

## Bryson F. Popham, P.A.

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February 7, 2022

The Honorable Delores G. Kelley  
Chair, Senate Finance Committee  
3 East, Miller Senate Office Building  
Annapolis, MD 21401

RE: Senate Bill 428 - Consumer Protection - Automotive Glass Repair or Replacement - Advanced Driver Assistance System Recalibration  
FAVORABLE

Dear Chair Kelley and Members of the Senate Finance Committee,

I represent Safelite, the leading provider of vehicle glass repair, replacement and recalibration services in the United States, including Maryland. Safelite supports Senate Bill 428 - Consumer Protection - Automotive Glass Repair or Replacement - Advanced Driver Assistance System Recalibration.

As you know, this General Assembly addressed the subject of motor vehicle glass replacement in 2021, in the form of House Bill 519/Senate Bill 445. The Senate passed House Bill 519 on a vote of 47-0, so each of you voted for that bill. Safelite is pleased that the sponsor of Senate Bill 445, Senator Chris West, has decided to take the necessary next step and drafted legislation to provide a compliance and enforcement mechanism for this important service.

That legislation has become Senate Bill 428, and its principal subject is a process known as "recalibration." Recalibration is a service that is likely to be needed by every new or late model vehicle that suffers certain damage to its windshield or other safety glass. The reason is simple: vehicles today have much more than glass in their windshields. They have cameras and sensors that, together, provide an "advanced driver assistance system" (ADAS). As Senator West stated, motor vehicles today are as much instruments of information technology as they are a form of transportation.

Because of this fact, many vehicles with damaged windshields require specialized services for repair. The repair does not end with the installation of a new windshield. It is necessary to recalibrate the ADAS on the entire vehicle, in order that the vehicle may perform in accordance with manufacturers' specifications.

The consequences of non-performance of ADAS from an improper repair are serious and potentially life-threatening. Drivers learn to rely upon ADAS for numerous safety functions in the operation of their vehicles. If a recalibration is off by just a millimeter, a serious accident could occur.

We have worked closely with legislators, regulators and other stakeholders on this legislation. In particular, we continue to work with representatives of the Auto Glass Safety Council (AGSC) which was involved in last year's effort. From those discussions, we expect to offer some minor amendments which will improve the legislation.

Senate Bill 428 supplements the valuable public policy you enacted in House Bill 519 last year by adding a compliance

and enforcement function through the Office of the Attorney General, Consumer Protection Division. While last year's legislation focused on the standards applicable to the replacement glass itself, we recognized the necessity to have a State agency assume responsibility for regulating the important process of recalibration. We are pleased that the Consumer Protection Division supports the bill. We further note that the Motor Vehicle Administration, which is drafting regulations to implement House Bill 519 from last year, has advised its intention to monitor Senate Bill 428. We believe that Maryland has the right combination of regulators to protect both drivers and passengers of vehicles with ADAS.

Accordingly, we respectfully request a favorable report on Senate Bill 428.

Very truly yours,

A handwritten signature in black ink, reading "Bryson Popham". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Bryson F. Popham

cc: The Honorable Chris West