

Joint Interim Committee on Advertising Public Notices

Report to the 85th Texas Legislature

November 1, 2016



Co-Chairman:  
Senator Konni Burton  
Representative J.M. Lozano

Clerk:  
Jeff Edward Frazier II



Joint Interim Committee on Advertising Public Notices

November 1, 2016

The Honorable Dan Patrick  
Lieutenant Governor of Texas  
P.O. Box 12068  
Austin, Texas 78711

The Honorable Joe Straus  
Speaker, Texas House of Representatives  
P.O. Box 2910  
Austin, Texas 78768

Lieutenant Governor Patrick and Speaker Straus:

House Concurrent Resolution 96, passed by the 84<sup>th</sup> Legislature during the regular session, established the Joint Interim Committee to Study the Issue of Advertising Public Notices. The Committee submits this report in accordance to HCR 96.

The Committee has carefully considered all of the testimony received on this issue and looks forward to continued discussions during the 85<sup>th</sup> legislative session.

Respectfully submitted,

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Co-Chair  
Konni Burton

Handwritten signature of J.M. Lozano in cursive script.

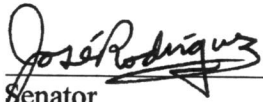
Co-Chair  
J.M. Lozano

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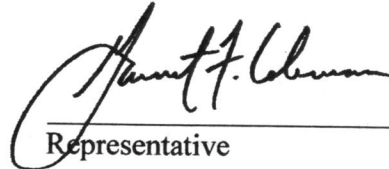
Co-Vice Chair  
Kirk Watson

Handwritten signature of Raymond Gutierrez in cursive script.

Co-Vice Chair  
Raymond Gutierrez



Senator  
José Rodríguez

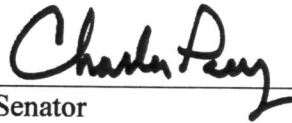


Representative  
Garnet Coleman

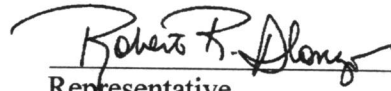


Representative  
Gary Elkins

Senator  
Kelly Hancock



Senator  
Charles Perry



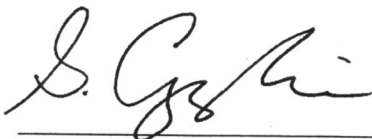
Representative  
Roberto R. Alonzo



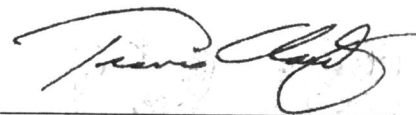
Representative  
Todd Hunter



Representative  
Alma Allen



Representative  
Giovanni Capriglione



Representative  
Travis Clardy

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### Executive Summary

In order to ensure that a broad cross-section of the public has access to information about their government's proposed actions, budgets, bids, and auctions, Texas statutes require that political subdivisions place notice in a local newspaper<sup>i</sup>.

In each of the past five sessions, legislators have filed bills attempting to alter this requirement in order to allow its fulfillment through posting notice on either the website of the political subdivision issuing the notice or a centralized repository within the Office of the Comptroller.

House Concurrent Resolution (HCR) 96, by Representative Hunter, requested that the Lieutenant Governor and Speaker of the House create the Joint Committee on Advertising Public Notices in order to study the issue and make recommendations to the legislature.

The committee recommends that the legislature maintain the current print requirement, distinguish the costs of public notice from other types of advertising costs, create an additional notification system through the Office of the Comptroller, and further study the question of fulfilling print requirement through third party media outlets online, should all local print options cease print operations.

## **Committee Composition and Proceedings**

The Lieutenant Governor and Speaker of the House were asked to appoint members to the Joint Committee to Study the Issue of Advertising Public Notices consisting of members from each body. Senator Konni Burton and Representative J.M. Lozano were appointed by Lieutenant Governor Patrick and Speaker Straus as Co-Chairs, respectively. In addition, Senator Kirk Watson and Representative Roland Gutierrez were chosen as Co-Vice Chairs. Full membership is as follows:

### **Senate Members:**

Co-Chair Konni Burton  
Co-Vice Chair Kirk Watson  
José Rodríguez  
Kelly Hancock  
Charles Perry

### **House Members:**

Co-Chair J.M. Lozano  
Co-Vice Chair Roland Gutierrez  
Garnet Coleman  
Gary Elkins  
Roberto R. Alonzo  
Todd Hunter  
Alma Allen  
Giovanni Capriglione  
Travis Clardy

The Committee held one hearing on August 18, 2016 to gather information and public input. Representatives from cities, counties, school boards, educational organizations, newspapers, and other interested organizations gave testimony along with private citizens whose lives have been impacted by public notice.

## **Background and History**

### *Purpose of Public Notice*

Due process of law requires that parties who have an interest in a suit, legislative proceeding, or other act of government be given proper notice beforehand so that they may avail themselves of the process and act to defend their interests if necessary. For government entities

providing notice to the public about their proposed actions, budgets, bids, and auctions, Texas statutes require that notice be placed in a local newspaper<sup>ii</sup> in order to ensure that a broad cross-section of the public has access to the notice and to provide a record that the government fulfilled its statutory requirement.

Public notices in newspapers are placed in the classified advertisements section with the requirement that the paper must charge the government entity “the newspaper’s lowest published rate for classified advertising.”<sup>iii</sup>

In recent years, legislators have begun to question whether newspapers, in an era of declining readership, still provide sufficient notice to the public and if they still demonstrate the most effective use of tax dollars in providing notice to the public.<sup>iv</sup> For that reason, the 84<sup>th</sup> Texas Legislature passed HCR 96, creating the Joint Committee on Advertising Public Notices to study these questions.<sup>v</sup>

## **Summary of Issues and Testimony**

The committee, tasked with studying the issue of how best to provide proper public notice, held a hearing on August 18, 2016, in the Texas Capitol. Invited testimony was provided by a mix of local government entities, representatives of school boards, newspapers, interested organizations, and individuals affected by public notice in the past. The committee also received eighty-two pieces of written testimony from newspapers, government officials, and private citizens.

### *Representatives of Municipal and County Governments*

*Bennett Sandlin (Texas Municipal League)* – Over one-hundred state laws require cities to publish notices in a print newspaper, from budget hearings to annexation hearings, with the vast majority of notices dealing with procurement and purchasing. We must make sure that when we require taxpayer money to be spent on notices, that we are giving the right kind of notices.<sup>vi</sup>

We could move some notices to a city website with a requirement for a permanent archive. Another possibility would be to move one notice to a city website when the law requires two or more, as proposed in a past bill. Rather than a city website, another option would be allowing an online posting on the newspaper's website. Additionally, a centralized database of public notices with a state agency, or with an online-only publisher could allow for a reduction in overall spending on public notices.<sup>vii</sup>

*Mary Kayser (City of Fort Worth)* – Fort Worth publishes a variety of legal notices. We mostly use the *Fort Worth Star Telegram* for posting notices; however, because we are located across five counties, we will advertise in a number of local papers depending on what the notice is. Fort Worth has spent at least \$24,000 on publication of notices from January 1, 2016, to

August 18, 2016. Many items will be placed in the online version of the newspaper, as well as in print publications, or by letter if required. <sup>viii</sup>

The overall goal is to reach the broadest audience possible through multiple mediums. This is especially important in budget and water rights questions, and we use multiple methods to do so. The previously suggested idea of repeat publications being placed online rather than a second round of print is a good one and should be considered.

*Representatives of School Districts*

*Becky St. John (Grapevine Colleyville ISD/TASB)* – Any solution to the issues facing public notice in Texas must incorporate some level of flexibility in order to reflect the vast geographic, population, and socioeconomic differences that exist across such a large and varied state. Local elected officials should be allowed to determine how best to share information with the people they serve in order to reach the most people. <sup>ix</sup>

With the recent school finance ruling, school districts are looking to increase operational efficiency as much as possible. Allowing school districts to have the choice of posting notices on preexisting district websites dedicated to public notice would allow for this level of flexibility. School districts where internet access and use is low could choose to utilize their local newspaper, whereas in areas where the public is more capable and more fluent with electronic delivery, the district may choose to post notices electronically. TASB recommends local decisions for local needs. <sup>x</sup>

*Phillip Ellison (Spring ISD/TASBO)* – As a school district, we are required to publish every bid and request for proposals, a requirement that the legislature does not place on those operating in the higher education environment. We conducted a study to determine which

methods of publication generated the most response from our vendors (not the general public), determining that 85% received notice via online means, 8% from subscription services, 4% from a friend or colleague, and 0.2% via newspapers. <sup>xi</sup>

Due to the cost among the school districts we contacted, (over \$500,000, which could otherwise employ six teachers) we are requesting a release from the mandate and to be allowed to place notice in the areas that will best reach those we serve. <sup>xii</sup>

*Personal Invited Testimony*

*Ken Whalen* – The problem with public notice being sent both to a government site and to a print newspaper is the cost. Circulation has dropped; however, the prices of placing ads have not fallen in kind with circulation. Allowing an abbreviated version of the notices to be placed in print, with the full version available online, could help cut costs. Newspapers could also offer an online-only option, for a reduced fee, that could fulfill the requirement. Finally, the legislature, rather than requiring the lowest classified rate, could set the rate for public notice advertisements, which other states have done. <sup>xiii</sup>

*Gary Hendrix (Dripping Springs)* – A local business proposed to build a concrete batch plant uncomfortably close to the residential areas of Dripping Springs. Public notice for the proposal was placed in the San Marcos newspaper, which, while in the same county as Dripping Springs, has almost no circulation, and is not available for retail purchase in the impacted area. The notice was also placed on December 23<sup>rd</sup>, when the public was getting ready for Christmas and not as likely to be paying attention to the news. <sup>xiv</sup>

The plant would have been permitted to pump up to seventy tons of particulate matter into the air every year, which would not have been good for neither me nor my asthmatic

granddaughter's health. I did not receive word of the notice for a further six weeks, when the public comment period had already ended thirty days after the initial newspaper publication. Eventually, the TCEQ ruled that the notice had been inadequate and the plant proponents were required to publish notice in the truly local paper for Dripping Springs. Hundreds of comments, contested case hearings requests, and requests for public meetings came in, and the application was denied as a result of the lack of further notice and lack of public meetings. When citizens receive adequate public notice, the system can work properly. <sup>xv</sup>

*Robert Rose (Bryan College Station)* – In February 2016, I happened upon a notice in my local paper that a company would be seeking a modification to their air quality permit that would allow them to emit various potentially toxic contaminants into the air. Based on my previous career in scientific research and my own poor respiratory health, I was concerned. Upon researching the current permit and the proposed changes, I determined that the change would affect my personal health as well as the health of children and teachers located very close to the business. <sup>xvi</sup>

After working with the Bryan School Board and several of the local schools, the change to the air quality permit was stopped. If it were not for the local newspaper notice, I would never have known. It is unlikely that I would have logged on the TCEQ website. Newspapers serve a vital function for transparency and democracy and the committee should consider keeping public notices there. <sup>xvii</sup>

*Mike Weaver*<sup>xviii</sup> – As the owner of a large construction firm, we rely heavily on public notices in newspapers to find out about new projects for which we can submit bids. Currently, Texas law requires notice for public construction projects to be placed in a general circulation

newspaper in the county in which the project will be constructed for two consecutive weeks. We subscribe to 20 newspapers in our area in order to make sure nothing slips by us.<sup>xix</sup>

Four years ago in Lockhart, the county wished to expand the jail into the old Wal-Mart building. The county had a contractor they wanted to work with, and as such did not advertise as required by law. We had a superintendent in Lockhart on the lookout for the notice. When it did not appear, we filed a complaint. Eventually, the awarded contract was rescinded, a notice was advertised, and several proposals were submitted. While the county eventually rewarded the project to the same firm, at least the process was completed in the proper and legal way.<sup>xx</sup>

Our nation's founders said that the whole system only works when it is governed by righteous and just people; unfortunately, not all people are righteous and just. Human nature is to skirt the system and do what they can to circumvent transparency. Going to an online database will change the dynamics of the system in the wrong direction for transparency. I liken it to email notifications on your phone. You can set notifications for "push" or "pull". "Push" notifications happen in real time, someone sends you a message and your phone dings. "Pull" notifications require you to go and get your email.

Currently, legal notices work on a "push" system: they are there every week, whether you want them or not. However, putting notices online makes the system into a "pull" system, requiring that the public go and hunt for them. This setup invites abuse and for people to try to go around the system, hiding notices in obscure portions of the website, and making it more difficult for the public to access it.<sup>xxi</sup>

### Representatives of Newspapers

*Robert Moore (El Paso Times)* – Local newspapers play a unique role in serving our communities as “connective tissue”. Among their other duties, they allow business to grow and prosper through advertising, and to act as a repository for public notices that inform the community about important acts of government.<sup>xxii</sup>

Texas and other states have reviewed this function for understandable reasons; the audience is moving increasingly towards digital means of gathering information, and governments look for the most efficient means of using taxpayer dollars. Texas newspapers are adapting to those changes to help provide an efficient means of getting those notices to the public by posting notices onto the web versions of their papers for no additional cost, and as with any advertising driven business, papers have a financial incentive to maximize the visibility of their advertising by not placing their classified section behind a pay wall. By placing notices online, where newspaper readership is expanding rather than shrinking, as well as in print, newspapers are already providing a solution to the problem of declining print readership without removing the third party accountability that is so vital to the proper due process of law.<sup>xxiii</sup>

Placing notices in newspapers serves the interests of the community. Those who regularly consume public notices reiterate that it is vital to have a single inexpensive source of public notices. If government agencies could place notices on their website, there would no longer be such a place, which would be difficult for smaller businesses who do not have the staff to search websites continually. Additionally, internet access is not universal, with poorer and rural communities having less access to information, a problem that is only made worse by the rapid change from broadband to metered mobile internet.<sup>xxiv</sup>

*Lisa Chappell (Greenville Herald-Banner)* – The law requires print publications of public notices because lawmakers have long known the importance of keeping citizens aware of what government is doing. Newspapers are not dying; they are shifting from paper to online readership. A recent survey revealed that 69% of adults read a newspaper either in print or online in a typical week, making newspapers an attractive source to get a message out to a mass audience. No online-only option can match this reach.<sup>xxv</sup>

The independent, third-party approach is essential for accountability and transparency. If government entities can post notices on their own websites, it would be a disservice to the people of Texas, and you are just asking for people to try to get around providing proper public notice.

*Chip Latcham (Beeville Publishing Company)* – Transparency and accountability are the two things we want to see. Publishing notices in modern newspapers come with the paper's online edition. Since they are paid advertisements, the section of the paper's website housing the public notices is not behind any "pay wall". They are also placed on TexasPublicNotices.com to be viewed by people statewide. By removing these notices from the newspaper, you would be keeping the notices away from underserved, economically distressed areas and doing a disservice to the State of Texas.<sup>xxvi</sup>

#### Interested Organizations

*Donnis Baggett (Texas Press Association)* – In 2011 in Muenster, Texas, a few residents saw a small notice in the paper dealing with an air quality permit for a new sand mining operation. The people of North Texas take pride in the quality of their environment and sent in 350 comments and 129 requests for a hearing. When the hearing came, more than 450 people came to talk about it, with people on both sides of the issue. The issue is still in question, but without the notice, the approval would have happened in a matter of weeks.

Waller County offers a multitude of examples of how public notice in newspapers has made a difference, including: water well farms on the local aquifer being stopped; preventing a landfill of trash from Houston to be built on top of the same aquifer; a proposed installation of traffic cameras in rural areas being halted; and an 8% raise proposed for all county officials which was eventually reversed.

*Peggy Venable (Former Director, Americans for Prosperity)* – The last time legislation was brought forward to place public notices on the internet, I asked the legislator, who filed it, who had brought the bill to them. They said it was the Texas Municipal League. While I am thankful for TML looking to save taxpayer money, I would advise that they do so by halting their taxpayer-funded lobbying. As the TML representative said, cities do not have money, it is the taxpayer's money. Taxpayers want to be involved and engaged, and as keeping citizens informed is a core function of government, it shouldn't be something done in the least expensive way possible at the expense of effectiveness.<sup>xxvii</sup>

More is better. Public notices should be in papers. They should be on their website. They should make every effort to inform citizens, and I would challenge those who would limit that. We have 6,000 taxing entities and some taxpayers have up to eleven entities in which they pay taxes. To ask that citizens regularly access eleven separate websites to stay informed is bad public policy.<sup>xxviii</sup>

Some public notices are for bond initiatives. Texas owes \$328,000,000,000 in local debt, that was accumulated through one local bond initiative after another. While citizens complain about the property taxes that go towards paying for that debt, bond initiatives continue to pass at around a 75% rate; citizens need more information about how they are affected by bonds, not less.<sup>xxix</sup>

In this digital age, we must take the “All of the Above” approach. There may come a time when we can go to an internet-only public notice system, but that time is not now. We should expand public notice rather than limit it.<sup>xxx</sup>

*Kelly Shannon (Freedom of Information Foundation)* – To focus on the logistics of public notice, while publishing notices online, access issues erase the benefits of increased efficiency. While 75% of Texans have broadband access, that means 6,000,000 people do not, and would likely be cut off from government information. We should be adding sources of information without removing any.<sup>xxxi</sup>

Over 13,000,000 adults every week read some kind of newspaper in Texas, either in print or online, and that level of transparency and accountability is not something to be overlooked. The newspaper acts as an independent third party for archiving, and that is an important aspect of the system. Even more web savvy people would have trouble digging through a government website looking for notices and attempting to find them, because all taxing entities can’t compare to the “one stop shop” of a local paper.<sup>xxxii</sup>

Even if it costs a bit of money to keep public notices in newspapers, it is our government, and we have a right to know what is going on and a right to be informed. If a little government money is spent on that, it is money well spent.<sup>xxxiii</sup>

*Yannis Banks (NAACP)* – Even in a city as tech savvy as Austin, over 55,000 people do not have internet access, 43% of them don’t have access because they don’t know how to use it, and 37% say it is just too hard to learn. 50% of Hispanic adults do not have access to internet in their homes and 46% of African Americans do not have access to the internet. 48.6% of households in Brownsville, 30.2% of households in El Paso, and 29.9% of households in Dallas

do not have internet access. These people want and deserve to have access to public notices as well. <sup>xxxiv</sup>

*The New York Times* covered a story earlier this year about two sixth-grade kids in McAllen, Texas, who have to stand outside their school trying to catch a Wi-Fi signal in order to do their homework, as the tutorial and assignments were online. These types of requirements make it harder and harder for those without access to high speed internet. <sup>xxxv</sup>

While there is nothing wrong with trying to save money, we also must be realistic and realize that not everybody will have access to notices placed online. There is a trust issue when you are talking about bids. People need to know that the entire process is done above board and in public view. TEA and even TCEQ have difficult-to-navigate websites, and even someone as tech-savvy as myself often requires help navigating to find exactly what we need. <sup>xxxvi</sup>

Information needs to be in more places than just online, it needs to be placed where people know that they can go to. While not everyone subscribes to a newspaper, it is a lot simpler for people to get a hold of a paper than to gain access to the internet when they do not have it. We must try to reach as many people as possible and not be content with 75%. <sup>xxxvii</sup>

*James Quintero (Texas Public Policy Foundations)* – My public finance background makes me look at this issue through efficiency metrics. In 2013, we sent out fifteen public information act requests, asking how much money the largest cities in Texas spent on advertising public notices, and came to a figure of \$1,500,000. While that may not seem like a lot, remember that that figure is annual and will be ongoing in perpetuity. Add to that the costs from 6,000 political subdivisions, and we are talking about much more than \$1,500,000 spent per year, which could be spent on roads, police, etc. <sup>xxxviii</sup>

The solution is not one of forcing political subdivisions to place notice only online, but in letting them choose to do so if they feel it is in the best interest of their community. This would be a first step in the right direction. The Texas Comptroller's Office should work as a warehouse for notices, and should have a system to notify citizens when a public notice for their area is available. A system can be set-up that allows better access and more efficiency. <sup>xxxix</sup>

### **Findings and Recommendations**

The Committee, having examined the issues related to the posting and advertising to the general public of legally required notices, hereby makes the following recommendations based on its findings.

#### **Retain Print Requirement**

The state requires government entities to place public notice in print publications in order to ensure transparency in government and to disseminate information about government activity in a manner easily accessible to all whom it may concern. In doing so, the state involves a third-party who both creates a lasting and reliable record of the notice and acts as a gatekeeper to ensure that governments post their notices correctly.

While the print circulation of newspapers has declined in recent years,<sup>xi</sup> the online presence of these third party media organizations has increased dramatically. Many local media organizations have followed the demands of the public and shifted to serve their customers' needs, indicating that they still maintain a relevance across the general public. Additionally, many media organizations offer placement of a public notice on the classified section of their website for free when a government entity places a notice in the print edition. <sup>xli</sup>

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With media organizations expanding their reach across mediums to continue to reach the public and the possible constitutional compliance concerns raised by Representative Hunter, the Committee does not recommend removing the requirement that government entities place notice in a print media at this time.

However, the legislature should continue to study the issue, as in the near-future there may come a time when the print requirement no longer serves the needs of the people. In such a circumstance, however, the necessity of placing the notice with a local, third-party media organization likely remains.

#### *Distinguish Between Public Notice Spending and General Advertising*

Government entities repeatedly raised the issue of cost of advertising public notices in both written and oral testimony. However, due to the method by which political subdivisions report their budgets and spending to the public, with all advertising spending often aggregated into one amount, the Committee could not obtain a precise and reliable understanding of the true cost to the state of advertising public notices.

Therefore, the Committee recommends legislation requiring that political subdivisions distinguish between public notice spending and other advertising, creating a line-item for monies spent fulfilling their statutory requirement to post public notices with local print media organizations so that further study on this issue may address the question of cost based on official budget records.

### Creation of Public Notice E-Mail Alert System

While media organizations have expanded their reach into online spaces, and remain a vital part of fulfilling the duty of the government to advertise public notices, modern technology provides the opportunity for the government to engage with the public more directly as well.

The Committee recommends that the state create, within the Office of the Comptroller, a website which will act as a clearinghouse for public notices. The State of Texas, and all political subdivisions, will be required to send a copy of all public notices to the Comptroller electronically for placement on this website.

The functionality of the website should be simple: an individual may search by address or by type or name of a government entity to find current and past public notices. Furthermore, the website will enable individuals to sign-up for email alerts for all future notices for those same search criterion. Therefore, any Texan can receive a regular, automated email containing all public notices posted by political subdivisions for which they enroll.

This system will exist alongside the current system, providing a second avenue of notice and ensuring that interested citizens will have another means of receiving notices that concern them, while maintaining the third-party accountability and general distribution of local media outlets.

It must be made clear that the website and the email alert system do not satisfy the public notice requirement, but merely enhance the state's overall system of providing notice. Further, as this new system would serve as a secondary avenue for notice, so long as all other notice requirements have been fulfilled and the political subdivision demonstrates a good faith effort to deliver notice to the Office of the Comptroller, failures in online posting or in delivery of an

email alert to the appropriate constituencies would not result in the traditional penalties for failure to provide notice.

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<sup>i</sup> Tex. Gov't Code Ann. §551(c)

<sup>ii</sup> Tex. Gov't Code Ann. §551(c)

<sup>iii</sup> Tex. Gov't Code Ann §2051.045

<sup>iv</sup> House Continuing Resolution of May 27, 2015, 84<sup>th</sup> Leg., R.S., H.C.R. 96

<sup>v</sup> House Continuing Resolution of May 27, 2015, 84<sup>th</sup> Leg., R.S., H.C.R. 96

<sup>vi</sup> Testimony of Mr. Bennett Sandlin to the Joint Interim Committee on Advertising Public Notices, August 18, 2016

<sup>vii</sup> Testimony of Mr. Bennett Sandlin to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>viii</sup> Testimony of Ms. Mary Kayser to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>ix</sup> Testimony of Ms. Becky St. John to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>x</sup> Testimony of Ms. Becky St. John to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xi</sup> Testimony of Mr. Phillip Ellison to the Joint Interim Committee of Advertising Public Notices, August 18,2016

<sup>xii</sup> Testimony of Mr. Phillip Ellison to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xiii</sup> Testimony of Mr. Ken Whalen to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xiv</sup> Testimony of Mr. Gary Hendrix to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xv</sup> Testimony of Mr. Gary Hendrix to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xvi</sup> Testimony of Mr. Robert Rose to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xvii</sup> Testimony of Mr. Robert Rose to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xviii</sup> By permission of the Co-Chairs, the Testimony of Mr. Mike Weaver was read by Laurie Prather, as Mr. Weaver was undergoing cancer treatment at the time of the hearing.

<sup>xix</sup> Testimony of Mr. Mike Weaver to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xx</sup> Testimony of Mr. Mike Weaver to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxi</sup> Testimony of Mr. Mike Weaver to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxii</sup> Testimony of Mr. Robert Moore to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxiii</sup> Testimony of Mr. Robert Moore to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxiv</sup> Testimony of Mr. Robert Moore to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxv</sup> Testimony of Ms. Lisa Chappell to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxvi</sup> Testimony of Mr. Latcham to the Joint Interim Committee of Advertising Public Notices, August 18, 2016

<sup>xxvii</sup> Testimony of Ms. Peggy Venable to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxviii</sup> Testimony of Ms. Peggy Venable to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxix</sup> Testimony of Ms. Peggy Venable to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxx</sup> Testimony of Ms. Peggy Venable to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxxi</sup> Testimony of Ms. Kelley Shannon to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxxii</sup> Testimony of Ms. Kelley Shannon to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxxiii</sup> Testimony of Ms. Kelley Shannon to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxxiv</sup> Testimony of Mr. Yannis Banks to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxxv</sup> Testimony of Mr. Yannis Banks to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxxvi</sup> Testimony of Mr. Yannis Banks to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxxvii</sup> Testimony of Mr. Yannis Banks to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxxviii</sup> Testimony of Mr. James Quintero to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xxxix</sup> Testimony of Mr. James Quintero to the Joint Interim Committee on Advertising Public Notices, August 18,2016

<sup>xl</sup> Testimony of Mr. Bennett Sandlin to the Joint Interim Committee on Advertising Public Notices, August 18, 2016

<sup>xli</sup> Testimony of Mr. Latcham to the Joint Interim Committee on Advertising Public Notices, August 18, 2016