is seldom used as the Department of Homeland Security (DHS) issues Form I-94, Arrival/Departure Record, to aliens who are admitted to the U.S., adjusting status while in the U.S., or extending their stay. A Customs and Border Protection officer attaches the Form I-94 to the non-immigrant visitor’s passport upon entry to the U.S.

The proposed list of acceptable documents for a valid registration or renewal is requested to be reviewed for completeness as well as a reconsideration of additional documentation that may be available for a comprehensive and up-to-date list of acceptable documents for the State’s motor vehicle registration.

CONCLUSION

The proposed amendments to Chapter 217, Vehicle Titles and Registration, require a common sense approach to titling and registering a motor vehicle that uses the public roads in Texas.

Requiring personal identification documentation to be sent through the mail or through the use of a computer to the local tax assessor collector for renewing a vehicle registration invites identification theft. In addition, only law enforcement has the wherewithal to determine if a copy of a license or passport is fraudulent—not the TAC or their employees, a lender, or a dealership.

As the REAL ID Act of 2005 is referenced for a driver’s license, the documentation that TSA accepts in addition to a driver’s license with a gold star should also be considered.

The purpose for titling and registering a motor vehicle should not be

overshadowed by a nonresident's or another's registering a vehicle as titling and registering a motor vehicle is evidence of financial responsibility; the State's method to perfect a motor vehicle security interest; the means to identify vehicle owners; and, to prevent motor vehicle theft. In addition, a manufacturer's or distributor's motor vehicle recall consistently depends upon a State's motor vehicle registration list and it is in the interest of all parties that a recall be repaired.

On behalf of TADA, HADA, NCDWT, SAADA, EPNCDA, VADA, AADA, and NTXAD, thank you for the opportunity to comment on the proposed amendments as published in the December 5, 2025, *Texas Register*.

Sincerely,



Karen Phillips
General Counsel/EVP

EXHIBIT 1

Takata Recall Spotlight

Language: **English** ▾

Overview

Tens of millions of vehicles with Takata air bags are under recall. Long-term exposure to high heat and humidity can cause these air bags to explode when deployed. Such explosions have caused injuries and deaths.

NHTSA urges vehicle owners to take a few simple steps to protect themselves and others from this very serious threat to safety.

DO NOT DRIVE

Do Not Drive [warnings](#) have been issued for some of the vehicles.

OTHER

A separate group of defective Takata air bags was recalled in late 2019. Unlike the air bag inflators in the larger Takata recalls, this recall involves [non-azide driver inflators](#).

What's
Wrong
With Your
Air Bag?

Share: [f](#) [X](#) [in](#) [✉](#)

FOR CONSUMERS

Overview

RELATED TOPICS

[THE STEPS FROM COMPLAINT TO RECALL
AIR BAGS](#)

Approximately 67 million Takata air bags (priority groups 1-12) have been recalled because these air bags can explode when deployed, causing serious injury or even death. All vehicle owners should:

- **Check for Recalls** using your [vehicle identification number](#) (VIN).
- **Get the Fix** by calling your local dealer; it will be repaired for free.
- **Sign Up for [Recall Alerts](#)** about any future recall affecting your vehicle.

[WATCH THE VIDEO](#)

FIND OUT MORE

[FAQS: TAKATA DESICCATED INFLATORS AND VOLKSWAGEN RECALLS](#)
[STATE OF TAKATA AIR BAG RECALLS | FOURTH REPORT](#)
[MORE TAKATA AIR BAGS RECALLED](#)
[VIDEO: TAKATA AIR BAG INFLATOR TESTING](#)

From: [Karina Saenz](#)
To: [Zz - Resource - GCO Rules](#)
Subject: 43 Texas Administrative Code, Chapter 217
Date: Thursday, January 1, 2026 10:57:48 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Good morning,

Thank you for accepting comments from Car Dealer Owners.

We have been in business since April of 2019 and although business started rough due to COVID-19 this new rule implementation listed above has made it even harder than before. Our sales have drastically dropped in just these last weeks and current customers are panicking because they feel they will not be able to renew a vehicle they currently have a financing agreement contract with us.

Please help all of us come to a different agreement where the new rules do not hurt any more of our business and customers can still stay compliant.

Thank you for your time.

Respectfully,

Karina Saenz
Encore Motors



**Independent
Bankers
Association
of Texas**

Greg Wilson
IBAT Chairman
Lamar National Bank, Paris

Gabe Guerra
IBAT Chairman-Elect
Kleberg Bank, Corpus Christi

Jay Bearden
IBAT Secretary-Treasurer
Legend Bank, Bowie

Tracy Harris
IBAT Immediate Past Chairman
Texas Regional Bank, Harlingen

Bradley H. Tidwell
Chairman
IBAT PAC Committee
VeraBank, Henderson

Sarah Long
Chairman
IBAT Leadership Division
First National Bank of Ballinger

Kevin W. Monk
Chairman
IBAT Education Foundation
Integrity Bank, SSB, Houston

Christopher L. Williston VI, CAE
President and CEO
IBAT, Austin

January 5, 2026

Office of General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, Texas 78731

Via Email: rules@txdmv.gov

Re: PROPOSAL OF REVISIONS TO SUBCHAPTER B. MOTOR VEHICLE
REGISTRATION 43 TAC: §§217.22, 217.26, 217.28, AND 217.29

Dear Counsel,

The following comments are submitted on behalf of the Independent Bankers Association of Texas ("IBAT"), the largest state-based community banking trade association representing Texas community banks, on the notice of proposed revisions to Subchapter B, Motor Vehicle Registration.

The Texas Department of Motor Vehicles (department) proposes amendments to 43 Texas Administrative Code (TAC) Subchapter B, Motor Vehicle Registration, §§217.22, 217.26, 217.28, and 217.29 to limit the types of personal identification documents that an applicant can use to register a vehicle in Texas under Transportation Code, §502.040, which requires that the owner of a vehicle apply for registration in Texas and that the applicant for registration is a resident of Texas. These proposed amendments are necessary to ensure that the applicant's personal identification document is valid and that the applicant is legally eligible to reside in Texas.

Community banks have been encouraged by regulators to serve the borrowing needs of non-resident aliens for decades. And while the proposed rule is not specific to banks in particular, in nonetheless will result in increased credit risk to lenders potentially penalizing community banks that did work to serve diverse communities in the following ways:

- Borrowers fail to register vehicles out of fear they will not be able to provide the necessary personal identification documents. That could make locating and repossessing collateral more difficult, leading to increased costs on the bank in the event of default.

- Borrowers could try and transfer the vehicle that has a valid lien to another individual – perhaps a family member that does have the personal identification documents – resulting in confusion, sales tax issues and potential title scams.
- Borrowers simply abandoned the vehicle when they cannot provide the necessary personal identification documents. This results in credit losses by banks that inevitably must recover those costs from other borrowers.

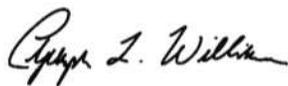
This proposal represents a significant change that will have a chilling effect on banks willing to serve the non-resident aliens. Previously, a borrower did not have to produce identification documents to register a vehicle or obtain insurance on said vehicle. Banks relied upon the Customer Identification Program (“CIP”) requirements outlined in 12 CFR Chapters I through III and VII, and 31 CFR Chapter X for identifying customers.

A bank’s CIP must contain procedures detailing the identifying information to obtain from each customer. At a minimum, a bank must obtain the following identifying information from each customer before opening the account: Name, Date of birth for an individual, Address, and Identification number which consist of (i) for a U.S. person, a taxpayer identification number; or (ii) for a non-U.S. person, one or more of the following: A taxpayer identification number; passport number and country of issuance; alien identification card number; or number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.

While Texas community banks are sympathetic with the goal, this proposal, if adopted, would create inconsistencies between a bank’s CIP requirements and the requirements necessary to register a vehicle. That, coupled with the fact that it will penalize banks that served the non-resident alien community at the behest of regulators.

Thank you in advance for your time and thoughtful consideration of IBAT’s concerns.

Very truly yours,



Christopher L. Williston IV
President & CEO
Independent Bankers Association of Texas

From: [Kevin Lawson](#)
To: [Zz - Resource - GCO Rules](#)
Subject: New ID Requirements for Vehicle Registration
Date: Monday, January 5, 2026 3:51:06 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Texas DMV Rules,

I am the General Manager and part-owner of an auto finance company based in Dallas, Texas. We have proudly operated in this state for nearly fourteen years, employ approximately twenty people, and have never laid off an employee. We deeply value doing business in Texas and supporting our local economy.

Unfortunately, the newly implemented ID requirements for vehicle registration place our company and many others in the auto industry in a very difficult position. Based on our customer base and transaction history, this rule will immediately reduce our revenue by an estimated 20%, which will likely force us to lay off employees. That outcome benefits no one.

I support thoughtful improvements to immigration policy. However, these new ID requirements for vehicle registration are extreme, unnecessary, and misguided. Requiring dealerships and finance companies to verify a non-U.S. passport holder's Department of Homeland Security admission stamp, permanent resident card, or unexpired immigration visa is far outside the scope of our responsibility. We are not immigration officers, and this is not an appropriate function for private businesses to perform. This policy places businesses in an impossible position and exposes us to significant operational and legal risk.

The financial impact of this policy will be severe. For many auto lenders and dealerships, this rule will eliminate roughly one-fifth of their business overnight, leading to lost jobs, reduced tax revenue, and economic disruption across Texas. Most ITIN customers are hardworking, dependable individuals who consistently meet their financial obligations and contribute meaningfully to their communities. In our own portfolio, ITIN customers actually produce lower loss ratios than U.S. citizens. They are stable, responsible borrowers.

I urge you not to allow the well-publicized TriColor case to distort this discussion. That company failed due to internal management fraud not because ITIN customers are unreliable or unsafe borrowers.

Beyond the auto industry, this decision will directly affect Texas's housing, construction, agriculture, and service sectors. If working families are prevented from purchasing reliable

transportation, they cannot get to work. That shortage of labor will increase costs, slow production, and worsen affordability, an issue Texans are already struggling with. This policy moves the state in the wrong direction economically.

For these reasons, I respectfully but firmly request that this rule be reversed immediately. If it remains in place, the consequences will include lost jobs, reduced tax revenue, higher prices, and greater strain on Texas businesses and families.

Texas thrives when its policies encourage growth, responsibility, and opportunity. This rule does the opposite.

Sincerely,

Kevin Lawson

General Manager

First Texas Auto Credit

Office: (469) 637-0101

Cell: (940) 231-5747

The proposed amendments to *SUBCHAPTER B. MOTOR VEHICLE REGISTRATION*

43 TAC §§217.22, 217.26, 217.28, AND 217.29 require Motor Vehicle Dealers and their representatives to go beyond verifying the buyers' identity (via a picture identification card issued by a state, federal, national, or consular agency) and beyond verifying Texas residency (via utility bill, lease /mortgage or Property Tax bill) and tasks them with the responsibility of verifying the customer's legal eligibility to reside in the state of Texas based solely upon visual observation & evaluation of documents presented by the buyer at the time of sale/purchase.

In addition, **the Dealer assumes all risks, liabilities and costs associated with inaccurate determinations of the customer's legal eligibility to reside in Texas made by the dealership's representatives.**

These risks, liabilities and costs include, but are not limited to:

- Rejected Title/Registration Applications submitted via WebDealer**
- Dealer having to locate and retrieve vehicles from affected customers weeks after the sale date**
- Dealer having to refund purchase price and TTL collected from affected customers**
- Dealer having to Void Buyer's Plate Assignments for Rejected Applications**
- Dealer having to obtain Bonded Titles for Rejected Applications because the Evidence of Ownership (title) was stamped "Surrendered" at time of WebDealer submission**
- Dealer processing sales as "Out of State" transactions when customer actually was legally eligible to reside in Texas**
- Dealer's failure to collect/remit sales tax on sales processed as Out of State which were made to customers legally eligible to reside in Texas**
- Dealer's failure to Transfer Ownership in accordance with Texas Transportation Code Section 501.0234**
- Legal actions brought by affected customers**
- Enforcement actions brought by TxDMV**
- Legal actions brought by Texas State Comptroller's Office**

Verification of a person's legal eligibility to reside in Texas is outside the purview and expertise of a Motor Vehicle Dealer/ Representative.

As such, the proposed amendments to *SUBCHAPTER B. MOTOR VEHICLE REGISTRATION*

43 TAC §§217.22, 217.26, 217.28, AND 217.29 **should only be applicable to county Tax Assessor-Collectors processing vehicle registration renewals and private seller transfers/registrations.**

Title Transfer/ Registrations submitted by Dealers via WebDealer should be specifically exempted from the proposed amendments' requirements.

From: [Mary duque](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Comment on Proposed TxDMV Rule Change
Date: Wednesday, December 10, 2025 3:21:42 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Marisneidys Duque
Houston, Texas
TWT Transport LLC

12-10-2025

Texas Department of Motor Vehicles (TxDMV)

Subject: Public Comment on Proposed Regulation Regarding Identification Requirements for Vehicle Transactions

Dear Texas Department of Motor Vehicles,

My name is **Marisneidys Duque**. I reside in Houston, Texas, and I currently work as a **runner for TWT Transport LLC**, a company dedicated to title services and vehicle-related processes. Through this letter, I would like to formally express my deep concern and disagreement with the proposed regulation that would restrict the ability to complete TxDMV transactions using a **passport without a legal entry stamp** as a valid form of identification.

In my daily work, I assist a large number of Texas residents, particularly within the Latino community. I have witnessed the effort, dedication, and responsibility of individuals who, even with only their passport as identification, have consistently complied with TxDMV requirements and completed their transactions in an organized and honest manner. These procedures are essential for their mobility and for fulfilling their family and work-related responsibilities.

The approval of this proposal would severely affect hundreds of individuals who depend on the ability to register and transfer their vehicles in order to travel to their jobs and meet their daily obligations. Additionally, this regulation would impact many businesses—including title services like ours—that follow strict procedures and verify documents according to what is currently permitted under the law. Changing these rules would create unnecessary barriers and generate uncertainty for both customers and service providers.

For these reasons, I respectfully request that this proposal **not be approved**, as it would create significant obstacles for residents who need to complete their vehicle transactions and who have demonstrated, for many years, that they are hardworking individuals committed to keeping their responsibilities in order.

Thank you for taking the time to consider this public comment and for evaluating the practical and human implications that this regulation would bring.

Sincerely,

Marisneidys Duque

Houston, Texas

Runner – TWT Transport LLC



A dynamic association of innovative and resourceful professionals whose purpose is to educate, support, and advance the office of County Tax Assessor-Collectors of Texas
www.tacaoftexas.org

December 30, 2025

Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, TX 78731

Sent via email: rules@txdmv.gov

The Texas Department of Motor Vehicles recently published in the *Texas Register* proposed rules concerning changes to identification requirements for motor vehicle registration renewal, amending 43 TAC §217.22, §217.26, §217.28, and §217.29. The Tax Assessor/Collectors Association of Texas and its members are committed to abiding by any new approved law or rule, and also want to ensure the new requirements serve their intended purpose while minimizing the negative impact on the citizens of Texas and maintaining local efficiency in serving the motoring public. TACA of Texas submits the following comments outlining our members' concerns and possible solutions in response to the published rules, [50 TexReg 7868-7874](#).

The proposed rules would require all motor vehicle owners who renew registration by mail to provide a copy of their valid, unexpired identification, a check, and the registration renewal stub. This new requirement creates significant concerns for motor vehicle owners and the tax office. Those concerns include the following:

- Many users of the mail option to renew registration include military (especially out-of-state Texas military), the elderly and disabled, and rural residents, all of whom may not have access to a copy machine or the internet. Additionally, those who provide a copy of their ID are subjecting themselves to possible identity theft and financial fraud. The mailed renewals are in an easily identifiable envelope that will contain an ID and a check (bank account). This scenario makes all mailed renewals targets for mail theft that could lead to identity and financial fraud. According to [FedWeek.com](#), reports of mail theft have exploded over 300% in recent years, and robberies of letter carriers and the "arrow key" that unlocks mailboxes have surged more than 800%. Additionally, [FBI Alert I-012725-PSA issued January 27, 2025](#), acknowledges a significant increase in mail theft-related check fraud and strongly advises that you do not include personal data, such as a DL #, when placing a check in the mail. Texans are being forced to put their identity and finances at risk with this requirement.
- Increased Taxpayer Expense: An estimated 1 million renewals are mailed annually. The vast majority will be rejected because a copy of an ID was not included. The Tax Office must return the renewal notice and check with a letter explaining why. Counties will incur additional expenses (postage, envelopes, printing letters, and labor) to return those registration renewals to the motor vehicle owner. Because the county's reimbursement for processing a registration renewal (\$2.30, last adjusted around 2016) is well below the actual cost due to labor inflation and postage increases over

the past decade, the additional expenses incurred by this requirement mean counties are significantly undercompensated for each renewal we process.

- **Inefficiency:** Currently, many large population counties utilize an RPS machine (Rapid Processing System) to process mail renewals automatically in large batches by scanning the check and renewal notice stub. Because entering the ID type and expiration of an ID must be manually inputted for each registration, the RPS process will no longer work, requiring us to process each of those renewals manually. We can expect a significant increase in employee time spent processing large volumes of mailed-in renewals.

The remaining options to renew registration include in-person at a tax office and online. These two remaining options also present barriers for Texans who have valid, unexpired identification.

- **Online:** The online option created by DIR, named [Texas-x-Texas](#) or TxT, is cumbersome at best. You can't simply enter your plate number, the last 4 digits of the VIN, and payment information, as in the prior online renewal system. An individual must include personal identity data, including email, birthdate, social security, and driver's license numbers, to set up a profile. Fewer people will utilize the online renewal process, which means more mail (that will be rejected) and more people in our lobby. Because an individual's identity must be used to create an online profile, hundreds of thousands of vehicles owned by businesses and government entities will no longer be able to renew registration online. This will then add to rejected mail-ins and in-person renewals, inflating the expenses and inefficiencies described in previous bullets. Additionally, a person can add any vehicle to their profile, meaning people with a valid, unexpired ID can renew registration for an owner who does not have a valid ID.
- **In-person:** The in-person option at the tax office will have minimal impact on motor vehicle owners who have a valid, unexpired ID. Driving to a tax office may create an inconvenience; however, for Texans who have valid but expired IDs, it will cause them to forgo renewing registration at that time, meaning they may lose use of their vehicle or be forced to drive illegally with expired registration until they can return to our office with a renewed, unexpired ID. This scenario increases the wait times and service times in tax offices and decreases the level of service we provide Texans.

For those current motor vehicle owners who don't have a valid, unexpired ID, who can't or won't put a copy of their ID in the mail with their check for renewal, or are unable or unwilling to create a TxT account, many fraudulent alternatives will be available that ultimately would increase criminal activity throughout the state. The number of ways to circumvent this new requirement will be numerous and easy, given the precedents that have been set by other types of fraud around motor vehicle requirements.

- **Counterfeit registration stickers:** Bad actors have offered fraudulent alternatives to help keep motor vehicle owners on the road for decades. On the very same day that news media reported the new identification requirements, these [bad actors posted on social media](#), offering to renew the registration for owners who would not meet the ID requirements. "Renewing registration" often means providing a fake registration sticker to a motor vehicle owner (often unknown to the owner that the tag is fake) who pays far more than the actual cost of registration.

- Counterfeit identification: Our staff are not trained and have no expertise in identifying fraudulent identifications. Fake ID usage will increase significantly, and the black market activity for these types of IDs will flourish, similar to that for fake registration stickers.
- REAL ID requirements: The REAL ID Act of 2005 was enacted to provide additional identification security for domestic air travel and entrance to federal facilities, not as a requirement for the operation of a motor vehicle. When law enforcement conducts a traffic stop, the operator of the motor vehicle is only required to present a valid, unexpired driver's license, not a REAL ID-compliant identification.

Given the precedent for fraudulent activity and the anticipation of increased fraud to circumvent the requirements for registration renewal, the State of Texas could face a loss of revenue from sales tax and registration renewal fees.

- Registration revenue: As noted in the previous section, bad actors will find ways to fill the void left by motorists who are unwilling or unable to abide by the proposed rules to renew registration. The State will lose revenue from motorists who previously renewed their registration legally through the tax office, online, and by mail. A study by TxDOT prior to 2009 found that the State was losing as much as \$70 million a year in fees due to Texas residents registering vehicles in bordering states of New Mexico, Oklahoma, and Louisiana.
- Sales tax revenue: The chilling effect noted above will increase an already known issue, whereby vehicle owners will have an additional incentive to title and register their motor vehicles in bordering states that have less strict requirements and more favorable tax implications.
- Legal consequences: The requirements of the proposed rules will have a chilling effect on the purchase of new and used vehicles in Texas. This will lead people to use straw man buyers (much like illegal gun sales), hiding the true ownership of motor vehicles, which causes many other concerns for law enforcement and the court system.

The Tax Assessor-Collectors Association supports amending the current proposed rules before approval to eliminate or alleviate many of the concerns outlined in this document while maintaining the intent of the rules.

- Amending the current proposed rules to reflect that a valid, unexpired identification is required to be presented by the applicant of motor vehicle title transfer upon the submission of an application for ownership would achieve this outcome. This solution will allow confirmation of valid, unexpired identification, either by dealership or tax office staff, at the time a vehicle is purchased. Additionally, a motor vehicle owner could request a "title only" transaction and avoid the current proposed rule requirement, which is currently applicable only for registration. This solution will ensure that a valid, unexpired identification is presented any time a person applies for ownership of a motor vehicle.
- If verifying valid, unexpired identification for purposes of renewing registration remains a requirement, we feel this should be a back-end verification process based on the current ownership of the vehicle that is performed silently within the Registration and Titling System, in the same way that insurance and inspections are verified by RTS today at the time of registration renewal. If this

technology can't be incorporated into the current RTS system, we ask that DMV ensure it is part of the RTS Modernization effort.

As previously stated, the Tax Assessor/Collectors Association of Texas and its members are committed to abiding by any new approved law or rule and also want to ensure the new requirements serve their intended purpose while minimizing the negative impact on the citizens of Texas and maintaining local efficiency in serving the motoring public. As locally elected officials, we have an obligation to the citizens in our county to manage effective and timely operations when conducting business on behalf of the County and State of Texas. The Tax Assessor-Collectors Association of Texas and our members appreciate the opportunity to provide our comments on the proposed rule amendments as published in the December 5, 2025, *Texas Register*.

Sincerely,

A handwritten signature in blue ink, appearing to read "Larry Gaddes".

Larry Gaddes

Williamson County Tax Assessor-Collector

President-Elect, Tax Assessor/Collectors Association of Texas

From: [Lonnie Newbury](#)
To: [Zz - Resource - GCO General](#)
Subject: Fwd: Urgent Concerns Regarding Recent TxDMV Vehicle Registration Changes and Their Economic Impact on Texas Businesses and Residents
Date: Monday, December 8, 2025 4:46:35 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

My name is Lonnie Newbury, and I am the Pre-Owned Manager of Peters Chevrolet in Longview, Texas. As a local auto dealer serving our community for 22 years, I have always appreciated your commitment to public safety and fraud prevention. However, I am writing to express my deep concerns about the new Texas Department of Motor Vehicles (TxDMV) policy requiring stricter photo ID verification for vehicle registrations, which took effect on November 18, 2025. While I understand the intent behind this change, it is having severe unintended consequences on my business and the broader Texas economy. In our dealership, approximately 30% of our customer base is from the Hispanic community, many of whom are essential workers in industries like construction, agriculture, and services. Prior to this policy, these individuals could register vehicles using an unexpired foreign passport alone. Now, without a DHS stamp or equivalent federal documentation, they are unable to complete registrations, leading to deals falling through at the point of sale. This has resulted in a sharp decline in sales—we've already seen a 25-30% drop in transactions since the rollout, forcing us to reconsider inventory purchases. If this continues, it could jeopardize our operations and lead to layoffs in an already challenging market. The ripple effects extend far beyond individual businesses like ours. Texas relies on a mobile workforce to drive our \$2 trillion economy, and many affected residents are long-term contributors who pay taxes, support local schools through property taxes, and fuel consumer spending. Without the ability to legally register and insure vehicles, we're likely to see :An increase in uninsured drivers on our roads, raising insurance premiums for all Texans and heightening accident risks.

Reduced productivity as workers struggle with transportation, impacting sectors critical to our state like energy, manufacturing, and logistics.

Broader economic losses, including decreased sales tax revenue from vehicle purchases and related services, potentially costing the state millions annually.

Strain on families and communities, exacerbating inequality in a state where public transit options are limited.

I believe there is a balanced path forward that upholds your goals of

security and compliance while allowing these hardworking individuals to continue contributing. One viable solution could be the introduction of a limited-purpose driver's license program in Texas, similar to California's AB60 or programs in 13 other states (including New Mexico and Colorado). This would enable undocumented residents to obtain a state-issued ID with proof of residency and identity (e.g., foreign passport plus utility bills), without conferring federal benefits or voting rights. Such a program could include: Strict background checks and biometrics to prevent fraud.

A distinct marking (e.g., "Driving Privilege Only") to differentiate it from standard licenses.

Integration with TxDMV systems for seamless vehicle registrations, ensuring all drivers are insured and accountable.

This approach has proven successful elsewhere: In California, AB60 has reduced uninsured drivers by 10-15% and boosted economic activity without compromising security. Implementing something similar in Texas could generate additional revenue through application fees while keeping our roads safer and our economy stronger. I respectfully urge you to consider sponsoring or supporting legislation for such a program in the upcoming session. I would welcome the opportunity to discuss this further. Please feel free to contact me. Thank you for your leadership and for taking the time to address this pressing issue. I look forward to your response.

Sincerely,

Lonnie Newbury

Pre-Owned Manager

Peters Chevrolet

4818 US 259 N

Longview, TX 75605

903-571-1800 - cell

552.137

- Personal

552.137

- Work



[Follow Me on LinkedIn](#)

From: [MARCELA SALINAS](#)
To: [Zz - Resource - GCO Rules](#)
Subject: New Rule Comment
Date: Monday, January 5, 2026 4:58:29 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I strongly disagree with this proposed law. Requiring valid identification for vehicle registration and restricting vehicle sales to individuals without legal status could unfairly impact vulnerable populations, including undocumented immigrants who contribute to the economy and communities. It may also lead to unintended consequences, such as increased uninsured driving and difficulties for law-abiding citizens who lack necessary documentation. Let's focus on finding solutions that promote public safety and inclusivity, and explore alternative solutions that balance security concerns with accessibility and fairness.

As a car dealer in Texas, this law will significantly impact our business. We'll need to implement new procedures to verify customers' identities and ensure compliance with the webDealer system. However, restricting sales to individuals without legal status may limit our customer base and harm our business. We're concerned about the potential consequences, including increased administrative burdens and lost sales opportunities. We urge lawmakers to consider the impact on businesses like ours and work towards solutions that balance public safety with economic realities.

*Thank you,
Marcela Salinas
Alaniz Auto Ranch
1144 E. Irving Blvd.
Irving Texas, 75060*



Phone: 972-554-7100

Fax: 972-554-7133

From: [Marcia Torkelson](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Chapter 217 code 502.040
Date: Tuesday, December 30, 2025 9:31:32 AM
Attachments: [Outlook-4pvwkmrv.png](#)

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I understand what you are trying to accomplish with this new proposal however as always there are issues you might not have considered . We sell preowned park models which are titled through the DMV. You cannot drive these down the highway(they have to be towed) and they have no odometer. Canadians coming down to Winter in Texas is a large part of our business. The new law as written will prevent us from selling and titling these homes to Canadians who are only here for 3-5 months out of the year. Not all clients are in Texas when they purchase these small homes, so the stamp will not work either(I understand you are no longer accepting that anyways)We are not a "dealer" but a third party that titles these as part of our "closing" using a power of attorney. We currently include a copy of their passport , but I understand this is no longer acceptable. The "Winter Texans" contribute millions of dollars to the economy every year. I currently have 2 titles that need to be transferred because we were not aware of this new proposal ,only finding out about this when the DMV rejected them. Please reconsider the effects this will have on our business as well as the economy . I understand that you are scheduling hearings regarding this and I would like to be informed when the dates are set.

Sincerely,

Marcia Torkelson
956-782-3587



From: [Maria R. Garza](#)
To: [Zz - Resource - GCO Rules](#)
Subject: PUBLIC COMMENT: Chapter 217, Vehicle Titles and Registration Amendments: §§217.22, 217.26, 217.28, 217.29
– Economic and Community Impact of Proposed Rule
Date: Monday, December 8, 2025 3:07:43 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Dear TxDMV,

I am submitting this comment to you in response to the proposed amendments regarding the use of foreign passports without legal entry stamps for vehicle registration. The department has requested information on the costs, benefits, or effects of these amendments.

Below is a summary of the anticipated impacts:

1. Economic Costs

- **Sales Tax Revenue Loss:** Texas auto sales in 2024 totaled **\$68.47 billion**, with **1.52 million new cars sold**. At a 6.25% sales tax rate, this sector generates billions annually. If even 40% of the 1.58 million undocumented adults in Texas are excluded from registering vehicles, the state could lose **~\$1.8 billion annually in sales tax revenue**.
- **Dealer and Lender Losses:** Michigan's auto industry collapse during the Great Recession required a **\$60 billion federal bailout**. While it saved nearly **1 million jobs**, taxpayers ultimately absorbed **\$11–12 billion in losses**. Texas risks similar instability if registrations block buyers from completing payments.

2. Insurance Market Effects

- **Claim Denials:** Insurance companies often deny claims if the vehicle is not registered to the insured.
- **Premium Increases:** Roughly **1 in 8 Texas drivers is already uninsured**. Blocking registrations will increase this number. Adding 632,000 unregistered drivers could raise the uninsured pool by ~24%. The Insurance Research Council found uninsured drivers rose from 11% to 14% nationally between 2019–2022, forcing insurers to raise premiums for all customers. Texans could face **\$1.5–3 billion in higher premiums each year**.

3. Public Safety and Liability

- **Seller Liability:** Even after filing transfer notices, sellers may face toll charges, tickets, or liability for accidents involving vehicles they no longer own.

Community Risk: Vehicles left unregistered often circulate without proper insurance or accountability.

4. Emotional and Community Health Impact

- Research on shelter-in-place during COVID found **greater loneliness and depression among older adults** and **disrupted family life, education, and work** among Mexican-origin farmworker families.
- Emotional health is a measurable cost: untreated isolation increases healthcare costs by ~\$1,600 per person annually. For 632,000 affected adults, that represents **~\$1 billion in added healthcare burdens**.

5. Purchasing Power & Household Spending

- If 632,000 families shelter in place, assume \$20,000 annual household spending is suppressed. That equals **~\$12.6 billion in lost consumer demand annually**.
- During COVID, Texas sales tax collections dropped nearly **9.3% in April 2020**, the steepest decline since 2010, showing how quickly restricted mobility collapses consumer spending.

6. State Comparisons

- **California (AB 60, 2015):** Reversed restrictions by issuing non-REAL ID licenses to undocumented residents. Result: **2.6 million licenses issued**, hundreds of thousands of new registrations, millions in fees and sales tax, safer roads, and lower insurance premiums.
- **New York (Green Light Law, 2019):** Allowed undocumented residents to obtain standard licenses. Result: **over 400,000 licenses issued in the first year**, generating millions in revenue, boosting registrations, and reducing uninsured drivers.
- **Arizona (restrictions):** Families unable to register vehicles in Arizona were forced to register in neighboring states. Result: Arizona lost sales tax, dealer revenue, insurance stability, and consumer spending — while other states gained. Texas risks the same: billions in lost income flowing to Oklahoma, New Mexico, and Louisiana.
- **New Mexico (restrictions, later reversed):** Saw spikes in uninsured drivers when access was blocked, then documented improvements when access was restored.

Conclusion

Blocking registrations doesn't just punish families; it costs Texans billions. Based on conservative estimates, this rule could create **over \$20 billion annually in lost sales tax, dealer defaults, higher insurance premiums, suppressed spending, and healthcare burdens**. Michigan's bailout shows how quickly auto market instability can cost taxpayers billions. California and New York proved that reversing restrictions generates revenue, lowers costs, and improves safety. Arizona proved that restrictions export revenue to other states. Texas should not repeat these costly errors.

Respectfully,

Maria R. Garza
City of Austin Resident

Reference Links

Texas Auto Sales & Sales Tax

- Alliance for Automotive Innovation – [Texas Auto Sales Data](#)
- Texas Comptroller – [Motor Vehicle Sales Tax Rate](#)

Michigan Bailout Precedent

- U.S. Treasury – [Auto Industry Financing Program \(AIFP\) Report](#)
- Fraser Institute – [Taxpayer Losses from GM Bailout](#)

Insurance Premiums & Uninsured Drivers

- Insurance Information Institute – [Uninsured Motorists Statistics](#)
- Insurance Research Council – [Uninsured Motorists Report](#)

Purchasing Power & COVID Precedent

- Texas Comptroller – [April 2020 Sales Tax Collections](#)
- Texas Tribune – [Texas Sales Tax Revenue Plummets During COVID](#)

Emotional & Community Health

- CDC – [Loneliness and Health Costs](#)
- NIH – [Loneliness in Older Adults During COVID](#)
- Journal of Agromedicine – [Mexican-Origin Farmworker Families During COVID](#)

California AB 60 (2015)

- California DMV – [AB 60 Driver License Program](#)
- Sacramento State Study – [Impact of AB 60 Licenses](#)

New York Green Light Law (2019)

- NY DMV – [Green Light Law Information](#)
- Green Light NY Coalition – [Fact Sheet](#)

Arizona Restrictions

- Arizona Republic – [Arizona Vehicle Registration Restrictions](#)
- Migration Policy Institute – [Immigrant Access to Driver's Licenses](#)

New Mexico Reversal

New Mexico Legislative Finance Committee – [Driver's License Access Report](#)

--

--- Live a **2 Corinthians 5:17** life, honoring the Father through a **Galatians 5:22-23** Spirit and

James 4:8 will change your life forever, don't try unless you mean it, I mean it! ---

How's your God treating you?



Virus-free www.avast.com



HONORABLE PATRICIA A. BARRERA, RTA

TAX ASSESSOR-COLLECTOR

www.webbcountytx.gov

Good afternoon, Webb County Dealers,

This letter is to inform you that on **November 18, 2025**, all car dealers received a notice from the Texas DMV regarding new regulations on identification requirements for vehicle registrations.

The **Webb County Tax Assessor's Office** is concerned about these changes and how they may affect our community. We have submitted a formal letter to Senator Zaffirini expressing our concerns. Attached, please find a copy of my letter together with the new ID requirements for registering a vehicle or obtaining a new registration in Texas.

If you have any disagreements or concerns regarding these changes, we encourage you to submit your comments in writing. You may do so by email at rules@txdmv.gov or by mail to:

Office of General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, TX 78731

Thank you for your attention to this matter.



Honorable, Patricia A. Barrera

Webb County Tax Assessor Collector



Subject: Chapter 217, Vehicle Titles and Registration
Amendments: §§217.22, 217.26, 217.28, and 217.29
(Relating to Personal Identification Requirements for Vehicle Registration under Texas
Transportation Code, §502.040)

RECOMMENDATION

ACTION ITEM. Approval to publish the proposed amendments in the *Texas Register* for public comment.

PURPOSE AND EXECUTIVE SUMMARY

The proposed amendments are necessary to ensure that an applicant for vehicle registration under Transportation Code §217.040 provides personal identification documents that are valid and that prove the applicant is legally eligible to reside in Texas.

FINANCIAL IMPACT

There will be no significant fiscal implications related to the proposed amendments and new section.

BACKGROUND AND DISCUSSION

Transportation Code, §502.040 requires Texas residents to register their motor vehicles. The proposed amendments would restrict the types of personal identification documents that the department will accept from a vehicle owner applying for vehicle registration as a Texas resident under Transportation Code §502.040. The acceptable forms of personal identification under the proposed amendments are limited to:

- A valid, unexpired driver's license or state identification certificate;
- A valid, unexpired Texas license to carry a handgun;
- A valid, unexpired United States passport or passport card; or
- A valid, unexpired passport issued by a foreign country, with a stamp or mark on the passport showing lawful admission to the United States, a permanent resident card, or an unexpired immigrant visa from the United States Department of Homeland Security.

These amendments are necessary to prevent fraud and to prevent applicants who are not legally eligible to reside in Texas from registering vehicles to drive on Texas roads.

REQUEST FOR PUBLIC COMMENT.

If you want to comment on the proposal, submit your written comments by 5:00 p.m. CST on January 5, 2026. The department requests information related to the cost, benefit, or effect of the proposed amendments, including any applicable data, research, or analysis, from any person required to comply with the proposed rule or any other interested person. A request for a public hearing must be sent separately from your written comments. Send written comments or hearing requests by email to rules@txdmv.gov or by mail to Office of General Counsel, Texas Department of Motor Vehicles, 4000 Jackson Avenue, Austin, Texas 78731. If a hearing is held, the department will consider written comments and public testimony presented at the hearing.



Texas Department of Motor Vehicles

HELPING TEXANS GO. HELPING TEXAS GROW.

Asunto: Capítulo 217, Registro y Títulos de Vehículos
Enmiendas: §§217.22, 217.26, 217.28, y 217.29
(Relacionado con los Requerimientos de Identificación Personal para el Registro de Vehículos bajo el Código de Transportación de Texas, §502.040)

RECOMENDACIÓN

ASUNTO PARA ACCIÓN. La aprobación para publicar las enmiendas propuestas para comentario público en el *Texas Register*.

PROPÓSITO Y RESUMEN EJECUTIVO

Las enmiendas propuestas son necesarias para asegurar que el solicitante de registro de vehículo bajo el Código de Transportación §217.040 provee documentos de identificación personal que son válidos y que comprueban que el solicitante es legalmente elegible para radicar en Texas.

IMPACTO FINANCIERO

No habrá ninguna implicación fiscal significativa relacionada con las enmiendas propuestas y la nueva sección.

ANTECEDENTES Y DISCUSIÓN

El Código de Transportación, §502.040 requiere que los residentes de Texas registren sus vehículos motorizados. Las enmiendas propuestas restringirán el tipo de documentos de identificación personal que el departamento acepte del dueño de un vehículo que solicita el registro de su vehículo como residente del estado de Texas bajo el Código de Transportación §502.040. Las formas aceptables de identificación personal bajo las enmiendas propuestas se limitan a:

- Una licencia válida y no expirada o un certificado estatal de identificación;
- Una licencia válida y no expirada para portar un arma;
- Un pasaporte válido y no expirado o una tarjeta de pasaporte;
- Un pasaporte válido y no expirado expedido por un país extranjero, con un sello o marca en el pasaporte que demuestre admisión legal a los Estados Unidos, una tarjeta de residente permanente, o una visa no expirada de inmigrante expedida por el Departamento de Seguridad Nacional de los Estados Unidos.

Estas enmiendas son necesarias para prevenir fraude y para prevenir que los solicitantes que no son legalmente elegibles para radicar en el estado de Texas que registren vehículos para manejar en las carreteras de Texas.

SOLICITUD PARA COMENTARIO PÚBLICO

Si Ud. quisiera opinar acerca de esta propuesta, envíe sus comentarios por escrito a más tardar el 5 de enero de 2026 antes de las 5:00 p.m. Tiempo del Centro. El Departamento pide información relacionada con el costo, los beneficios, o el efecto de la regla propuesta, incluyendo los datos, la investigación o el análisis de cualquier persona que esté requerida de acatar la regla propuesta o cualquier otra persona interesada. La petición para una audiencia pública tiene que ser enviada por separado de sus comentarios por escrito. Mande sus comentarios por escrito o sus peticiones para audiencias por correo electrónico a: rules@txdmv.gov o por correo a Office of General Counsel, Texas Department of Motor Vehicles, 4000 Jackson Avenue, Austin, Texas 78731. Si se lleva a cabo la audiencia, el departamento considerará los comentarios por escrito y el testimonio público presentado en la audiencia.



HONORABLE PATRICIA A. BARRERA, RTA

WEBB COUNTY TAX ASSESSOR-COLLECTOR

www.webbcountvtx.gov

December 4, 2025

Hand-Delivery and emailed

Morgan.Kaffie@senate.texas.gov

Hon. Dean Senator Judith Zaffirini

1417 Washington St.

Laredo, Texas 78040

Re: Changes to the ID Requirements for Motor Vehicle Transactions

Dear Dean Senator Zaffirini,

On November 18, 2025, while attending the Texas Association of Tax Assessors-Collectors Conference, I and members of my staff were informed by Ms. Annette Quintero, Director of Title and Registration, Texas Department of Motor Vehicles, that the Department had implemented new identification requirements for vehicle registration and renewal, effective immediately. I expressed, to her and the group, that imposing such a significant policy change without prior notice to the public would severely and adversely affect residents who purchased vehicles and obtained titles under previous regulations, and who would now be abruptly denied a title and/or a renewal sticker. Based on the presentation Ms. Quintero made at the conference, I understood that these changes had been mandated by the Legislature.

The effect of these changes functionally prevents Tax Assessor-Collector's from processing title transfers and/or issuing registration renewals for individuals who cannot prove legal residence in the State of Texas.

Re: Changes to ID requirements for DMV

Page 2

After researching the matter, it appears that the changes are not the result any legislative or Texas Administrative Code mandate but stem from concerns raised by Representative Brian Harrison of Ellis County as reflected in his letter to Governor Abbott (attached). Representative Harrison subsequently claimed victory in a public post stating that he “Stopped the DMV from giving vehicle registration to illegal aliens!” A copy of that post is also attached.

On November 18, 2025, the Texas DMV issued two directives on these revised rules which were emailed to all Texas Tax Assessor-Collectors on November 20, 2025. A third directive was issued on November 26, 2025, introducing additional changes. Copies of all directives are attached.

Our General Counsel reviewed the applicable rulemaking procedures and found that, on November 19, 2025, the Texas Department of Motor Vehicles submitted a *Proposal of Revisions to Motor Vehicle Registration* to the Legislature. According to this proposal, public comments are due January 5, 2026 (see copy attached).

Notably, page 4 of the proposal states that the changes “[have] no taking impact” and “do not restrict or limit an owner’s right to property.” This is incorrect. These changes do, in fact, restrict or limit the ability of owners to secure proper title and registration for their vehicles.

Under the proposed rule, an individual who is **not** a “legal resident” of Texas-but who nonetheless **currently owns a Texas-titled and registered motor vehicle-**would become **ineligible to renew that vehicle’s registration.** Registration is legally required for a vehicle to be operated on public roadways. By prohibiting renewal, the rule would render the vehicle **undriveable and essentially useless** for its intended purpose. This regulatory action significantly impairs the owner’s use and enjoyment of their property, thereby effecting a clear and measurable **“taking** “ of the individual’s property interest.

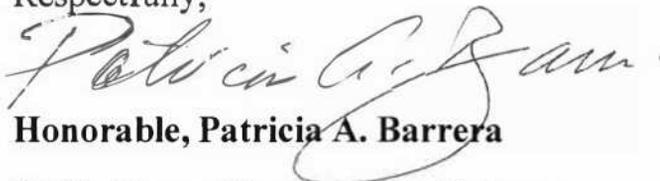
The proposal is scheduled to be published on December 5, 2025. A copy of the publication notice is attached.

Our office remits to the Texas Comptroller's Office an average of **\$38 million** in motor vehicles sales taxes annually collected for the State of Texas and Webb County retains 5%. This office also collects **\$67 million** annually for the Texas Department of Motor Vehicles and Webb County retains less than 10%. A preliminary survey of Webb County car dealers indicates that **40%-60% of vehicle purchasers will not meet the new identification requirements**, posing significant economic consequences for our county and for the State of Texas.

Given the magnitude of these impacts and the procedural concerns surrounding the implementation of this policy, we respectfully request your guidance and assistance in clarifying this matter.

Thank you for your attention to this urgent matter.

Respectfully,



Honorable, Patricia A. Barrera

Webb County Tax Assessor-Collector

LETTER FROM REP. BRIAN HARRISON
TO THE GOVERNOR DATED NOV. 17,
2025



TEXAS HOUSE OF REPRESENTATIVES
BRIAN HARRISON

11/17/2025

[Delivered via electronic mail]

Governor Abbott:

Texas should be leading the fight against illegal immigration; not incentivizing it.

The Texas Department of Motor Vehicles (DMV) recently confirmed that they are and have been issuing vehicle registrations to illegal aliens, saying to me in writing, "immigration policy is not within the department's core functions historically."

This is unacceptable. DMV's policy of allowing illegals to register vehicles not only incentivizes illegal immigration but also endangers Texas drivers and causes vehicle insurance to skyrocket.

While I appreciate DMV telling me they are attempting to determine the "full understanding of options available to address the issues," this requires IMMEDIATE action.

According to Texas Transportation Code section 502.040(b), DMV has been given broad authority by the legislature to determine what personal identification must be presented in order to register a vehicle, and you appoint the membership of the DMV Board.

Therefore, please consider this letter my formal request that you direct your appointees to immediately issue any and all rules necessary to ensure that illegal aliens are no longer allowed to register vehicles in the state of Texas.

Thank you for your attention to this urgent matter.

For Liberty,

A handwritten signature in black ink, appearing to read "B. Harrison", with a long horizontal flourish extending to the right.

Brian Harrison

cc: Mr. Charles Bacarisse, Chair, Texas DMV Board

Attachments:

- My letter to DMV dated 3Nov25
- DMV's email response to my 3Nov25 letter

POST FROM BRIAN HARRISON
TAKING CREDIT FOR MORE WINS
THAN THE GOVERNOR, LT.
GOVERNOR AND TEXAS HOUSE AND
TEXAS SENATE COMBINED

 **Brian Hanson**
WINNING! The Liberty Bots have delivered more victories this year than the Governor, Lt Governor, Texas House, Texas Senate... **COMBINED!**

Just in the past few months:

- Forced out the leftist Texas A&M President!
- Stopped the DMV from giving vehicles registration to illegal aliens!
- and TODAY... Ended the biggest DEI program in Texas!

Texans are taking back their government!!

THANK YOU!!

**EMAIL COVER SHEET RECEIVED ON
NOV. 20, 2025**

From: Ramirez, Lorena <Lorena.Ramirez@txdmv.gov>
Sent: Thursday, November 20, 2025 9:18 AM
To: Julio Hernandez; Susana R. Castillo; L. Laura Gonzalez; Edelmiro Garcia; Santos Castilleja; Mary Alvarado; esparza, hermelinda; Kristi Torres; Melissa Muniz; Nadine Garcia; Norma Hinojosa; anitaj@zapatacountytx.org; deliam@zapatacounty.tx.org; Adriana M. Martinez; Maria E. Morales; Teresa Silvas; Linda DeLeon Anderson
Subject: Revised Initial Registration and Renewal Identification Requirements
Attachments: Initial Registration and Renewal Identification Requirements.pdf; Initial Registration and Renewal Identification Requirements Dealers.pdf

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning, All

This email serves to confirm that we have all received the two govDeliveries sent yesterday concerning identification requirements for all customers. As we work through this new update, I anticipate that questions will arise, and I encourage everyone to submit them as we seek to find answers. These changes take effect immediately for all customers applying for initial registration or renewals. Should you have any additional questions, please do not hesitate to reach out. Note, we encourage that any mail that you all have or might be receiving continues to be processed until further notice.

Thank you,

Lorena Ramirez II Program Specialist

Texas Department of Motor Vehicles

Vehicle Titles and Registration Divison-Pharr Regional Service Center

Email: Lorena.Ramirez@txdmv.gov **Phone:** 956-784-6700

IMPORTANT Attention Motor Vehicle Dealers, County Tax Offices, and Law Enforcement: New license plate, temporary registration, and webDEALER requirements take effect July 1, 2025. Stay informed about the latest operational changes and upcoming deadlines at www.TxDMV.gov/hb718.

**DIRECTIVE TO TAX OFFICE SHEET
RECEIVED ON NOV. 20, 2025**



Texas Department *of* Motor Vehicles

HELPING TEXANS GO. HELPING TEXAS GROW.

PURPOSE

The purpose of this bulletin is to clarify current identification requirements for initial registration and registration renewal of a motor vehicle under Transportation Code, Chapter 502.

DETAILS

Effective immediately, an applicant for initial registration or renewal must present certain photo identification.

The initial registrations and renewals of special registrations listed below require one of the following identification documents:

(1) driver's license or state identification certificate issued by a state or territory of the United States; (2) United States or foreign passport; (3) United States military identification card; (4) North Atlantic Treaty Organization identification or identification issued under a Status of Forces Agreement; (5) United States Department of Homeland Security, United States Citizenship and Immigration Services, or United States Department of State identification document; or (6) a valid, unexpired license to carry a handgun issued by the Texas Department of Public Safety under Government Code, Chapter 411, Subchapter H.

1. Military service members serving out of state and domiciled in Texas
2. International Registration Plan
3. Non-resident Agricultural Permit
4. Annual Permits
5. 72 and 144 Hour Permits
6. Temporary Registration (One Trip or 30-Day)

For all other initial registrations and renewals, an applicant must provide one of the following identification documents:

- (1) driver's license or state identification certificate issued by a state or territory of the

United States; (2) United States or foreign passport; or (3) a valid, unexpired license to carry a handgun issued by the Texas Department of Public Safety under Government Code, Chapter 411, Subchapter H.

For purposes of this RTB:

- A "United States or foreign passport" is (A) an unexpired passport or passport card issued by the United States government; or (B) an unexpired passport issued by the government of another country with: (i) a stamp or mark affixed by the United States Department of Homeland Security onto the passport to evidence and authorize lawful admission into the United States; and (ii) a current permanent resident card or unexpired immigrant visa issued by the United States Department of Homeland Security; and
- A "driver's license or state identification certificate issued by a state or territory of the United States" is a valid, unexpired driver's license or state identification certificate issued by a state or territory of the United States that complies with the minimum document requirements and issuance standards for federal recognition under the REAL ID Act of 2005, Public Law 109-13.

For renewal of registration, renewal applicants will have to verify their personal identity through one of the documents described above. This verification can be done either through the Texas-by-Texas interface, which can verify that an applicant has a valid Texas driver's license, or by presenting the identification documents in-person or by mail to the dealer or county tax assessor-collector.

COUNTY AND DEALER ACTION

Ensure all applicants' identifications meet the criteria stated above. Expired passports are not acceptable for motor vehicle registration.

CONTACT

If you have any questions, please contact your local Texas Department of Motor Vehicles Regional Service Center.

Texas Department of Motor Vehicles



STAY CONNECTED



SHARE

SUBSCRIBER SERVICES

[Preferences](#) | [Help](#)
[Contact Us](#)

This email was sent to trinie.delacruz@txdmv.gov using GovDelivery Communications Cloud on behalf of Texas Department of Motor Vehicles, 4000 Jackson Ave, Austin, TX 78751.



**DIRECTIVE TO DEALERS SHEET
RECEIVED ON NOV. 20, 2025**



Texas Department *of* Motor Vehicles

HELPING TEXANS GO. HELPING TEXAS GROW.

IMPORTANT NOTICE TO DEALERS

Updated Identification Requirements for Registration Transactions

The Texas Department of Motor Vehicles is issuing updated guidance on the forms of identification dealers must verify when processing **initial registrations**. These requirements are **effective immediately**.

What You Need to Know

When completing a vehicle sale, dealers are required to ensure that all buyers provide **valid, unexpired photo identification** prior to processing any initial registration or renewal.

Expired passports or IDs cannot be accepted.

Acceptable Identification Documents

Dealers must verify that applicants provide **one** of the following:

1. **Valid U.S. driver's license or state identification card** issued by a U.S. state or territory
2. **Valid U.S. or foreign passport**
3. **Valid, unexpired Texas License to Carry (LTC)**

4. **U.S. military identification card**
5. **NATO identification** or identification issued under a Status of Forces Agreement
6. **Identification issued by:**
 - U.S. Department of Homeland Security (DHS)
 - U.S. Citizenship and Immigration Services (USCIS)
 - U.S. Department of State

Clarifying Passport Requirements

U.S. Passport

- Must be unexpired (passport book or passport card acceptable)

Foreign Passport

Must be unexpired **and** include:

- A valid Department of Homeland Security admission stamp/mark, **and**
- A current permanent resident card **or** unexpired immigrant visa

Clarifying U.S. Driver License / State ID Requirements

- Must be **valid and unexpired**
- Must meet **REAL ID Act** standards – to include the star symbol in the top right corner

Dealer Requirements

Dealers must ensure:

- ✓ The ID presented is **valid and unexpired**
- ✓ The applicant provides **one** of the approved ID types listed above
- ✓ Foreign passport holders also present required Department of Homeland Security documentation
- ✓ No expired passports or expired IDs are accepted for any registration transaction

Texas Department of Motor Vehicles



STAY CONNECTED:



 SHARE

SUBSCRIBER SERVICES:

[Preferences](#) | [Help](#)
[Unsubscribe](#) | [Contact Us](#)

This email was sent to trinie.delacruz@txdmv.gov using GovDelivery Communications Cloud on behalf of: Texas Department of Motor Vehicles · 4000 Jackson Ave, Austin, TX 78731



**CORRECTION TO NEW RULES SENT
TO US ON NOV. 26, 2025**

From: Deodata Torres
Sent: Wednesday, November 26, 2025 8:05 AM
To: Adriana M. Martinez; Patricia Gomez; Patricia Cabriales; Samantha O. Villarreal; Sabrina Lopez; Maria E. Morales; Patricia Barrera
Subject: TxDMV: Clarification on Acceptable Identification – Foreign Passport & DHS Documentation
Importance: High



Texas Department of Motor Vehicles

HELPING TEXANS GO. HELPING TEXAS GROW.

Please review and distribute as appropriate.

This message provides clarification on previously distributed communications, related to acceptable identification for customers presenting a foreign passport. For purposes of vehicle registration by Texas residents under Transportation Code §502.040, a **foreign passport** is an unexpired passport issued by the government of another country, accompanied by a current permanent resident card or unexpired immigrant visa issued by the United States Department of Homeland Security (DHS).

Please ensure staff are aware that moving forward, a foreign passport is **only required to be accompanied by a Permanent Resident Card (Green Card) or an unexpired immigrant visa, and a DHS stamp/mark is no longer required.**

Additionally, this definition of "foreign passport" does not apply for the following registration categories, which only need a current photo identification without additional supporting documentation:

1. Military service members serving out of state and domiciled in Texas
2. International Registration Plan
3. Non-resident Agricultural Permit
4. Annual Permits
5. 72 and 144 Hour Permits
6. Temporary Registration (One Trip or 30-Day)

**COPY OF PROPOSAL TO AMEND THE
DMV VEHICLE TITLES AND
REGISTRATION SUBMITTED ON NOV.
19, 2025**

TITLE 43. TRANSPORTATION

Proposed Sections

Part 10. Texas Department of Motor Vehicles

Page 1 of 19

Chapter 217 – Vehicle Titles and Registration

1

2

PROPOSAL OF REVISIONS TO

3

SUBCHAPTER B. MOTOR VEHICLE REGISTRATION

4

43 TAC

5

§§217.22, 217.26, 217.28, AND 217.29

6

7

INTRODUCTION. The Texas Department of Motor Vehicles (department) proposes amendments to 43

8

Texas Administrative Code (TAC) Subchapter B, Motor Vehicle Registration, §§217.22, 217.26, 217.28, and

9

217.29 to limit the types of personal identification documents that an applicant can use to register a

10

vehicle in Texas under Transportation Code, §502.040, which requires that the owner of a vehicle apply

11

for registration in Texas and that the applicant for registration is a resident of Texas. These proposed

12

amendments are necessary to ensure that the applicant's personal identification document is valid and

13

that the applicant is legally eligible to reside in Texas.

14

EXPLANATION.

15

The proposed amendments to 43 TAC §217.22 would add a new §217.22(44), defining "valid

16

passport" as an unexpired passport or passport card that is issued by the United States government, or

17

an unexpired passport that is issued by the government of another foreign country and supported by a

18

stamp or mark on the passport and either a permanent resident card, or an unexpired immigrant visa

19

from the United States Department of Homeland Security to show that the person has the legal right to

20

reside in the United States. The remaining subsections in §217.22 are proposed to be renumbered as

21

necessary to accommodate new §217.22(44). These proposed amendments are necessary to strengthen

22

the document validity requirements for vehicle registration in order to prevent fraud and to prevent

23

applicants who are not legally eligible to reside in Texas from registering vehicles to drive on Texas roads.

TITLE 43. TRANSPORTATION

Part 10. Texas Department of Motor Vehicles

Chapter 217 – Vehicle Titles and Registration

1 The proposed amendments to §217.26 would distinguish the personal identification document
2 requirements for registration that does not require the applicant to be a resident of Texas from
3 registrations under Transportation Code, §502.040, which requires Texas residency. While the proposed
4 amendment to §217.26(a) preserves the existing flexibility in personal identification documents for
5 applicants for types of registration that do not require Texas residency, proposed new §217.26(b) limits
6 the types of personal identification documents the department would accept from applicants for
7 registration requiring Texas residency. Applicants for vehicle registration under Transportation Code,
8 §502.040 would have to show either a valid, unexpired driver's license or state identification card that
9 meets the requirements of the REAL ID Act of 2005 (REAL ID), a valid passport as defined by new
10 §217.22(44), or a valid, unexpired Texas handgun license. All three of these methods of identification
11 provide proof that the applicant is legally eligible to reside in Texas. REAL ID requires that the issuing
12 authority verify the legal presence status of applicants who are not United States citizens. As stated above,
13 the proposed new definition of "valid passport" in §217.22(44) would show that the applicant is legally
14 eligible to reside in Texas. Business and Commerce Code §507.001, relating to Concealed Handgun License
15 as Valid Proof of Identification, requires that the department accept a Texas handgun license in lieu of a
16 driver's license; an applicant for a handgun license must provide proof of citizenship or lawful presence.
17 These proposed amendments are necessary to prevent fraud and to prevent applicants who are not legally
18 eligible to reside in Texas from registering vehicles. The remaining subsections of §216.26 are proposed
19 to be relettered to accommodate proposed new §217.26(b).

20 Proposed amendments to §217.28 and §217.29 would require applicants seeking to renew a
21 motor vehicle registration to provide documents or information to allow the department to verify that
22 the vehicle owner has a personal identification document that meets the requirements of proposed
23 amended §217.26. These changes are necessary to implement the new identification requirements for all

TITLE 43. TRANSPORTATION

Proposed Sections

Part 10. Texas Department of Motor Vehicles

Page 3 of 19

Chapter 217 – Vehicle Titles and Registration

1 registered vehicles, including those that were initially registered prior to the effective date of these
2 proposed amendments. Subsections of §228.28(c) would be renumbered to accommodate the addition
3 of the new identification requirements in proposed new §228.28(c)(2).

4 **FISCAL NOTE AND LOCAL EMPLOYMENT IMPACT STATEMENT.** Glenna Bowman, Chief Financial Officer,
5 has determined that for each year of the first five years the amendments will be in effect, there will be no
6 significant fiscal impact to state or local governments as a result of the enforcement or administration of
7 the proposal because the department's data shows that the vast majority of applicants for registration
8 have been presenting the department with personal identification documents that will meet the
9 requirements of the amended rules. Annette Quintero, Director of the Vehicle Titles and Registration
10 Division, has determined that there will be no measurable effect on local employment or the local
11 economy as a result of the proposal.

12 **PUBLIC BENEFIT AND COST NOTE.**

13 Public Benefit. Ms. Quintero has also determined that, for each year of the first five years the
14 amended sections are in effect, the public benefits anticipated as a result of the proposal include reducing
15 the risk of fraud in vehicle registration, and preventing people who are not legally eligible to reside in
16 Texas from attaining registration to drive on Texas roads.

17 Anticipated Costs To Comply With The Proposal. Ms. Quintero anticipates that there will be costs
18 to comply with these revisions for individuals who do not have a valid, unexpired driver's license or
19 unexpired passport and have to pay the application costs necessary to attain those documents. The cost
20 to persons required to comply with the proposal would be \$33 or less for the Texas driver's license fee
21 and \$165 or less for a United States passport.

22 **ECONOMIC IMPACT STATEMENT AND REGULATORY FLEXIBILITY ANALYSIS.** As required by Government
23 Code, §2006.002, the department has determined that the proposed amendments will have an adverse

TITLE 43. TRANSPORTATION

Proposed Sections

Part 10. Texas Department of Motor Vehicles

Page 4 of 19

Chapter 217 – Vehicle Titles and Registration

1 economic effect on small businesses, micro-businesses, and rural communities to the extent that they
2 register vehicles and do not have valid, current identification document for the individual registering a
3 vehicle under Transportation Code, §502.040. These individuals would have to apply for and pay the fees
4 associated with a Texas driver's license or United States passport, as described above. There are
5 approximately 3.5 million small and micro-businesses in Texas and approximately 1,660 incorporated
6 communities in Texas with a population of less than 25,000; the department has no data on how many of
7 these businesses and communities register their vehicles through a representative with a valid driver's
8 license or passport that would meet the requirements of the proposed revisions. Therefore, the
9 department is required to prepare a regulatory flexibility analysis under Government Code, §2006.002.
10 The department considered establishing separate identification requirements for small and micro-
11 businesses and rural communities, exempting small and micro-businesses from the identification
12 requirements, and allowing small and micro-businesses and rural communities to use the same personal
13 identification requirements as the proposed rules provide for registration that does not require Texas
14 residency. The department rejected all three options because they would not be consistent with the
15 health, safety and welfare of the state, as they would all allow the risk of fraud and the risk of individuals
16 who are not legally eligible to reside in Texas registering vehicles and driving on Texas roads.

17 **TAKINGS IMPACT ASSESSMENT.** The department has determined that no private real property interests
18 are affected by this proposal and that this proposal does not restrict or limit an owner's right to property
19 that would otherwise exist in the absence of government action and, therefore, does not constitute a
20 taking or require a takings impact assessment under Government Code, §2007.043.

21 **GOVERNMENT GROWTH IMPACT STATEMENT.** The department has determined that each year of the
22 first five years the proposed amendments are in effect, no government program would be created or
23 eliminated. Implementation of the proposed amendments would not require the creation of new

TITLE 43. TRANSPORTATION

Proposed Sections

Part 10. Texas Department of Motor Vehicles

Page 5 of 19

Chapter 217 – Vehicle Titles and Registration

1 employee positions or elimination of existing employee positions. Implementation would not require an
2 increase or decrease in future legislative appropriations to the department or an increase or significant
3 decrease of fees paid to the department. The proposed amendments technically create a new regulation
4 for an applicant for vehicle registration who is required to be a resident of Texas. The proposed
5 amendments do not expand or repeal an existing regulation. The proposed amendments limit an existing
6 regulation by restricting the types of identifying documents that a person can use to register a vehicle
7 under Transportation Code, §502.040. Lastly, the proposed amendments do not affect the number of
8 individuals subject to the rule's applicability and will not affect this state's economy.

9 REQUEST FOR PUBLIC COMMENT.

10 If you want to comment on the proposal, submit your written comments by 5:00 p.m. CST on January 5,
11 2026. The department requests information related to the cost, benefit, or effect of the proposed
12 amendments, including any applicable data, research, or analysis, from any person required to comply
13 with the proposed rule or any other interested person. A request for a public hearing must be sent
14 separately from your written comments. Send written comments or hearing requests by email to
15 rules@txdmv.gov or by mail to Office of General Counsel, Texas Department of Motor Vehicles, 4000
16 Jackson Avenue, Austin, Texas 78731. If a hearing is held, the department will consider written comments
17 and public testimony presented at the hearing.

18
19 SUBCHAPTER B. MOTOR VEHICLE REGISTRATION**20 43 TAC §§217.22, 217.26, 217.28 AND 217.29**

21 **STATUTORY AUTHORITY.** The Texas Department of Motor Vehicles (department) proposes amendments
22 to §§217.22, 217.26, 217.28 and 217.29 under Transportation Code, §502.0021, which gives the
23 department the authority to adopt rules to administer Transportation Code, Chapter 502; Transportation

TITLE 43. TRANSPORTATION

Part 10. Texas Department of Motor Vehicles

Chapter 217 – Vehicle Titles and Registration

1 Code, §502.040, which gives the department authority to determine by rule the personal identification
2 required for vehicle registration under that section; and Transportation Code, §502.043, which gives the
3 department authority to make rules to prescribe the manner and required information for an application
4 for vehicle registration and to require an applicant for registration to provide current personal
5 identification.

6 **CROSS REFERENCE TO STATUTE.** Transportation Code, Chapter 502 and 1002; Business and Commerce
7 Code, Chapter 507.

8

9 TEXT.

10 §217.22. Definitions.

11 The following words and terms, when used in this subchapter, shall have the following meanings,
12 unless the context clearly indicates otherwise.

13 (1) Affidavit for alias exempt registration--A form prescribed by the director that must be
14 executed by an exempt law enforcement agency to request the issuance of exempt registration in the
15 name of an alias.

16 (2) Agent--A duly authorized representative possessing legal capacity to act for an
17 individual or legal entity.

18 (3) Alias--The name of a vehicle registrant reflected on the registration, different than the
19 name of the legal owner of the vehicle.

20 (4) Alias exempt registration--Registration issued under an alias to a specific vehicle to be
21 used in covert criminal investigations by a law enforcement agency.

TITLE 43. TRANSPORTATION

Part 10. Texas Department of Motor Vehicles

Chapter 217 – Vehicle Titles and Registration

1 (5) Axle load--The total load transmitted to the road by all wheels whose centers may be
2 included between two parallel transverse vertical planes 40 inches apart, extending across the full width
3 of the vehicle.

4 (6) Border commercial zone--A commercial zone established under Title 49, C.F.R., Part
5 372 that is contiguous to the border with Mexico.

6 (7) Bus--A motor vehicle used to transport persons and designed to accommodate more
7 than 10 passengers, including the operator; or a motor vehicle, other than a taxicab, designed and used
8 to transport persons for compensation.

9 (8) Carrying capacity--The maximum safe load that a commercial vehicle may carry, as
10 determined by the manufacturer.

11 (9) Character--A numeric or alpha symbol displayed on a license plate.

12 (10) County or city civil defense agency--An agency authorized by a commissioner's court
13 order or by a city ordinance to provide protective measures and emergency relief activities in the event
14 of hostile attack, sabotage, or natural disaster.

15 (11) Current photo identification--a government-issued photo identification that is
16 currently valid or is expired not more than 12 months, or a state-issued personal identification certificate
17 issued to a qualifying person if the identification states that it has no expiration.

18 (12) Digital license plate--As defined in Transportation Code, §504.151.

19 (13) Digital license plate owner--A digital license plate owner is a person who purchases
20 or leases a digital license plate from a department-approved digital license plate provider.

21 (14) Director--The director of the Vehicle Titles and Registration Division, Texas
22 Department of Motor Vehicles.

23 (15) Division--Vehicle Titles and Registration Division.

TITLE 43. TRANSPORTATION

Part 10. Texas Department of Motor Vehicles

Chapter 217 – Vehicle Titles and Registration

1 (16) Executive administrator--The director of a federal agency, the director of a Texas
2 state agency, the sheriff of a Texas county, or the chief of police of a Texas city that by law possesses the
3 authority to conduct covert criminal investigations.

4 (17) Exempt agency--A governmental body exempted by statute from paying registration
5 fees when registering motor vehicles.

6 (18) Exempt license plates--Specially designated license plates issued to certain vehicles
7 owned or controlled by exempt agencies.

8 (19) Exhibition vehicle--

9 (A) An assembled complete passenger car, truck, or motorcycle that:

10 (i) is a collector's item;

11 (ii) is used exclusively for exhibitions, club activities, parades, and other
12 functions of public interest;

13 (iii) does not carry advertising; and

14 (iv) has a frame, body, and motor that is at least 25-years old; or

15 (B) A former military vehicle as defined in Transportation Code, §504.502.

16 (20) Fire-fighting equipment--Equipment mounted on fire-fighting vehicles used in the
17 process of fighting fires, including, but not limited to, ladders and hoses.

18 (21) Foreign commercial motor vehicle--A commercial motor vehicle, as defined by 49
19 C.F.R. §390.5, that is owned by a person or entity that is domiciled in or a citizen of a country other than
20 the United States.

21 (22) GPS--A global positioning system tracking device that can be used to determine the
22 location of a digital license plate through data collection by means of a receiver in a digital license plate.

TITLE 43. TRANSPORTATION

Proposed Sections

Part 10. Texas Department of Motor Vehicles

Page 9 of 19

Chapter 217 – Vehicle Titles and Registration

1 (23) Highway construction project--That section of the highway between the warning
2 signs giving notice of a construction area.

3 (24) International symbol of access--The symbol adopted by Rehabilitation International
4 in 1969 at its Eleventh World Congress of Rehabilitation of the Disabled.

5 (25) Legend--A name, motto, slogan, or registration expiration notification that is
6 centered horizontally at the bottom of the license plate.

7 (26) Make--The trade name of the vehicle manufacturer.

8 (27) Metal license plate--A non-digital license plate issued by the department under
9 Transportation Code Chapter 502, 503, or Chapter 504.

10 (28) Nonprofit organization--An unincorporated association or society or a corporation
11 that is incorporated or holds a certificate of authority under the Business Organizations Code.

12 (29) Nominating State Agency--A state agency authorized to accept and distribute funds
13 from the sale of a specialty plate as designated by the nonprofit organization (sponsoring entity).

14 (30) Optional digital license plate information--Any information authorized to be
15 displayed on a digital license plate in addition to required digital license plate information when the
16 vehicle is in park, including:

17 (A) an emergency alert or other public safety alert issued by a governmental
18 entity, including an alert authorized under Subchapter L, M, or P of Government Code Chapter 411;

19 (B) vehicle manufacturer safety recall notices;

20 (C) advertising; or

21 (D) a parking permit.

22 (31) Park--As defined in Transportation Code, §541.401.

TITLE 43. TRANSPORTATION

Proposed Sections

Part 10. Texas Department of Motor Vehicles

Page 10 of 19

Chapter 217 – Vehicle Titles and Registration

1 (32) Political subdivision--A county, municipality, local board, or other body of this state
2 having authority to provide a public service.

3 (33) Primary region of interest--The field on a metal or digital license plate with
4 alphanumeric characters representing the plate number. The primary region of interest encompasses a
5 field of 5.75 inches in width by 1.75 inches in height on metal license plates manufactured for motorcycles,
6 mopeds, golf carts, or off-highway vehicles. The primary region of interest encompasses a field of 8.375
7 inches in width by 2.5625 inches in height on metal license plates manufactured for all other vehicles.

8 (34) Registration period--A designated period during which registration is valid. A
9 registration period begins on the first day of a calendar month and ends on the last day of a calendar
10 month.

11 (35) Required digital license plate information--The minimum information required to be
12 displayed on a digital license plate: the registration expiration month and year (unless the vehicle is a
13 token trailer as defined by Transportation Code, §502.001), the alphanumeric characters representing the
14 plate number, the word "Texas," the registration expiration notification if the registration for the vehicle
15 has expired; and the legend (if applicable).

16 (36) Secondary region of interest--The field on a metal or digital license plate with the
17 word "Texas" centered horizontally at the top of the plate. The secondary region of interest encompasses
18 a field of 2.5 inches in width by 0.5625 inches in height on metal license plates manufactured for
19 motorcycles, mopeds, golf carts, or off-highway vehicles. The secondary region of interest encompasses
20 a field of 6 inches in width by 1.9375 inches in height on metal license plates manufactured for all other
21 vehicles.

22 (37) Service agreement--A contractual agreement that allows individuals or businesses to
23 access the department's vehicle registration records.

TITLE 43. TRANSPORTATION

Proposed Sections

Part 10. Texas Department of Motor Vehicles

Page 11 of 19

Chapter 217 – Vehicle Titles and Registration

1 (38) Specialty license plate--A special design license plate issued by the department.

2 (39) Specialty license plate fee--Statutorily or department required fee payable on
3 submission of an application for a specialty license plate, symbol, tab, or other device, and collected in
4 addition to statutory motor vehicle registration fees.

5 (40) Sponsoring entity--An institution, college, university, sports team, or any other non-
6 profit individual or group that desires to support a particular specialty license plate by coordinating the
7 collection and submission of the prescribed applications and associated license plate fees or deposits for
8 that particular license plate.

9 (41) Street or suburban bus--A vehicle, other than a passenger car, used to transport
10 persons for compensation exclusively within the limits of a municipality or a suburban addition to a
11 municipality.

12 (42) Tandem axle group--Two or more axles spaced 40 inches or more apart from center
13 to center having at least one common point of weight suspension.

14 (43) Unconventional vehicle--A vehicle built entirely as machinery from the ground up,
15 that is permanently designed to perform a specific function, and is not designed to transport property.

16 (44) Valid passport--

17 (A) An unexpired passport or passport card issued by the United States
18 government; or

19 (B) An unexpired passport issued by the government of another country with:

20 (i) A stamp or mark affixed by the United States Department of Homeland
21 Security onto the passport to evidence and authorize lawful admission into the United States; and

22 (ii) A current permanent resident card or unexpired immigrant visa issued
23 by the United States Department of Homeland Security.

TITLE 43. TRANSPORTATION

Proposed Sections

Part 10. Texas Department of Motor Vehicles

Page 12 of 19

Chapter 217 – Vehicle Titles and Registration

1 (45) ~~[(44)]~~ Vehicle classification--The grouping of vehicles in categories for the purpose of
2 registration, based on design, carrying capacity, or use.

3 (46) ~~[(45)]~~ Vehicle description--Information regarding a specific vehicle, including, but not
4 limited to, the vehicle make, model year, body style, and vehicle identification number.

5 (47) ~~[(46)]~~ Vehicle identification number--A number assigned by the manufacturer of a
6 motor vehicle or the department that describes the motor vehicle for purposes of identification.

7 (48) ~~[(47)]~~ Vehicle registration insignia--A license plate, symbol, tab, or other device
8 issued by the department evidencing that all applicable fees have been paid for the current registration
9 period and allowing the vehicle to be operated on the public highways.

10 (49) ~~[(48)]~~ Vehicle registration record--Information contained in the department's files
11 that reflects, but is not limited to, the make, vehicle identification number, model year, body style, license
12 number, and the name of the registered owner.

13 (50) ~~[(49)]~~ Volunteer fire department--An association that is organized for the purpose of
14 answering fire alarms, extinguishing fires, and providing emergency medical services.

15

16 §217.26. Identification Required.

17 (a) In a registration class under Transportation Code, Chapter 502 that does not require the owner
18 of the vehicle to be a resident of this state, an ~~[An]~~ application for initial registration is not acceptable
19 unless the applicant presents a current photo identification of the owner containing a unique
20 identification number and expiration date. The current photo identification must be a:

21 (1) driver's license or state identification certificate issued by a state or territory of the
22 United States;

23 (2) United States or foreign passport;

TITLE 43. TRANSPORTATION

Proposed Sections

Part 10. Texas Department of Motor Vehicles

Page 13 of 19

Chapter 217 – Vehicle Titles and Registration

1 (3) United States military identification card;

2 (4) North Atlantic Treaty Organization identification or identification issued under a Status
3 of Forces Agreement;

4 (5) United States Department of Homeland Security, United States Citizenship and
5 Immigration Services, or United States Department of State identification document; or

6 (6) license to carry a handgun issued by the Texas Department of Public Safety under
7 Government Code, Chapter 411, Subchapter H.

8 (b) In a registration class under Transportation Code, Chapter 502 that requires the owner of the
9 vehicle to be a resident of this state, an application for initial registration is not acceptable unless the
10 applicant presents one of the following for the owner of the vehicle:

11 (1) a valid, unexpired driver's license or state identification certificate issued by a state or
12 territory of the United States that complies with the minimum document requirements and issuance
13 standards for federal recognition under the REAL ID Act of 2005, Public Law 109-13;

14 (2) a valid passport; or

15 (3) a valid, unexpired license to carry a handgun issued by the Texas Department of Public
16 Safety under Government Code, Chapter 411, Subchapter H.

17 (c) [(b)] If the motor vehicle is titled in:

18 (1) more than one name, then the identification of one owner must be presented;

19 (2) the name of a leasing company, then:

20 (A) proof of the Federal Employer Identification Number/Employee Identification
21 Number (FEIN/EIN) of the leasing company must be submitted, written on the application, and can be
22 entered into the department's titling system. The number must correspond to the name of the leasing
23 company in which the vehicle is being titled; and

TITLE 43. TRANSPORTATION

Part 10. Texas Department of Motor Vehicles

Chapter 217 – Vehicle Titles and Registration

- 1 (B) the leasing company may submit:
- 2 (i) a current photo identification, required under this section, of the
- 3 lessee listed as the registrant; or
- 4 (ii) a current photo identification, required under this section, of the
- 5 employee or authorized agent who signed the application for the leasing company, and the employee's
- 6 or authorized agent's employee identification, letter of authorization written on the lessor's letterhead,
- 7 or a printed business card. The printed business card, employee identification, or letter of authorization
- 8 written on the lessor's letterhead must contain the name of the lessor, and the employee's or authorized
- 9 agent's name must match the name on the current photo identification;
- 10 (3) the name of a trust, then a current photo identification, required under this section,
- 11 of a trustee must be presented; or
- 12 (4) the name of a business, government entity, or organization, then:
- 13 (A) proof of the Federal Employer Identification Number/Employee Identification
- 14 Number (FEIN/EIN) of the business, government entity, or organization must be submitted, written on the
- 15 application, and can be entered into the department's titling system. The number must correspond to the
- 16 name of the business, government entity, or organization in which the vehicle is being titled;
- 17 (B) the employee or authorized agent must present a current photo identification,
- 18 required under this section; and
- 19 (C) the employee's or authorized agent's employee identification; letter of
- 20 authorization written on the business', government entity's, or organization's letterhead; or a printed
- 21 business card. The printed business card, employee identification, or letter of authorization written on
- 22 the business', government entity's, or organization's letterhead must contain the name of the business,

TITLE 43. TRANSPORTATION

Proposed Sections

Part 10. Texas Department of Motor Vehicles

Page 15 of 19

Chapter 217 – Vehicle Titles and Registration

1 governmental entity, or organization, and the employee's or authorized agent's name must match the
2 name on the current photo identification.

3 (d) ~~(c)~~ Within this section, an identification document such as a printed business card, letter of
4 authorization, or power of attorney, may be an original or photocopy.

5 (e) ~~(d)~~ A person who holds a general distinguishing number issued under Transportation Code,
6 Chapter 503 is exempt from submitting to the county tax assessor-collector, but must retain:

7 (1) the owner's identification, as required under this section; and

8 (2) authorization to sign, as required under this section.

9 (f) ~~(e)~~ A person who holds a general distinguishing number issued under Transportation Code,
10 Chapter 503 is not required to submit photo identification or authorization for an employee or agent
11 signing a title assignment with a secure power of attorney.

12 (g) ~~(f)~~ This section does not apply to non-titled vehicles.

13
14 §217.28. Vehicle Registration Renewal.

15 (a) To renew vehicle registration, a vehicle owner must apply to the tax assessor-collector of the
16 county in which the owner resides or a county tax assessor-collector who is willing to accept the
17 application.

18 (b) The department will send a registration renewal notice, indicating the proper registration fee
19 and the month and year the registration expires, to each vehicle owner prior to the expiration of the
20 vehicle's registration.

21 (c) The registration renewal notice should be returned by the vehicle owner to the county tax
22 assessor-collector in the county in which the owner resides or a county tax assessor-collector who is
23 willing to accept the application, or to that tax assessor-collector's deputy, either in person or by mail,

TITLE 43. TRANSPORTATION

Proposed Sections

Part 10. Texas Department of Motor Vehicles

Page 16 of 19

Chapter 217 – Vehicle Titles and Registration

1 unless the vehicle owner renews via the Internet. The renewal notice must be accompanied by the
2 following information, documents and fees:

3 (1) registration renewal fees prescribed by law;

4 (2) documents or information necessary to verify that the vehicle owner has a personal
5 identification document that meets the applicable requirements of §217.26 of this title (relating to
6 Identification Required);

7 (3) ~~(2)~~ any local fees or other fees prescribed by law and collected in conjunction with
8 registration renewal; and

9 (4) ~~(3)~~ evidence of financial responsibility required by Transportation Code, §502.046,
10 unless otherwise exempted by law.

11 (d) If a registration renewal notice is lost, destroyed, or not received by the vehicle owner, the
12 vehicle may be registered if the owner presents personal identification that meets the applicable
13 requirements of §217.26 of this title ~~[acceptable to the county tax assessor-collector or via the Internet]~~.
14 Failure to receive the notice does not relieve the owner of the responsibility to renew the vehicle's
15 registration.

16 (e) Renewal of expired vehicle registrations.

17 (1) If the owner has been arrested or cited for operating the vehicle without valid
18 registration then a 20% delinquency penalty is due when registration is renewed, the full annual fee will
19 be collected, and the vehicle registration expiration month will remain the same.

20 (2) If the county tax assessor-collector or the department determines that a registrant has
21 a valid reason for being delinquent in registration, the vehicle owner will be required to pay for 12 months'
22 registration. Renewal will establish a new registration expiration month that will end on the last day of
23 the eleventh month following the month of registration renewal.

TITLE 43. TRANSPORTATION

Proposed Sections

Part 10. Texas Department of Motor Vehicles

Page 17 of 19

Chapter 217 – Vehicle Titles and Registration

1 (3) If the county tax assessor-collector or the department determines that a registrant
2 does not have a valid reason for being delinquent in registration, the full annual fee will be collected and
3 the vehicle registration expiration month will remain the same.

4 (4) Specialty license plates, symbols, tabs, or other devices may be prorated as provided
5 in §217.45(d)(2) of this title (relating to Specialty License Plates, Symbols, Tabs, and Other Devices).

6 (5) Evidence of a valid reason may include receipts, passport dates, and military orders.
7 Valid reasons may include:

8 (A) extensive repairs on the vehicle;

9 (B) the person was out of the country;

10 (C) the vehicle is used only for seasonal use;

11 (D) military orders;

12 (E) storage of the vehicle;

13 (F) a medical condition such as an extended hospital stay; and

14 (G) any other reason submitted with evidence that the county tax assessor-
15 collector or the department determines is valid.

16 (6) The operation of a vehicle with an expired registration that has been stored or
17 otherwise not in operation that is driven only to an inspection station for the purpose of obtaining an
18 inspection, if applicable, required for registration, will not affect the determination of whether the
19 registrant has a valid or invalid reason for being delinquent.

20 (f) For purposes of Transportation Code §502.407(c), the county tax assessor-collector's office of
21 the county in which the owner resides is closed for a protracted period of time if the county tax assessor-
22 collector's office has notified the department that it is closed or will be closed for more than one week.

23

TITLE 43. TRANSPORTATION

Proposed Sections

Part 10. Texas Department of Motor Vehicles

Page 18 of 19

Chapter 217 – Vehicle Titles and Registration

1 §217.29. Vehicle Registration Renewal via Internet.

2 (a) Internet registration renewal program. The department will maintain a uniform Internet
3 registration renewal process. This process will provide for the renewal of vehicle registrations via the
4 Internet and will be in addition to vehicle registration procedures provided for in §217.28 of this title
5 (relating to Vehicle Registration Renewal). The Internet registration renewal program will be facilitated by
6 a third-party vendor.

7 (b) County participation in program. All county tax assessor-collectors shall process registration
8 renewals through an online system designated by the department.

9 (c) Eligibility of individuals for participation. To be eligible to renew a vehicle's registration via the
10 Internet, the vehicle owner must meet all criteria for registration renewal outlined in this subchapter and
11 in Transportation Code, Chapter 502.

12 (d) Information to be submitted by vehicle owner. A vehicle owner who renews registration via
13 the Internet must submit or verify the following information:

14 (1) registrant information, including the vehicle owner's name, ~~and~~ county of residence,
15 and information necessary to verify that the vehicle owner has a personal identification document that
16 meets the applicable requirements of §217.26 of this title (relating to Identification Required);

17 (2) vehicle information, including the license plate number of the vehicle to be registered;

18 (3) insurance information, including the name of the insurance company, the name of the
19 insurance company's agent (if applicable), the telephone number of the insurance company or agent (local
20 or toll free number serviced Monday through Friday 8:00 a.m. to 5:00 p.m.), the insurance policy number,
21 and representation that the policy meets all applicable legal standards;

22 (4) credit card information, including the type of credit card, the name appearing on the
23 credit card, the credit card number, and the expiration date; and

TITLE 43. TRANSPORTATION

Part 10. Texas Department of Motor Vehicles

Chapter 217 – Vehicle Titles and Registration

1 (5) other information prescribed by rule or statute.

2 (e) Duties of the county. A county tax assessor-collector shall:

3 (1) accept electronic payment for vehicle registration renewal via the Internet;

4 (2) execute an agreement with the department as provided by the director;

5 (3) process qualified Internet registration renewal transactions as submitted by the third-

6 party vendor;

7 (4) verify that the vehicle owner’s personal identification document meets the applicable

8 requirements of §217.26;

9 (5) [(4)] communicate with the third-party vendor and applicants via email, regular mail,

10 or other means, as specified by the director;

11 (6) [(5)] reject applications that do not meet all requirements set forth in this chapter, and

12 in Transportation Code, Chapter 502; and

13 (7) [(6)] register each vehicle for a 12-month period.

14 (f) Duties of the department. For vehicle registration renewals that are submitted via the Internet,

15 the department and its centralized third-party vendor shall promptly facilitate and mail vehicle

16 registration insignias to applicants.

17

18

**COPY OF PROPOSED PUBLICATION
DATE OF DECEMBER 5, 2025**

Proposed and Adopted Rules for 2025

Rules that have been adopted by the Board are listed by year proposed.

| Subject | Proposal Filed | Proposal Summary (English and Español) | Proposal Published | Adoption Filed | Adoption Published | Effective Date |
|--|--------------------|--|--------------------|----------------|--------------------|----------------|
| Chapter 217, Vehicle Titles and Registration Amendments: §§217.22, 217.26, 217.28, 217.29 (Relating to Personal Identification Requirements for Vehicle Registration Under Transportation Code, §502.040) | <u>Chapter 217</u> | <u>Summary/Resumen</u> | 12/5/25 | | | |

COPY OF MOTOR VEHICLE SALES TAXES

| Month | Sales Tax and Penalties | Estimated Amount for County | YTD % |
|--------|-------------------------|-----------------------------|---------|
| Jan-24 | \$ 3,173,215.65 | \$ 158,660.78 | 10.58% |
| Feb-24 | \$ 2,684,603.58 | \$ 134,230.18 | 19.53% |
| Mar-24 | \$ 2,898,839.62 | \$ 144,941.98 | 29.19% |
| Apr-24 | \$ 3,488,642.68 | \$ 174,432.13 | 40.82% |
| May-24 | \$ 3,542,332.98 | \$ 177,116.65 | 52.63% |
| Jun-24 | \$ 3,196,362.66 | \$ 159,818.13 | 63.28% |
| Jul-24 | \$ 2,241,644.35 | \$ 112,082.22 | 70.75% |
| Aug-24 | \$ 2,670,492.97 | \$ 133,524.65 | 79.65% |
| Sep-24 | \$ 3,345,178.48 | \$ 167,258.92 | 90.80% |
| Oct-24 | \$ 3,912,365.00 | \$ 195,618.25 | 103.85% |
| Nov-24 | \$ 2,377,845.97 | \$ 118,892.30 | 111.77% |
| Dec-24 | \$ 2,782,798.08 | \$ 139,139.90 | 121.05% |

| | | |
|-------------|------------------|-----------------|
| Grand Total | \$ 36,314,322.02 | \$ 1,815,716.10 |
|-------------|------------------|-----------------|

State Comptroller (Jan 2025 - Dec 2025)

| Month | Sales Tax and Penalties | Estimated Amount for County | YTD % |
|--------------------|-------------------------|-----------------------------|---------|
| Jan-25 | \$ 2,617,849.61 | \$ 130,892.48 | 8.18% |
| Feb-25 | \$ 2,735,385.30 | \$ 136,769.27 | 16.73% |
| Mar-25 | \$ 3,551,593.15 | \$ 177,579.66 | 27.83% |
| Apr-25 | \$ 4,113,640.89 | \$ 205,682.04 | 40.68% |
| May-25 | \$ 3,477,658.39 | \$ 173,882.92 | 51.55% |
| Jun-25 | \$ 3,409,532.86 | \$ 170,476.64 | 62.21% |
| Jul-25 | \$ 2,833,756.17 | \$ 141,687.81 | 71.06% |
| Aug-25 | \$ 3,286,133.06 | \$ 164,306.65 | 81.33% |
| Sep-25 | \$ 3,434,713.56 | \$ 171,735.68 | 92.06% |
| Oct-25 | \$ 3,160,989.48 | \$ 158,049.47 | 101.94% |
| Nov-25 | | \$ - | 101.94% |
| Dec-25 | | \$ - | 101.94% |
| | | | |
| Grand Total | \$ 32,621,252.47 | \$ 1,631,062.62 | |

COPY OF MOTOR VEHICLE PROCESSING FEES

REPORTS FROM OCT 2024-SEP 2025

| DATE | COLLECTIONS | AMOUNT FOR COUNTY |
|---------------|----------------------|--------------------------|
| Oct-24 | 6,478,756.20 | 489,985.95 |
| Nov-24 | 4,137,680.17 | 361,906.50 |
| Dec-24 | 4,502,854.81 | 386,001.55 |
| Jan-25 | 5,231,067.53 | 525,144.75 |
| Feb-25 | 5,147,331.78 | 492,462.40 |
| Mar-25 | 6,608,112.91 | 633,556.20 |
| Apr-25 | 7,733,598.13 | 634,834.75 |
| May-25 | 6,035,097.64 | 638,723.15 |
| Jun-25 | 5,879,717.68 | 518,465.55 |
| Jul-25 | 5,578,229.86 | 538,933.95 |
| Aug-25 | 6,139,575.75 | 535,074.60 |
| Sep-25 | 5,919,203.12 | 493,760.70 |
| TOTAL | 69,391,225.58 | 6,248,850.05 |

MOTOR VEHICLE COLLECTION**REPORTS FROM OCT 2023-SEP 2024**

| DATE | COLLECTIONS | AMOUNT FOR COUNTY |
|---------------|----------------------|--------------------------|
| Oct-23 | 5,208,788.06 | 437,230.80 |
| Nov-23 | 3,996,348.29 | 387,800.75 |
| Dec-23 | 4,464,514.18 | 405,078.80 |
| Jan-24 | 5,513,471.32 | 475,085.95 |
| Feb-24 | 5,206,657.29 | 509,036.10 |
| Mar-24 | 5,476,466.55 | 508,931.70 |
| Apr-24 | 6,731,590.90 | 604,085.35 |
| May-24 | 6,153,672.56 | 542,299.45 |
| Jun-24 | 5,459,625.85 | 472,751.20 |
| Jul-24 | 4,772,460.13 | 516,261.10 |
| Aug-24 | 5,325,196.23 | 516,516.45 |
| Sep-24 | 5,616,322.26 | 465,492.90 |
| TOTAL | 63,925,113.62 | 5,840,570.55 |

From: [Maria Pericz](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Hardship of Verifying Legal Status and Impact on Buy Here Pay Here Dealerships
Date: Saturday, December 20, 2025 2:37:21 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Subject

To Whom It May Concern,

I am writing to formally outline the significant operational and financial hardships faced by automobile dealerships—particularly Buy Here Pay Here (BHPH) dealerships—related to verifying legal status in the United States and the resulting impact on vehicle registration renewals for existing customers.

Automobile dealerships are not government agencies and do not have access to federal or state databases required to accurately verify an individual's legal or immigration status. Attempting to place this responsibility on dealerships creates substantial risk, as dealership personnel are not trained, authorized, or equipped to interpret immigration documentation or determine legal presence. This exposes businesses to potential liability, discrimination claims, inconsistent enforcement, and unintentional noncompliance, while diverting resources away from their primary function of selling and servicing vehicles in accordance with existing motor vehicle and consumer finance laws.

The hardship is especially severe for Buy Here Pay Here dealerships, which serve customers who often rely on alternative financing and flexible payment structures. Many current customers who are otherwise compliant with their payment obligations are unable to renew their vehicle registrations due to new or expanded legal status verification requirements imposed at the registration level. When customers cannot legally register their vehicles, they are often unable to drive them, which directly affects their ability to work, meet financial obligations, and continue making timely payments to the dealership.

As a result, dealerships experience increased delinquencies and defaults through no fault of the business or the customer's willingness to pay. Vehicles that cannot be registered lose practical value, increase repossession rates, and impose additional storage, administrative, and recovery costs on dealerships. This creates a cascading financial impact that threatens the sustainability of BHPH operators, many of which are small or family-owned businesses serving local communities.

In summary, requiring dealerships to verify legal status places an unreasonable burden on private businesses and creates unintended

consequences that harm customers, dealerships, and local economies alike. We respectfully urge policymakers and regulators to recognize these challenges and consider solutions that preserve compliance while avoiding the transfer of governmental verification responsibilities to private entities ill-equipped to perform them.

Thank you for your time and consideration of this important matter.

Sincerely,

--

Maria Pericaz

Manager

Express Auto Financial
3501 E Main Street
Grand Prairie, TX 75050
Phone 972-642-5445
Fax 972-642-9839

Subject: Public Comment – Chapter 217 Vehicle Registration Amendments

To Whom It May Concern,

I am a licensed motor vehicle dealer and title service runner in the State of Texas. I am writing to respectfully submit public comment regarding the proposed amendments to Chapter 217 concerning identification requirements for vehicle registration.

In my capacity as a title service runner, I regularly assist customers who legally purchase vehicles but do not possess a Texas driver license, a United States passport, or a foreign passport containing a United States entry stamp or accompanying immigration documentation. Many of these individuals rely solely on a valid foreign passport as their only form of government issued identification.

Under the proposed amendments, these customers would be unable to register or renew their vehicles, despite the fact that their transactions are lawful and properly documented. This would create unnecessary barriers to compliance and may inadvertently lead to an increase in unregistered vehicles operating on Texas roadways.

The proposed changes would have a significant and adverse impact on the community I serve, as well as on my ability to continue operating my licensed dealer and multiservice business. Vehicle purchases and registrations would be directly affected, as many customers would no longer be able to complete transactions due to the more restrictive identification requirements.

I respectfully urge the Texas Department of Motor Vehicles to reconsider these proposed amendments and to allow broader forms of acceptable identification. Doing so would enable residents to continue registering vehicles legally while remaining in compliance with Texas law.

Thank you for your time and consideration of this public comment.

From: [Matthew Oliver](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29, relating to personal identification requirements for vehicle registration under Transportation Code §502.040.
Date: Friday, December 26, 2025 11:32:42 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Subject

Dear Ms. Moriaty,

I'm writing as an independent automobile dealer in Texas regarding the proposed changes to the identification requirements for vehicle registration. I appreciate the chance to submit comments and wanted to share how this would affect my business and the people I work with day to day.

Like a lot of independent dealers, we deal with real people trying to get to work, take care of their families, and keep their lives moving. When a sale gets delayed or falls apart, it's not just paperwork—it affects paychecks, schedules, and customers who don't have a lot of margin for disruption. My concern with these proposed rules is that they're going to slow things down in ways that are hard for small businesses and customers to absorb, especially given the current DPS appointment backlogs.

I'm also uneasy with the idea that dealers are being pushed into reviewing or interpreting immigration or lawful-presence documents. That's not something we're trained for, and it's not a role dealers have historically played. It puts us in a difficult position where we're trying to comply with one set of rules while worrying about unintentionally violating others, including fair-lending and discrimination laws. That's not a good place for a small business to be.

Like many dealers, I've invested time, money, and people into my business based on the rules that were in place at the time. Employees were hired, loans were made, and inventory was purchased without any expectation that we'd be responsible for making citizenship or immigration-related determinations as part of registration. Changing that framework now creates uncertainty that's hard to plan around.

I understand and support the goal of preventing fraud and making sure identification is valid. I just don't think this proposal, as written, strikes the right balance. My request is that the Department reconsider these amendments in their current form, or at the very least provide a clear safe harbor, such as grandfathering existing transactions or exempting vehicles with

active liens, so businesses and customers aren't caught in the middle.

Thank you for taking the time to consider comments from those of us on the ground. I appreciate the work the Department does and hope these concerns can be taken into account before the rules are finalized.

Sincerely,

Matthew Oliver
214-500-5006 cell



Matthew Oliver
Owner
The Car Network

1840 Forest Lane
Garland Texas 75042

552.137

thecarnetwork@gmail.com

214-298-5686 (payments)

972-272-3061 (office / fax)

www.dfvcarnetwork.com

December 20, 2025

From: Mauricio Arzayus Moriones / AMT Auto Sales LLC

To: The Texas Department of Motor Vehicles.

Thank you for the opportunity to provide comments regarding the Texas Department of Motor Vehicles' proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29, relating to personal identification requirements for vehicle registration under Transportation Code §502.040. I write to share how these changes affect my business, employees, and customers, and to highlight unintended consequences that should be considered before the rules are finalized.

In June 2001 my father, brother and I came to America from Colombia with a heart and mind full of dreams. We know what it is and how it feels to be an immigrant in this country. Luckily, during the 3 years we were in that situation of not having legal documents to stay in this country, my father was able to buy and register a car under his name with his foreign passport to go to work and provide for us, his family.

Because of my father's hard work, my brother and I were able to go to school and obtain our bachelor's degree from the University of Houston. With our expertise and hard work, the three of us were able to open a successful car dealership in Houston, TX serving the community since 2004.

For 20 years, our business has operated in Alief, TX in the county of Harris. Alief, TX is one of Houston's most diverse neighborhoods with a strong Asian and Hispanic community. With that being say, majority of our customers are Hispanics, Asians, Africans, and so on. It is my proud to say that I have the best clientele a business can ask for. They are responsible and have excellent moral character.

On November 19, 2025, our business and customer found out about the new id requirements rules. This new law is drastically affecting our business, customers, and employees in a negative way. For example, sales dropped 50%, collections decreased 30%, and repossession increased by 20%. The sad part is that most of the repossessions are voluntarily returned because customers are scared and say that if they cannot renew their registration, they won't be able to pay the car notes. Let's keep in mind that these were investments made under the prior rules. Never in my life I thought that I will go to something like this because of a new id requirement rule, effecting my business and personal life in such a negative way.

I am requesting that the rule be returned to its prior form because if this rule happened 20 years ago, I would not be writing this letter as a business owner of AMT Auto Sales LLC and I definitely won't be giving back to my community the same way we do it now because my father wouldn't have the opportunity to register a car under his name, therefore he wouldn't have the basic need of transportation to provide for my brother and I. The number of jobs we give, and the amount of money paid in taxes depends on the number of sales we will have soon.

Finally, we did not choose to be in Alief. It was God's plan for us to be here, and I am proud of it. I am proud to be part of the most diverse community in Texas.

Sincerely,



Mauricio Arzayus Moriones

AMT AUTO SALES LLC

Owner

From: 552.137
To: [Zz - Resource - GCO Rules](#)
Subject: Formal Objection to Proposed Identification Restriction on Vehicle Sales
Date: Monday, January 5, 2026 2:34:50 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Dear Texas Department of Motor Vehicles (TxDMV),

My name is Melissa Sandoval, and I am writing on behalf of JMS Auto Sales, a licensed motor vehicle dealer operating in the state of Texas. I respectfully submit this letter to formally express my opposition to the proposed regulation that would restrict vehicle sales exclusively to individuals holding a Texas-issued identification or a valid U.S. visa.

This proposed measure would have a significant and negative impact not only on JMS Auto Sales, but on many dealerships across Texas that serve a diverse customer base. A large portion of our customers are individuals who lawfully purchase vehicles using a valid passport as their primary form of identification. These customers rely on personal transportation for work, family responsibilities, and daily life. Limiting sales to only those with Texas IDs or visas would drastically reduce the population eligible to purchase vehicles, resulting in substantial losses in sales revenue for dealerships statewide.

Such a reduction in sales would lead to increased operational costs, potential staff reductions, and financial instability for many small and medium-sized dealerships. This would ultimately harm the Texas economy, reducing tax revenue generated from vehicle sales, registrations, and related services.

Additionally, a person's immigration or legal status should not determine their ability to purchase a vehicle. Owning a vehicle is not a legal privilege but a practical necessity, especially in a state like Texas where public transportation is limited. Many individuals without Texas IDs or visas are responsible, paying customers who comply with all financial requirements and fulfill their contractual obligations.

Current identification practices, including the use of valid passports, already provide sufficient means to verify a buyer's identity. Implementing this restriction does not enhance public safety but instead creates unnecessary barriers that disproportionately affect certain communities

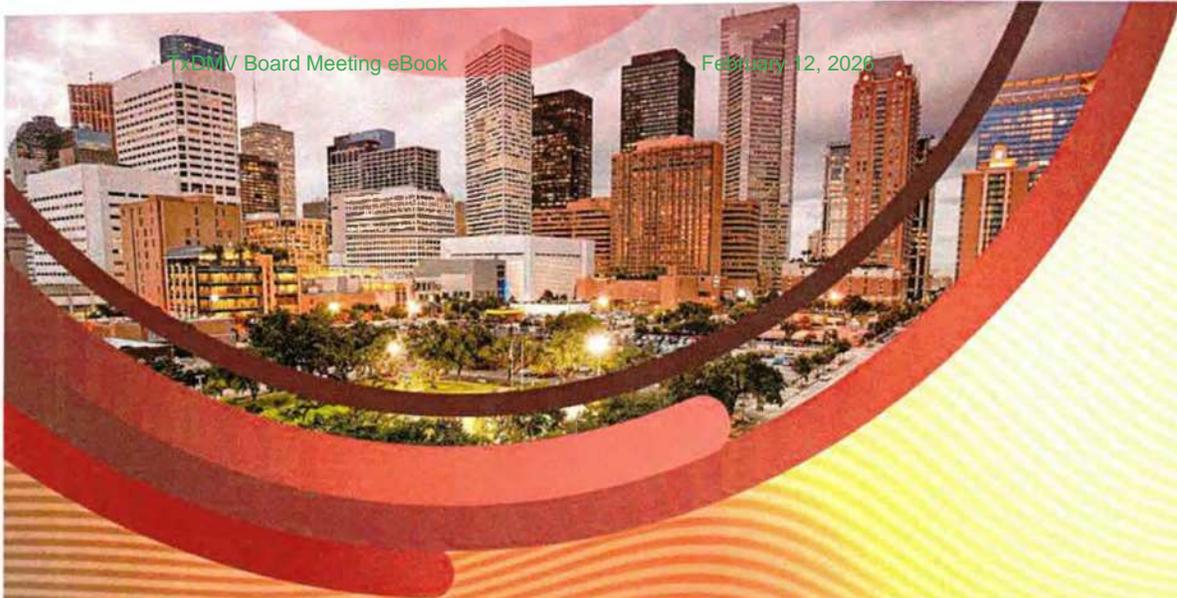
while placing undue burdens on legitimate businesses.

For these reasons, I respectfully urge the Texas Department of Motor Vehicles to reconsider and not approve this proposed regulation. I strongly encourage TxDMV to engage with licensed dealers and industry stakeholders to explore solutions that balance regulatory concerns without harming businesses, consumers, and the broader Texas economy.

Thank you for your time and consideration. I appreciate the opportunity to express these concerns and would welcome further discussion on this matter.

Sincerely,

Melissa Sandoval
JMS Auto Sales
General Manager



Drive Away[®]

DriveAwayAutos.com

DRIVEAWAY AUTOS / HOUSTON, TX.

Drive Away Autos

5715 North Freeway
Houston, Texas 77076

December 31, 2025

Laura Moriaty

General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, Texas 78731

Re: Comments on Proposed Amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29 (Transportation Code §502.040) - rules@txdmv.gov

Dear Ms. Moriaty,

Thank you for the opportunity to submit comments regarding the Texas Department of Motor Vehicles’ proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29, concerning personal identification requirements for vehicle registration under Transportation Code §502.040. I respectfully submit this letter to explain how the proposed changes would affect Drive Away Autos, our employees, our customers, and the broader communities we serve, and to outline several significant and unintended consequences that warrant careful consideration prior to final adoption of these rules.

Company Background and Economic Impact

Drive Away Autos began operations approximately fifteen years ago as a small, family-owned buy-here-pay-here retail auto center. Through experience and steady growth, the company identified and served an underserved segment of the Hispanic market that, at the time, had limited access to traditional franchise dealerships and lenders. What began with a staff of approximately ten employees has since expanded to more than 250 employees, five retail locations, and a centralized five-acre service facility.

From the outset, ownership and leadership committed to creating an environment comparable to a new-car franchise dealership, based on the belief that every customer deserves a welcoming, safe, clean, and professional experience characterized by dignity, fairness, and respect. This philosophy has guided our operations and culture since inception.

DRIVEAWAY AUTOS



The company was initially capitalized with only a few thousand dollars and a \$500,000 floor plan and credit facility from a regional lender. By 2022, Drive Away Autos' floor plan exceeded \$20 million, with an aggregate credit facility of approximately \$225 million across eleven lenders. Annual revenues now exceed \$100 million. Notably, losses on our auto loan portfolio average approximately 9 percent annually, significantly below the industry average of 40 to 50 percent. To date, the company has originated and serviced more than \$1 billion in vehicle sales and auto loans.

Employees and Community Commitment

Drive Away Autos has maintained long-term employment relationships, including employees who have been with the company since its earliest years and many others with more than a decade of service. Our mission statement, "Changing People's Lives," reflects a genuine commitment not only to our customers but also to our employees and the communities in which we operate. We view ourselves not solely as a dealership and lender, but as a community partner.

Over the years, Drive Away Autos has supported employees and their families through tuition assistance, transportation needs, medical expenses, and funeral costs, particularly during the COVID-19 pandemic. The company has also contributed to disaster recovery efforts, including rebuilding homes affected by Hurricane Harvey.

Community Outreach and Social Responsibility

Community involvement is a cornerstone of Drive Away Autos' operations. Examples of our long-standing outreach include:

- An annual Christmas celebration hosted for more than fifteen years, providing gifts, food, and activities for hundreds of families. Recent events have hosted over 480 attendees, with children receiving bicycles, tablets, and computers.

CHRISTMAS CELEBRATIONS

REACH: **6,000 (10 YEARS)**



- Annual back-to-school supply distributions for children in need, including backpacks and essential school materials.

BACK 2 SCHOOL

REACH: **5,000**



- A youth soccer tournament initiated fifteen years ago with eight teams, which has grown to more than 200 teams annually, serving over 10,000 players at no cost to participants. The program is supported by major corporate sponsors, including professional sports organizations and national brands.

SOCCER TOURNAMENTS

REACH: **120,000 (10 years, 50+ EVENTS)**



- A decade-long partnership with the City of Galveston to host free beach-based music, volleyball, and soccer events, benefiting dozens of teams each year.

GALVESTON EVENTS - CITY OF GALVESTON

REACH: **90,000 (10 YEARS)**



- Collaboration with QAd Marketing to produce the Pro Challenge Soccer Camp, offering free skills training, professional player mentorship, and scouting exposure for youth participants.

PROCHALLENGE - SOCCER CLINIC FOR KIDS

REACH: **14,000 (10 YEARS)**



- Sponsorship of the Multiple Sclerosis Society’s MS 150 Bike Ride as a gold sponsor for three consecutive years, contributing \$25,000 annually and providing logistical support for participants.

TEXAS BIKE MS-150

REACH: **16,000**



- Continued support of the BEAR (Be A Resource) program for children involved with Child Protective Services in Houston, including the adoption of more than 200 children for holiday gift programs in the past year alone.

BEAR HOUSTON

REACH: **4,500**



- Continued support to our Highways.

TEXAS HIGHWAY SPONSOR

10 YEARS



Regulatory Compliance

Drive Away Autos maintains strict compliance with all applicable state and federal regulations. Within the past year, the company has undergone audits by the Office of Consumer Credit Commissioner, the Internal Revenue Service, banking audit firms, and an independent external audit firm, all of which resulted in no findings, penalties, or corrective actions. Additionally, the Texas Department of Motor Vehicles has recently issued our license for a fifth retail location.

Concerns Regarding the Proposed Rule Changes

This letter is submitted with reluctance, as Drive Away Autos traditionally operates with minimal public exposure and limited advertising. However, the proposed identification requirements necessitate a clear explanation of who we are and the tangible consequences these changes would impose.

Under the proposed rules, Drive Away Autos is already experiencing a loss of lawful customers who lack a Real ID-compliant driver's license or passport, despite being U.S. citizens and otherwise qualified purchasers. Many individuals do not possess Real ID credentials simply because they do not travel by air or internationally. The denial of vehicle transactions to such individuals, including at least one military veteran, raises serious concerns regarding equity, access, and unintended discrimination against law-abiding residents.

Projected Impact if Adopted

If implemented as proposed, these rule changes would result in severe and measurable consequences, including:

- An estimated annual revenue reduction of approximately \$50 million.
- Workforce reductions affecting approximately 100 to 125 employees.
- Closure of two of our five retail locations.
- Elimination of all community outreach, charitable events, and social responsibility programs.
- Significant revenue losses for partner financial institutions participating in our credit facilities.
- Loss of part-time employment opportunities for approximately 20 law enforcement officers per week who currently provide security services at our locations and events.
- These impacts extend beyond our organization, affecting employees' families, local communities, law enforcement personnel, and public-sector revenue streams.
- The resulting loss of sales tax and county title fee revenue to the State of Texas Comptroller of Public Accounts will lose approximately \$2 million dollars a year from Drive Away alone, not to mention the overall reduction of the hundreds of dealers that will be affected by this new rule.

Conclusion

We respectfully urge the Texas Department of Motor Vehicles to reconsider the proposed amendments and to fully evaluate their economic, social, and community-wide consequences. Operating a compliant business in today's regulatory environment is already challenging. The imposition of additional identification requirements without sufficient accommodation for lawful residents risks unnecessary harm to businesses, workers, and communities across Texas.

Thank you for your consideration of these comments. I would welcome the opportunity to provide additional information or participate in further discussions regarding the real-world implications of these proposed changes.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "W. Kellagher", is written over a light blue horizontal line.

William Kellagher
Chief Executive Officer
Drive Away Autos

Confidentiality and Non-Disclosure Notice

This correspondence and any attachments are submitted for the limited purpose of providing comments to the Texas Department of Motor Vehicles regarding the proposed rulemaking referenced herein. The information contained in this letter may include confidential, proprietary, or sensitive business information belonging to Drive Away Autos. Disclosure, distribution, reproduction, or use of this information for any purpose other than official regulatory review is not authorized without the express written consent of Drive Away Autos, except as required by applicable law. If any portion of this submission is subject to public disclosure requirements, we respectfully request advance notice to allow for the identification and protection of any confidential or proprietary information to the extent permitted by law.

**Drive Away Autos**

5715 North Freeway
Houston, Texas 77076

December 31, 2025

Laura Moriaty

General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, Texas 78731

Re: Comments on Proposed Amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29 (Transportation Code §502.040) - rules@txdmv.gov

Dear Ms. Moriaty,

Thank you for the opportunity to submit written testimony regarding the implementation of Real ID requirements and their impact on vehicle financing, Texas businesses, and working families. I respectfully submit this letter to explain how the proposed changes would affect

My name is Miguel Quiroz. I immigrated to the United States from Mexico more than twenty-five years ago. I am married to a retired United States Army First Class Sergeant who served honorably for twenty years. We are raising two children, ages thirteen and nine, and are proud to call Texas our home.

I serve as the Director of Marketing and Sales for Drive Away Autos Companies. For the past fifteen years, I have helped build this organization and have personally recruited, hired, and trained more than 150 employees. As part of my role, I review or oversee every customer application submitted to our dealerships.

Since the implementation of the new Real ID-related requirements, we have been compelled to deny financing to many applicants who are otherwise qualified, responsible, and financially stable. These denials are not based on creditworthiness, employment history, or risk, but solely on the absence of a Real ID.

I would like to outline several common scenarios we encounter:

- Longstanding customers who have previously purchased multiple vehicles, paid as agreed, built credit across all three bureaus, maintained bank accounts with major institutions, and carried insurance through national providers are now being denied due to the lack of a Real ID.
- Applicants with stable employment, housing, and established credit who require a co-applicant to meet income thresholds are being denied when the co-applicant—often a parent with valid Social Security documentation, strong credit, and banking history—does not possess a Real ID.
- Active-duty service members and veterans with extensive employment histories, valid driver's licenses, Social Security cards, bank accounts, and stable residences are also being denied for the same reason.

Many of these individuals are self-employed tradespeople and small business operators, including roofers, builders, concrete workers, landscapers, welders, restaurateurs, and oil field workers. Reliable transportation is essential to their ability to work. Denying access to vehicle financing will inevitably result in workforce disruptions, increased costs, and delays across multiple sectors of the Texas economy.

Additionally, the application of this requirement raises concerns regarding consistency and fairness. Similar identification standards are not uniformly applied in the banking, insurance, or healthcare industries. As a result, the automotive financing sector—particularly Buy Here Pay Here dealers—has been disproportionately impacted.

While I understand that the underlying policy may not be subject to reversal, I respectfully urge the Legislature to consider a more equitable implementation. Allowing a single Real ID on a joint application would maintain regulatory intent while preventing unnecessary harm to qualified applicants, service members, and legitimate businesses.

Thank you for your time, consideration, and service to the State of Texas.

Respectfully submitted,



Miguel Quiroz
General Sales and Marketing Manager

I wish to share my concerns over the adoption of Texas administrative Code Title 43, §§217.22,217.26,217.28,217.29. If this proposal is put into effect, it will negatively impact individuals, families, communities, and our state. This proposal will raise car insurance premiums for our residents, further restrict vehicle registration for many, and threatens to grind to a halt the lives of residents who have made up a crucial segment of our labor force and have lived here for decades and are well integrated into our economy. These are friends, family, and fellow community members that participate in industries facing labor shortages such as construction, health and home care, hospitality, agriculture, retail and trade services, sanitation, and other roles, making up about 8% of the total workforce in our state.¹ As residents of our state, they endow our treasury and enrich our culture and economy, so suffice to say that they too contribute to the funding of Texas roads. Therefore, I am deeply unsettled and concerned for all who will be impacted by the implementation of this proposal. It brings great sadness to consider that the true purpose of this effort is to make marginalized communities even more vulnerable by imposing these exaggerated measures that will physically, emotionally, and financially harm all Texas residents.

More than 31 million people call Texas home, with 19 million people being licensed drivers.^{2,3} The Texas Department of Motorized Vehicles estimates that 20% of Texas drivers are uninsured and 80% are insured.⁴ With roughly 12.6 million registered vehicles on the road (4.2 million light trucks, 8.1 million automobiles, 328,300 motorcycles) and drivers paying a yearly average of \$786 for minimum coverage to \$2,751 for full coverage, the total premiums written by the car insurance industry is \$35,202,678,902 from Texans.^{5,6,7,8} The individuals most affected by this proposal are long time undocumented residents lacking legal residence status which are estimated to be 1.7 million Texans. Of these 1.7 million individuals, 1.2 million are in our workforce.¹ If these residents are no longer eligible to obtain vehicle insurance there will be a revenue loss of \$1 billion for insurance companies who will most likely distribute that loss to other drivers, not to mention a further increase in premiums due to a spike in uninsured motorists on the road. From 2022 to 2023, the percent change in vehicle insurance premiums for Texas was +25%.¹⁰ All factors considered, licensed drivers could see an increase of 38% in premiums because of this proposal as a result of a sudden pool of people who will no longer be able to obtain insurance. With an increase in insurance premiums, more Texans may choose to forgo car insurance until rates become more affordable, resulting in yet even more uninsured drivers on the road, impacting those in poverty significantly more than other individuals and resulting in higher insurance premiums for all drivers.

The implementation of this proposal will not prevent people who are not legally eligible to reside in Texas from using Texas roads to go to work and provide for their families. ForwardUS reports that there are 1.2 million undocumented workers in Texas.¹ More than 50% have been residing and contributing to our state for more than a decade.⁹ Workers without legal status contribute \$45 billion to the Texas economy.¹ The state of Texas has also secured measures that aim to block work authorization for DACA recipients.¹¹ For DACA recipients to obtain a drivers license in Texas, it is contingent upon them also having work authorization which could result in an additional 86,000 residents subject to persecution on Texas roads should this proposal pass due to the inability for them to register vehicles which they already own and rely on.¹² While legal residents will be mainly affected financially, this proposal paired with SB8 would be lethal for the undocumented community, resulting in arrest, detention, and ultimately deportation, effectively turning a minor traffic violation punitive. It would be unjust to haphazardly ignore the economic and cultural value they've added to our communities over decades and upend their lives by making them easy targets for local law enforcement to arrest and turn them

over to ICE when the vast majority of undocumented immigrants are less likely to be convicted of a crime than native-born Americans.¹⁶

It is difficult to shake the thought that Title 43 is being amended with the intention to unjustly harm our loved ones and community members. Rep. Brian Harrison has made it clear that this change is in response to him finding out that undocumented immigrants are able to register their vehicles. Yet, the state of Texas has long been aware of this capacity given that the ability to operate a vehicle and the ability to register a vehicle are distinct under Texas law. The inability to provide a drivers license during traffic stops already makes this community vulnerable. Minor traffic violations have been weaponized against them to justify their deportation, upending years of their effort in a matter of seconds. For decades, Texas has benefited from undocumented immigrant labor, and to now cast them aside and go as far as to persecute them openly on our roads is beyond the pale. These marginalized residents, just like ordinary Texans, have contributed billions to the economy and despite being denied a drivers license, they comply and register their vehicles thus satisfying insurance requirements. This proposal appears to intentionally victimize these long time undocumented residents of Texas who, considering their contributions to our state, rightly deserve to utilize Texas roads. Further, it would benefit the state to allow them to obtain a drivers license once more to increase everyone's safety on the road.

This proposal will affect legal Texas residents as well. Lately, there has been a surge in partnership between local law enforcement departments and private companies that provide automated license plate reader services, so it is not a stretch to assume that law enforcement is capable of easily identifying every vehicle without registration.¹⁵ Legal residents too will find themselves swept up by these invasive surveillance tactics, resulting in all individuals being easily targeted and charged with unregistered vehicle fees which can be up to \$200 plus additional fees if applicable.¹³ Of course, some may be able to pay these fees, but those struggling financially may find themselves burdened with debt. It should also be noted that registering a vehicle can be cumbersome in that it requires satisfying other documentation that can take months to acquire. Unfortunately, time is a resource that the economically disadvantaged community lack. In Texas, approximately 42% of households are below the ALICE (Asset Limited, Income Constrained, Employed) threshold, and they are the other segment of Texas residents that would, incidentally, be most negatively impacted by this proposal due to their economic hardship.¹⁴

This proposal is morally wrong and discriminatory, and it is improper to politicize marginalized communities by using them as scapegoats to combat fraud. So I ask that this proposal be stopped in full. While it is appropriate and commendable to target fraud, the consequences of this proposal as it stands will inflict great physical, emotional, and financial harm to all Texas residents, and a more prudent proposal must be sought.

Sources:

- [1] <https://www.fwd.us/news/texas-immigrants/>
- [2] <https://www.texastribune.org/2024/12/19/texas-population-31-million/>
- [3] <https://www.statista.com/statistics/198029/total-number-of-us-licensed-drivers-by-state/>
- [4] <https://www.txdmv.gov/motorists/register-your-vehicle/texasure-insurance-verification>
- [5] <https://texasvehicle.org>
- [6] <https://summitfleet.com/blog/top-three-states-biggest-pickup-populations/>
- [7] <https://www.bankrate.com/insurance/car/average-cost-of-car-insurance-in-texas/>
- [8] <https://www.tdi.texas.gov/reports/pc/documents/pcalr2024.pdf>
- [9] <https://www.texastribune.org/2025/02/17/texas-undocumented-immigrants-trump-deportation-demographics/>
- [10] <https://www.thezebra.com/auto-insurance/how-to-shop/car-insurance-rate-increases/>
- [11] <https://www.nilc.org/resources/latest-daca-developments/>
- [12] <https://www.americanimmigrationcouncil.org/blog/texas-only-daca-ruling-could-upend-national-policy/>
- [13] <https://tex.org/texas-car-registration-2025-online-inspections-and-emissions-spots/>
- [14] <https://www.unitedforalice.org/introducing-ALICE/texas>
- [15] <https://truthout.org/articles/a-vast-camera-system-now-feeds-information-to-police-on-drivers-across-the-us/>
- [16] <https://www.brennancenter.org/our-work/analysis-opinion/debunking-myth-migrant-crime-wave>

From: [Misty Bagley](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Passport Requirements
Date: Friday, December 12, 2025 3:23:29 PM
Attachments: [image001.png](#)

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To Whom it May Concern,

We have recently done business with a customer who had a foreign passport this week. Since we received our new rules from the State of Texas we were requiring a “stamp or mark affixed by the US Dept of Homeland Security” on this persons passport to allow them to purchase this vehicle.

This customer debated with us the issue of this “stamp” required by our State rules. After doing our own research we came to the conclusion that the Federal Government does not stamp or mark these passports since approximately 2022, they in fact issue a form I94.

I would like to request an update to this ruling due to the fact that it is outdated information, to not require a ‘stamp or mark’, but to require an I94 form.

(44) Valid passport—

(A) an unexpired passport or passport card issued by the United States government; or

(B) An unexpired passport issued by the government of another country with:

(i) a stamp or mark affixed by the United States Department of Homeland Security onto the passport to evidence and authorized lawful admission into the United States; and

(ii) A current permanent resident card or unexpired immigrant visa issued by the United States Department of Homeland Security.

Thank you for this consideration.

Respectfully,

Misty Bagley

Controller

1639 State Hwy 6

Marin, TX 76661

254-883-2571 ext.200



From: [Monica Davila](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Public Comment – Chapter 217 Vehicle Registration Amendments
Date: Thursday, December 18, 2025 4:53:54 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whom it may concern,

I am a licensed title service in Texas, and I am writing to express my concern regarding the proposed amendments to Chapter 217 related to identification requirements for vehicle registration.

As a multiservice, I regularly work with customers who legally purchase vehicles but do not possess a Texas driver license, a U.S. passport, or a foreign passport with a U.S. entry stamp or immigration documentation. Many of these individuals rely on a valid foreign passport as their only form of government-issued identification.

Under the proposed rules, these customers would be unable to register or renew their vehicles, even though the transactions are legitimate and properly documented. This creates unnecessary barriers to compliance and may ultimately result in more unregistered vehicles operating on Texas roads.

These new requirements will have a significant impact on the community I serve. They will directly affect vehicle purchases and will substantially impact my ability to continue operating my multiservices, as many customers will no longer be able to complete vehicle transactions due to the restricted identification requirements.

I respectfully urge the Texas Department of Motor Vehicles to reconsider these amendments and allow broader forms of identification so residents can continue to register vehicles legally and remain in compliance with Texas law.

Thank you for the opportunity to submit this public comment



Agente de seguros y Profesional de Impuestos
DAVILAS MULTISVCS LLC
10001 W Bellfort Ave STE. E Houston, Tx 77031

Office Number: 281-495-9924

Whatsapp: 832-996-1321

Fax: 281-495-9924

Email: [REDACTED] 552.137

ESTE CORREO ELECTRONICO ESTA DESTINADO UNICAMENTE A LA PERSONA QUE VA DIRIGIDO, QUEDA PROHIBIDA CUALQUIER REVISION O OTRO USO DE ESTA INFORMACION POR PARTE DE PERSONAS O ENTIDADES DISTINTAS DEL DESTINARIO PREVISTO O CUALQUIER RETRASMISION SIN EL CONSENTIMIENTO DEL REMITENTE.

From: [Nancy Colunga](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Public Comment – Impact of Proposed DMV Rule Changes on Insured Texans
Date: Wednesday, December 24, 2025 12:50:52 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To Whom It May Concern,

I am writing to formally submit my public comment in opposition to the proposed changes to the Texas DMV vehicle registration and renewal rules.

These proposed rule changes will have serious and unintended consequences for Texas families, particularly working-class households, immigrant families, and individuals who rely on their vehicles for employment, medical access, and daily life. Any added barriers, documentation requirements, or delays in the registration or renewal process will create unnecessary stress, fear, and financial strain for families who are already navigating economic uncertainty.

For many households, a vehicle is not a luxury—it is essential. Making registration or renewal more difficult risks pushing families into noncompliance, not by choice, but by circumstance. This could expose them to fines, citations, loss of employment opportunities, and increased anxiety, especially among communities that already experience heightened fear when interacting with government systems.

Additionally, these changes will negatively impact the insurance industry in Texas. Vehicle registration and insurance are directly linked. When consumers face obstacles to registering or renewing vehicles, insurance policies may lapse or be canceled, not due to irresponsibility, but due to administrative hurdles. This creates instability for insurers, agents, and consumers alike, increasing uninsured vehicles on Texas roads and undermining public safety.

As an insurance professional, I can attest that disruptions in the registration process lead to higher rates of policy cancellations, coverage gaps, customer confusion, and

financial loss for both families and insurance providers. These outcomes do not serve the interests of the State of Texas, its residents, or its regulated industries.

Public policy should aim to simplify compliance, not complicate it. Any regulatory changes must prioritize accessibility, transparency, and fairness, while considering the real-world impact on families and essential industries that support the Texas economy.

I respectfully urge the Texas Department of Motor Vehicles to reconsider these proposed changes, engage meaningfully with community stakeholders, and ensure that any final rules do not disproportionately harm vulnerable populations or destabilize the insurance market.

Thank you for the opportunity to submit this comment and for considering the voices of Texans who will be directly affected by these decisions.

Sincerely,
Nancy Colunga

Senior Insurance Agent
Texas Insurance Professional
Dallas–Fort Worth, Texas

From: [Adriel Garcia](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Appeal to reverse changes
Date: Wednesday, December 31, 2025 3:53:55 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hi,

My name is [Noe Garcia], and I'm the owner of Servicios De Titulos Placas Y Mas, a vehicle registration and titling service in Dallas County. I'm writing to submit public comment ahead of the January 5, 2026 deadline regarding the recent changes to personal identification requirements for registration and renewals (including the November 18, 2025 guidance limiting use of foreign passports unless accompanied by proof of lawful U.S. presence).

We support TxDMV's goal of preventing fraud. However, the way this change was implemented is creating immediate, serious harm for Dallas County residents and for small businesses like ours.

In our business, approximately [80–90]% of our customers will be impacted. Many are long-time Texas residents who rely on their vehicles to work, take children to school, and access medical care. Since this change took effect, we've seen customers turned away even when they have insurance, inspection, proof of residency, and proper ownership documents—because they cannot meet the new lawful-presence documentation requirement.

This is already creating a domino effect:

- fewer renewals and title transfers completed legally,
- more unregistered (and potentially uninsured) vehicles on the road,
- lost state and local revenue from fees and taxes,
- reduced business for dealers, lenders, inspection stations, mechanics, and insurance agencies,
- and counter staff/businesses being pressured to interpret immigration documents without clear statewide procedures.

We respectfully request that TxDMV reconsider or revise this policy to reduce unintended harm while still addressing fraud. Specifically, please consider:

- 1) a transition/grace period for renewals and currently registered vehicles;
- 2) clear, uniform statewide guidance/checklists on exactly what documents are acceptable;
- 3) an approach centered on verifying identity and Texas residency without requiring providers to act as immigration status verifiers; and
- 4) a stakeholder workgroup or public hearing with county offices, dealers, and registration services before finalizing any permanent rule.

Thank you for your consideration, and please confirm receipt of this comment.

Sincerely,

Noe Garcia
Owner, Servicios De Títulos Placas Y Mas
Dallas County, TX
6164050316

552.137

From: [Nory Pakravan](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Request for Reconsideration of Recent TxDMV Documentation Changes
Date: Monday, December 15, 2025 6:20:53 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I am Nory Pakravan, small business owner here in San Antonio Texas. I am writing to express my serious concern regarding the Texas DMV's recent requirement that an unexpired passport must now be accompanied by an immigrant visa in order to complete vehicle-related transactions. This change has created significant economic disruption for my business and many others across the state.

I am a Texas small business owner who started my dealership in 2018 using my own personal funds. For years, I sold approximately 10 vehicles per month, and through hard work and dedication, I have grown my business to selling 35-40 vehicles per month. My company provides reliable transportation to working families who depend on their vehicles to get to work, take their children to school, and attend medical appointments.

Since November 18, 2025, when this new requirement went into effect, I have already lost approximately 20 vehicle sales. These were customers who were fully prepared to purchase a vehicle but no longer qualify due to the new documentation requirement. This is not a hypothetical concern, this is a measurable and immediate loss of revenue.

Even more concerning, many current customers are now fearful that they will no longer be able to renew their vehicle registration. As a result, some have expressed that they may simply return their vehicle to the finance company or dealership because they see no point in continuing payments if they cannot legally operate or register the vehicle. This creates unnecessary defaults, harms financial institutions, and destabilizes the entire auto sales ecosystem.

We are private businesses selling a product to customers. We are not immigration authorities. I respectfully ask whether this precedent will extend further. Will companies like HEB or Walmart be required to verify legal status before selling groceries or household goods? Where does this responsibility end?

Texas is home to millions of people who live, work, and contribute daily to the state's economy, regardless of immigration classification. This policy change places the burden of immigration enforcement on industries that are neither trained nor intended to serve that function. Immigration compliance should remain with the appropriate federal agencies, while businesses are allowed to continue serving customers lawfully and ethically.

The ripple effects of this requirement are severe:

- Fewer vehicle sales mean fewer purchases from auctions and wholesalers
- Reduced demand for auto parts, paint, and body work
- Fewer jobs across reconditioning, sales, and service sectors
- Fewer insured vehicles, harming insurance providers
- Fewer loans issued, impacting financial institutions
- Reduced vehicle sales tax and registration revenue for the State of Texas

In short, if I sell fewer vehicles, Texas loses revenue and many hardworking Texans lose access to reliable transportation.

I respectfully ask that the Texas DMV reconsider or modify this requirement, as it is not good for small businesses, not good for consumers, and not good for the Texas economy as a whole.

This change is already pushing people toward informal and illegal solutions, including paying third parties to register vehicles in someone else's name. This results in the State no longer knowing who the true driver or vehicle owner is, which undermines registration, insurance verification, and law enforcement accountability.

Additionally, this requirement increases the likelihood of fake or altered documents being presented simply so individuals can continue driving to work, school, or medical appointments. These outcomes create exactly the type of black market activity the DMV's processes are meant to prevent.

When legal pathways become inaccessible, people do not stop driving they find unsafe and unregulated alternatives. This policy risks increasing fraud, untraceable vehicle ownership, and uninsured drivers on Texas roads.

Thank you for your time and consideration. I hope you will carefully review the unintended consequences of this policy and work with the business community to find a more practical solution.

Thanks in Advance!
Nory Pakravan

From: [omar.gonzalez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Protest to new ID requirements BY TXDMV
Date: Wednesday, December 24, 2025 1:24:57 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hi, my name is Omar Gonzalez from Gonzalez Used Cars,LLC

I am being so affected by this new ID requirement by the Texas Department of motor vehicles. My sales have drop sinse new rules have been implemented and Traffic has dropped as well. I demand a change because if this continuous, I will have to go out of business and close my business permanently , i demand a hearing in person !.
Sent from my iPhone

From: [Oscar Garcia](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Id requirements changes
Date: Sunday, January 4, 2026 1:46:11 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whomever this may concern.

My name is Oscar Garcia. I am the owner of a dealership here in Dallas. I have some complaints about the new ID requirements to obtain a registration. My issue is particularly with requiring legal status when registering for a vehicle. There are reports that up to 8% of the population of Texas is undocumented. With this being said I do not expect the state to care about undocumented immigrants. I do however expect the state to care and understand the economic impact this policy will have. My business personally runs on being able to sell to anyone in need of a vehicle. We are not ice agents, and we should not have the power to discriminate undocumented people. My business depends on being able to provide a safe and reliable vehicle to anyone. Adding this new hurdle threatens my business and my way of life. By not allowing people without a visa to register cars my business is in jeopardy of closing. My clientele is based on a safe place immigrants can buy a vehicle. This does not only impact my business but also any business adjacent to mine. Many small insurance offices, tire shops, mechanic shops, auto body shops, etc are in danger of shutting down. All of our businesses face the reality of losing 8% of consumers. I do not see a way where we eliminate 8% of the consumer base and we all come out of this with thriving business. This 8% of consumers is over 80% of my clients. My business regularly sells 4 cars a month and I've sold 2 since the third week of November when this policy took place. That is over 66% drop in sales. If things continue at this rate I would have to close my business in the next 6 months. Owning a dealership is all I know. I would start over from zero. I also fear this is the same for many others. Even those who do not think they will be affected. There is no positive outcome from this new policy change. At the very least this should be pushed back to allow business to become accustomed to the change and ready ourselves for such a huge change. I appreciate your time to hear me out, thank you.

From: [Parker Cuvelier](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Major Fiscal implications from Chapter 217, Vehicle Titles and Registration rule change
Date: Monday, December 8, 2025 3:35:16 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whom it may concern,

My name is Tommy Cuvelier and I am with Cuvelier Used Cars in Tyler Texas. We have been in business 50 years. The majority of our business is "Seller-Financed Sales." We are seeing a huge problem with this new rule clarification the state has put out with no warning. The problem lies with customers that are still paying on vehicles purchased over the last few years that cannot renew their registration stickers. These accounts will stop making payments on the vehicles and the accounts will be repossessed or lost. There will be MAJOR financial implications due to this rule change. This will not only affect dealers like me, but also credit unions and banks.

In the past there was no reason or guidance from the state on selling people that only had a passport. There was no reason to check if they were a legal citizen or had a green card. The state only asked for ID, and foreign passports were acceptable. Now out of nowhere many businesses are going to suffer massive losses due to a rule that was not voted on or frankly even thought through.

Parker Cuvelier
Cuvelier Used Cars
1605 West Erwin St.
Tyler, Tx 75702
903-592-1411

PURPOSE AND EXECUTIVE SUMMARY The proposed amendments are necessary to ensure that an applicant for vehicle registration under Transportation Code §217.040 provides personal identification documents that are valid and that prove the applicant is legally eligible to reside in Texas.

FINANCIAL IMPACT There will be no significant fiscal implications related to the proposed amendments and new section.

From: [Vanessa Portillo](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Montgomery Quality llc major impact due to new law
Date: Saturday, January 3, 2026 1:38:11 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whom it may concern,

As an owner of a small car business, I believe that everyone should be able to buy a vehicle regarding their status. This law will drafty damage us (small businesses). We have hardly achieved the sales this past month. If Texas implements this law will affect us so much because most of our customers have a passports. If this business loses sales my employees and myself will be jobless. We have hard working people that only have a valid passport and is not fair for them to not be able to buy a vehicle just because of their status.

Please keep us in mind regarding this concern. Thank you for your understanding.

Montgomery Quatily LLC
Pedro Manzanares
2114 Ferguson way
Houston TX 77088
713-898-4303

Express Auto Financial LLC
3501 E Main Street
Grand Prairie TX 75050
Phone 972-642-5445

RECEIVED
DEC 29 2025
TxDMV
OFFICE OF GENERAL COUNSEL

12/20/2025

To Whom It May Concern,

I am writing to formally outline the significant operational and financial hardships faced by automobile dealerships—particularly Buy Here Pay Here (BHPH) dealerships—related to verifying legal status in the United States and the resulting impact on vehicle registration renewals for existing customers.

Automobile dealerships are not government agencies and do not have access to federal or state databases required to accurately verify an individual's legal or immigration status. Attempting to place this responsibility on dealerships creates substantial risk, as dealership personnel are not trained, authorized, or equipped to interpret immigration documentation or determine legal presence. This exposes businesses to potential liability, discrimination claims, inconsistent enforcement, and unintentional noncompliance, while diverting resources away from their primary function of selling and servicing vehicles in accordance with existing motor vehicle and consumer finance laws.

The hardship is especially severe for Buy Here Pay Here dealerships, which serve customers who often rely on alternative financing and flexible payment structures. Many current customers who are otherwise compliant with their payment obligations are unable to renew their vehicle registrations due to new or expanded legal status verification requirements imposed at the registration level. When customers cannot legally register their vehicles, they are often unable to drive them, which directly affects their ability to work, meet financial obligations, and continue making timely payments to the dealership.

As a result, dealerships experience increased delinquencies and defaults through no fault of the business or the customer's willingness to pay. Vehicles that cannot be registered lose practical value, increase repossession rates, and impose additional storage, administrative, and recovery costs on dealerships. This creates a cascading financial impact that threatens the sustainability of BHPH operators, many of which are small or family-owned businesses serving local communities.

In summary, requiring dealerships to verify legal status places an unreasonable burden on private businesses and creates unintended consequences that harm customers, dealerships, and local economies alike. We respectfully urge policymakers and regulators to recognize these challenges and consider solutions that preserve compliance while avoiding the transfer of governmental verification responsibilities to private entities ill-equipped to perform them.

Thank you for your time and consideration of this important matter.

Sincerely,



Maria Pericaz
Owner

RECEIVED 307

DEC 22 2025

TxDMV
OFFICE OF GENERAL COUNSEL

Dear Laura Moriarty of General Counsel,

We are reaching out to you today in order to give our unique perspective as an independent car dealer that operates out of the DFW Metroplex, and **plead with the state to return the law to its prior form in regards to the citizenship changes to the Texas vehicle registration process.** Our business, Post Motors Mansfield, has been in operation over 20 years buying, selling, trading, & financing automobiles. During this time we have done an estimated \$140 million dollars in sales, which makes us responsible for collecting and contributing an estimated \$9 million in state sales taxes to the state of Texas. We have also contributed an estimated \$20 million to a multitude of local shops & businesses, in order to get our vehicles made ready for sale in that same 20 years. Additionally, we have also used our profits to reinvest money back into thousands of customers and businesses in this time frame with over \$15 million contributed to the community in the form of finance agreements.

That being said, **these investments were made under prior rules that did not require citizenship inquiries.** The proposed changes to the current title and registration process in the state of Texas, changes our roles as automobile and sales professionals into roles which should be reserved for the Department of Homeland security and ICE. We have no prior experience or expertise in the field of reviewing citizenship documents, and this could cause serious customer relations problems, with such an abrupt change to the previous policies. It could also raise potential issues with the TXDMV and titling process, due to confusion and miscommunication of what would be required to register a vehicle, if this proposed change is made law.

We have brought this information to your attention in order to give you our opinion that **we believe the state should reverse the law to its original form in regards to citizenship changes to the registration process,** thereby protecting the legally binding contracts that are already in place, the investments of thousands of dealers like us across the state of Texas, and protecting the property of individuals who have paid for their property fair and square. Furthermore, we have found based on past experiences that not permitting undocumented individuals to register/own vehicles will only further perpetuate fraud and "straw purchases". It will also have a negative impact on both documented and undocumented Texans, in the form of a large increase of driver's without insurance. Although driver's without insurance is a common problem, however, we have found that individuals with something to lose (a vehicle in their name) are more likely to follow the laws and maintain minimum security requirements with an asset of value in their name. We do not have the answer to our immigration problem, however, I can say with certainty that preventing undocumented Texans from purchasing cars is not going to be the solution. Thank you for taking the time to read our letter, we hope that you have found our perspective of value, and we pray that you do what you know in your heart to be the right thing to do.

Sincerely,

Post Motors Mansfield

Le Joon President

Matt Cochran Secretary



COLE DANIELL

Post Motors Mansfield
8151 Rendon
Bloodworth Rd.
Mansfield, TX 76063
Office 817-477-2299
Fax 817-477-3143
Cell 817-944-3386

Email info@postmotorsmansfield.com

www.postmotorsmansfield.com



Matt Cohagen
817-477-2299

8151 Rendon
Bloodworth Rd
Mansfield, TX 76063
Cell 817-706-7179



2333 N Broadway, Suite 400
Santa Ana, California 92706
Phone (714) 415-6193
Fax (714) 415-6154

January 5, 2026

VIA EMAIL

Texas Department of Motor Vehicles Board
c/o
GCO_General@txdmv.gov
rules@txdmv.gov

To the Honorable Members of the Board:

This office represents Veros Credit, LLC (“Veros”) in all legal and regulatory matters. We write to you today to address concerns as to the proposed revisions to 43 Texas Administrative Code, Chapter 217 (the “Code”) relating to personal identification requirements for motor vehicle registrations.

Veros is a leading nation-wide provider of technology-based automotive finance solutions, and has had the privilege of serving Texas consumers since 2013. As of the date of this letter, Veros currently has nearly \$100,000,000 in outstanding accounts in Texas, and has always sought to offer financing solutions to Texas consumers in compliance with, and in the spirit of, Texas law.

This past Fall, we learned of proposed changes to the Code that would prevent thousands of Texas drivers from obtaining new registrations on, *and also re-registering*, motor vehicles without specified forms of identification. While we understand the motivation behind such a change, we are gravely concerned about the unintended consequences of such a rule.

First, prior to the proposed change, neither Veros nor its industry peers were mandated to require proof of residency in Texas to finance vehicle purchases. By not incorporating this requirement, Veros was able to provide access to credit to lawful and productive residents of Texas who, for a variety of reasons, might not have the type of identification enumerated in the proposed rule. If the rule is enacted as proposed, lenders will inevitably suffer catastrophic losses as a result of vehicles that can no longer be legally driven in the state, and therefore subject to confiscation or abandonment.

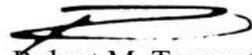
Second, vehicle registrations generate necessary revenue for state infrastructure and administrative costs. By preventing the payment of registration fees by thousands of previously registered drivers, we are concerned that the burden of the loss of that revenue will be borne by the citizens of Texas.

Third, we believe that the inability of drivers to register vehicles will directly lead to an influx of uninsured drivers on Texas roads. While some small percentage of unregistered drivers may elect to leave the state, the reality is that many will stay due to long established ties to their communities, and will simply exist in the shadows. This will again be a heavy financial burden

shifted to Texas citizens through higher insurance premiums and little recourse against at-fault, uninsured drivers in collisions.

We urge you to reconsider the proposed changes to the Code. As an alternative, we would suggest enacting the identification on new registrations only, to create a transitional period to allow Texas, its citizens, and its financial services sector, to adapt to the changes.

Sincerely,



Robert M. Tennant, Esq.
Chief Legal Officer
Veros Credit, LLC

Analysis of the non-acceptance of foreign passports for vehicle-related transactions in the State of Texas.

Rosa Cecilia Medellin
Texas Independent Insurance Agent

552.137

31 December 2025

Houston, Harris, Texas

Abstract

The new and used automobile industry in Texas generates jobs and tax revenue throughout the state and counties. A proposed revision to the 43 Texas Administrative Code (43 TAC) to reject the acceptance of foreign passports for motor vehicle title and registration transactions will have an economic impact on sparsely populated counties in Texas and a foreseeable decrease in investment in new and used vehicles throughout the state by foreign passport holders. Presently, the Texas Department of Motor Vehicles (TXDMV) does not have and cannot provide actual data on the amount of tax collected by vehicle owners with foreign passports and non-licensed U.S.-approved identifications or with a valid driver's license. Nor can it provide data on the types of identification criminals hold. The vast majority of used and new auto dealers in Texas accept foreign passports for vehicle title registration, and many conduct export sales. Refusing to accept foreign passports for vehicle title and registration will have a significant economic impact on the new and used automobile industry statewide.

Analysis of the non-acceptance of foreign passports for vehicle-related transactions.

Introduction: In the twenty-first century, owning a vehicle is no longer a luxury; it has become a necessity for survival worldwide. According to the U. S. Department of Energy, approximately 21,392,800 gas-powered cars were registered in Texas in 2023 (USDOE, 2025). As of December 2025, the Texas Department of Motor Vehicles (TXDMV) does not have data on vehicles registered without a valid Texas driver's license or on the amount of tax collected annually from vehicle titles and registrations of owners without a driver's license or foreign passports or even with a valid identification listed in the 43 Texas Administrative Code (43 TAC) of the TXDMV. The impact of not accepting foreign passports for title transfer and registration renewal procedures will cause a domino effect on the economic ecosystem of the new and used automobile industry in the State of Texas, resulting in a loss of tax revenue. TXDMV is not a branch of an immigration department, nor are the county tax offices. The mission of the TXDMV is "to serve, protect and advance the citizens and industries in the state with quality motor vehicle related services" (TXDMV, 2025). Presently, the TXDMV does not have accessible data of Texans registering vehicles with a Texas driver's license, military, U. S. passport, Texas handgun license, NATO ID, U. S. Dept of State ID, U. S. Dept of Homeland Security ID, or U. S. Citizenship and Immigration Services/DOJ ID, which are not driver's licenses.

The domino effect leading to the collapse of new and used car dealerships in overpopulated cities in Texas. The Texas Automobile Dealers Association (TADA) represents about 1,400 franchised new-car dealerships, and the Texas Independent Automobile Dealers Association (TIADA) represents about 14,000 licensed independent dealers (TADA, TIADA, 2025). As of December 2024, the TXDMV reported that the following counties registered 3,472,906 vehicles: Harris County, 2,085,403; Dallas County, 1,711,879; Tarrant County, 1,677,854; and Bexar County, 985,765 (TXDMV, 2025). Travis County reported 985,765. Presently, there is no data available from the TXDMV on how many vehicles auto dealers or Texas's largest counties, such as Harris, Dallas, Tarrant, Bexar, and Travis, have registered with non-driver's licenses or foreign passports. These populated counties will incur economic losses due to the rejection of foreign passports for vehicle title registration or renewals. Many foreign passport holders have at least one, and possibly more than two, registered vehicles.

Undoubtedly, the counties will be unable to collect sales and county taxes, and auto dealers will not report federal tax on vehicles sold to foreign passport holders. Therefore, many new and used auto dealers will experience a reduction in sales to customers with foreign passports. The closure of many small auto dealerships in populated communities will result in the nonrenewal of dealers' licenses and the termination of commercial property leases in Texas. Since there will be no commercial property in use, the need for utilities such as light, internet, water, and maintenance services will be null. Figure 1.0 below highlights the breadth of a single auto dealer in Texas, which directly or indirectly affects its ecosystem. In the long term, sales at many reputable vehicle dealers will decline, leading to distrust of the new- and used-car sales industry. The auto dealer industry, both new and used, has a significant impact on jobs in populated counties. With a reduction in vehicle sales to foreign passport holders, the automotive dealership industry will decline, and in-person vehicle purchases may become nonexistent for those investors. Many foreign citizens purchase vehicles for export to Latin America, thereby benefiting Texas vehicle dealerships, especially along the Texas–Mexico border.

Dealer's Permit → Commercial Lease → Local Permits (DBAs, Certificate of Occupancy, etc.) → Utilities Services → Federal Income Tax → State Sales Tax → County Tax → School District Tax → County Property Tax → Wages & Employee Commissions → Auto, Inventory, Commercial Insurance and Commercial Bonds → Vehicle Inspection Stations → Financial Loans and Financial Permits → TXDMV & County Clerks Positions → Fines & Penalties from TXDMV & Counties → Peace Officers Automobile Related Fines & Local Municipality Court Fees → County Title Services & Title Runners Permits → Auto Auctions → Licensed Renewal Locations → Gas Stations → Vehicle New & Used Auto Parts → Oil Change, Mechanic, & Tire Shops.

Figure 1.0 The economic ecosystem of a single automobile dealership in Texas.

Financial institutions may also be affected by the drastic measures proposed in 43 Texas Administrative Code Subchapter B (43 TAC), given the acceptance of foreign passports for financing vehicles in Texas. Dealerships that operate their income through bank accounts may be forced to close their commercial bank accounts due to a loss of sales involving foreign passports. Prohibiting car dealerships from accepting foreign passports will disrupt business permits and government processes, including inspection stations and the issuance of fines for unregistered vehicles. Law enforcement officials will see a loss of revenue from fines due to the drastic reduction in the number of cars on the roads of major metropolitan areas. The scope of auto

dealers in smaller counties like Briscoe, Cochran, and Loving is incomparable with larger counties since the collection of vehicle sales tax and registration renewals is less than 3,000 vehicles registered as of December 2024; these counties reported the registration of about 1,873, 2,778, and 213, respectively (TXDMV*, 2025). The economic impact in smaller counties does not compare with that in overpopulated counties with more than 500,000 registered vehicles per year. In major metropolitan areas, new and used auto dealerships accept original foreign passports issued by consulates accredited to the United States.

The legal consequences of not accepting foreign passports for vehicle transactions.

Undoubtedly, all Texans want safe roads and efficient automobile title and registration transactions. Refusing to accept foreign passports in overpopulated counties will lead people to invest in a vehicle and register it in the name of someone with acceptable identification. Truthful vehicle investors will not be able to dispute ownership of a car or mislead local government agencies. With a foreign passport and registration, peace officers can identify the vehicle's actual owner. Any accidents or incidents caused by individuals with foreign passports will be subject to assume legal and financial responsibility. If foreign passports are accepted, greater control over revenue collected can be achieved through reliable data and the known whereabouts of the vehicle owners. Agencies such as the Department of Health and Human Services will lack sufficient information to determine whether to approve or deny SNAP and health benefits when a foreign passport holder lacks proper vehicle registration.

Furthermore, the Texas Department of Public Safety (DPS) and other police agencies depend on the most current license plate information for Amber and Blue Alerts and other useful alerts. Declining foreign passports will lead to disparities and delays in verifying vehicle ownership. Over the past twenty years, accepting foreign passports has benefited law enforcement agencies by facilitating the reporting and resolution of crimes, the payment of fines, and attendance at court appearances, and even enabling collaboration with law enforcement officers to keep communities safe. It's not simply a matter of saying there will be no impact on the state of Texas by not accepting foreign passports for vehicle title and registration; this will create chaos in trying to solve criminal cases and could lead to falsely accusing individuals who may have registered vehicles in good faith with valid identification for a friend or family member. Many officers will interview the wrong vehicle owner when investigating potential

criminal cases or gathering leads because the driver may hold a foreign passport. Not all United States citizens and Texans are criminals in the same way, nor are all foreign passport holders.

Surcharge fee for registering a vehicle without a valid Texas driver's license or a foreign passport. The TXDVM application form VTR-130-U accepts the following non-license identifications for registering a car: Texas and out-of-state identifications, military identification, U. S. passport, Texas handgun license, NATO ID, U. S. Department of State ID, U. S. Department of Homeland Security ID, or U. S. Citizenship and Immigration Services/DOJ ID. Many Texas residents register their vehicles using the mentioned identification instead of a Texas driver's license. Nonetheless, after titling a car in Texas with a non-driver identification, the registered owner often continues to renew the vehicle registration without verifying their actual home address or obtaining a driver's license permit. Do the aforementioned forms of identification replace a Texas driver's license when an officer issues a ticket for not having a Texas driver's license on hand? The TXDMV has not collected data on vehicles registered to individuals using non-licensed identification documents or foreign passports, nor has it collected information on the vehicle sales tax generated by each identification type.

The vast majority of insurance companies surcharge individuals with foreign passports, expired driver's licenses, or state identification in their insurance premiums. Applying a surcharge to title transfers and registration renewals for foreign passport holders and non-licensed identifications will enable the TXDMV to invest in a system to collect data on transactions processed without a Texas driver's license. At the same time, the State could allocate the surcharge to Texas roads, establish a fraud department within the TXDMV, or use the funds to develop a database of vehicle identification types. Such a database will provide data on economic impacts and comparisons among licensed drivers, non-licensed individuals, and foreign passport holders. The TXDMV could implement a surcharge on all transactions involving foreign passports or non-driver-identification documents, including Texas Duplicate Titles, VTR-130-SOF Bonded Titles, temporary license plates, and permits.

Financial institutions even charge higher interest rates to foreign passport holders for financing vehicles, which functions as a surcharge. Furthermore, primary standard and non-standard automobile insurance companies also surcharge insured drivers with foreign passports. Officials may implement the surcharge not only at the time of vehicle title transfer but also at the time of registration renewal each year. Without a doubt, the TXDMV and county tax offices may

set their surcharge fees in accordance with the criteria of their respective organizations. The surcharge fee should be mandatory not only for foreign passports but also for non-licensed U.S. identifications, such as Texas ID, military ID, and handgun licenses, because such identifications are not driver's licenses. Many residents with foreign passports have at least two vehicles per household, which definitely contributes to the TXDMV and the county tax office at the time of vehicle registration renewal.

A surcharge on non-licensed authorized identifications and foreign passports may fund county and state agencies to target online vehicle fraud sales from unscrupulous websites that authorize transactions without proper permits and employ untraceable salespersons. The crime and abuse committed on online auto sales social media sites such as Facebook Marketplace, Offer Up, eBay, Instagram, TikTok, and others often lead to the purchase of stolen vehicles, auto parts, and counterfeit auto titles, without resulting in the capture of most offenders. While physical and new auto dealers comply with the codes imposed by the TXDMV and often pay fines and penalties, an impossible surcharge with an acceptable foreign passport will benefit consumers by providing a funded department to monitor and penalize social media platforms involved in used auto parts and vehicles without proper permits since fraudulent vehicle transactions are not solved for the most part data to determine who commits the erroneous online auto or parts sales by licensed, non-licensed authorized identifications or foreign passport holders.

Proposal to accept foreign passports for registration of an automobile in Texas. As noted previously, the Texas Department of Motor Vehicles and other Texas governmental agencies do not have data to distinguish between vehicles registered to a Texas driver's license, a Texas identification card, or other approved national unlicensed identifications. The primary focus of 43 TAC is to target individuals registering vehicles with a foreign passport; however, there are countless vehicles registered with expired Texas driver's licenses and identifications, including non-licensed U.S. identifications as if a Texas identification, an Immigration Naturalization Service card, or a U. S. Passport are replacements for a driver's license. The State of Texas urgently needs a system that identifies vehicle registration types to support updates to current codes and to use accurate data to evaluate how different identification types relate to criminal activity.

In addition, recommending accepting foreign passports for vehicle registration and requesting at least one or two reference addresses so that peace officers or government agencies can verify the vehicle's actual owner and whereabouts. Another option for accepting a foreign passport for vehicle registration is to obtain a recommendation from a Texas-approved identification holder who has contact information. Because the state is concerned about vehicle misuse and title fraud, it may request the surrender of license plates issued to foreign passport-registered cars after they are sold at county tax offices to prevent improper use of tags, and the county may charge a fee for receiving the plates.

Conclusion: One does not have to be an economist to recognize the actual impact of not accepting foreign passports under 43 TAC on the new and used auto dealer industry and on the collection of counties, state, and federal taxes in overpopulated metropolitan cities. Clearly, in low-population counties where some residents must travel outside their jurisdiction to purchase a vehicle, the vehicle sales ecosystem would not be affected if a foreign national purchases a car. Would Texas be able to reduce crime by a significant percentage if it stopped accepting foreign passports for vehicle purchases and title registration? It's better to benefit from investors with foreign passports by charging fees for driving without identification listed in 43 TAC, because there will be greater control in not only knowing who the correct owners of a vehicle are, but it also benefits the economy of large metropolitan areas and, above all, the ecosystem that the vehicle sales industry benefits our Lone Star State through taxes. Finally, does money take precedence over identification when a vehicle, new or used, is purchased with hard-earned cash, often the result of much labor and savings?

My name is Rosa Cecilia Medellin, and I have a Property and Casualty Texas Insurance License. For the past 20 years, I have operated as an independent insurance agent in the Houston area. I do not qualify for governmental benefits and work every day, including holidays, to support my family. The auto dealers' industry, both new and used, has directly benefited me. The reason is that foreign passport holders purchase their vehicles, and many Texas insurance agents and companies can generate an income by writing auto insurance policies. In this analysis, I focus solely on new and used personal automobiles; commercial vehicles and fleets owned by foreign companies and small business owners with foreign passports are excluded from this report.

The Internal Revenue Service (IRS) requests the original foreign passport for certain transactions. Why can't the TXDMV or our local counties use the same method to verify the identity of an actual vehicle owner when registering a vehicle? *Claiming that individuals with foreign passports who register cars in Texas are criminals suggests that refusing to accept foreign passports for registration and title will eliminate all crime in Texas.* Small cities or counties with low vehicle sales will not be affected by the type of vehicle identification used for registration. On the contrary, allocating revenue from the new and used automobile industry to benefit all communities in Texas will contribute to the state's economic growth. The rejection of foreign passport vehicle transactions will have the opposite effect, causing not only economic chaos in the new- and used-vehicle industry but also a loss of control over who is driving vehicles in Texas. What is the purpose of allowing foreign passport holders to invest in automobiles while not being able to contribute to vehicle taxes or operate a car?

ch ch

U. S. Department of Energy [USDOE]. Retrieved 2025, December 29. Vehicle Registration Counts by State. <https://afdc.energy.gov/vehicle-registration>

Texas Department of Motor Vehicles [TXDMV]. Retrieved 2025, December 29. About Us. <https://www.txdmv.gov/aboutus#:~:text=The%20Texas%20Department%20of%20Motor,quality%20motor%20vehicle%20related%20services.%E2%80%9D>

Texas Department of Motor Vehicles [TXDMV*]. Retrieved 2025, December 30. Vehicle Titles and Registration Data PDF Registered Vehicles by County January 2020 through December 2024. <https://www.txdmv.gov/publications/vehicle-titles-and-registration-data>

Texas Automobile Dealers Association (TADA). Retrieved 2025, December 30. What do we do? <https://www.tada.org/>

Texas Independent Automobile Dealers Association (TIADA). Retrieved 2025, December 30. Blog: Where do you rank in vehicles sold? https://www.txiada.org/blog_home.asp?display=151

From: [Russell Moore](#)
To: [Zz - Resource - GCO Rules](#)
Subject: ID CHANGES
Date: Monday, January 5, 2026 11:23:14 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Subject: Concerns Regarding Proposed Identification Requirement Changes and Economic Impact to Texas

Dear [Commissioner / Director / Members of the Board],

I appreciate the opportunity to provide feedback regarding the proposed changes to identification requirements impacting motor vehicle transactions in Texas. I write on behalf of independent automobile dealers and finance companies who serve a substantial portion of Texas's working population—particularly credit-challenged consumers who rely on regulated Buy Here Pay Here and independent finance models to maintain reliable transportation.

While we fully support efforts to prevent fraud and protect consumers, the proposed changes—if implemented as currently written—will create significant unintended economic consequences, disrupt lawful commerce, and materially reduce state and local tax revenue.

Real-World Operational Impact

Independent dealers operate in a highly regulated environment and already comply with robust identity verification, OFAC screening, anti-fraud, and record-retention requirements. The proposed changes introduce new identification standards that many lawful Texas residents—despite being employed, insured, and tax-paying—simply cannot meet in practice.

In real-world dealership operations, this will result in:

Inability to complete lawful vehicle sales for otherwise qualified buyers

Increased contract unwind rates and transaction abandonment

Delays in titling, registration, and tax remittance

Reduction in vehicle sales volume across independent dealers statewide

Transportation is not discretionary for most of these consumers—it is foundational to employment. When access is restricted, job loss and default risk increase, creating downstream effects well beyond the automotive sector.

Estimated Economic Impact to Texas

Based on conservative industry benchmarks and current dealer volume across the state:

Independent dealers sell hundreds of thousands of vehicles annually

Average taxable transaction value (vehicle + fees): \$10,000–\$14,000

Sales tax per transaction: \$625–\$875

If only 10–15% of transactions are prevented or delayed due to identification barriers, Texas could experience:

\$180–\$300 million annually in lost or delayed sales tax revenue

Additional losses in title, registration, inspection, and local fees

Reduced income tax receipts indirectly via employment disruption

These figures do not include secondary impacts to:

Automotive service and repair businesses

Insurance carriers

Local employment and payroll taxes

Consumer credit performance and collections

Lessons from Florida’s Recent Experience

Florida recently implemented similar identification and documentation changes. The result was not fraud reduction—but operational gridlock:

Widespread transaction delays and dealer backlogs

Confusion across tax collectors and regulatory agencies

Emergency clarifications, temporary allowances, and post-implementation revisions

Texas now has the benefit of observing these outcomes before repeating them. Florida’s experience demonstrates that broad, rigid ID requirements disproportionately affect lawful consumers and small businesses without meaningfully improving enforcement outcomes.

Request for Consideration

We respectfully ask the agency to consider one or more of the following before implementation:

Delay enforcement to allow for industry education and system readiness

Provide clear carve-outs for existing regulated finance models

Allow alternative verification methods already used under federal compliance frameworks

Pilot or phase implementation rather than statewide immediate enforcement

Independent dealers are not opposed to accountability—we are opposed to policy that unintentionally removes tens of thousands of Texans from lawful commerce and employment.

Closing

Texas has long been a model for balancing consumer protection with economic vitality. We strongly believe that with industry collaboration, the state can achieve both goals without sacrificing tax revenue, employment, or access to transportation for working families.

Thank you for your time, consideration, and service to the State of Texas. I would welcome the opportunity to participate in stakeholder discussions or provide additional data as needed.

Respectfully,

Russell Moore
Owner / Operator
Top Notch Used Cars
Conroe, Texas

Russell Moore

Top Notch Used Cars

900 East Davis

Conroe, Texas 77301

936-539-9909 office

936-539-9988 fax

936-760-9715 cell

552.137

"Whether you think you can, or you think you can't-- you're right"

Henry Ford

From: [Sara Torres](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Concern Regarding Transportation Code 502.040 – Acceptable Identification Requirements
Date: Monday, December 8, 2025 10:32:01 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To Whom It May Concern,

I am writing to respectfully express my concerns regarding the current implementation of Transportation Code 502.040, specifically the requirement that individuals using a foreign passport must also present a valid visa or permanent resident card in order to complete vehicle title transfers or registration transactions.

While I understand the intention behind maintaining secure and verifiable identification, this policy presents several unintended negative consequences for both our community and our state.

First, many individuals who live, work, or have long-standing ties in Texas may not possess a visa or permanent resident card despite having legitimate foreign passports or other reliable forms of identification. By preventing these individuals from purchasing or transferring ownership of vehicles, this policy may inadvertently limit their ability to work, travel, and participate in the economy. This creates unnecessary barriers for families and individuals who are trying to comply with the law.

Second, when people are unable to legally purchase or register vehicles through proper channels, it increases the likelihood of informal or undocumented vehicle transactions. This can unintentionally open the door to fraudulent activity, unsafe vehicles on the road, and other public-safety concerns that could otherwise be prevented through regulated title transfers.

Additionally, many insurance companies accept consular IDs (matriculas) and foreign passports without requiring visas or immigration documentation. This creates an inconsistency where individuals may be fully insured and legally operating a vehicle but are denied the ability to legally transfer or register it. This gap undermines both compliance and safety, and places unnecessary strain on agencies — including ours — that rely on smooth, lawful vehicle transactions.

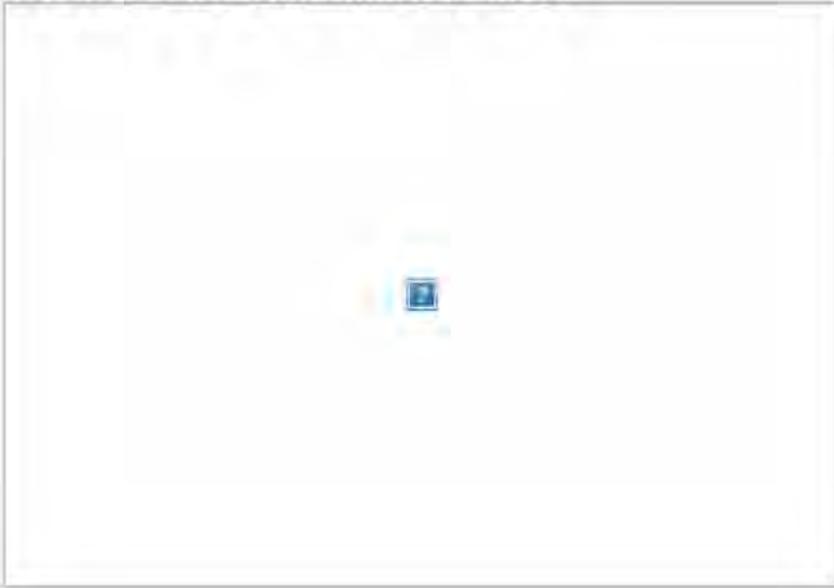
For these reasons, I respectfully ask that the Texas DMV reconsider or modify the identification requirements for foreign passport holders so that vehicle transfers and registrations remain accessible, secure, and consistent with the identification standards already accepted by other state-regulated industries.

Thank you for your time, your service, and your attention to this important issue. I appreciate

your consideration and would welcome any updates or opportunities for public input regarding this policy.

Sincerely,

Sara Torres
Personal and Commercial Lines





COMMITTEES
FINANCE, VICE CHAIR
TRANSPORTATION

THE SENATE OF TEXAS
JUAN "CHUY" HINOJOSA
DISTRICT 20

COMMITTEES
JURISPRUDENCE
CRIMINAL JUSTICE
BORDER SECURITY

January 5, 2026

Texas Department of Motor Vehicles
Office of General Counsel
4000 Jackson Avenue
Austin, TX 78731

Sent via email: rules@txdmv.gov

**Re: Public Comment on Proposed Rules Published in Texas Register on
December 5, 2025**

Dear Ms. Moriarty,

I write to formally express my concerns regarding the proposed rules published in the *Texas Register* on December 5, 2025, regarding changes to identification requirements for motor vehicle registration renewal, amending 43 TAC §217.22, §217.26, §217.28, and §217.29. The purpose of vehicle registration is for the state to have accurate ownership information for every vehicle regardless of the person's status. Based on feedback from constituents in my senate district, including residents, business owners, and public officials, I believe that these proposed rules, if adopted, will make Texas residents less safe, increase the risks of identity theft and fraud, impose an unfunded mandate on county tax assessor collectors, and negatively impact the Texas economy.

Over the past several years, under the leadership of Governor Greg Abbott and Lt. Governor Dan Patrick, the legislature has focused on reducing regulations, eliminating red tape, and making government more effective and efficient for Texas residents. Unfortunately, this proposed rule does the opposite.

Residents who have transitioned to online vehicle registration renewal may have concerns and be reluctant to use this service if they are required to upload identification, which could lead to identity theft. Those who mail in their registration may face similar identity theft concerns and others will have difficulty getting a copy of their identification documents. For those who fail to include the necessary identification, the tax assessor will have to send a rejection notice resulting in processing delays and increased staffing demands. This creates an unfunded mandate for our counties.

Texas Department of Motor Vehicles
January 5, 2026
Page 2

Additionally, counties using a Rapid Processing System (RPS) to process mail renewal requests may no longer be able to use this system. The new proposed requirements of manually entering the identification type and expiration date render the RPS useless. Residents in counties that use this system will now have to wait much longer to have their renewal processed.

Another concern is that by adding unnecessary hurdles, bad actors may exploit the situation, leading to the creation of fraudulent alternatives and illegal tags. The proposed changes will also exacerbate the problem of ghost titles, making it even more challenging for law enforcement to address these fraudulent activities and keep our public safe. This will also lead to more uninsured vehicles on our roads and concerns have been brought up that recall notices may not get to the actual owners of the vehicles. For residents that live near bordering states, they may decide to register their vehicles in other states.

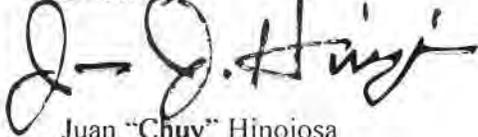
The requirement for identification at the initial registration is already established under §217.26, making it unnecessary to impose this requirement for renewals. Further, employees at dealerships and tax assessor collector offices currently lack the training to verify and validate identification documents effectively.

There are also reports of auto sales being delayed or lost entirely due to these requirements, adversely affecting our auto dealers, particularly small dealerships, and consequently impacting the state's revenue. It is also important to recognize that Texas residents, especially those in border and rural communities, depend heavily on having a vehicle to get to work, school, a medical appointment, or participate in normal daily life.

For all these reasons, I respectfully request that the Texas Department of Motor Vehicles Board rescind the previous bulletins and not adopt the proposed amendments published in the *Texas Register* on December 5, 2025. If the Board chooses to move forward, I request that it incorporate the recommendations provided by the Tax Assessor-Collectors Association of Texas and the Texas Automobile Dealers Association.

Thank you for your attention to this important matter. Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,



Juan "Chuy" Hinojosa
State Senator, District 20

Cc: The Honorable Greg Abbott, Governor of Texas
The Honorable Dan Patrick, Lt. Governor of Texas
The Honorable Robert Nichols, Chair of Senate Committee on Transportation



January 5, 2026

General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, Texas 78731

Re: Comments to Proposed Amendments to 43 Texas Administrative Code Chapter 217, Vehicle Titles and Registration (Non-Emergency) (proposing amendments to §§217.22, 217.26, 217.28, and 217.29)

Dear Ms. Moriarty:

Thank you for the opportunity to provide comments regarding the Texas Department of Motor Vehicles' proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29, relating to personal identification requirements for vehicle registration under Transportation Code §502.040. I submit these comments to explain how the proposed changes would affect Buckeye Risk Services ("Buckeye"), the dealers and finance companies we support, and the customers they serve, and to highlight unintended consequences that warrant reconsideration before the rules are finalized.

Buckeye works closely with automobile dealers and finance companies across Texas to support compliance-driven vehicle transactions and the administration of voluntary protection products for consumers' benefit (i.e. vehicle service contracts, limited warranties, and GAP waivers), as well as products designed to protect lienholders (i.e. collateral protection insurance). As a result, we have direct visibility into how changes at the registration stage affect real-world operations downstream.

Permanently codifying restrictive identification guidance will significantly increase transaction delays and lost sales due to factors outside a dealer's control. Dealers are already contending with substantial DPS appointment backlogs. When customers are required to obtain new or replacement identification as a condition of registration, otherwise lawful transactions stall or collapse, disrupting vehicle delivery, funding timelines, and product administration.

These impacts are not isolated. Dealers routinely encounter long-time Texas residents, seniors, working families, and lawfully present individuals who are fully qualified to purchase and register a vehicle but are unable to satisfy rigid documentation requirements. These outcomes create



1170 E. Western Reserve Road,
Building 2 – Second Floor
Poland, Ohio 44514

Phone: 330-726-9030
Fax: 330-319-7337
buckeyerrisk.com

confusion for customers, increase the burden on dealership staff, and undermine the efficiency of the registration process.

The proposed rules also place dealers and their employees in an untenable position by effectively requiring them to review and interpret immigration-related documentation. Dealership personnel are not immigration authorities and lack the training, authority, and legal clarity to make such determinations—particularly in light of the increasing prevalence of AI-generated and synthetic fraudulent documents. From Buckeye’s perspective, this ambiguity introduces compliance risk throughout the transaction lifecycle and increases the likelihood of inconsistent treatment across dealerships.

We are also concerned about potential conflicts with existing federal fair lending laws. For example, in October 2023, the Consumer Financial Protection Bureau and the U.S. Department of Justice cautioned that businesses may not deny credit solely on the basis of immigration status when applicants are otherwise qualified. We share the concern of dealers and finance companies that the proposed rule change could unintentionally embed immigration-related considerations into the registration process, placing dealers and their service partners in conflict with federal consumer protection standards and exposing them to fair lending liability.

Buckeye joins the industry’s request that TxDMV refrain from permanently codifying the current restrictive identification guidance and pause this rulemaking to engage further with stakeholders. At a minimum, TxDMV should remove the photocopy-by-mail requirement, clarify or eliminate the “verification” obligation, and provide transition relief for vehicles already registered and financed under existing rules. Ultimately, any changes should be clear, administrable, and should not impose new operational or legal burdens on independent dealers and the businesses that support them.

Absent further collaboration and clarification, permanent rulemaking risks excluding lawful customers, increasing systemic friction, and placing additional strain on an already challenged segment of the Texas automotive market.

Thank you for considering these comments and for your continued engagement with the regulated community. I welcome the opportunity to provide any additional insight or assistance through the rulemaking process.

Sincerely,



Shaun K. Petersen
Chief Legal Officer

From: [Sony Santana](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Letter
Date: Monday, January 5, 2026 9:20:05 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

TO WHOM IT MAY CONCERN,

I am writing on behalf of **Autosiglo Group LLC**, a licensed Texas motor vehicle dealer (Dealer License No. **P150444**), regarding the identification requirements implemented on **November 19, 2025**. I respectfully submit this letter ahead of the **January 5 legislative meeting** to request that **this restriction be eliminated** and that licensed dealers be allowed to **sell vehicles to customers presenting valid foreign passports, without the additional requirement of Department of Homeland Security admission stamps, permanent resident cards, or immigrant visas**, as was permitted prior to this change.

Autosiglo Group LLC operates in full compliance with all Texas laws related to vehicle sales, titling, registration, inspection, and insurance. Historically, approximately **80% of our customers** relied on foreign passports as their primary form of identification. These customers consistently obtained insurance, properly registered their vehicles, and made their payments on time.

The impact of the current restriction has been immediate and severe. To illustrate this clearly:

- **December 2024:** 17 vehicles sold
- **December 2025:** 5 vehicles sold

This decline is directly tied to the restriction. In December 2025 alone, we were forced to turn away **approximately 15 customers** who were ready and financially able to purchase vehicles but were denied solely because they presented foreign passports that no longer met the newly imposed documentation requirements.

Our dealership typically sells **15 to 20 vehicles per month**, which is necessary to cover fixed expenses. Our monthly rent alone is **\$4,200**, excluding payroll, inventory, insurance, and other operating costs. At the current sales level, our business is operating at a loss. If this restriction remains in effect, we will be forced to reconsider the continuation of our business.

Prior to November 19, licensed dealers were able to sell vehicles to customers using valid foreign passports without additional federal immigration documentation. That system functioned effectively for dealers, customers, and the State. **Restoring this standard would immediately prevent further financial harm and allow compliant businesses like ours to continue operating.**

We respectfully request that the current restriction be **eliminated** and that licensed dealers be permitted to sell vehicles to customers presenting **valid foreign passports without additional immigration documentation**, as was previously allowed.

Thank you for your time and consideration.

Respectfully,

Autosiglo Group LLC
Dealer License No. **P150444**

--

Best Regards,
Sony Santana

CAPITOL OFFICE:
P.O. Box 2910
AUSTIN, TEXAS 78768-2910
(512) 463-0924



DISTRICT OFFICE:
2909 E. ALDINE AMPHITHEATRE DR., STE. 307
HOUSTON, TEXAS 77039
(281) 442-2206

STATE REPRESENTATIVE
DISTRICT 140

January 5th, 2026

Texas Department of Motor Vehicles
Office of General Counsel
4000 Jackson Avenue Austin, TX, 78731

**Re: Public Comment on Chapter 217, Vehicle Titles and Registration Amendments:
§§217.22, 217.26, 217.28, 217.29**

To Whom It May Concern:

I am writing to express strong concern for the proposed rules regarding the Personal Identification Requirements for Vehicle Registration Under Transportation Code, §502.040. While I understand the importance of maintaining secure and accurate records, the proposed ID requirements would have tremendous implications for many Texans. Residents already have valid registered vehicles and the proposed rules add complexity, administrative costs, and legal concerns.

Businesses in Texas such as Title companies, New and Used Car Sales, and Banking Lenders have expressed concerns to me that with a quick and unclear timeline their industries will see a downturn in revenue and possibly cease operations. Small businesses will see the greatest amounts of challenges to cover the unexpected increase in compliance costs.

As the State Representative for House District 140, I have received multiple inquires expressing concerns from constituents who have seen negative impacts. Many are unsure if they will be able to renew their vehicles and are fearful they cannot work to support their families without a vehicle. The proposed rules have the potential to disproportionately impact seniors, rural Texans, and law abiding individuals who have trouble obtaining specific IDs.

I respectfully request that the Texas Department of Motor Vehicles consider providing clear guidelines, delaying implementation until after the 90th Legislative Session, and removing proposed requirements for Texans renewing their registration. Thank you for your attention to this important issue and for your continued work to protect public safety.

Respectfully submitted,

State Representative Armando Walle
House District 140



1905 Aldrich Street, Suite 210 | Austin, TX 78723
1-866-227-7443 | Fax: 512-469-6060
aarp.org/tx | txaarp@aarp.org | twitter: @aarptx
facebook.com/aarptexas

December 31, 2025

Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, Texas 78731

Sent via email: rules@txdmv.gov

RE: Public Comments Opposing Proposed Amendments to 43 TAC §§217.22, 217.26, 217.28, and 217.29

Dear Rulemaking Division,

AARP Texas seeks to provide comments here to the Texas Department of Motor Vehicles on proposed changes to the identification requirements for motor vehicle registration renewal, amending 43 TAC §217.22, §217.26, §217.28, and §217.29.

AARP is the nation's largest nonpartisan, nonprofit association dedicated to empowering those age 50 and older to choose how they live as they age. In Texas, about 9 million residents are 50 or older, with projections showing this group as the fastest-growing segment of the population. By 2050, this population is expected to reach 16.4 million, making it a key demographic for the state's future planning and underscoring the importance of considering how this proposed rule will affect older persons.

The Department's commitment to preventing fraud and ensuring the integrity of vehicle registration is laudable. However, AARP Texas foresees potential unintended consequences under these proposed amendments, especially for older Texans.

Many older adults do not possess a REAL ID-compliant license or a passport, since obtaining these documents often require multiple in-person visits, original paperwork, and additional costs. Significant hurdles in obtaining the necessary documents frequently include missing or inconsistent records (such as birth certificates or marriage licenses), difficulty proving name changes, transportation challenges, limited technology access, as well as the cost of gathering documents.

Older adults often face challenges in simply renewing their driver's licenses due to long waits, limited appointment availability, confusing building layouts, and complex

processes. For individuals on fixed incomes or those living in rural areas, these requirements create even more significant barriers.

The proposed changes fail to account for a common reality among older adults: many allow caregivers or family members to use their vehicles to assist them with errands, appointments, and daily needs. These arrangements are often informal but critical for maintaining independence and well-being. If registration renewal becomes contingent on the vehicle owner presenting specific forms of identification, older adults who cannot meet these requirements may lose the ability to keep their vehicles legally registered, even though they are not frequent drivers. This could leave caregivers without access to transportation needed to provide essential support.

AARP Texas also recognizes that fraud is a growing concern for the public, particularly for older adults. To address this, AARP provides educational programs focused on fraud prevention, and we advocate for legislation that combats financial crimes. During the most recent legislative session, we supported measures to increase penalties for mail and check fraud, which are common issues for older adults who rely on mail-in options.

AARP Texas is gravely concerned that the proposed rule would require individuals to send sensitive personal information along with a check through the mail, as this could increase the risk of identity theft and fraud.

Thank you for your attention to these concerns and for your commitment to fair and effective rulemaking. We respectfully ask that the Department carefully evaluate the negative impact these changes will pose for older adults and those who assist them, and revise the amendments to address these concerns.

Sincerely,



Stephanie Mace
Associate State Director, Advocacy & Outreach
AARP Texas

552.137



January 5, 2026

Relating to Personal Identification Requirements for Vehicle Registration Implementing Texas Transportation Code §502.040

Dear Members of the Texas Department of Motor Vehicles Board:

I am writing to provide formal comments on the proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29, which implement restrictions on acceptable personal identification documents for vehicle registration and renewals under Texas Transportation Code §502.040. As a representative of a financial institution engaged in vehicle financing, I wish to address a specific aspect of the proposal: the assertion in the fiscal note that the amendments entail no significant fiscal implications. This statement does not accurately reflect the potential economic consequences for private sector entities, which could in turn result in substantial fiscal impacts to the state.

Our institution currently manages 2,143 active accounts that would be impacted by this proposal with a total principal balance exceeding \$20 million. These accounts involve vehicles financed under the prior regulatory framework and are structured as tax-deferred arrangements, wherein sales taxes are collected and remitted to the state comptroller over the term of the financing. If affected customers who purchased vehicles before the effective date are unable to renew their registrations due to the new identification requirements, they may be compelled to cease operating the vehicles, leading to potential defaults on financing agreements. In such scenarios, borrowers might seek to return the vehicles or abandon payments, resulting in repossessions and over \$20 million in company losses. The aggregate impact could be catastrophic, not only eroding principal balances but also incurring additional costs related to asset recovery, resale, and legal proceedings. Such outcomes would undermine the stability of the vehicle financing sector in Texas.

Furthermore, premature terminations of these tax-deferred accounts due to registration barriers would result in the state forfeiting collection of deferred sales taxes tied to the outstanding balances. This could lead to a loss of just over \$1.2 million in anticipated tax revenue to the state comptroller, directly contradicting the proposal's claim of no significant fiscal implications.

I respectfully urge the Board to reconsider the fiscal impact assessment.

Sincerely,

A handwritten signature in black ink, appearing to be "John" followed by a surname, written over a horizontal line.

Third Coast Auto Group LP/ TRU Financial

10500 North IH 35 #C

Austin, TX 78753

Ph# (512)-833-6044



CORNERSTONE LEAGUE

Uniting & Inspiring Credit Unions
to Advance the Greater Good

January 5, 2026

Office of General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue,
Austin, Texas 78731

Sent Via Email to: rules@txdmv.gov.

To Whom it May Concern,

I am writing on behalf of the Cornerstone Credit Union League ["Cornerstone"]. Cornerstone is a trade association representing nearly 600 state and federal credit unions in a 5-state region, which includes Texas as well as Arkansas, Kansas, Missouri, and Oklahoma. In the state of Texas, we represent over 330 credit unions, many of which could be negatively impacted by the proposed changes to Chapter 217 regarding identification required for vehicle registration in Texas. Thank you for the opportunity to voice our concerns and suggestions.

Credit Unions are Unique

Credit unions are not-for-profit, member-owned cooperatives, meaning that profits are returned to members in the form of better loan rates, higher savings returns, and lower fees, rather than for the benefit of outside stockholders. The credit union mission is to serve people of "modest" means. In other words, credit unions strive to provide affordable, equitable financial services (savings, loans, credit) to everyday people, especially those underserved by mainstream banks, fostering thrift and financial inclusion through cooperative, not-for-profit operations, guided by a "People Helping People" philosophy.

Credit unions serve a "field of membership" which defines who can join the credit union based on established bonds. The bonds might be tied to working in the same industry, joining the same association, or living in a specific community.

Credit Union Auto Lending

Unlike big banks which generally focus on multimillion-dollar loans to large businesses, credit unions focus on personal auto lending "–the bread and butter" for credit unions.

Cornerstone is concerned that the proposal, as drafted, would negatively impact the ability of credit unions to offer auto loans to some people in our membership going forward. Being forced to limit to whom we can grant an auto loan due to concerns with registering the

collateral would negatively impact the profitability of the credit union, ultimately negatively impacting all credit union members.

Additionally, some credit unions have ITIN auto loans currently on the books and this proposal would impact those loans in several ways. The inability to register the vehicle would place these borrowers in violation of their contractual obligations with the credit union. The collateral for the loan would be at risk if the borrower cannot register the vehicle going forward. If borrowers cannot register the car, they cannot drive to work, and therefore, they would be less likely to be able to make loan payments, possibly leading to default and repossession.

Some credit unions participate in an ITIN lending program developed by the Filene Research Institute with other partners. Filene is an independent, nonprofit think tank dedicated to improving consumer financial well-being, primarily serving the credit union system through unbiased research, innovation, and strategic incubation of new ideas and solutions for the future of finance. Information on the Filene ITIN lending program can be found [here](#).

Some of the key concerns raised by our member credit unions include:

1. Financial Impact

- Loan Volume Reduction: Restrictive ID requirements will reduce auto loan originations.
- Operational Costs: Compliance efforts, member education, and process adjustments could increase administrative expenses.
- Default Risk: Members unable to register vehicles may default on loans, increasing charge-offs and repossession costs.

2. Long-Term Risk Exposure

- Credit Risk: Higher delinquency rates due to loss of transportation and employment.
- Reputational Risk: Perceived exclusion of Hispanic and migrant communities could harm trust and membership growth.
- Regulatory Risk: Increased audit exposure and compliance complexity.

3. Program Adaptation

- Lending programs would require stricter ID verification, reducing approvals and creating friction for all members.
- Alternative products may need development, such as secured personal loans or mobility financing.

4. Compliance Implications

- Enhanced verification processes and staff training will be necessary.
- Increased documentation requirements for audits and regulatory reviews.

5. Contractual Obligations

- Existing loan agreements assume vehicle registration and insurance. If members cannot register vehicles, collateral value and repossession processes are compromised.
- Dealer partnerships may require renegotiation due to delays in vehicle delivery.

6. Unintended Consequences

- Community Impact: Hispanic and migrant populations may face mobility restrictions, job loss, and economic instability.
- Market Distortion: Increased reliance on unregistered vehicles or informal transportation, raising safety and liability concerns.

Recommended Action

Based on these concerns, we offer the following recommendations. First, please consider withdrawing the proposal and continuing to allow alternative pieces of identification including consular IDs, ITIN documentation, and other secure forms of identification.

If the DMV moves forward with the proposal by restricting acceptable identification required for automobile registration, we respectfully request that you implement a sufficient grace period and grandfather in existing loans to help minimize the impact on auto lenders like credit unions. We also request that you ensure DMV materials and assistance are available in Spanish so that new requirements are easily understood by all. We encourage the state to conduct an economic impact analysis to assess effects on border-region employment and financial institution loans.

Sincerely,

Suzanne Yashewski
Cornerstone Credit Union League
(512) 853-8516

552.137

From: [Title & Acquisitions](#)
To: [Zz - Resource - GCO Rules](#)
Subject: P168029 - Newly Proposed Identification Rule
Date: Monday, January 5, 2026 4:55:08 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

The new limits on acceptance for the proposed identification requirements will affect our sales due to multiple customers not meeting the identification standards that are proposed within this rule.

--

Title & Acquisitions
titleacquisitions@gmail.com
PH (915)-400-7808
FAX (915)-400-6808
titleacq.com

January 5, 2026

Office of General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, Texas 78731

Via Email: rules@txdmv.gov

RE: Proposed Amendments to Administrative Code, Title 43, Part 10, Chapter 217 – Personal Identification Requirements

To the Office of General Counsel:

Founded in 2012, Carvana is a Fortune 500 automotive retailer that provides a convenient online alternative to the traditional vehicle purchasing process. Carvana allows customers to select, finance, and purchase a vehicle from the comfort of home, with the convenience of local pickup or home delivery. To date, Carvana has sold over 300,000 vehicles to Texans who have chosen to take advantage of the Carvana experience.

Given our significant commitment to the Texas market, we appreciate the opportunity to provide public comment regarding the proposed amendments to Chapter 217. While we recognize the Department's intent, we wish to share specific data and concerns regarding the potential for these rules to unintentionally limit sales to citizens and individuals lawfully present in the U.S.

1. Significant Impact on Citizens and Legal Residents

Our analysis of vehicle sales transactions involving Texas residents suggests the proposed requirement for REAL ID-compliant identification imposes a substantial and immediate burden on U.S. citizens and individuals lawfully present in the U.S.

An internal audit of over 800 recent transactions involving Texas purchasers found that over 5% of customers who completed a purchase did not currently possess a REAL ID-compliant identification despite being lawful U.S. citizens or residents. Critically, all but one¹ of those purchasers utilized Carvana's in-house vehicle financing, a process which requires and verifies a valid Social Security Number (SSN), consistent with most modern vehicle financing offerings. This data strongly indicates that these individuals are citizens or lawfully present in the U.S. and are already demonstrating identity and lawful presence through existing, robust financial verification standards.

We believe our findings would be largely consistent with other Texas motor vehicle dealers' sales, representing a negative impact on sales of 4% to 5% for other licensed dealers while adding friction to accessing transportation for lawful residents of Texas. It is probable that some portion of these individuals may have an alternative form of acceptable identification, such as a U.S. passport or military ID.

¹ Our data suggests this one purchaser was also a lawful U.S. resident.

2. Practical Barriers and Economic Burden

The shift to a strict REAL ID standard creates an "ID-first" bottleneck for commerce and unintentionally limits consumers' access to transportation. Individuals eligible to obtain a REAL ID-compliant document can face significant delays in obtaining these documents; reports indicate that appointments for a driver's license in Texas can take up to six months. This creates an incredibly costly burden for lawful U.S. residents, who could be unable to purchase a vehicle for months if they do not have another form of acceptable identification.

Furthermore, for those without a REAL ID-compliant ID, the cost of obtaining alternative documents, such as a U.S. passport, can be up to \$165, an expense that serves as an additional tax on the basic necessity of securing personal transportation.

3. Regional and Neighboring State Impact

Our data also reveals that residents of certain neighboring states are significantly less likely to hold REAL ID-compliant documents due to varying state-level rollout schedules. For example, in our audit of transactions involving Arkansas licenses, 87.5% were non-compliant. Strict enforcement without an alternative 'off-ramp' will disrupt commerce for thousands of citizens and residents, including: (1) Texans who have not yet updated to a compliant ID, and (2) lawful new residents who, as mentioned previously, could face multi-month delays in obtaining a Texas ID due to current processing backlogs.

Proposed Recommendations

To mitigate these concerns without disrupting the goals of this policy, we respectfully suggest allowing the presentation of a non-REAL ID state identification document if accompanied by a verified SSN. SSN verification could easily be accomplished by motor vehicle dealers – dealers often collect an SSN as part of the auto financing underwriting process.

If a purchaser is not financing a motor vehicle and only has a non-REAL ID state identification, the rules should permit dealers to use electronic identity verification systems to verify SSNs or obtain authorization from the purchaser to complete a credit pull for these purposes only.

Allowing licensed dealers, subject to state oversight, to validate SSNs is a reasonable accommodation that can be easily implemented. We thank the department for allowing Carvana to contribute its perspective.

Sincerely,

A handwritten signature in black ink, appearing to read "Carling Dinkler".

Carling Dinkler
Head of Government Affairs,
West Region and Federal

A handwritten signature in black ink, appearing to read "Tony Hall".

Tony Hall
Head of Policy, Title and Registration
Modernization

VAMOS AUTO

720 North Watson Road • Arlington, Texas 76011
<https://vamosauto.us>

18 December 2025

Texas Department of Motor Vehicles

Attn: Dealer and Motor Vehicle Services Division

Dear Ms. Moriarty and Members of the Texas Department of Motor Vehicles,

As the owner and CEO of DB Motors and DB Motors Financial dba Vamos Auto— a Texas veteran-owned Buy Here and Pay Here business and a 20-year U.S. Navy Veteran—I appreciate the opportunity to express my concerns regarding the recently issued guidance on updated identification requirements for vehicle registration transactions.

BHPH dealers serve working Texans who do not qualify for traditional bank financing but rely on personal transportation to maintain employment and support their families. Under the updated requirements, particularly the REAL ID mandate, strict expiration rules, and immediate implementation—a significant portion of otherwise qualified customers will be unable to complete or renew vehicle registrations.

These customers will not stop driving. Instead, many will register vehicles in another person's name or continue operating vehicles with expired registrations. This creates serious insurance complications, increases liability exposure, and places additional strain on law enforcement resources tasked with enforcing administrative violations rather than addressing public safety priorities.

The guidance also increases the likelihood of fraudulent documentation as individuals attempt to work around the system. When lawful registration becomes inaccessible, compliance decreases rather than improves.

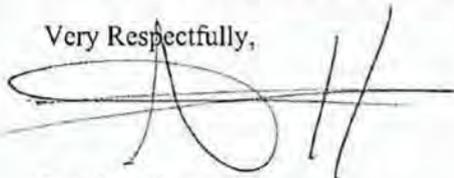
For dealers, the inability to complete registrations directly disrupts lawful sales, delays transactions, increases inventory risk, and reduces sales tax revenue remitted to the State of Texas. These outcomes undermine both public safety and state economic interests.

We respectfully request that TxDMV consider a reasonable transition period, limited flexibility for recently expired identification with proof of renewal, and accommodations for lawfully present individuals with valid federal documentation. We also encourage stakeholder engagement with independent and BHPH dealers prior to permanent enforcement.

Reliable transportation is essential for working Texans. Policies that unintentionally restrict registration do not prevent vehicle use; they push it into less transparent, less insured, and less compliant channels.

Thank you for your time and consideration.

Very Respectfully,



Travis Allison
CEO, Vamos Auto

552.137

281.923.6562



January 5, 2026

Relating to Personal Identification Requirements for Vehicle Registration Implementing Texas Transportation Code §502.040

Dear Members of the Texas Department of Motor Vehicles Board:

I am writing to provide formal comments on the proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29, which implement restrictions on acceptable personal identification documents for vehicle registration and renewals under Texas Transportation Code §502.040. As a representative of a financial institution engaged in vehicle financing, I wish to address a specific aspect of the proposal: the assertion in the fiscal note that the amendments entail no significant fiscal implications. This statement does not accurately reflect the potential economic consequences for private sector entities, which could in turn result in substantial fiscal impacts to the state.

Our institution currently manages 2,143 active accounts that would be impacted by this proposal with a total principal balance exceeding \$20 million. These accounts involve vehicles financed under the prior regulatory framework and are structured as tax-deferred arrangements, wherein sales taxes are collected and remitted to the state comptroller over the term of the financing. If affected customers who purchased vehicles before the effective date are unable to renew their registrations due to the new identification requirements, they may be compelled to cease operating the vehicles, leading to potential defaults on financing agreements. In such scenarios, borrowers might seek to return the vehicles or abandon payments, resulting in repossessions and over \$20 million in company losses. The aggregate impact could be catastrophic, not only eroding principal balances but also incurring additional costs related to asset recovery, resale, and legal proceedings. Such outcomes would undermine the stability of the vehicle financing sector in Texas.

Furthermore, premature terminations of these tax-deferred accounts due to registration barriers would result in the state forfeiting collection of deferred sales taxes tied to the outstanding balances. This could lead to a loss of just over \$1.2 million in anticipated tax revenue to the state comptroller, directly contradicting the proposal's claim of no significant fiscal implications.

I respectfully urge the Board to reconsider the fiscal impact assessment.

Sincerely,

A handwritten signature in black ink, appearing to be "A. Brown", written over a horizontal line.

Third Coast Auto Group LP/ TRU Financial

10500 North IH 35 #C

Austin, TX 78753

Ph# (512)-833-6044

From: [Policy.DLD](#)
To: [Zz - Resource - GCO Rules](#)
Cc: [Policy.DLD](#)
Subject: TXDPS Public Comment Response on TxDMV Proposed Rule §217.26(b)
Date: Tuesday, December 23, 2025 4:57:54 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Good afternoon,

Please review the following public comment from Texas Department of Public Safety regarding changes to Chapter 217, Subchapter B, Rule §217.26 (b). If you have any questions or comments, please let us know.

Texas Department of Public Safety

Concerning the Proposed Texas Department of Motor Vehicles Amendment to Rule §217.26(b) Identification Required.

The response: Impact on the Texas Department of Public Safety, Driver License Division

I. Summary of the Conflict

The Texas Department of Motor Vehicles proposed rule requires applicants for initial Texas vehicle registration to present one of the following:

- (1) a valid, unexpired driver's license or state identification certificate issued by a state or territory of the United States that complies with the minimum document requirements and issuance standards for federal recognition under the REAL ID Act of 2005, Public Law 109-13.
- (2) a valid passport; or
- (3) a valid, unexpired license to carry a handgun issued by the Texas Department of Public Safety under Government Code, Chapter 411, Subchapter H.

Under Transportation Code Section 521.144, the Texas Department of Public Safety may not issue a driver license to an applicant who owns a motor vehicle unless that motor vehicle is registered under Chapter 502, or the applicant submits an affidavit affirming that the applicant does not own a vehicle that is required to be registered.

This creates a circular compliance issue for applicants. To obtain a driver license from the Texas Department of Public Safety, a customer who owns a vehicle must provide proof that the vehicle is registered. To obtain vehicle registration from the Texas Department of Motor Vehicles, the customer must already possess a credential listed in §217.26(b). Many applicants do not possess those documents until after they obtain a Texas driver license. As a result, the applicant is unable to complete either process or cannot lawfully comply with the requirements of both agencies.

II. Practical and Operational Impacts to the Texas Department of Public Safety

1. New Residents and First Time Applicants Will Be Unable to Obtain a Texas Driver License

Applicants who own a vehicle but do not yet possess a REAL ID compliant credential, a passport, or a License to Carry will be unable to register their vehicle. Because of Section 521.144, the Texas Department of Public Safety will be prohibited from issuing those applicants a driver license.

2. Increased Risk of Inaccurate or False Affidavits

The only alternative provided by Section 521.144 is an affidavit stating that the applicant does not own a vehicle. Applicants who do own a vehicle but are unable to register it due to the Texas Department of Motor Vehicles rule may feel compelled to sign the affidavit. This increases the risk of inaccurate or false statements being submitted to the State.

3. Increased Operation of Unregistered Vehicles and Unlicensed Drivers

Applicants who cannot complete either process may operate vehicles without registration or without a valid Texas driver license. This increases enforcement encounters and negative outcomes for applicants, law enforcement, and the courts.

4. Increased Customer Service and Field Office Impact

The conflict will increase rejected applications, repeated visits, extended processing times, and complaints directed at the Texas Department of Public Safety. Field offices and customer service operations will experience additional workload and delays. Regional managers and field leadership will be required to troubleshoot issues originating from the Texas Department of Motor Vehicles rule.

III. Recommendation

In our shared commitment to streamlining public services while maintaining rigorous security standards, the Texas Department of Public Safety formally recommends that the Texas Department of Motor Vehicles include original or certified copies of U.S. birth certificates as an approved document for verifying lawful presence during vehicle

registration.

While a significant number of Texans do not possess a U.S. passport, nearly all eligible citizens have access to a birth certificate. Incorporating this standard, which is already used by DPS for driver license issuance, would create a vital pathway for eligible applicants who lack a Real ID to fulfill registration requirements. Adopting this change will streamline the registration process for eligible citizens and prevent unnecessary procedural barriers.

IV. Conclusion

The proposed Texas Department of Motor Vehicles rule conflicts with Transportation Code Section 521.144 and prevents applicants who own vehicles, but do not yet have REAL ID compliant identification, a passport, or a License to Carry, from obtaining either vehicle registration or a Texas driver license. This conflict places applicants in an impossible compliance situation, creates statutory and operational inconsistencies, and increases customer service, enforcement, and administrative challenges for the State.

Thank you,

Policy Team
Driver License Division
Texas Department of Public Safety

Office of General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, Texas 78731

December 23, 2025

Dear Members of the Board of Directors of the Texas Department of Motor Vehicles,

On behalf of the members and Texas businesses represented by the signatories of this letter, we respectfully request a 30-day extension of the comment period on proposed changes to 43 Texas Administrative Code (TAC) Subchapter B, Motor Vehicle Registration, §§217.22, 217.26, 217.28, and 217.29 to limit the types of personal identification documents that an applicant can use to register a vehicle in Texas under Transportation Code, §502.040, which requires that the owner of a vehicle apply for registration in Texas and that the applicant for registration is a resident of Texas.

The signatory organizations are working with members and affected businesses to detail the impact of the rule change on the business conditions and economy of the State. The timing of the comment period over the Thanksgiving and Christmas holidays, as well as year-end, has made it challenging for members to provide the most thorough information for the Board to consider prior to final consideration of these amendments.

The members of our organizations have raised concerns related to the proposed amendments, as well as current guidance provided by the Texas Department of Motor Vehicles to county tax offices on November 18, which effectively implements the proposed change prior to its enactment.

We additionally respectfully request that the November 18 guidance be withdrawn until the formal rulemaking process is complete and final rules are adopted. As drafted, the guidance has led to significant concern regarding inconsistent interpretation and application across Texas's 254 counties, with some counties applying the guidance differently and others not at all. This lack of uniformity has created confusion for county officials and the public alike, undermining predictability and confidence in the registration process. Temporarily pulling the guidance until the rulemaking process is finalized would promote consistency, transparency, and orderly implementation statewide.

We look forward to providing comment on the proposed amendments and appreciation your consideration of our requests for more time to encourage meaningful engagement from affected Texas businesses and pulling the guidance to ensure consistency.

Sincerely,

Independent Bankers Association of Texas
TexasBankers Association

Texas Credit Union Association
Texas Independent Automobile Dealer Association



From: [Western Auto Finance](#)
To: [Zz - Resource - GCO Rules](#)
Subject: New proposed I.D changes
Date: Wednesday, December 24, 2025 11:52:32 AM
Attachments: [Outlook-horizontal.png](#)
[Outlook-Western Au.png](#)

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

We are reaching out with concern to the measures proposed by your office. We currently have a portfolio of 300+ customers, granted we're a small business, but have been in business in Texas for 20 years. This new change will not only greatly affect our ability to sell to a certain customer that currently takes up about 50% of our current paying customers, but also in new sales.

As I am sure your office is aware the used car sales have taken a big hit, especially after 2020, but we have managed to hang on. We have always been a completely liquid business no floor plans, no outside banks, no outside financing for our buy here pay here customers. Our risk is much higher than other dealers'. We've had great pride in our state to have always been business forward. This new rule will also impact the Tax revenue that we currently collect in sales tax, that can be between \$6000-\$12000 a month.

Being a border state, we run a high risk of losing our investments to those who simply will drive across the border and we will not even have an opportunity to recover our collateral.

Please consider the situation this will put us in from one day to the next. Even Webdealer changes were done in a span of 2 or 3 years; dealers, tax offices and the general public had time to prepare for the change. Which also put the burden mostly on us dealers as too will be verifying someone's legal status; this burden is again placed on the dealer.

Please consider the proposal presented by TIADA, and consider the more than 15,000 dealerships across our state this will affect.



2814474533

8906 AIRLINE DR

HOUSTON, TX 77037

<http://westernautofnc.com>



100 Summer St, Suite 1920
Boston, Massachusetts 02110
Phone 857.999.0250
www.lendbuzz.com

January 5, 2026

Attention: Laura Moriaty, General Counsel
Texas Department of Motor Vehicles
4000 Jackson Ave,
Austin, TX 78731
Via email: rules@txdmv.gov and GCO_General@txdmv.gov

Re: Proposed Amendments to Transportation Code Chapter 217 re: Personal Identification Requirements

Dear Ms. Moriaty,

I am submitting these comments on behalf of Lendbuzz, Inc. and its subsidiaries (“Lendbuzz”) in response to the Texas Department of Motor Vehicles’ (Texas DMV) proposed amendments to Texas Administrative Code Chapter 217, specifically Section 217.26, regarding personal identification requirements for vehicle registration, published in the Texas Register on December 5, 2025.

Lendbuzz is a Delaware corporation headquartered in Massachusetts and makes consumer loans to finance vehicle purchases throughout the United States. In 2025, 12,377 Texas customers financed a vehicle purchase with Lendbuzz in Texas. Because Lendbuzz has made a significant number of loans in Texas, Lendbuzz is in a unique position to provide information regarding the costs, benefits and unintended consequences of the proposed rule.

While the stated intent of the proposed rule is to prevent fraud and ensure applicants are eligible to reside in Texas, the practical application of these sudden, strict identification requirements will have significant adverse implications for road safety in Texas and unintended adverse economic consequences on vehicle owners, dealers and lenders.¹ I urge the Department to reconsider the proposed amendments based on the following concerns regarding the impact on legitimate residents, public safety, and the state’s economy.

I. The Proposed Rule Unfairly Burdens Texas Residents Who Do Not Yet Have a Real ID

The requirement that an applicant possess a REAL ID-compliant driver’s license or identification card to register a vehicle is new. REAL ID is a concept that Americans associate with travel standards,

¹ The true impact of the proposed rule has not yet been determined as the Public Benefit and Cost Note to the Proposed Sections states there will be impact on small businesses, micro-businesses, and rural communities (3.5 million small and micro-businesses in Texas and approximately 1,660 incorporated communities with a population of less than 25,000) and “the department has no data on how many of these businesses and communities register their vehicles through a representative ... that would meet the proposed revisions.” Dep’t of Motor Vehicles, Proposal of Revisions to 43 TAC §§217.22, 217.26, 217.28, and 217.29, at 4 (Nov. 19, 2025).



100 Summer St, Suite 1920
Boston, Massachusetts 02110
Phone 857.999.0250
www.lendbuzz.com

not state property activities. For example, a basic google search AI overview states that REAL ID is a federal requirement for travel and secure federal sites, while a state ID covers driving, banking, voting (See Exhibit A). Moreover, the [Texas Department of Public Safety website](#) states as of December 22, 2025: “If your card does not have the star, you can continue to use the card after May 7, 2025, but **it will only be accepted for state-related purposes such as driving** (driver license only), banking, and voting. It will not be accepted as identification for federal purposes.” (emphasis added).

There are numerous classes of legitimate Texas residents who legally own vehicles but may not possess a REAL ID-compliant document, including:

- **Elderly and Non-Driving Owners:** Many elderly Texans no longer drive but own vehicles for caregivers or family members to transport them. They may possess older, non-compliant identification or valid state IDs that have not been updated to REAL ID standards.
- **University Students:** Out-of-state students attending Texas universities often maintain their home state residency and identification but keep vehicles in Texas for the duration of their education.
- **Valid Non-Compliant License Holders:** A Texas driver’s license (even if not federal REAL ID-compliant) is still a valid state-issued document authorizing the holder to purchase or operate a motor vehicle. It is arbitrary and capricious to allow an individual to legally (i) purchase and register a vehicle up through the date of this proposed rule; (ii) drive a vehicle on Texas roads with a standard license, but (iii) suddenly forbid them from registering or renewing that same vehicle.

By narrowing the scope of acceptable identification so significantly, the Department risks blocking registration by lawful vehicle owners who simply have not navigated the specific bureaucratic hurdles of the REAL ID Act, which was designed for federal security purposes, not state vehicle registration.² The Department concluded in the Takings Impact Assessment “that this proposal does not restrict or limit an owner’s right to property that would otherwise exist in the absence of government action”. However, given that lawful vehicle owners will not be able to re-register and therefore operate their vehicles, we respectfully submit that at a minimum some analysis of this impact is required. Dep’t of Motor Vehicles, Proposal of Revisions to 43 TAC §§217.22, 217.26, 217.28, and 217.29, at 4 (Nov. 19, 2025).

II. The Proposed Rule Creates Significant Public Safety Risks

The proposed rule will likely have the inverse effect of its intended goal to promote law and order. By creating a high barrier to entry for vehicle registration, the Department will not stop individuals from owning the vehicles they have already legally purchased, nor from driving them; it will simply force them

² The cost of obtaining a Real ID of \$33 or the \$165 for a US passport is cited by the DMV as the public “cost” of the requirement, however the analysis overlooks the economic and practical hurdles that many face in obtaining a REAL ID, such as travel, time off work, and assembling paperwork as well as long wait times. Dep’t of Motor Vehicles, Proposal of Revisions to 43 TAC §§217.22, 217.26, 217.28, and 217.29, at 3 (Nov. 19, 2025).



100 Summer St, Suite 1920
Boston, Massachusetts 02110
Phone 857.999.0250
www.lendbuzz.com

to drive unregistered vehicles. This creates a cascade of public safety issues and related costs:

- **Increase in Uninsured Motorists:** Vehicle registration is a crucial checkpoint for ensuring liability insurance compliance, according to TexasSure. The TexasSure registration and insurance verification process uses registration as the point of verification for insurance coverage. [TexasSure also notes that already twenty \(20\) percent of Texas drivers are uninsured, at a cost of \\$900 Million.](#) If additional individuals are blocked from registering their vehicles, they are statistically less likely to maintain insurance coverage. This exposes all Texas drivers to greater financial risk in the event of accidents. It also exposes all Texas drivers to increased car insurance and drivers and non-drivers alike to increased health insurance rates as the number of uninsured driver accidents increases.
- **Hit-and-Run Incidents:** Drivers operating unregistered and potentially uninsured vehicles are more likely to flee the scene of an accident to avoid detection and penalties.

Drivers who cannot register their vehicles will continue to drive—but now without the insurance verification that registration provides, and unregistered and uninsured drivers will be less likely to take accountability for accidents they cause. Public safety is best served by a system that encourages maximum participation in the registration and insurance pool, rather than one that pushes a significant portion of the driving population into non-compliance and inability to follow the rules. As an even higher percentage of drivers lack insurance coverage, there will be incremental costs, which will drive up car insurance rates, and will impact health care costs to be borne by the remaining participants in the insurance pools, hospitals, the state or insurance companies.

III. The Proposed Rule Will Cause Economic Harm to the State and Businesses

The economic impact of this rule extends beyond the individual applicant to the broader Texas economy:

- **Impact on Dealerships:** Automotive dealers will face significant friction in finalizing sales. If a buyer cannot immediately produce the specific, narrowed list of acceptable IDs, sales will fall through, inventory will stagnate, and tax revenue from vehicle sales will decrease. Lenders will be impacted when borrowers cannot renew their registrations and therefore become more likely to stop repaying their loans.
- **Impact on Secured Lenders:** Lenders rely on vehicle registration to perfect security interests and track collateral. If borrowers cannot renew registrations, lenders face increased default risk and difficulty enforcing liens. This disrupts the automotive financing market and reduces credit availability for Texas consumers.
- **Loss of State Revenue:** Every vehicle that is not purchased represents a loss of tax revenue, and every vehicle that goes unregistered represents a loss of revenue for the State Highway Fund.



100 Summer St, Suite 1920
Boston, Massachusetts 02110
Phone 857.999.0250
www.lendbuzz.com

The Texas DMV itself admits that the Department is lacking data on economic impact as noted above. Dep't of Motor Vehicles, Proposal of Revisions to 43 TAC §§217.22, 217.26, 217.28, and 217.29, at 4 (Nov. 19, 2025). At a minimum the Texas DMV should reconsider the conclusion that “the proposed amendments ... will not affect this state’s economy.” Dep't of Motor Vehicles, Proposal of Revisions to 43 TAC §§217.22, 217.26, 217.28, and 217.29, at 5 (Nov. 19, 2025).

IV. The Proposed Rule Impairs Settled Reliance Interests and Should Not Apply Retroactively to Existing Owners

The Department should distinguish between new registrations and renewals for existing vehicle owners. Thousands of Texans—including over 12,000 Lendbuzz customers—entered into multi-year financing contracts with the settled expectation that they could continue to register and operate their vehicles so long as they remained in compliance with existing laws. These borrowers made significant financial commitments based on the regulatory framework in place at the time of purchase.

By suddenly imposing a new barrier to renewal, the proposed rule effectively “de-registers” property that was lawfully acquired, rendering vehicles legally inoperable through no fault of the owner. This creates an immediate crisis: borrowers who cannot renew their registrations face the choice of either driving illegally or abandoning their vehicles and defaulting on their loans. Neither outcome serves the public interest.

Grandfathering existing owners is a standard regulatory tool to avoid retroactive harm. The state's interest in validating residency at the point of initial registration is fundamentally different from its interest in re-validating residency for someone already in the system. A vehicle owner who has been lawfully registered for years poses a lower risk of fraud, and should be able to continue to enjoy their property whether or not they have the Real ID Act-compliant license.

A phase-in approach would allow the Department to achieve its stated goals without creating a wave of technical defaults that would harm Texas's credit and automotive markets. Specifically, the rule should exempt renewals for vehicles that were registered prior to the effective date, allowing existing owners to continue renewing under the prior identification requirements.

Conclusion

The proposed amendments to Chapter 217 impose overly restrictive requirements that impose an unreasonable barrier between vehicle ownership and vehicle registration. The Department has not provided sufficient evidence that the current identification requirements were leading to fraud at a scale that justifies the costs of such a disruptive policy shift.

Lendbuzz respectfully requests that the Texas DMV take one of three steps to lessen the adverse impact of this rule:



100 Summer St, Suite 1920
Boston, Massachusetts 02110
Phone 857.999.0250
www.lendbuzz.com

- (1) withdraw these proposed amendments pending a thorough study of the potential impact on property ownership, the economic impact on small and micro-business and rural communities, and the overall economy;
- (2) expand the list of acceptable identification documents to include valid, non-REAL ID compliant state licenses and other forms of identification previously accepted; or
- (3) limit the impact of this rule by phasing it in so that it does not prevent renewal of vehicles that were legitimately purchased under the prior regulations so that it is not an unfair and dangerous removal of the owners' ability to register their lawful property.

Sincerely,

A handwritten signature in cursive script that reads 'Zoe Sharp'.

Zoe Sharp
General Counsel, Lendbuzz, Inc.

552.137



100 Summer St, Suite 1920
 Boston, Massachusetts 02110
 Phone 857.999.0250
 www.lendbuzz.com

EXHIBIT A

real id for travel vs state law activities

AI Overview

A REAL ID is for federal purposes like domestic flights and entering secure federal sites (with a star), while a standard license covers state activities (driving, banking, voting), but after May 7, 2025, you'll need a REAL ID or another accepted ID (passport, Enhanced Driver's License (EDL)) for air travel. An EDL, with a U.S. flag, works for both air travel and land/sea border crossings to Canada/Mexico/Caribbean, unlike a standard REAL ID which is only for domestic air/federal access. [🔗](#)



REAL ID vs. Standard License (State Activities)

- **Standard License/ID:** Allows driving, voting, banking, retail identity, and accessing health services.
- **REAL ID:** Does all the above PLUS lets you board domestic flights, enter military bases, and access federal facilities. It has a star in the corner. [🔗](#)

For Travel (Federal Requirements)

- **Domestic Flights (After May 7, 2025):** You need a REAL ID, an EDL, a U.S. Passport, or another acceptable ID (like a Trusted Traveler Card).
- **Enhanced Driver's License (EDL):** Issued by a few states (MI, MN, NY, VT, WA).
 - Allows domestic air travel.
 - Allows land/sea entry to Canada, Mexico, and Caribbean.
 - Has a U.S. flag, not a star. [🔗](#)

Key Takeaway

- **Standard:** Drive & State stuff.
- **REAL ID:** Drive, State stuff, *and* Domestic Flights/Federal Sites (star).
- **EDL:** Drive, State stuff, Domestic Flights, *and* Border Crossings (flag).

From: [Aron Serrato](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, January 4, 2026 8:01:02 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Adrian Amaya](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Friday, December 26, 2025 3:34:05 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Alfredo Hernandez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Friday, December 26, 2025 3:24:59 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Enviado desde mi iPhone

From: [Andrea Castrejon](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, December 21, 2025 1:51:49 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Enviado desde mi iPhone

From: [Angelica Aire](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Friday, December 26, 2025 3:50:41 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Enviado desde mi iPhone

From: [Angelica Felix](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Tuesday, December 23, 2025 3:59:11 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Angelica Juarez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, January 4, 2026 4:47:16 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Araceli Rojas](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Saturday, December 27, 2025 6:41:19 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Ashley Saucedo](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Saturday, January 3, 2026 11:38:54 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Atanasio Elias](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Thursday, December 25, 2025 7:27:45 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Bedel Romero](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Monday, December 22, 2025 8:01:26 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [REDACTED] 552.137
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Saturday, January 3, 2026 11:53:23 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Both Prieto](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Monday, December 22, 2025 8:01:30 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Carlos Serrato](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Monday, January 5, 2026 8:30:33 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [CECILIA GAVIA](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Tuesday, December 23, 2025 2:29:51 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Citlaly](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Saturday, December 27, 2025 4:27:16 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Best Wishes,
Citlaly Torres

From: [Daniel Castrejon](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Wednesday, December 24, 2025 7:15:24 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Enrique Cervin Gallegos](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Friday, January 2, 2026 7:02:28 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Enrique Mojarro](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, December 21, 2025 4:36:04 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Evelyn Duran](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Monday, December 22, 2025 5:01:12 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Felipe Arnulfo](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Saturday, January 3, 2026 11:13:14 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Felipe Arnulfo](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Friday, December 26, 2025 4:22:18 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Gerardo Escalante](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Monday, January 5, 2026 8:30:39 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Jeferson Loaiza](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Tuesday, December 23, 2025 6:20:15 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Jesus Castrejon](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Monday, December 22, 2025 8:00:16 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Enviado desde mi iPhone

From: [JLo](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Saturday, January 3, 2026 11:41:16 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Jordy Campos](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, January 4, 2026 7:53:26 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Jorge Gorostieta](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Monday, December 29, 2025 8:41:44 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Juan Carlos Villa Silverio](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, January 4, 2026 9:47:00 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Leonor Hernandez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, January 4, 2026 8:03:28 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Enviado desde mi iPhone

From: [Lucy Villarreal](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Monday, December 22, 2025 4:44:22 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

[Yahoo Mail: Search, Organize, Conquer](#)

From: [M Castillo Auto Sales](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Saturday, January 3, 2026 11:11:54 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hello, I am an independent dealership owner and I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Manuel Ramos](#)
To: [Zz - Resource - GCO Rules](#)
Date: Friday, December 26, 2025 4:51:12 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies

From: [Maria Carreon](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Friday, December 26, 2025 2:48:24 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [maribel sanchez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Monday, December 29, 2025 8:41:49 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Marina Garcia](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Monday, December 29, 2025 8:41:42 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Maximino Torres](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Friday, December 26, 2025 2:46:19 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Melanie Gaona](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Wednesday, December 24, 2025 7:13:27 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Selerina Miranda](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Wednesday, December 24, 2025 7:08:33 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Enviado desde mi iPhone

From: [Olga Sanchez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, January 4, 2026 9:37:04 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Pablo Higueros](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, December 21, 2025 10:07:27 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Paola Castrejon](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Monday, December 22, 2025 7:58:53 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Roberto Sáenz](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, January 4, 2026 6:36:47 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Rocio Cano](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Monday, December 22, 2025 7:12:48 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Rocio Cano

Enviado desde mi iPhone

From: [REDACTED] 552.137
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Wednesday, December 24, 2025 7:07:36 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Rosa Mendoza](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Tuesday, December 23, 2025 5:44:09 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Enviado desde mi iPhone

From: [Rosa Ramirez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, December 21, 2025 2:42:14 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Enviado desde mi iPhone

From: [Saul Aguirre](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Friday, December 26, 2025 3:07:56 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies. Some of them do have insurance and are responsible.

Sent By Saul Aguirre

From: [Sophia Serrato](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, January 4, 2026 9:52:51 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Steph](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, January 4, 2026 12:07:42 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

This e-mail and any files or attachments transmitted with it contains information that is confidential and privileged. This information is intended only for the use of the individual(s) and entity(ies) to whom it is addressed. If you are the intended recipient, further disclosures are prohibited without proper authorization. If you are not the intended recipient, any disclosure, copying, printing, or use of this information is strictly prohibited and possibly a violation of federal or state law and regulations. If you have received this information in error, please notify immediately.

From: [Stephanie Olson](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, December 21, 2025 2:51:31 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Stephanie Olson
Tyler, TX

Sent from my iPhone

From: [Suheli Santos](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, January 4, 2026 6:37:22 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Teresa Carrizales](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Monday, December 22, 2025 5:01:38 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [thalia vera](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Wednesday, December 24, 2025 7:17:02 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Uriel Mejia](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, December 21, 2025 1:29:12 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Vicente Santos](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, January 4, 2026 6:36:10 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Yaima Gonzalez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, December 21, 2025 9:42:34 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [YiAn S.](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Saturday, January 3, 2026 11:52:21 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Abel Oregon](#)
To: [Zz - Resource - GCO Rules](#)
Date: Tuesday, December 23, 2025 10:51:03 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hello, I would like to share my comment please do not cancel the renewal of vehicles for undocumented people let's be aware of everything that can affect the state of Texas we should give better options and not so abrupt thank you Texan brothers

I wish to share my concerns over the adoption of Texas administrative Code Title 43, §§217.22,217.26,217.28,217.29. If this proposal is put into effect, it will negatively impact individuals, families, communities, and our state. This proposal will raise car insurance premiums for our residents, further restrict vehicle registration for many, and threatens to grind to a halt the lives of residents who have made up a crucial segment of our labor force and have lived here for decades and are well integrated into our economy. These are friends, family, and fellow community members that participate in industries facing labor shortages such as construction, health and home care, hospitality, agriculture, retail and trade services, sanitation, and other roles, making up about 8% of the total workforce in our state.¹ As residents of our state, they endow our treasury and enrich our culture and economy, so suffice to say that they too contribute to the funding of Texas roads. Therefore, I am deeply unsettled and concerned for all who will be impacted by the implementation of this proposal. It brings great sadness to consider that the true purpose of this effort is to make marginalized communities even more vulnerable by imposing these exaggerated measures that will physically, emotionally, and financially harm all Texas residents.

More than 31 million people call Texas home, with 19 million people being licensed drivers.^{2,3} The Texas Department of Motorized Vehicles estimates that 20% of Texas drivers are uninsured and 80% are insured.⁴ With roughly 12.6 million registered vehicles on the road (4.2 million light trucks, 8.1 million automobiles, 328,300 motorcycles) and drivers paying a yearly average of \$786 for minimum coverage to \$2,751 for full coverage, the total premiums written by the car insurance industry is \$35,202,678,902 from Texans.^{5,6,7,8} The individuals most affected by this proposal are long time undocumented residents lacking legal residence status which are estimated to be 1.7 million Texans. Of these 1.7 million individuals, 1.2 million are in our workforce.¹ If these residents are no longer eligible to obtain vehicle insurance there will be a revenue loss of \$1 billion for insurance companies who will most likely distribute that loss to other drivers, not to mention a further increase in premiums due to a spike in uninsured motorists on the road. From 2022 to 2023, the percent change in vehicle insurance premiums for Texas was +25%.¹⁰ All factors considered, licensed drivers could see an increase of 38% in premiums because of this proposal as a result of a sudden pool of people who will no longer able to obtain insurance. With an increase in insurance premiums, more Texans may choose to forgo car insurance until rates become more affordable, resulting in yet even more uninsured drivers on the road, impacting those in poverty significantly more than other individuals and resulting in higher insurance premiums for all drivers.

The implementation of this proposal will not prevent people who are not legally eligible to reside in Texas from using Texas roads to go to work and provide for their families. ForwardUS reports that there are 1.2 million undocumented workers in Texas.¹ More than 50% have been residing and contributing to our state for more than a decade.⁹ Workers without legal status contribute \$45 billion to the Texas economy.¹ The state of Texas has also secured measures that aim to block work authorization for DACA recipients.¹¹ For DACA recipients to obtain a drivers license in Texas, it is contingent upon them also having work authorization which could result in an additional 86,000 residents subject to persecution on Texas roads should this proposal pass due to the inability for them to register vehicles which they already own and rely on.¹² While legal residents will be mainly affected financially, this proposal paired with SB8 would be lethal for the undocumented community, resulting in arrest, detention, and ultimately deportation, effectively turning a minor traffic violation punitive. It would be unjust to haphazardly ignore the economic and cultural value they've added to our communities over decades and upend their lives by making them easy targets for local law enforcement to arrest and turn them

over to ICE when the vast majority of undocumented immigrants are less likely to be convicted of a crime than native-born Americans.¹⁶

It is difficult to shake the thought that Title 43 is being amended with the intention to unjustly harm our loved ones and community members. Rep. Brian Harrison has made it clear that this change is in response to him finding out that undocumented immigrants are able to register their vehicles. Yet, the state of Texas has long been aware of this capacity given that the ability to operate a vehicle and the ability to register a vehicle are distinct under Texas law. The inability to provide a drivers license during traffic stops already makes this community vulnerable. Minor traffic violations have been weaponized against them to justify their deportation, upending years of their effort in a matter of seconds. For decades, Texas has benefited from undocumented immigrant labor, and to now cast them aside and go as far as to persecute them openly on our roads is beyond the pale. These marginalized residents, just like ordinary Texans, have contributed billions to the economy and despite being denied a drivers license, they comply and register their vehicles thus satisfying insurance requirements. This proposal appears to intentionally victimize these long time undocumented residents of Texas who, considering their contributions to our state, rightly deserve to utilize Texas roads. Further, it would benefit the state to allow them to obtain a drivers license once more to increase everyone's safety on the road.

This proposal will affect legal Texas residents as well. Lately, there has been a surge in partnership between local law enforcement departments and private companies that provide automated license plate reader services, so it is not a stretch to assume that law enforcement is capable of easily identifying every vehicle without registration.¹⁵ Legal residents too will find themselves swept up by these invasive surveillance tactics, resulting in all individuals being easily targeted and charged with unregistered vehicle fees which can be up to \$200 plus additional fees if applicable.¹³ Of course, some may be able to pay these fees, but those struggling financially may find themselves burdened with debt. It should also be noted that registering a vehicle can be cumbersome in that it requires satisfying other documentation that can take months to acquire. Unfortunately, time is a resource that the economically disadvantaged community lack. In Texas, approximately 42% of households are below the ALICE (Asset Limited, Income Constrained, Employed) threshold, and they are the other segment of Texas residents that would, incidentally, be most negatively impacted by this proposal due to their economic hardship.¹⁴

This proposal is morally wrong and discriminatory, and it is improper to politicize marginalized communities by using them as scapegoats to combat fraud. So I ask that this proposal be stopped in full. While it is appropriate and commendable to target fraud, the consequences of this proposal as it stands will inflict great physical, emotional, and financial harm to all Texas residents, and a more prudent proposal must be sought.

Sources:

- [1] <https://www.fwd.us/news/texas-immigrants/>
- [2] <https://www.texastribune.org/2024/12/19/texas-population-31-million/>
- [3] <https://www.statista.com/statistics/198029/total-number-of-us-licensed-drivers-by-state/>
- [4] <https://www.txdmv.gov/motorists/register-your-vehicle/texasure-insurance-verification>
- [5] <https://texasvehicle.org>
- [6] <https://summitfleet.com/blog/top-three-states-biggest-pickup-populations/>
- [7] <https://www.bankrate.com/insurance/car/average-cost-of-car-insurance-in-texas/>
- [8] <https://www.tdi.texas.gov/reports/pc/documents/pcalr2024.pdf>
- [9] <https://www.texastribune.org/2025/02/17/texas-undocumented-immigrants-trump-deportation-demographics/>
- [10] <https://www.thezebra.com/auto-insurance/how-to-shop/car-insurance-rate-increases/>
- [11] <https://www.nilc.org/resources/latest-daca-developments/>
- [12] <https://www.americanimmigrationcouncil.org/blog/texas-only-daca-ruling-could-upend-national-policy/>
- [13] <https://tex.org/texas-car-registration-2025-online-inspections-and-emissions-spots/>
- [14] <https://www.unitedforalice.org/introducing-ALICE/texas>
- [15] <https://truthout.org/articles/a-vast-camera-system-now-feeds-information-to-police-on-drivers-across-the-us/>
- [16] <https://www.brennancenter.org/our-work/analysis-opinion/debunking-myth-migrant-crime-wave>

From: [Adrian Ortiz](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Chapter 217, Vehicle Titles and Registration Amendments: §§217.22, 217.26, 217.28, and 217.29 (Relating to Personal Identification Requirements for Vehicle Registration under Texas Transportation Code, §502.040)
Date: Tuesday, December 23, 2025 2:42:39 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

More unregistered vehicles on the road will cause insurance premiums to go up for “law abiding” citizens. This is discriminatory targeting to please our fuhrers. Go fuck yourselves

From: [Aguila Travel Services](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Passport Rule
Date: Friday, December 5, 2025 9:38:57 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Good morning

With all due respect to you, I just want to let you know that I have been a resident of the United States for 22 years, I have always paid my taxes and my business is aimed at Spanish-speaking people.

I have two children at TCU university

Now with this new regulation it is affecting me to be able to continue with the payments of the University they attend.

I know that many people are not bothered by this new rule implemented, but in Texas there are more than a million people that this State opened the doors to us. I hope they continue to rest us without putting these restrictions on us
Thank you for your time in reading my concern.

Good bless you!!!

From: [Albert Gonzales](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Public Comment Opposing Proposed Vehicle Registration Rule Changes
Date: Wednesday, December 31, 2025 11:37:59 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Dear Texas Department of Motor Vehicles,

I am submitting this comment to express strong opposition to the proposed changes to vehicle registration and renewal rules.

These rules, as written, would create significant and unnecessary barriers for many Texans who rely on their vehicles to work, care for their families, and participate fully in daily life. The impact would fall hardest on immigrant communities, low-income workers, and residents who already face obstacles navigating state systems. Policies that restrict access to vehicle registration do not improve safety or compliance — they simply make it harder for people to follow the law.

The DMV's responsibility is to ensure that registration processes are accessible, fair, and designed to support public safety, not to create new hurdles that push people into vulnerable or unlawful situations. If these rules are adopted, many Texans will be forced to choose between losing their ability to work or risking penalties for driving without proper registration. That outcome serves no one.

I urge the agency to reconsider these rules for the following reasons:

- They risk disproportionate harm to immigrant families and essential workers who depend on reliable transportation
- They introduce complexity and confusion into a process that should remain straightforward and accessible
- They undermine the state's interest in ensuring that as many vehicles as possible are properly registered and insured
- They were initially introduced without public input, raising concerns about transparency and accountability

Texas benefits when its residents can meet legal requirements without facing unnecessary administrative barriers. These proposed changes move in the opposite direction.

I respectfully ask the Texas DMV to withdraw or substantially revise these rules to avoid

harming the very communities that keep our state running.

Thank you for considering this comment and for taking public feedback seriously.

Sincerely,
Albert Gonzales
Fort Worth, Texas

Sent by Albert Gonzales

From: [Alexandra Sanchez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: CHAPTER 217 TITLE TRANSFER AND REGISTRATION
Date: Friday, December 5, 2025 1:48:26 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

TO WHOM IT MAY CONCERN:

HELLO MY NAME IS ALEJANDRA MONCADA I AM US CITIZEN I DISAGREE WITH THIS RULE BECAUSE I THINK IS DISCRIMINATORY AND CONSIDER ITS GOING TO AFFECT TEXAS ECONOMY BECAUSE ALL THIS PEOPLE PAY THEIR TAXES, INSURANCES AND ANNUAL REGISTRATIONS THAT HELPS WITH THE TEXAS ROADS CONSTRUCTION.

SINCERELY,
ALEJANDRA MONCADA

From: [Peter Martinez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: How the New DMV ID Rule Is Affecting My Family
Date: Wednesday, December 10, 2025 11:59:48 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whom it may concern,

I am writing to express my deep concern regarding the recent identification requirements for vehicle registration in Texas. I have lived in this state for many years, and I only have a valid foreign passport. Because of this rule change, I will no longer be able to renew the registration sticker for my vehicle.

For more than nine years, I have complied with every requirement and contributed to the Texas Department of Motor Vehicles without fail. However, next year will be different. This new rule places me in a difficult and uncertain situation. It affects my family, my ability to work, and my daily responsibilities—such as taking my daughter to school and ensuring I can safely get to my job.

I respectfully want to share how this decision impacts people like me. Many of us have spent years supporting our communities, working hard, and doing everything the right way. During the pandemic in 2020, we continued working as essential workers, helping keep the state running, even though we were never fully acknowledged.

We are simply asking for the opportunity to continue living peacefully, contributing to our communities, and providing for our families. This policy does not stop our determination, but it does create unnecessary obstacles for people who want to follow the rules and continue building a better future.

Thank you for taking the time to consider the impact this rule has on families like mine.
Sincerely,

Pedro Alfonso Galarza

From: [Amanda Million](#)
To: [Zz - Resource - GCO Rules](#)
Subject: No to Texas Administrative Code Title 43, §§217.22, 217.26, 217.28, 217.29
Date: Tuesday, December 23, 2025 9:00:54 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whom it may concern,
I am writing to express disapproval for the proposed rules on Title 43, §§217.22, 217.26, 217.28, 217.29. More bureaucracy is NOT needed. More racism is not welcome.

Amanda M

From: [Ambereen Siddiqui](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Written comment regarding Texas Administrative Code Title 43, §§217.22, 217.26, 217.28, 217.29
Date: Thursday, December 18, 2025 6:55:48 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Good morning,

I am opposed to this new proposed DMV rule that requires proof of legal immigration status to register a vehicle. It will be harmful to Texas residents, and put a financial burden on all of us, as well as businesses and our own government. Restricting vehicle registration isn't helping anyone. I especially don't appreciate the lack of transparency around this rule and the lack of opportunity thus far for public input on this decision. The majority of Texans don't want this rule. Take the time to listen to the public, I am urging the DMV to halt and reconsider now.

Thank you,
Ambereen Siddiqui

From: [Angelica E](#)
To: [Zz - Resource - GCO Rules](#)
Subject: New vehicle registration law
Date: Wednesday, December 17, 2025 9:06:08 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whom it may concern,

My name is Angelica Escalante and I would like to provide my comment in regards to the new law that was passed for vehicle registration. I highly recommend this law to be removed due to the fact that a lot of immigrant people will be affected with it. Not only them but I also ask that you take into consideration how huge of a percentage Hispanic people make up the amount of registrations/ renewals on a yearly basis. If you think about it each county will start seeing a significant loss due to them not being able to process any title transfer, vehicle registrations, and registration renewals among other things. On average I want to say a Hispanic household has at least 4 vehicles that is easily close to \$300 dollars (assuming each registration is roughly about \$70) just in a single family household. Now imagine that times however many Hispanic families contribute to this department.

Not only will it affect that but it'll also affect their daily transportation. Whether it is to work, school, basic errands or even taking loved ones to get the care they need. We all depend on our vehicles and it is crucial on a day to day basis.

To summarize, I am asking that you all remove this new law just to keep everyone safe on the streets. The Hispanic population are a very responsible, hard working, and kind hearted groups of people. I plead you remove this law as it will affect their everyday transportation significantly.

Thank you,
Angelica Escalante

From: [ARTURO CORTES](#)
To: [Zz - Resource - GCO Rules](#)
Date: Tuesday, December 9, 2025 4:41:35 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hi good morning im a texas dealer and im getting affected by this new law of id requirements im loosing business ind i fieel really sad. bucause we been in business for almost 1 years and this is what most affecting us we re trying to stay strong on sales but is impossible whit the new requirements if theres a possibility to change it back to normal god bles yall.

From: [Vania Barrios Mendez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, December 21, 2025 1:28:05 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Enviado desde mi iPhone

From: [blaromero1](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Strong Opposition to New ID Requirements
Date: Sunday, December 7, 2025 12:37:57 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Blanca Romero
Irving, TX
Dec 7, 2025

Texas Department of Motor Vehicles

To the Texas DMV:

I strongly oppose the proposed ID rule that blocks undocumented Texans from registering vehicles. This policy is harmful, unnecessary, and will create more danger on Texas roads by pushing more people to drive unregistered and uninsured.

It also destroys revenue the state currently collects from these residents and threatens the survival of small dealerships that rely on serving immigrant communities. This rule hurts Texas far more than it helps.

I urge you to stop this proposal immediately that is targeting immigrants specifically.

Sincerely,
Blanca Romero

From: [Blanca Cienfuegos](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Changes to License Plate Transferring
Date: Thursday, December 18, 2025 12:17:14 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hello,

Hope this email finds you well. I am taking the time to write this email in hopes you will consider the fact that making changes to the requirements for transferring and renewing vehicles in Texas will tremendously affect a majority of people.

Many of these people are our nannies, landscapers, housekeepers, restaurant employees etc and they do not have the documents required to transfer a vehicle or get their renewal sticker due to the fact that it is not as easy for them to acquire a legal status in the country.

Others are waiting on immigration processes as well and still need to make it to and from work, to keep their bills up to date.

I, as an employee of a car dealership, have seen the impact in the sales area, people are scared of purchasing a car, since they have been told they cannot register it under their name. There has been a big slow down in sales in the hispanic community due to this concern.

Please re-evaluate and reconsider this change.

We are a nation built by immigrants.

God Bless you all.

Best Regards,

Bianca Cienfuegos

From: [Bob Nichols](#)
To: [Zz - Resource - GCO Rules](#)
Subject: ID for registration
Date: Thursday, December 18, 2025 3:42:58 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I completely agree with requiring proof of legal residency to register any vehicle in Texas.
Bob Nichols.

From: [Brittany Robinson](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Economic and Community Impact of Proposed Rule
Date: Tuesday, December 9, 2025 6:00:49 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Dear TxDMV,

Restricting vehicle registration for families without legal entry stamps will cause widespread economic harm. Based on conservative estimates, if 40% of Texas's 1.58 million (census data) undocumented adults cannot register vehicles, the state faces over \$20 billion in annual losses.

: Blocking registrations could cost ~\$1.8 billion annually.

& : Defaults could cost ~\$3.2 billion, echoing Michigan's \$60B bailout with \$11–12B taxpayer losses.

: Texans would pay \$1.5–3 billion more annually.

: Families sheltering in place would suppress ~\$12.6 billion in consumer spending annually.

: Isolation adds ~\$1 billion annually in burdens.

: California and New York reversed restrictions and gained revenue. Arizona lost revenue as families registered in neighboring states, exporting income.

Blocking registrations doesn't just punish families, it destabilizes Texas's economy, raises costs for all residents, and risks repeating Michigan's bailout mistake while exporting revenue to neighboring states.

Respectfully, Brittany Robinson

From: [cecilia.gavia](#)
To: [Zz - Resource - GCO Rules](#)
Subject: new rule
Date: Friday, December 26, 2025 3:57:41 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I am showing my concern about the new rule that people with foreign passport not longer can obtain o transfers title or renovation stks. I think this rule is very unfair, I will make people drive with expired registrations and even without insurance which makes the roads even more dangerous.

the State of Texas will face a catastrophic losses because lots of business rely on this market. this rule will not benefit the State at all and neither the hard working people that makes THE STATE OF TEXAS STRONG.

CECILIA GAVIA

Office of General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, TX 78731

RECEIVED

DEC 23 2025

TxDMV
OFFICE OF GENERAL COUNSEL

Dear Sir or Madam,

I am submitting this comment as a Texas resident to express serious concerns about the Texas Department of Motor Vehicles' proposed amendments to Chapter 217 of the Texas administration code regarding identification and lawful-presence requirements for vehicle registration and renewal.

The proposed rule raises significant concerns regarding its practical implementation and its consistency with the underlying purposes of the vehicle registration system, including roadway safety, insurance compliance, and accurate vehicle identification. By conditioning registration eligibility on documentation standards unrelated to vehicle ownership, insurance, or mechanical safety, the rule risks excluding otherwise compliant residents from the registration process.

In particular, the rule disproportionately affects immigrants families, including households with mixed immigration status, pending federal applications, or time-limited documentation. Many such individuals lawfully reside in Texas and are integral participants in the state's workforce and economy. Restricting their access to vehicle registration impairs their ability to maintain employment, obtain medical care, and/or meet family obligations.

From a public-policy perspective, the denial of registration does not eliminate vehicle operation; rather, it increases the likelihood of unregistered and uninsured vehicles operating on Texas roadways. This outcome is contrary to the Department's stated mission of promoting safety, accountability, and compliance within the motor vehicle system.

Accordingly, I respectfully urge the Department to reconsider the proposed amendments or, at minimum, to adopt alternative documentation standards, explicit exemptions, or a phased implementation period with a meaningful grace provision. Such measures would better align the rule with public safety objectives while reducing unintended harm to Texas residents and communities.

Thank you for the opportunity to provide public input on this important matter.

Sincerely,
A Concerned Texas Resident

From: [Toledo, Denise](#)
To: [Zz - Resource - GCO Rules](#)
Subject: November 18/ID RULE CHANGE
Date: Thursday, December 18, 2025 10:46:02 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

12/18/2025

To whom it may concern:

I am writing to express my concern about the recent rule that was implemented on 11/18/2025 in regard to ID changes for many people. Mostly the immigrant community. I wanted to let you know that I'm dissatisfied with these changes, since I work with a dealership and we depend on selling vehicle to all of our community, doesn't matter their status. This helps me get paid by my employer, and if sales go down, I will be left without a job to feed my family. I am currently pursuing my masters in Mental Health counseling, and as you might already know, our president introduced the big beautiful act and approved that the department of education lower the loan amount for my profession to only \$20000.00 per year., since he considers that my career is not professional anymore. This means I have to keep working and pay for my degree ,cutting down cost at home because of this. This all is a domino effect with everybody. And I urge you to please leave the rules the way they where because it also helps customers the get to where they need to be in their everyday life. I assure you the state will also see a big impact on revenue going down, due to no more sales taxes being collected, and registrations not being renewed.

Thank you,

Denise Toledo

From: [Donna Watson](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Chapter 217
Date: Friday, December 19, 2025 10:51:00 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I agree with the proposed changes for ID documents acceptable and see no undue burden on American citizens.
Thank you

From: [Dulce Garcia](#)
To: [Zz - Resource - GCO Rules](#)
Date: Friday, December 19, 2025 4:42:26 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Buenos Dias porfavor no pongan esas Nuevas leyes afectaria mucho a los Hispanos que compran carros y con los seguros y placas

Good morning, please do not implement these new laws; they would greatly affect Hispanics who buy cars, as well as their insurance and license plates.

From: [Elizabeth zaragoza](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Txdmv new registration rules
Date: Thursday, December 18, 2025 1:49:09 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

This changes that the dmV will make are affecting a lot of families specifically the immigrants they are hard working people that to everything legal they pay insurance, taxes, renew registration every year . They just want to be able to drive the vehicle legally to work and produce for their family.

[Sent from Yahoo Mail for iPhone](#)

From: [Elle Collins](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Concerns Regarding DHS Verification Requirement for Vehicle Registration
Date: Friday, January 2, 2026 12:31:33 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I am writing to express opposition to the new requirement mandating DHS document verification in order to register a vehicle.

This policy will have serious negative consequences for the Texas economy, particularly for local small businesses such as used car dealerships, auto lenders, repair shops, and related industries that rely on daily vehicle sales. These transactions generate sales tax revenue, title and registration fees, and employment opportunities that directly benefit the state and local governments.

Limiting the ability to register vehicles will reduce overall sales activity, lower tax revenue, and place additional strain on small businesses that are already operating under extensive regulatory requirements. Many individuals who contribute to the economy through lawful work and daily commerce will be excluded, creating unintended financial harm rather than improving public safety.

Texas has long promoted economic growth, business freedom, and efficiency. This policy moves in the opposite direction and risks weakening an important sector of the state's economy.

Please reconsider or revise this requirement with the broader economic impact and small business community in mind.

Thank you for your time and consideration.

From: [Eric Solis](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Chapter 217 Vehicle Titles
Date: Friday, December 5, 2025 1:25:30 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whom it may concern:

I'm a us citizen and I don't agree with the new way you guys are managing asking people passports with visas acting like as the department of homeland security. And requesting people's social security number in order to renewed your registration online or a change of address. And in case there is a data breach my information is going to be around the whole web. I don't understand why you guys are making things so difficult to drive your vehicle. Furthermore you guys are making it harder for people to registered their car saying that people are illegally driving vehicles while you guys are approving vehicles to self drive. Honestly it doesn't make sense who is running this place. At least you know who is driving behind the wheel instead of using a third person as the owner.

Sincerely,
Eric Solis

From: [Erica Arreola](#)
To: [Zz - Resource - GCO Rules](#)
Subject: New ID requirements Concern
Date: Friday, December 5, 2025 2:53:22 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hello,

My name is Erica Arreola, and I am writing to express my opposition to the new ID requirements. I believe that this decision will have a significant negative impact on many families, particularly those in the working class.

Several businesses, including dealerships, banks, and insurance companies, will likely suffer financial losses due to a decrease in sales. This is because many Hispanic families purchase two or three vehicles to ensure reliable transportation to and from work. In the event of a vehicle breakdown, they have two additional vehicles to rely on.

These families work diligently to maintain their jobs and adhere to the law. However, the new ID requirements may inadvertently enable individuals to be victimized by fraudulent schemes. These schemes involve individuals claiming to provide insurance or title services, which can result in financial losses for the victims. It is crucial to address the concerns raised by the Hispanic community. They pay for their title and pay the taxes to their vehicles, it's not fair.

From: [Ernesto Morales](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opinion about the new rules of Nov, 18th!
Date: Friday, December 19, 2025 5:22:39 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

This is Daisy and Ernesto!

We Want to express the following; We understand that they follow state norms and rules, but it is not just about one person, we are talking about thousands that will be affected, including workers, small and larger businesses, from a paint shop to a Bank without leaving aside the sellers of cars, trailers, mechanics, so said to the economy of Texas itself, and what to say about the children that their parents go and leave to school, you have to think into everyone and not just the good of a few!!!

Probably you could think if the person is driving a car or trailer or whatever and if you are inmigrant that does not mean they are going to be the responsible of a crash, if you check the stadistics it is way different.

Please think about the economy of the State itself, which for some reason is the second best in the United American States.

Thanks I hope you all read this !!!

Thanks by Ernesto and Daisy!!!

Enviado desde [Outlook para iOS](#)

From: [Little Mouse](#)
To: [Zz - Resource - GCO Rules](#)
Subject: New DMV Texas Registration Rules Comments
Date: Thursday, December 18, 2025 11:34:59 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hello Texas Department of Motor Vehicles,

My name is Fatima Gutierrez and I am a United States Citizen. I have to say these new registration rules are discriminating against the people of Texas and will create an unsafe environment for citizens like myself. If undocumented people are not able to register their cars they will most likely start doing fraud and paying others to register their vehicles for them. This will make it very unsafe in case a vehicle is in an accident and the driver takes off because you will not know who the vehicle is actually registered to. Something needs to be done to allow these people to buy and register their vehicles. These new rules are very inane and targeted. Many of these people do not have the ability to obtain a legal entry on their passport. There needs to be an alternative for them to register their vehicles.

Without these registration fees several counties and cities will suffer that depend on these fees to keep up with rising costs. Everything is already expensive as it is and we do not need prices to go up because of a simple procedure that the state wants to do. I urge you to fix this and keep things the way they are now or come up with a better solution whether that be allowing undocumented persons to obtain a drivers license like other states or simply allow them to register their cars with their passports since most of these people have their international license already.

Thank you,
Fatima Gutierrez

From: [FELIPE TREVINO](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Comment Proposed ID Requirements
Date: Monday, January 5, 2026 2:26:44 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To Whom It May Concern,

I am writing to submit public comment regarding the proposed identification requirement rule that would limit the types of personal identification documents acceptable for vehicle registration in Texas.

As an independent motor vehicle dealer, I am concerned that this rule would negatively impact my business operations and restrict lawful customers' ability to purchase and register vehicles. Limiting acceptable identification may reduce sales, create unnecessary delays, and place an additional administrative burden on dealers without a clear public benefit.

I respectfully urge the Texas Department of Motor Vehicles and the Board to reconsider this proposal and fully evaluate its impact on independent dealers and the consumers we serve.

Thank you for the opportunity to provide input.

Sincerely,

From: [francisco sainz](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Chapert 217
Date: Sunday, December 7, 2025 1:15:43 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hello my name is Francisco Sainz and I disagree with this rule i believe this is going to create a huge impact on local businesses economy few friends that sell used and new cars have been affected and not able to sell one car in two weeks camper to a 3 two to 4 cars sold per week before this new rule please retract to this rule to avoid affecting local economy dropping.

Sincerely. Francias Sainz
Sent from my iPhone

From: [Francisco Juarez Ordoñez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: I35 VEHICULAR PARK
Date: Thursday, December 18, 2025 8:35:27 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Just need to see over the I35 Hw a lot of dealers trying to sale their cars.

So what they going to do with out costumers.

You better provide a good play game to increase sales like:

Allow licenses or drive permits to buy a car, if user fail to drive just take to junk.

Get [Outlook for Android](#)

From: [Gordon Merrill](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Chapter 217, Vehicle Titles and Registration Amendments: §§217.22, 217.26, 217.28, and 217.29
Date: Tuesday, December 9, 2025 1:27:08 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

The proposed change requires an unexpired identification document. In the recent past, an individual who moves to Texas with a recently expired document (e.g. Driver License not expired more than 2 years) can register their vehicle. With that done, they can then accurately and legally fill out a [DL-14A application](#) for a Texas Driver License. With the rule change that has been proposed, an individual who only possesses a recently expired out of state license will not be able to register their vehicle. Are they now supposed to lie on the DL application about having that done for all vehicles in their name? Did y'all think about that? Seems like it puts them in a bit of a Catch-22 since Texas (DMV, DPS, etc) pushes the whole registration first, license second.

From: [GRACIELA RUIZ](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Chapter 217 Vehicle Registration Amendments
Date: Thursday, December 18, 2025 5:16:21 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

o whom it may concern,

I am a licensed motor vehicle dealer in Texas, and I am writing to express my concern regarding the proposed amendments to Chapter 217 related to identification requirements for vehicle registration.

As a dealer, I regularly work with customers who legally purchase vehicles but do not have a Texas driver license, U.S. passport, or a foreign passport with a U.S. entry stamp or immigration documentation. Many of these individuals rely on a valid foreign passport as their only form of government-issued identification.

Under the proposed rules, these customers would be unable to register or renew their vehicles, even though the transactions are legitimate and properly documented. This will create barriers to compliance and may result in more unregistered vehicles on Texas roads.

These new requirements will have a significant impact on the community I serve. This change will directly affect vehicle purchases and will significantly impact my ability to continue operating my multiservices and dealer business, as many customers will no longer be able to complete vehicle transactions due to the new identification requirements.

I respectfully urge the Texas Department of Motor Vehicles to reconsider these requirements and allow broader forms of identification so residents can continue to register vehicles legally.

Thank you for the opportunity to submit this comment.

Sincerely,
Graciela Ruiz

From: [Ariana Guerrero](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Public Comments Regarding Texas Administrative Code Title 43, §§217.22, 217.26, 217.28, 217.29
Date: Saturday, December 20, 2025 1:48:37 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whom it may concern,

I am writing to express my concerns with the proposed changes regarding Texas Administrative Code Title 43, §§217.22, 217.26, 217.28, 217.29.

I am a Rio Grande Valley native and Austin resident. I am concerned the proposed code changes will hurt all communities and families by breaking trust with law enforcement. These changes will inevitably create more traffic stops and this risks conflicts escalating between law enforcement and the public. I would prefer my taxes to go towards other incentives for all individuals to have updated vehicle registration and not these unnecessary hurdles to renewal.

Respectfully,

--

Ariana Guerrero, (she/her/ella)
JD Candidate at The University of Texas at Austin School of Law

From: [REDACTED]
To: [REDACTED]
Subject: Proposed amendment to the Texas Administrative Code at 31AC
Date: Sunday, December 7, 2025 10:26:49 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and spyware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Texas Department of Motor Vehicles
Attn: Office of General Counsel
4006 Jackson Avenue
Austin, TX 78751

Subject: Formal Concern Regarding Proposed ID Requirements for Vehicle Registration

To: Whom It May Concern

I am writing to express serious concerns regarding the recently proposed changes to the identification requirements for vehicle registration in Texas. The new rule, which would limit acceptable identification to U.S. passports, REAL ID-compliant Texas driver licenses or IDs, licenses to carry, or foreign passports only when paired with U.S. immigration documentation, will have far-reaching and harmful impacts across our state.

First and foremost, this policy effectively excludes a large population of long-term Texas residents who lack the newly required forms of federal immigration documentation. Many undocumented Texans have lived in our communities for years, contribute to our economy, pay taxes, raise families, and rely on personal transportation for work, school, and daily life. Preventing these residents from legally registering vehicles does not make our roads safer; it only forces them into unregulated and unlicensed vehicles onto Texas highways, creating additional risk for everyone.

Secondly, this rule will result in significant financial consequences for the state. Undocumented residents currently contribute millions of dollars annually to Texas through registration fees, title fees, sales tax, and vehicle inspections. Cutting off this revenue stream will reduce funding available for state transportation infrastructure and local county tax offices.

Finally, small independent car dealerships — particularly those that serve immigrant communities — will be disproportionately harmed. These businesses rely on customers who may not possess the newly required immigration documents. If those customers can no longer register vehicles, dealerships will experience reduced sales, declining revenue, and possible closures. This harms not just immigrant buyers but also local economies and the Texans employed at these businesses.

I urge the Texas DMV to reconsider this proposed change and engage with community stakeholders, immigrant-serving organizations, small business owners, and county tax offices before finalizing any regulation that will negatively impact so many Texans.

A more balanced and practical policy would maintain roadway safety and identity verification without excluding entire communities that depend on vehicle registration to live and work.

Thank you for your attention to this important matter. I respectfully request that the DMV pause implementation of these restrictions and consider alternative solutions that do not harm Texas residents, small businesses, and public safety.

SINCERELY,
HECTOR A. ROMERO

Sent from Yahoo Mail for iPhone <mailto:11aef@links.protection.outlook.com?rel=reply> to 'Hector Romero' <mailto:1078729683@jpmc.com> on 12/7/2025 at 10:26:49 AM.
Original Message:
From: Hector Romero <mailto:1078729683@jpmc.com>
To: 'Hector Romero' <mailto:1078729683@jpmc.com>
Subject: Formal Concern Regarding Proposed ID Requirements for Vehicle Registration
Date: Sunday, December 7, 2025 10:26:49 AM

From: [JA Schwab](#)
To: [Zz - Resource - GCO Rules](#)
Subject: New Vehicle registration/renewal
Date: Friday, December 19, 2025 10:16:33 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I think it is an EXCELLENT rule! Implement it ASAP

From: [James Peinado](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Please keep the stricter language in place for obtaining a Texas Drivers's Liscence
Date: Monday, January 5, 2026 4:15:42 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Dear Sir or Madam: As a citizen of the State of Texas, I ask you to please retain the stricter requirements for applicant's identification documents promulgated in Chapter 217, Vehicle Titles and Registration Amendments: §§217.22, 217.26, 217.28, and 217.29 (Relating to Personal Identification Requirements for Vehicle Registration under Texas Transportation Code, §502.040).

The purpose is to keep aliens illegally residing in Texas from illegally operating vehicles on Texas roads.

Thank you for your consideration.

--

James Raul Peinado

6728 Camino Fuente Dr.
El Paso, Texas, 79912

"Setting a good example is a far better way to spread ideals than through force of arms." -
Ron Paul

From: [Janett Avila](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Passport use
Date: Tuesday, December 23, 2025 1:24:54 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I strongly oppose the enforcement of removing the passport with out a legal entry stamp for our community.

I have worked in the dmv environment for 12 years going on 13th. This decision has had a big bad effect on my community. This people need the vehicles to be able to go from and to work. Take their u.s citizen children to school, sports etc. They have a big part of the economy. 99%are kot criminals and they just love here to have a better life.

As someone who has been in this industry for many years. One of the first things we will see if people take advantage of the community. There is people out there already right now taht are charging this community an outrageous amount of money to be able to renew their registration. So many of the Construction community that build our roads and homes will not be able to renew their already owned vehicles. Pay their loans. The vehicle industry eill also suffer a great deal.

One big important issue I see is people will have to start titleling vehicles under other people's names. Thsi gives criminals an advantage to commit crimes that will be harder to solve or find the right person .

I just see this opening the door to so much more damage than the benefit that you are looking for.

Please reconsider this decision.

God bless you

My name is Jasmine Vega. As a concerned citizen and a former auto insurance representative, I **oppose** the proposed **Chapter 217, Vehicle Titles and Registration Amendments: §§217.22, 217.26, 217.28, 217.29** on the basis of common sense and morality. While the amendments claim to make our roads safer and combat fraud, there's neither empirical evidence nor basic logic to support such claims. Instead, these amendments are likely to deliver unintended consequences, such as loss of revenue for county/state services and increased danger on the roads from unregistered vehicles.

It's estimated that there are over 1.2 million workers in Texas without legal status or with temporary protections who contribute more than \$45 billion to the economy annually (Garcia). In a state without expansive and reliable public transportation, personal vehicles are virtually a necessity for any individual to work. It follows logically that undocumented individuals purchase and register vehicles to commute to work.

Again, following the logic, it's likely that undocumented individuals will continue to drive to work with the *chance* of getting pulled over for an unregistered vehicle, over the *higher chance* of losing their jobs if they can no longer commute there. Thus, preventing undocumented individuals from registering their vehicles would not combat fraud, but instead increase the number of unregistered vehicles on the road, removing vital funds from the State Highway Fund, TxDMV, and other state/county services. A research report published by the Texas Transportation Institute estimates that the state loses over \$10 million annually due to vehicle registration violations, such as not registering in a timely manner and fraudulent practices like registration placed on wrong vehicles (Lamkin and McAllister).

Unregistered cars also often lack insurance, forcing insured vehicles to carry the financial burden in case of an accident. If insurance companies are forced to pay out more claims without receiving more premiums, insurance premiums can substantially raise for already insured individuals. This harms all Texans- not just ones with legal status.

It's time that we stop holding undocumented individuals more accountable for public safety than corporations and our government. The fight for safer roads and lower insurance premiums is something all Texas can benefit from, but it needs to be addressed at its very root.

Garcia, Zaira. "Immigrants Are Crucial to Texas' Economy." *FWD.us*, 23 Feb. 2022, www.fwd.us/news/texas-immigrants/.

Lamkin, Jack, and Matt McAllister. *An Analysis of Violations of the Texas Motor Vehicle Registration Laws and Revenue Loss*. Texas A&M University System, May 1990, pp. 1–98.

From: [Jehu](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Complaint
Date: Monday, December 8, 2025 7:54:25 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I'm complaining for a proposed amendment under the new Transportation Code 217.040. I reason with this complaint since this new regulation could bring down Texas economy with no new sticker regulations. I believe qualifying for a sticker should be mandatory for any vehicle, immigrant or not, since it maintains safety and up to date information for vehicles. Most of the currency from vehicles could be from registration and or vehicles to the DPS. I strongly advise to reach out to me or for my proposition to be heard.

Thank you,
Jehu Hernandez

From: [Juan Mendoza](#)
To: [Zz - Resource - GCO Rules](#)
Date: Friday, December 12, 2025 7:43:08 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

It seems unfair to me the law they want to implement against the hardworking Hispanic community that pays taxes, has car insurance, and everything is up to date, while those who are undocumented drive around without license plates, insurance, or registration stickers. What cruel hearts they have!

From: [Julia Otero](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Amendments to chap 217
Date: Monday, December 29, 2025 12:52:50 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

The Texas Department of Motor Vehicles' role is vehicle registration, not immigration enforcement. A valid foreign passport is a government-issued, internationally recognized form of identification. If an applicant presents valid identification, pays all required fees, and insures their vehicle, no fraud is being committed. Denying registration based on immigration status exceeds TxDMV's scope, reduces compliance, increases unregistered and uninsured vehicles, and undermines public safety. A more reasonable alternative would be to accept foreign passports and apply an appropriate registration fee, ensuring revenue collection and road safety without imposing immigration determinations on DMV staff.

Sent from my iPhone

From: [Karla Tovar](#)
To: [Zz - Resource - GCO Rules](#)
Date: Tuesday, December 9, 2025 12:24:01 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I am against the article 217.040 transporación code 502.40 , To get car's registration transferencia car s title with a forgien pasaporte sealed by D H S it is descriminaton

From: [Kathi Pena](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Concerns Regarding DHS Verification Requirement for Vehicle Registration
Date: Friday, January 2, 2026 12:29:11 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I am writing to express opposition to the new requirement mandating DHS document verification in order to register a vehicle.

This policy will have serious negative consequences for the Texas economy, particularly for local small businesses such as used car dealerships, auto lenders, repair shops, and related industries that rely on daily vehicle sales. These transactions generate sales tax revenue, title and registration fees, and employment opportunities that directly benefit the state and local governments.

Limiting the ability to register vehicles will reduce overall sales activity, lower tax revenue, and place additional strain on small businesses that are already operating under extensive regulatory requirements. Many individuals who contribute to the economy through lawful work and daily commerce will be excluded, creating unintended financial harm rather than improving public safety.

Texas has long promoted economic growth, business freedom, and efficiency. This policy moves in the opposite direction and risks weakening an important sector of the state's economy.

Please reconsider or revise this requirement with the broader economic impact and small business community in mind.

Thank you for your time and consideration.

From: [Krysia Lynes](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Proposed changes to Vehicle Registration Ruled
Date: Wednesday, December 17, 2025 3:32:21 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hi

I am a naturalized citizen. Before I became a citizen, I was a permanent resident. When my Green Card was up for renewal, my driver's license would also expire. Certainly your proposed rules changes will inconvenience immigrants, people who are transgendered, and the kind of women that change their surname when they get married.

What is the benefit that results from this costs? I think you may see a reduction in the proportion of insured drivers. That doesn't seem like a benefit. You may make it more difficult for women and transgender individuals to vote. That doesn't seem like a benefit if you believe in government of the people for the people by the people.

Fundamentally, I think that we would be better served if people who are resident in Texas are able to obtain a license to drive, register a vehicle and insure a vehicle. If you need to indicate that they lack legal residency on the card, go ahead. Making life hard for immigrants creates a demand for stolen license plates, stolen documents and increases the number of uninsured drivers ... and we all pay because we need to add a rider for uninsured motorists. It is worse for everyone.

Immigration is a federal issue. Let the federal government deal with that problem. You can work on keeping Texas roads safer for all of us.

Thanks

Krysia Lynes

From: [Leticia Romero](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Strong Opposition to New ID Requirements
Date: Sunday, December 7, 2025 12:33:54 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Leticia Romero]
Irving, Texas

December 7, 2025

Texas Department of Motor Vehicles

To the Texas DMV:

I strongly oppose the proposed ID rule that blocks undocumented Texans from registering vehicles. This policy is harmful, unnecessary, and will create more danger on Texas roads by pushing more people to drive unregistered and uninsured.

It also destroys revenue the state currently collects from these residents and threatens the survival of small dealerships that rely on serving immigrant communities. This rule hurts Texas far more than it helps.

I urge you to stop this proposal immediately.

Sincerely,
Leticia Romero

From: [Lisa Quinlan](#)
To: [Zz - Resource - GCO Rules](#)
Subject: New ID Requirements
Date: Monday, January 5, 2026 12:33:38 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hello,

My father started a small used car business in our hometown 30 years ago. He literally began with a small loan and grew his business, while still small, that has been successful enough to raise kids and grandkids. My brother and I now manage one and we have someone that runs another.

We sell most of our vehicles on a buy here pay here platform although we retail a good number also. We help people with little to no means of getting transportation anywhere else. We have built a solid reputation in our community and see most of our customers as extended family.

The changes that are being made will cause a major set back for many of our customers and our livelihood's. We are an integral part of our community. We pay taxes, we sit on boards, we donate, attend church. We absolutely want safety and it's not a terrible idea but the ripple effect will hurt the car industry tremendously. Why the car industry? Not housing? There are many other avenues to get the same result but won't hurt a major industry in Texas.

We are asking that the rule be returned to its prior form. This was abruptly implemented with no discussion or even knowledge it was happening. Please consider the rule being returned.

Thank you,

Lisa Anthony

Dear Representatives from Texas Department of Translation /DMV, The Most Recent Changes to For New Auto Registration and Registration Renewals will Afect our Texas Roads, by Doing the Documentation ID Requirements Will put our Texas Roads in Danger and Not Safe, please Review the Driver license and Legal Status to Many or Millions Car Owners in Texas, I Don't Agree With the New Documents policy Changes Texas Wil not be able to Collect Taxes by not Reversing this new policy changes may God bless the Beautiful states of Texas, Happy Holidays to Everyone....

From: [Macías, Cuauhtémoc A](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Public Comments Regarding Texas Administrative Code Title 43, §§217.22, 217.26, 217.28, 217.29
Date: Saturday, December 20, 2025 1:39:32 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whom it may concern,

I am writing to express my concerns with the proposed changes regarding Texas Administrative Code Title 43, §§217.22, 217.26, 217.28, 217.29.

I am a lifelong Austin resident and am concerned these changes will hurt our economic growth by derailing police enforcement efforts from serious crimes. If these changes go into effect, police will be distracted with the overflow of expired tags and not be able to investigate serious crimes that actually hurt our communities. I respectfully oppose these changes to the code.

From: [Maria Isabel](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Fwd: Buzz Motor Company LLC
Date: Monday, January 5, 2026 1:45:30 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

We are writing to express our deep concern regarding the recent changes to Texas' vehicle documentation requirements, which have already created significant disruptions to our business operations and are poised to negatively affect the automotive industry as a whole. The new processes have introduced substantial delays, and added confusion for customers, resulting in slower sales cycles, a measurable decrease in sales, and growing frustration on all sides. These challenges are not isolated to our organization—dealers across the state are experiencing similar setbacks, and smaller dealerships in particular may struggle to adapt, potentially reducing competition and limiting consumer choice. We respectfully urge a reconsideration of these documentation changes and encourage collaboration with industry stakeholders to develop a more balanced approach that protects consumers without hindering the ability of businesses to operate effectively.

Sincerely, Maria

From: [Martha Nino De Pena](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Concerns Regarding DHS Verification Requirement for Vehicle Registration
Date: Friday, January 2, 2026 12:28:14 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I am writing to express opposition to the new requirement mandating DHS document verification in order to register a vehicle.

This policy will have serious negative consequences for the Texas economy, particularly for local small businesses such as used car dealerships, auto lenders, repair shops, and related industries that rely on daily vehicle sales. These transactions generate sales tax revenue, title and registration fees, and employment opportunities that directly benefit the state and local governments.

Limiting the ability to register vehicles will reduce overall sales activity, lower tax revenue, and place additional strain on small businesses that are already operating under extensive regulatory requirements. Many individuals who contribute to the economy through lawful work and daily commerce will be excluded, creating unintended financial harm rather than improving public safety.

Texas has long promoted economic growth, business freedom, and efficiency. This policy moves in the opposite direction and risks weakening an important sector of the state's economy.

Please reconsider or revise this requirement with the broader economic impact and small business community in mind.

Thank you for your time and consideration.

[Sent from Yahoo Mail for iPhone](#)

From: [Neni Aranda](#)
To: [Zz - Resource - GCO Rules; greg.abbott@gov.texas.gov](#)
Subject: Concerns Regarding DHS Verification Requirement for Vehicle Registration
Date: Friday, January 2, 2026 12:30:47 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I am writing to express opposition to the new requirement mandating DHS document verification in order to register a vehicle.

This policy will have serious negative consequences for the Texas economy, particularly for local small businesses such as used car dealerships, auto lenders, repair shops, and related industries that rely on daily vehicle sales. These transactions generate sales tax revenue, title and registration fees, and employment opportunities that directly benefit the state and local governments.

Limiting the ability to register vehicles will reduce overall sales activity, lower tax revenue, and place additional strain on small businesses that are already operating under extensive regulatory requirements. Many individuals who contribute to the economy through lawful work and daily commerce will be excluded, creating unintended financial harm rather than improving public safety.

Texas has long promoted economic growth, business freedom, and efficiency. This policy moves in the opposite direction and risks weakening an important sector of the state's economy.

Please reconsider or revise this requirement with the broader economic impact and small business community in mind.

Thank you for your time and consideration.

From: [Nuris Martinez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Public Comment Opposing Amendments to Chapter 217 (Vehicle Registration Identification Requirements)
Date: Friday, December 5, 2025 10:02:15 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whom it may concern,

I am writing to strongly oppose the proposed amendments to Chapter 217 regarding personal identification requirements for vehicle registration under Transportation Code §502.040.

Although the summary states that these changes will have “no significant financial impact,” this is not accurate. These amendments would create a major negative impact for Texas businesses, local counties, and the state as a whole.

Many Texas residents currently use foreign passports to register and insure their vehicles. These individuals pay registration fees, title fees, sales tax, inspection fees, insurance, and other state and county revenue-generating charges. Restricting foreign passports unless they show lawful admission will eliminate a large portion of legally active taxpayers who are already contributing to the Texas economy.

If these individuals are no longer allowed to register their vehicles, Texas will see:

- A significant decline in registration revenue
- Reduced insurance compliance
- Decreased inspection and title service activity
- Loss of income for small businesses that serve this community
- More uninsured and unregistered vehicles on Texas roads, creating additional public safety risks

This rule does not only affect immigrants; it directly harms small businesses like mine that rely on vehicle title, registration, insurance, and inspection transactions. It also harms the counties and the state by reducing millions in tax revenue.

I respectfully request that the Department reconsider this proposal, as the financial and community impact is far greater than stated.

Thank you for your consideration.

Sincerely,

Nuris Ocegueda

From: [OC AutoSales LLC](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Identification requirement rule
Date: Monday, January 5, 2026 1:35:06 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

We think the State should consider the public opinion before ruling on any laws.

From: [ramon estrada](#)
To: [Zz - Resource - GCO Rules](#)
Subject: We make the difference
Date: Wednesday, December 10, 2025 10:00:30 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Seguiremos las leyes del excelente País que nos encontramos, pero si sería conveniente que se siga aceptando un documento legal para poder colaborar con el gobierno ya que las personas que no tienen pasaporte con visa, económicamente paga lo que sea solo es una ley que tenga un auto bajo su nombre, pero también sería conveniente que tengan un ID por parte de DMV sabemos que pagarían 300 DLLs, solo por obtener su ID pero estarían legales y es un buen fondo para esté fabuloso PAÍS gracias

Get [Outlook for Android](#)

We will follow the laws of the excellent country we are in, but it would be convenient to continue accepting a legal document to be able to collaborate with the government since people who do not have a passport with a visa, economically pay whatever it is only a law that has a car under their name, but it would also be convenient for them to have an ID from DMV we know that they would pay 300 DLLs, just for getting your ID but they would be legal and it's a good fund for this fabulous COUNTRY thank you 🙏👍

From: [Ricardo Hernandez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to New ID Restrictions for Vehicle Registration
Date: Sunday, January 4, 2026 8:03:22 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I am writing to express my strong opposition to the recent Texas Department of Motor Vehicles (TxDMV) policy change that prevents individuals from registering or titling a vehicle using a foreign passport without a DHS stamp or immigrant visa. While presented as a security measure, this abrupt shift creates an unnecessary barrier to commerce and threatens the stability of the Texas economy.

This policy will have a "domino effect" across several key Texas industries:

- **Auto Dealerships:** By disqualifying a significant portion of the consumer base (Texas is home to an estimated 1.7 million undocumented residents), dealerships—particularly independent and used-car lots—will see a sharp decline in sales. This leads to a direct loss in state sales tax revenue (currently 6.25% per vehicle).
- **The Insurance Industry:** Restricting legal registration does not remove the need for transportation in our car-centric state. It instead forces drivers into "unregistered and uninsured" status. Experts predict this will drive up premiums for all Texans to cover the increased risk of accidents with uninsured motorists.
- **Auto Repair and Parts:** Immigrants make up nearly 23% of the "Other Services" labor force, which includes auto repair. By making vehicle ownership difficult, the state is effectively defunding the very mechanics and parts stores that keep Texas moving.

Key Economic Figures to Consider:

- **\$192 Billion:** The annual contribution of immigrants to the Texas economy in personal income and spending power (Source: [FWD.us](#)).
- **\$10 Billion:** The amount paid by Texas immigrants in combined federal, state, and local taxes annually (Source: [Texas Business Council](#)).
- **\$800,000+ Vehicles:** Estimates suggest that if even half of the undocumented population in Texas owns a car, nearly one million vehicles could become unregistered under these rules, leading to massive losses in registration fees and safety inspection revenue (Source: [Fleet Management Weekly](#)).

I urge you to reconsider this policy and restore the use of valid foreign passports for vehicle

registration to ensure that all Texas residents can contribute to our economy safely and legally.

Sincerely,

Ricardo

From: [Rick Gomez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Please keep the stricter language in place for obtaining a Texas Drivers's License
Date: Monday, January 5, 2026 4:24:00 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Dear Sir or Madam:

As a citizen of the State of Texas, I ask you to please retain the stricter requirements for applicant's identification documents promulgated in Chapter 217, Vehicle Titles and Registration Amendments: §§217.22, 217.26, 217.28, and 217.29 (Relating to Personal Identification Requirements for Vehicle Registration under Texas Transportation Code, §502.040).

The purpose is to keep aliens illegally residing in Texas from illegally operating vehicles on Texas roads.

Thank you for your consideration.

Ricardo Gomez
2000 Saul Kleinfeld Dr #310
El Paso, TX 79936

From: [Roman Gonzalez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Article 217.040 Transportation code 502.40
Date: Saturday, December 6, 2025 11:19:28 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I am against the new rule to get a car registered with a valid passport with a seal from DHS

From: [Ron Smith](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Rules for Vehicle Registration
Date: Tuesday, December 30, 2025 5:07:29 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Please KEEP the rules that prevent undocumented immigrants from registering vehicles in Texas.

Thank you,
Ron Smith
New Waverly, Texas

Sent from my iPhone

From: [Rosy Perez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Identification required affecting dealers
Date: Friday, December 5, 2025 10:57:40 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hi good morning im a Texas dealer and im getting affected by this new law of id requirements im loosing business and I feel really sad because we been in business for almost 14 years and this is what most affecting us we're trying too stay strong on sales but it's impossible with the requirements if there's a possibility to change it back to normal god bless yall

From: [rudv.enriquez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Comments on new rule changes by TEXAS DMV
Date: Monday, January 5, 2026 1:44:52 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Thank you for the opportunity to provide comments regarding the Texas Department of Motor Vehicles' proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29, relating to personal identification requirements for vehicle registration under Transportation Code §502.040. I write to share how these changes affect my business, employees, and customers, and to highlight unintended consequences that should be considered before the rules are finalized.

While I agree with the intended premise of the rule change, I don't believe it is as simple of a workaround for its intended outcome.

As a Motor Vehicle Dealer, this places undue burden on us to have yet another rule for us to learn to follow, and to be knowledgeable on immigration laws and to decipher VALID PASSPORTS from invalid stampings of passports?

As a bigger and more important note and premise, America and Texas is founded on property rights. Whether someone is legally or illegally in the country their property rights should still be protected. I do not believe that such big changes in how OUR state of Texas does business should be at the whims of rule changes. Whilst I understand that DMV has flexibility in how it chooses to accept what forms of ID they accept, For changes this big our democratically elected lawmakers should be involved in making changes this big. Citizens can come first AND property rights can be protected. Immigration enforcement is not a stated goal or directive for the TXDMV nor Motor Vehicle Dealers

I ask that the rule be returned to its prior form

From: [REDACTED] 552.137
To: [Zz - Resource - GCO Rules](#)
Subject: Comments on Chapter 217, Vehicle Titles and Registration Amendments: §§217.22, 217.26, 217.28, 217.29
Date: Friday, December 19, 2025 5:23:55 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

As a Texas residence, voter and taxpayer.; I fully support these rules changes and see no issue with having to show my DL when I renew my tags. I think this help keep cars off the road that do not have proper insurance in place and no way to collect from the owners in the event of an accident or property damage.

Samuel Harbaugh

[REDACTED] 552.137

4134 Old Highway 6
Van Alstyne, TX 75495

From: 552.137
To: [Zz - Resource - GCO Rules](#)
Cc: [Shawn Grice](#)
Subject: Registration of vehicles in Texas - Impacts of new rule changes in Chapter 217
Date: Wednesday, December 24, 2025 1:12:47 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Dear Sir/Madame,

With regard to the valid documentation required to register a vehicle in the state of Texas, we are struggling to understand what documents would support the requirements of the new rules.

We are family of Canadian Citizens that have for three generations spent time in Texas for the winter months. We own property in Texas and are therefore taxpayers. We have Texas plated vehicles and therefore also pay registration fees each year. We have supported the Texas economy since the late 1960's. We very much enjoy Texas; we respect the state and the US as a whole.

My parents recently travelled to the US with the intent on spending the winter in Texas. They entered with an I94 under a B2 visa classification that is valid until May 15, 2026. When they went to renew their vehicle registration they were advised they could not. They believed that their valid Canadian Passport (with Photos) along with a valid I94 that clearly shows a B2 class of admission (along with an official document number and that also clearly describes in the bottom of the document that the I94/I95 form in conjunction with other required ID would be considered bona fide evidence of the lawful entry (immigration) into the US. They pursued further information and we have now spoken to the DMV in Austin, the regional office in Pharr, and the County Tax assessors in Hidalgo. We now understand we have no choice but to drive our vehicle back to Canada before the Registration runs out as it sounds like under the current rules that vehicle will be stranded in Texas and unable to be driven.

We understand the need for safety and security in Texas and we applaud the intent of the rule changes, but we are concerned that perhaps you did not intend to prevent lawfully documented individuals such as Winter Texans from registering their vehicles. If you did, then that clarity would be nice to understand so that individuals can choose to live elsewhere during the winter months. If you did not, I would respectfully request that the

rule changes be considered in light of the I94 document not being considered sufficient to evidence the temporary residency in the State of Texas. If the I94 document could be allowed as necessary support, or you could implement a process to obtain a B2 visa with a photo (my parents were photographed and fingerprinted at the point of entry), it sounds like that would meet the needs of the County Tax Assessors. I have tried to contact DHS and CBP but the endless AI chat agents don't let you get to a real person so it has been impossible to try to seek clarity on what additional documentation they could provide that may assist. I would keep trying but after several hours and several days of trying we are now worried about the time that we have remaining on our current registration so we need to start driving back to Canada.

As an option, and if there is insufficient time to make legislative change before the current winter, perhaps you could allow non-US citizens to at least have a passport photo taken and have a Texas lawyer or other notary public notarize the photo and specify that it is to accompany the I94 and reference the I94 document and allow that as supporting evidence to allow people with valid passports and B1 or B2 visas (as stated on the I94) to register a vehicle. Perhaps that will allow a regulatory or administrative policy approach to overcoming the current dilemma where many winter Texans are going to have to leave the State of Texas fairly quickly this winter because they will not have the ability to drive (to get groceries, attend appointments, etc.).

Thank you for your consideration. I would be pleased to provide further information or clarity on my thoughts if you are interested. Thank you for the opportunity to provide feedback.

We enjoy Texas. It has been part of our family for over 60 years, and our comments are a reflection of our desire to stay with you for generations to come.

Respectfully,

Shawn Grice
Saskatchewan, Canada

[REDACTED]

306-539-3652

From: [Stephanie Hansen](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Proposed Registration Changes
Date: Thursday, December 18, 2025 7:20:51 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I support the proposed changes in registration. I also support requiring a valid driver's license and auto insurance to purchase a vehicle because they are items one must have to legally drive. I'm tired of skyrocketing auto insurance due to unlicensed/uninsured illegal immigrants, my family has been hit by a few and left to cover the damage they have caused. Anyone repeat offender should have their vehicles seized and sold.

Thank you,
Stephanie Hansen
Sent from my iPhone

From: [Ted Endicott](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Chapter 217, Vehicle Titles and Registration Amendments
Date: Monday, December 29, 2025 11:32:02 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Subject: Chapter 217, Vehicle Titles and Registration Amendments: §§217.22, 217.26, 217.28, and 217.29 (Relating to Personal Identification Requirements for Vehicle Registration under Texas Transportation Code, §502.040)

Texans cannot apply to register a vehicle without one of the listed ID.

- A valid, unexpired driver's license or state identification certificate;
- A valid, unexpired Texas license to carry a handgun;
- A valid, unexpired United States passport or passport card

Concern: 1. Do these requirements prevent a person such as a parent, who do not possess one of these documents, from buying and or registering a car in their name for use by a minor family member ?

Concern: 2. There are persons who own or purchase vehicles for use by family members or other care takers whom the owner allows use to transport them, since they may not be physically able to do so themselves. That person still owns that vehicle and is responsible for the registration, operation and insurance, but still may not have one of the stated required ID's. Some reasonable Examples of other ID may be, but not limited to: A VA ID, SSN card, a Federal Fire Arms License, a birth certificate, or even one of the stated ID that are expired. Note that An expired ID does not mean the person is NOT whom they are, it just means a fee has not been paid to renew it. That person is still the same person. So then why would they not be able to use other than the listed ID to affect a registration ? And why would they not be allowed to register a vehicle they own or newly purchase as long as they can prove they are who they are and are not

illegal ?

**Thank You
Ted Endicott**

From: [Tomalea Bench](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Rules for Vehicle Registration
Date: Sunday, January 4, 2026 11:37:57 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Thank you for the opportunity to comment on the proposed rules changes for vehicle registration.

I am in favor of the proposed changes and support the requirements of legal residency.

Tomalea Bench
105 Pecos Drive
Huntsville, Tx 77340

From: [Tore Fossum](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Tighter rules on issuing Texas driver's license
Date: Friday, January 2, 2026 6:50:19 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Dear Sir or Madam: As a citizen of the State of Texas, I ask you to please retain the stricter requirements for applicant's identification documents promulgated in Chapter 217, Vehicle Titles and Registration Amendments: §§217.22, 217.26, 217.28, and 217.29 (Relating to Personal Identification Requirements for Vehicle Registration under Texas Transportation Code, §502.040).

The purpose is to keep aliens illegally residing in Texas from illegally operating vehicles on Texas roads.

Thank you for your consideration,

Best regards,

Tore Fossum

PO Box 1634

Huntsville, Texas 77342

Reply [REDACTED]

From: [Vanessa Gmail](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Public Comment Opposing Proposed Vehicle Registration Rule Changes
Date: Wednesday, December 31, 2025 11:42:21 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Dear Texas Department of Motor Vehicles,

I am submitting this comment to express strong opposition to the proposed changes to vehicle registration and renewal rules.

These rules, as written, would create significant and unnecessary barriers for many Texans who rely on their vehicles to work, care for their families, and participate fully in daily life. The impact would fall hardest on immigrant communities, low-income workers, and residents who already face obstacles navigating state systems. Policies that restrict access to vehicle registration do not improve safety or compliance — they simply make it harder for people to follow the law.

The DMV's responsibility is to ensure that registration processes are accessible, fair, and designed to support public safety, not to create new hurdles that push people into vulnerable or unlawful situations. If these rules are adopted, many Texans will be forced to choose between losing their ability to work or risking penalties for driving without proper registration. That outcome serves no one.

I urge the agency to reconsider these rules for the following reasons:

- They risk disproportionate harm to immigrant families and essential workers who depend on reliable transportation
- They introduce complexity and confusion into a process that should remain straightforward and accessible
- They undermine the state's interest in ensuring that as many vehicles as possible are properly registered and insured
- They were initially introduced without public input, raising concerns about transparency and accountability

Texas benefits when its residents can meet legal requirements without facing unnecessary administrative barriers. These proposed changes move in the opposite direction.

I respectfully ask the Texas DMV to withdraw or substantially revise these rules to avoid

harming the very communities that keep our state running.

Thank you for considering this comment and for taking public feedback seriously.

Sincerely,
Vanessa Gonzales
Fort Worth, Texas

Sent by Vanessa

From: [Victoria Uriostegui](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Comment Against Texas Administrative Code Title 43, §§217.22, 217.26, 217.28, 217.29
Date: Friday, January 2, 2026 12:39:36 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hello,

My name is Victoria Uriostegui and I'm writing a comment against the Texas Administrative Code Title 43, §§217.22, 217.26, 217.28, 217.29. The new rule creates multiple issues for public safety and economic loss. To start, a rule change that dramatically impacts the lives of Texas drivers should have considered the input of the public. It creates problems where there aren't any. The state loses when they restrict which residents can become car owners. It creates a series of problems and financial loss to the auto and insurance companies in Texas. Moreover, it hurts Texas families. Without the ability to register vehicles families lose access to reliable transportation to meet their needs to go to school, work, and contribute to the economy. In summary the rule change fails to account for the wide sets of problems the new rule creates. It is highly unproductive and unnecessary.

- Victoria

--

Victoria Uriostegui-Garcia
Class of 2025
University of Texas at Austin
Email: vmu69@eid.utexas.edu
Cell: (512)-619-1862

From: [Willy Ayala](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Dealers' License Loophole - Close Licensing Loopholes for Limited-Term Residents
Date: Sunday, December 7, 2025 8:25:47 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Dear DMV

I am writing as a concerned citizen to respectfully request your attention to an important issue regarding the alignment of government and state licensing with immigration status verification.

In Texas, limited-term driver licenses are issued to immigrants whose presence in the United States is authorized for a specific period. These licenses expire when their lawful presence ends, ensuring that driving privileges do not extend beyond their approved stay. However, there is currently no uniform policy requiring other state or professional licenses—such as DMV Dealers licenses, occupational certifications, business permits, or concealed carry licenses—to expire in tandem with the individual's lawful presence or driver license expiration.

This inconsistency presents potential risks and enforcement challenges. Allowing individuals with expired lawful status to retain valid state-issued licenses can undermine the integrity of our licensing systems and may create loopholes that are difficult to monitor or address.

I respectfully urge you to consider sponsoring or supporting legislation that would require all state and government-issued licenses in Texas to expire no later than the expiration date of an individual's limited-term driver license or authorized immigration stay. This measure would enhance consistency across agencies, improve public accountability, and support lawful compliance with immigration and licensing standards.

Thank you for your continued service to the people of Texas. I appreciate your attention to this matter and your commitment to upholding the integrity of our state institutions.

Sincerely,

From: [Yadira Aldaco](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Public Comment Concern
Date: Thursday, December 25, 2025 5:22:24 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hello,

I am writing to submit a public comment regarding the proposed changes to Texas vehicle registration and renewal rules.

I am concerned that these changes may create barriers for many Texans, especially working families and immigrants, who depend on their vehicles for work, school, and medical needs. Reliable transportation is essential in Texas, and registration rules should be fair, clear, and accessible.

I respectfully ask the Texas DMV to reconsider any changes that could prevent otherwise eligible Texans from registering or renewing their vehicles and to ensure public input is fully considered before the rules are finalized.

Thank you for your time and consideration.

Sincerely,
Yadira Aldaco
Tyler, TX

From: [alejandro.jaramillo](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Jara's Auto Sales
Date: Friday, January 9, 2026 1:14:47 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

We, the owners and employees of Jara's Auto Sales Inc., a licensed independent dealer in Texas, respectfully request that the Board take into serious consideration the significant and immediate impacts of the new identification requirements for vehicle titling and registration, effective November 2025. While we understand the stated goals of the updated regulations, the current implementation is having severe, unintended economic consequences for small, legitimate businesses across the state.

Key Impacts on Jara's Auto Sales Inc. and Similar Dealers:

- **Customer Base Loss:** Approximately 80% of our monthly sales are to the Hispanic population. Of that demographic, an estimated 60% will most likely not meet the newly stringent documentation requirements (e.g., valid U.S. visa or permanent resident card in an unexpired foreign passport) to legally title an automobile in Texas. This abrupt shift threatens our business viability, with a high possibility of forcing closure.
- **Economic Domino Effect:** The negative impact extends beyond our dealership's sales floor. It directly jeopardizes the livelihoods of our entire staff, including mechanics, painters, salespersons, and other support personnel.
- **State Revenue Concerns:** The regulations inadvertently push a substantial portion of the population into a shadow market for transportation. This means a significant loss of state revenue through reduced sales tax, title fees, and vehicle registration fees, as individuals will seek alternative, potentially non-compliant, means of transportation.
- **Safety Implications:** Vehicles purchased or operated outside the legal registration system are more likely to be uninsured and unregistered, potentially increasing risks for all Texas drivers.

We urge the TxDMV to consider these real-world economic and safety implications and explore policy adjustments or alternative solutions that support legal, tax-paying Texas businesses while addressing regulatory goals. We are committed to compliance but need a workable framework that does not decimate our customer base and business operations. Thank you for your time and consideration of this critical matter.

Sincerely,
Jara's Auto Sales Inc.
Alejandro N. Jaramillo, Owner
[Dealer License Number, P150233]

281.507-6968



2820 Lombardy Ln Dallas, Tx 75220

TO WHOM IT MAY CONCERN:

THROUGH THIS LETTER, I WANT TO INFORM YOU ABOUT THE LOW SALES FIGURES I HAVE EXPERIENCED IN RECENT MONTHS SINCE THE NEW LAW WAS IMPLEMENTED IN NOVEMBER 2025.

THIS LAW IS AFFECTING MY BUSINESS IN TERMS OF SALES AND PAYMENTS, ENOUGH TO SAY THAT CERTAIN ASPECTS OF MY BUSINESS WILL NOT BE COVERED, SUCH AS SALARIES, REPAIRS, OR SIMPLY MONTHLY BILLS, SINCE 90% OF MY CUSTOMERS HAVE PASSPORTS.

I STARTED MY BUSINESS IN 2007, AND TO DATE , THE RECORDS SHOW AN ANALYSIS OF THE LOSSES WE HAVE EXPERIENCED IN THIS LAST YEAR , AND EVEN MORE SO IN THESE LAST FEW MONTHS AFTER THE NEW LAW WAS IMPLEMENTED.

FOR ANY QUESTIONS OR CLARIFICATIONS, PLEASE CONTACT US AT 214-293-5067

JOSE A RODRIGUEZ

ASHE AUTO SALES LLC



4204 OLD JACKSBORO HWY
WICHITA FALLS TX, 76302

TO WHOM IT MAY CONCERN:

THROUGH THIS LETTER, I WANT TO INFORM YOU ABOUT THE LOW SALES FIGURES I HAVE EXPERIENCED IN RECENT MONTHS SINCE THE NEW LAW WAS IMPLEMENTED IN NOVEMBER 2025.

THIS LAW IS AFFECTING MY BUSINESS IN SALES, PAYMENTS, THESE EXPENSES CANNOT BE COVERED AS SALARIES, REPAIRS, OR SIMPLY MONTHLY BILLS, SINCE 90% OF MY CLIENTS HAVE PASSPORTS. THE RECORDS SHOW AN ANALYSIS OF THE LOSSES WE HAVE EXPERIENCED IN THE LAST YEAR, AND EVEN MORE SO IN RECENT MONTHS AFTER THE NEW LAW WAS IMPLEMENTED. A LARGE PORTION OF MY CLIENTS USE PASSPORTS.

FOR ANY QUESTIONS OR CLARIFICATIONS, PLEASE CONTACT US AT 214-293-5067

JOSE A RODRIGUEZ

ASHE WICHITA AUTO SALES LLC

From: [Blanca Lopez De la Rosa](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Cristina morales district 145
Date: Monday, January 5, 2026 7:33:20 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Hello , I hope this message finds you well!

I'm trying to reach you on behalf the new rule you have been introduced in order to register or renew vehicle registration. I personally feel affected by this situation because I have to drive my kid from school to school in the morning since she is a traveling student . she is taking principles Bio Sci Honors every morning , this class is not given in her current school so the district gives her the opportunity to participate in a cte program and she travels every morning to another school in order to get that class.

If you implement this rule she is not going to have the tipe of education she needs to be able to go to college and start her career

and also the only way we could go to work

To buy groceries

To go in any emergency

Or going to a dialysis clinic 3 days a week for my husband who is currently in end stage of kidney failure

Many people will be affected by this, please take action against this

And thank you for taking the time to read my email!

Sent from myMail for iOS

From: [Carlos sanchez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: commets
Date: Monday, January 5, 2026 6:20:47 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

JANUARY 5, 2026
DALLAS TX

TO WHOM IT MAY CONCERN.

We are Three Country Auto Sales ,SINCE 1998 ON BUSINESS with the license number P37737, and am writing this letter to respectfully state our institutional position regarding the lawful sale of motor vehicles to people with foreign passport the state of Texas and how this affects our business

the 70 percent of our clients count only on their firing passport and they pay their (vehicle taxes , state inspection, and registration)

90% of our clients with foreign passports always end up paying off their vehicle without any issues.

all of our clients with foreign passports get valid vehicle insurance which is a benefit for us and the state

With our sales dropping due to the fact that we are turning away almost 80% of our clients with foreign passports , we are starting to see the financial impact on our business which is affecting the income we depend on to keep our business running.

thank you for attention to this matter .We remain available to cooperate any effort that promotes lawful vehicle sales, regulatory compliance ,and safety throughout the State of Texas

RESPECTFUL
THREE COUNTRY AUTO SALES

From: [David De Anda](#)
To: [Zz - Resource - GCO Rules](#)
Subject: comments regarding proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29,
Date: Thursday, January 8, 2026 12:46:26 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

January 4, 2026

To whom it may concern,

Thank you for the opportunity to provide comments regarding the Texas Department of Motor Vehicles' proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29, relating to personal identification requirements for vehicle registration under Transportation Code §502.040. I write to share how these changes affect my business, employees, and customers, and to highlight unintended consequences that should be considered before the rules are finalized.

I first fell in love with the automobile business when I was in middle school, I started by washing over 80 cars in one day under the sun making \$20 per day at my uncle's used car lot in Dallas, TX. This experience had the greatest impact of my life so that after finishing a degree in Electrical Engineering I decided to go into business with my parents and start our own used car lot. We started by buying 2 inexpensive cars and started doing in-house financing, at the time 90% of our customers used a foreign form of identification. The way I see it; these people are only trying to do the right thing by buying a vehicle and insuring it under their own names. Currently, we sell to 70% of people with a form of identification foreign to Texas, more specifically with a foreign passport. Needless to say these new ID requirements WILL put me out of business, and I can assure you I am not the only one.

The sort of consequence I foresee happening if these ID requirements go into effect based on the time in late November early December when it was unclear whether the amendments had been approved or not is that people may find someone to help them buy a vehicle with the required identification like a family member, or a friend. However, the way I see it, it is *BETTER* to identify who owns the vehicle and their whereabouts by allowing people buy their OWN means of transportation.

Again thank you for the opportunity to provide my comments regarding the matter, I ask that you consider not making any changes to the rules, after all a foreign passport just like an American Passport is and will always be a form of identification valid ALL AROUND THE WORLD.

Thank you,

David De Anda

From: [Felipe Arnulfo](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Tuesday, January 6, 2026 12:22:20 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Juliana Hernandez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Comments In Opposition to DMV Rule Preventing Immigrants From Registering Their Vehicles
Date: Monday, January 5, 2026 8:28:33 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I am very concerned about this proposal. This proposed change came out of nowhere. We are not even currently in the Texas Legislative Session. I believe this rule will only harm the safety of our communities. Additionally, restricting vehicle registration will place added difficulty to many Texan families, including citizens, who are already facing the difficult challenges the rest of the country is enduring.

I am saddened that a proposition seemingly made with discriminatory intentions has made it this far in my government.

Thank you for your time.

From: [Kanda Motors Sales](#)
To: [Zz - Resource - GCO Rules](#)
Subject: from Kanda Motors
Date: Tuesday, January 6, 2026 12:01:17 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

My name is Katie Robertson and I am a business owner and a mother. I may have met you at the TIADA conferences we attend each year to stay educated and compliant with our highly-regulated business. I hope you read this as I have spent hours away from my family, going through deal jackets to find the information we previously didn't collect in our database so you can also understand how your sudden rule change has affected our small business like a tidal wave to a dingy.

My husband Alex and I started Kanda Motors in 2019 to build a future for our family by providing quality used vehicles for people in the Dallas metroplex. We both gave up a lot to start and grow this business; Alex had an 8 year career with a major bank he resigned from; I hold a PhD in Neuroscience and resigned from a global analyst position at a major investment firm to run the day to day operations of our business. We invested our savings and time into growing Kanda Motors over the last 6 years. We have built relationships with our customers and their families as trustworthy auto dealers. We started an in-house finance program in 2022 to help families in need when other lenders were not an option. We still continue to offer BHPH and outside lenders so our customers can access the best program for their needs. This proposed rule change disproportionately affects our in-house accounts. Here are some numbers I have compiled.

In 2024, we sold 200 vehicles (excluding wholesale). This was \$2,402,678 in vehicle sales (excluding F&I products, doc fees and government taxes and fees). Of these sales, 71 sales presented foreign passports, \$817,566 in vehicle sales. 59 of those sales were financed by Kanda Motors (\$638,166 vehicle sales). 22 sales presented with Limited Term drivers licenses, totalling \$294,950 in vehicle sales. 16 of those limited term were financed by Kanda Motors. We have included this group because it is likely they will not be able to renew the limited term given the current political climate and will not be able to renew their registrations or purchase another vehicle. Combined, these two groups were 46.5% of our sales and represented 67.5% of accounts Kanda Motors financed in 2024.

Between Jan 1 2024 and Nov 15, 2025, we sold 385 vehicles. 121 of those sales presented a foreign passport. This is \$1.5M in sales we would have missed out on. This rule change affects over 30% of our sales. As it stands today, we are turning away every third customer due to identification requirements alone.

As of today, we have 46 active accounts financed (\$588k in vehicle sales) that are currently unable to renew their registrations or trade in their vehicle- this is 41.8% of our accounts. I have already had customers surrender their vehicles because they are not able to renew their registrations. Others call asking for guidance since their sticker expires this month or next month. I don't know what to tell them. While these numbers may seem small compared to other lenders or dealerships, they are quite large to us as a small family business. I know we are not alone in this. These proposed changes disproportionately affect the smaller businesses, and without any warning or runway, we were not allowed any time to pivot our business and mitigate potential losses.

I would estimate that the state would lose \$500M in registration fees each year with this new ID requirement. The sales tax lost in cars not sold would be even larger. This will also lead to more straw purchases and fewer properly insured vehicles and drivers. This change affects the small businesses and the businesses that rely on us - our local mechanic, our local body shop, the insurance agency- these people all have families to support too.

Please roll back your proposed change, or at least give us a 10 year runway.

Regards
Katie Robertson
Kanda Motors
P168740

4000 Jackson Ave.
Austin, TX 78731

TxDMV Board Meeting eB February 12, 2026

506

Re: Comment on proposed Amendment
Chapter 217, Vehicle Titles + Regis

I am writing to formally submit
regarding the proposed amendme.
Chapter 217, specifically § 217.22,
and 217.29.

As a Waco resident and owner of m
vehicles who frequently interacts wit
registration services, I am concer
the practical application of these
identification requirements. The r
rule states that there will be "
fiscal implications" related to th
Amendments. I respectfully gua
conclusion regarding the operations
on county tax offices.

The amendments restrict acceptab
identification to specific document
as unexpired foreign passports wi
stamps, permanent resident cards
unexpired immigrant visas. Verifying
validity of these complex federal
documents require a higher lev
certain mail times that...

If county tax office employees required to inspect and verify specific federal markings to ensure are "legally eligible to reside in - it will inevitably increase transaction times at the Counter. For resident myself who maintain registrations multiple vehicles, any increase in time contributes to longer wait inefficiency at local offices.

I request that the Texas DMV, or analysis on the anticipated increase in transaction times and the training required for county staff to accurately identify these specific federal markings before this rule is adopted.

Thank you for considering my comments.

Sincerely,

Roger Lain JR.
4111 N. 25th St.
WACO, TX 76708

From: [Rosie Clemente](#)
To: [Zz - Resource - GCO Rules](#)
Date: Tuesday, January 6, 2026 1:40:47 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

We are writing to express our deep concern regarding the recent changes to Texas' vehicle documentation requirements, which have already created significant disruptions to our business operations and are poised to negatively affect the automotive industry as a whole. The new processes have introduced substantial delays, and added confusion for customers, resulting in slower sales cycles, a measurable decrease in sales, and growing frustration on all sides. These challenges are not isolated to our organization—dealers across the state are experiencing similar setbacks, and smaller dealerships in particular may struggle to adapt, potentially reducing competition and limiting consumer choice. We respectfully urge a reconsideration of these documentation changes and encourage collaboration with industry stakeholders to develop a more balanced approach that protects consumers without hindering the ability of businesses to operate effectively.

JJ AUTO SALES LLC

From: [Salais Auto Group](#)
To: [Zz - Resource - GCO Rules](#)
Subject: P168840- New Proposed Identification Rule
Date: Monday, January 5, 2026 5:04:12 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

The new limits on acceptance for the proposed identification requirements will affect our sales due to multiple customers not meeting the identification standards that are proposed within this rule.

From: [Sur Cars & Trucks](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Identification requirements
Date: Tuesday, January 6, 2026 12:00:56 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

Sur Cars & Trucks LLC
8817 Airline Dr. F-31
Houston, Texas 77037

Texas Department of Motor Vehicles
Attn: Rules Department
Austin, TX 78720

Subject: Impact of November 2025 Rule Changes on Sales

To whom might it be concerned,

We hope this message finds you well. We are writing to express our concerns regarding the recent regulatory changes implemented in November 2025 and how these changes have directly impacted sales within our business. As a small family-owned car dealership, we have observed a significant downturn in sales since the new rules were enacted, and we believe it is important to bring this to your attention.

Since the changes were introduced, our company has faced a series of challenges that have contributed to the decline in sales. Some of the primary factors include:

1. **Consumer Confusion:** There has been widespread confusion among potential buyers regarding the new rules. Many of our customers are unsure about the specifics of how these regulations affect them, leading to delays in purchasing decisions and a general sense of uncertainty in the market.
2. **Reduction in Consumer Confidence:** The new rules have also impacted overall consumer confidence in the vehicle purchase process. Some customers feel that the added complexity and requirements may lead to an overly bureaucratic process, which has caused them to hesitate or even cancel their purchase plans altogether.
3. **Identification requirements at the Texas Department of Motor Vehicles and for car dealerships,** which now mandate strict photo ID and proof of legal status for vehicle registrations, renewals, and sales—with little time for dealers, DMV offices, and the public to adapt. This abrupt shift, communicated to county offices and dealers just days

before taking effect, leaves businesses scrambling and many Texans at risk of being unable to complete essential transactions without the newly specified documentation, creating confusion and potential disruptions for small dealers and vehicle owners alike.

In light of these factors, we respectfully request that the Texas DMV review the impact of these new regulations on businesses like ours and consider adjustments that could help alleviate some of the burdens these rules have imposed. We believe that a reconsideration of some aspects of the November 2025 rules could help restore confidence in the market and support businesses that are struggling due to these changes.

Thank you for your time and consideration.

Sincerely,

Sur Cars & Trucks LLC

January 5, 2026

Tony Proud
Owner, CEO, and Operator
Auto Union LTD
7410 Long Point Rd.
Houston, Texas 77055
Aul_anthony@yahoo.com

Laura Moriaty
General Counsel
Texas Department of Motor Vehicles
4000 Jackson Avenue
Austin, TX 78731

Re: Auto Union LTD Comments Regarding TxDMV Proposed Amendments Related to Transportation Code §502.040

Dear Ms. Moriaty,

Thank you for the opportunity to submit comments regarding the Texas Department of Motor Vehicles' proposed amendments to 43 Texas Administrative Code §§217.22, 217.26, 217.28, and 217.29, relating to personal identification requirements for vehicle registration under Transportation Code §502.040. I write to share how these changes affect my business, employees, and customers, and to highlight unintended consequences that should be considered before the rules are finalized.

I am the owner of an independent automobile dealership in Houston, Texas that serves and provides for our community. Like many independent dealers, my business is locally owned and operated, employs Texas residents, provides vehicle financing to customers across the state, and serves a diverse cross-section of our community. My dealership has made long-term financing commitments and multi-million-dollar investments in facilities, employees, and inventory in reliance on long-standing TxDMV registration rules that did not require dealers to evaluate nor verify lawful presence or immigration status.

I am deeply concerned that the proposed rules would permanently expand identification requirements in a way that creates serious unintended consequences for dealers, customers, and the vehicle registration system as a whole. I do not address my many other concerns in this letter, as I am confident that, prior to finalizing any changes to the rules, the Department will have carefully studied and conducted a full analysis on the unintentional economic impact of the proposed changes to determine the immediate financial impact on the State of Texas revenue stream (*i.e.*, through less motor vehicle sales/use tax revenue and title/registration-related fees) due to the reduction in completed vehicle transactions, increased delayed transactions, and higher administrative cost per transaction.

Operational and Consumer Impact

Under the proposed amendments, customers who are otherwise clearly eligible to purchase and register a vehicle may be unable to complete transactions due to identification limitations or delays at the Department of Public Safety. DPS appointment backlogs are already well documented, and requiring customers to obtain new or replacement identification will cause extended sales delays, canceled transactions, and lost income for both customers and dealerships.

These delays disproportionately affect working Texans who rely on a vehicle to get to their jobs, transport their families, and meet daily obligations. In many cases, these customers are not undocumented and are legally present, yet they will still be unable to proceed due to narrow identification categories or documentation issues outside their control.

Improper Burden on Dealers

The proposal effectively places independent dealers in the position of reviewing, interpreting, and assessing immigration-related documents—tasks for which we are neither trained nor legally qualified. Dealers have never been charged with making determinations regarding lawful presence, nor should we be expected to assume that role now.

This creates significant compliance risk. Different clerks, counties, or dealerships may interpret documents differently, leading to inconsistent outcomes and uncertainty across the state. It also exposes dealers to potential liability for making incorrect determinations in an area governed by complex federal law.

Conflict With Federal Fair-Lending Guidance

The proposed rules also raise serious concerns under federal fair-lending laws. In October 2023, the Consumer Financial Protection Bureau and the U.S. Department of Justice issued guidance warning that creditors may not deny credit solely based on immigration status when an applicant is otherwise qualified. Overly broad or rigid reliance on immigration-related documentation can expose dealers and lenders to claims of unlawful discrimination.

By tying vehicle registration eligibility to restrictive identification requirements, the proposed rules put dealers in an impossible position—forced to choose between complying with state administrative rules and avoiding potential violations of federal consumer protection laws.

Our Request

For these reasons, I respectfully request that TxDMV return the rule to its prior form and not codify the changes restricting identification types for vehicle registration. To the extent that the TxDMV is inclined to change the rules, I urge the Department to:

1. provide a safe harbor for dealerships that have been operating in this space for many years to grandfather them in on the prior rules;
2. provide resources and funding to support dealer education on the new rules;
3. provide resources and funding to mitigate the increased dealer labor and administrative costs due that are required to comply with the new rules; and
4. provide resources and funding to support and defend dealers who are threatened with consumer lawsuits that arise as a result of these new rules.

The existing framework already provides mechanisms to verify identity and prevent fraud without imposing new burdens on dealers or disrupting lawful transactions for Texas consumers and the State of Texas. Permanently expanding these requirements is unnecessary and risks significant harm to small businesses, employees, and communities across the state, as well as unintentionally and indirectly impacts state revenues.

Thank you for considering my comments and for the opportunity to participate in this rule making process. I urge the Department to carefully weigh the real-world consequences of this proposal before finalizing any changes.

Respectfully,

Tony Proud
Owner, CEO, and Operator
Auto Union LTD
Houston, Texas

**Chairperson**

Judge David Blackburn
Bell County

Chairperson-Elect

Comm. Justin Rodriguez
Bexar County

Immediate Past Chair

Judge Eddie Treviño Jr.
Cameron County

Vice-Chairpersons

Comm. David Stout
El Paso County

Comm. Bo Alfred
Jefferson County

Comm. Dana Macalik
Rockwall County

Comm. Adrian Garcia
Harris County

Comm. Susan Fletcher
Collin County

Directors

Comm. Will Jones
McLennan County

Comm. Brigid Shea
Travis County

Executive Director

John B. Dahill

Policy Director

Adam P. Haynes

Member Counties

*Bell · Bexar
Brazoria · Brazos
Cameron · Chambers
Collin · Comal
Dallas · Denton
Ellis · El Paso
Fort Bend · Galveston
Grayson · Harris
Hays · Hidalgo
Jefferson · Johnson
Kaufman · Lubbock
McLennan · Midland
Nueces · Potter
Randall · Rockwall
Smith · Tarrant
Travis · Webb
Williamson · Wise*

500 West 13th Street
Austin, TX 78701

512.476.6174

www.cuc.org

Texas Department of Motor Vehicles
Office of General Counsel
4000 Jackson Avenue
Austin, Texas 78731

Sent via email: rules@txdmv.gov

Re: **Comments on Proposed Chapter 217 Rules – Identification Requirements for Vehicle Registration and Renewal**

Dear Members of the Board and General Counsel:

On behalf of the Texas Conference of Urban Counties (CUC), we write to emphasize the concerns submitted by the Tax Assessor-Collectors Association of Texas and county officials across the state regarding the proposed amendments to Chapter 217 relating to identification requirements for motor vehicle registration and renewal. The Texas Department of Motor Vehicles (TxDMV) should withdraw the proposal and restart a stakeholder-driven process to develop new rules that address the concerns raised by county partners and other participants in the vehicle registration system.

CUC's member counties strongly support the position of county tax assessor-collectors and clerks, who are on the front lines of administering the motor vehicle registration system on behalf of the State. Their letters accurately describe the operational, security, and service-delivery challenges posed by the proposed rules, and we echo those concerns.

From a county perspective, the proposed rules would impose substantial new administrative duties on county offices without providing the tools, funding, or legal authority necessary to carry them out. Counties would be required to receive, handle, store, and in some cases "verify" copies of highly sensitive personal identification documents submitted by mail or electronically. County offices are not law enforcement agencies and are not equipped to authenticate federal, out-of-state, or immigration-related identification documents. This responsibility properly belongs with the agencies that issue those documents, not with local officials processing routine annual registration renewals.

The proposal also materially increases the risk of identity theft and financial fraud for Texas residents. Requiring copies of driver's licenses, passports, or similar documents to be mailed alongside checks or uploaded online creates new and unnecessary vulnerabilities. Counties should not bear the legal or financial consequences of breaches arising from state-mandated data collection. If the rule were to move forward, TxDMV would, at a minimum, need to provide a secure, centralized system that transfers responsibility for data storage and maintenance back to the Department. The proposal increases the need for

cybersecurity infrastructure, staffing, and funding, and those risks and costs must be assumed and fully funded by the State.

Critically, these operational changes would impose direct and unavoidable new costs on county taxpayers. Increased rejection of mail renewals, additional correspondence, manual processing, longer transaction times, and higher staffing demands all translate into higher local expenditures. County reimbursement rates for registration processing have not kept pace with inflation, labor costs, or postage increases, resulting in a shift of state administrative costs onto local governments. The proposed rules would significantly widen the gap between the actual cost of service and the compensation counties receive for providing state services.

When the State imposes new administrative requirements on counties without funding, counties are left with only one practical way to pay for them: local property taxes. Although framed as an administrative or security measure, the proposed rules create a de facto **property tax increase** by shifting state program costs to county property taxpayers. Counties cannot absorb these new costs without either raising property taxes or reducing funding for other essential local services such as law enforcement, courts, and public health.

CUC also shares the concern raised by county officials that the proposal would disproportionately impact military families, rural residents, elderly and disabled Texans, and others who rely on mail renewals or lack access to copying and online systems. The resulting increase in in-person traffic will further strain county offices, compounding service delays and fiscal pressures.

CUC supports the alternative approaches outlined by the Tax Assessor-Collectors Association, including limiting identification verification to title transfers or ownership changes, or implementing any verification requirement as a backend system check within the Registration and Titling System, similar to existing insurance and inspection verification processes. Any such changes should be addressed through system modernization rather than manual, county-administered review.

For these reasons, CUC respectfully urges the Department to withdraw the proposal and begin a new rule development process. TxDMV should work with county officials and other stakeholders to develop an approach that improves system integrity without increasing fraud risk, shifting state mandates onto county taxpayers, or forcing counties to raise property taxes in order to fund state services.

Thank you for the opportunity to comment and for your willingness to reconsider the proposal in light of county concerns.

Sincerely,



Adam Haynes
Policy Director

From: [Ximena De Jesus](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Comment on DMV changes
Date: Monday, January 5, 2026 6:10:05 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

As a Texas resident, I would like there to be no changes to the vehicle registration and renewal, as this would affect people with no drivers license for various reasons. Although immigrants don't have a drivers license, they are not excluded from paying insurance and vehicular taxes.

From: [Andrés Espinoza](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Tuesday, January 20, 2026 8:21:32 AM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

From: [Ron H](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Rules for Registration of Vehicles
Date: Wednesday, January 21, 2026 5:32:09 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

To whom it may concern,

I understand there was a hearing this week regarding the proper forms of ID required for vehicle sales and registration at the county offices. It is my understanding that certain dealership and immigration groups are pushing hard for more relaxed ID rules.

I understand their very biased positions for pushing for relaxed ID rules. As a Texan, taxpayer and driver, I am also biased. I highly encourage your agency to adhere to the most stringent rules possible.

Contrary to any unrealistic testimony about making Texas (and U.S.) roads safer, relaxed rules only enable unlicensed, and uninsured drivers easier access to our roadways. There will always be people who flaunt our laws.

There's countless news reports of illegal drivers causing accidents and killing others. I have personally witnessed multiple accidents where people caused wrecks and either fled, or everyone bailed from the vehicle and ran away on foot, most likely leaving an unregistered and uninsured vehicle. They don't care if they may have injured or killed someone else.

So, please don't buy into the myth that relaxed rules will somehow make people more law abiding and make our roads more safe. That's nonsense.

If I had my way, everyone would have to give valid ID, a family tree, letters of recommendation from 6th grade school teachers and DNA sample to get behind and wheel or vote.

All of us, our friends and loved ones travel on Texas roads. So, I implore you to not make them less safe. Keep ID rules as strict as possible in Texas.

Sincerely,

Ronald P. Hays
182 CR3260
Mount Pleasant, TX 75455
903-466-6860

Sent from my iPhone

Ron

Sent from my iPhone

From: [Antelmo Landaverde](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Thursday, January 22, 2026 11:42:28 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Sent from my iPhone

From: [Vania Barrios Mendez](#)
To: [Zz - Resource - GCO Rules](#)
Subject: Opposition to the 2025 DMV regulations impacting our community
Date: Sunday, December 21, 2025 1:28:05 PM

ATTENTION: This email originated from outside of TxDMV. Malicious software, such as viruses, worms, and ransomware can be transmitted via email attachments and links. Do not click any links or open any attachments unless you recognize the sender and have confirmed the content is safe.

I oppose the 2025 DMV regulations targeting residents without legal status. Measures like blocking vehicle registrations and adding "Noncitizen" labels to IDs create a dangerous environment, preventing people from safely driving to work or school. By making it impossible for our neighbors to register cars, these rules decrease road safety and punish families. Please reconsider these policies.

Enviado desde mi iPhone



Board Meeting Date: 2/12/2026
BRIEFING ITEM

To: Texas Department of Motor Vehicles Board
From: Keith Yawn, Government & Strategic Communications Division Director
Agenda Item: 7.A
Subject: 89th Legislature, Bill Implementation Updates

RECOMMENDATION

Briefing Only.

PURPOSE AND EXECUTIVE SUMMARY

Government and Strategic Communications (GSC) Division staff will provide a briefing on implementation of legislation passed by the 89th Texas Legislature.

FINANCIAL IMPACT

N/A

BACKGROUND AND DISCUSSION

The 89th Texas Legislature enacted 40 bills with impact on department programs. GSC staff will provide an update on the implementation status for these bills.

Board Meeting Date: 2/12/2026
BRIEFING ITEM

To: Texas Department of Motor Vehicles Board
From: Keith Yawn, Government & Strategic Communications Division Director
Agenda Item: 7.B
Subject: Development Schedule for Recommendations to the 90th Legislature

RECOMMENDATION

Briefing Only.

PURPOSE AND EXECUTIVE SUMMARY

Government and Strategic Communications (GSC) Division staff will brief the board on the development schedule for Texas Department of Motor Vehicles (TxDMV)'s statutory change recommendations to the 90th Texas Legislature.

FINANCIAL IMPACT

N/A

BACKGROUND AND DISCUSSION

Transportation Code, Section 1001.025, authorizes the TxDMV Board to recommend statutory changes that would improve the operation of the department.

The 90th Texas Legislature will convene in regular session on January 12, 2027. Developing recommendations for statutory changes typically begins a year before the start of the session. The schedule ensures proposed recommendations are properly reviewed and available for consideration by the next legislature.

In February 2026, the Government and Strategic Communications (GSC) Division will work with department program divisions and the board to identify potential statutory changes to improve department operations. Identified potential changes will be reviewed by impacted program offices, GSC, the Office of the General Counsel and the Executive Director's Office before presentation of proposed recommendations to the Legislative and Public Affairs Committee in June 2026. Using board and stakeholder input received, the department will refine the recommendations before final consideration and request for approval by the board in August 2026. Following board approval, final recommendations will be presented to legislative offices during the fall of 2026.

Board Meeting Date: 2/12/2026
BRIEFING ITEM

To: Texas Department of Motor Vehicles Board
From: Jason Gonzalez, Internal Audit Director
Agenda Item: 8
Subject: Internal Audit Division Status Update

RECOMMENDATION

Briefing Only.

PURPOSE AND EXECUTIVE SUMMARY

This status update provides information on current Internal Audit Division activities.

FINANCIAL IMPACT

N/A

BACKGROUND AND DISCUSSION

Internal Engagements

The Internal Audit Division has four ongoing internal engagements: (1) a quality assurance external peer review of the Internal Audit Division; (2) the Information Technology Services Division Project Governance Audit; (3) Finance and Operations Accounts Receivable Advisory; and (4) the Motor Vehicle Crime Prevention Authority Audit.

The Quality Assurance Peer Review is currently in the fieldwork phase. The objective is to evaluate Internal Audit Division's compliance with the Texas Internal Auditing Act, the Institute of Internal Auditor's Global Internal Audit Standards, and the U.S. Government Accountability Office's Government Auditing Standards.

Additionally, the Information Technology Services Division Project Governance Audit is currently in the reporting phase. The objective is to evaluate whether the Texas Department of Motor Vehicles' (TxDMV) IT project governance and prioritization practices are effectively structured and implemented to address essential aspects of project governance. The evaluation will include organizational and project governance structures, strategic and operational planning, technology planning, project value delivery and realization, IT project risk management, executive leadership, and resource prioritization and deployment.

Next, the Finance and Operations Accounts Receivable Advisory is in the reporting phase. The objective is to review the funds adjustment process; specifically, the Registration and Title System and Tx.GOV reconciliation processes, and the Tax Assessor Collector ticketing process.

Finally, the Motor Vehicle Crime Prevention Authority Audit is in the reporting phase. The objective is to evaluate the financial grant review and approval processes.

External Engagements

The State Auditor's Office is conducting an audit on TxDMV's data governance and management. The audit objectives are to determine whether TxDMV has implemented data management and data governance programs for managing its data assets; and the status of a prior audit recommendation issued by the State Auditor's Office to TxDMV in Report #23-020 (related to webDEALER user access). The audit is currently in the reporting phase.



Texas Department
of Motor Vehicles