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February 2, 2021

The Honorable Kumar P. Barve, Chairman House Environment and Transportation Committee Room 251 House Office Building Annapolis, MD. 21401

RE: House Bill 519 Vehicle Equipment - Safety Glass - Replacement Standards Position: Favorable with Amendments

Dear Chairman Barve and Members of the Committee,

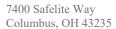
Safelite is the leading provider of vehicle glass repair, replacement and recalibration services in the United States, including Maryland. Our company is also committed to consumer protection and information regarding quality, safety and anti-fraud within the industry.

Our company offers comments on HB 519 in three specific areas. First, the bill references the ANSI standards which provide guiding principles for vehicle glass replacement. ANSI refers to the American National Standards Institute which is a private, non-profit organization that administers and coordinates the U.S. voluntary standards and conformity assessment system. Safelite not only supports the ANSI standard, it participates in the process coordinated by the Auto Glass Safety Council (AGSC). The ANSI standard itself mostly focuses on the replacement process and not glass quality.

Glass quality is already regulated by the federal government through the Department of Transportation (DOT) and various Motor Vehicle Safety Standards (FMVSS) under the National Highway Transportation Safety Administration. In addition, every piece of glass manufactured, imported and installed should at minimum include a DOT number. In addition, glass manufacturers include fit, purpose and performance statements for aftermarket glass the attest that the glass meets or exceeds OEM specifications. Also, whether the vehicle glass is manufactured for a specific vehicle manufacturer or is deemed aftermarket, all glass must meet the same specifications. Safelite respectfully suggests that the national standards utilized by both ANSI and NHTSA provide a durable, national set of rules to follow in this area, and we also suggest that Maryland should not attempt to duplicate those rules, in whole or in part.

Second, no state has a Motor Vehicle Department that regulates vehicle glass replacement. Should the Maryland MVA seek to collect data related to glass specifications, this would include millions of data points. Again, Maryland's effort would duplicate existing standards. In addition, we are advised that the Maryland MVA has no regulatory authority over the auto glass replacement industry. A key issue which must be addressed before proceeding is for Maryland public officials to decide upon the conduct that should be regulated and to identify the appropriate regulator for that conduct.

Third, Safelite is focused on consumer protection and information, and we commend the sponsor for bringing this important subject forward. Safelite would recommend an amendment that would create a





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study on the subject and welcomes the opportunity to participate in those discussions. The advancement of automobile technology and the recalibration of advanced safety features should also be part of that study to ensure consumer safety and to protect access to data and information. These are all complex but important issues on a subject that affects millions of Maryland consumers.

We welcome the opportunity to work with the Chairman and this Committee on this important subject.

Thank you for your consideration.

Scot Zajic Vice President – Legislative Affairs Safelite Group, Inc.

cc: Bryson Popham, Bryson F. Popham, P.A.