

# **AUTO GLASS SAFETY COUNCIL™**

December 15, 2022

Ms. Christine Nizer, Administrator  
MDOT MVA  
6601 Ritchie Highway, N.E.  
Room 200 Glen Burnie, MD 21062

Re: COMAR 11.13.12

Dear Administrator Nizer:

This is to notify the Maryland Motor Vehicle Administration that updates have been made to the Automotive Glass Replacement Safety Standard (AGRSS Standard) and to recommend that the Maryland Motor Vehicle Administration promulgate revisions to COMAR 11.13.12 Safety Glass Replacement Standards to reflect those revisions.

The Auto Glass Safety Council (AGSC) is a non-profit organization dedicated to the safe repair and replacement of auto glass. Members of the AGSC are auto glass service companies, glass manufacturers, suppliers, insurers, associations, and safety groups that voluntarily agree to adhere to the AGRSS standard in the performance of auto glass replacement and repair services, employ AGSC-certified technicians, and consent to periodic extensive, independent third-party audits to ensure on-going compliance with the AGRSS Standard.

In 1999, the AGSC led the development of the AGRSS Standard, a national voluntary industry standard governing vehicle glass replacement, under the American National Standards Institute (ANSI). The AGRSS Standard, approved by ANSI, was updated in 2002, 2015, 2018, and now again in 2022. The 2022 AGRSS Standard update addresses complex calibration-related issues resulting from the advent of Advanced Driver Assistance Systems (ADAS) in recent model-year vehicles.

In 2021 the Maryland legislature enacted HB 519 (Ch. 461, Acts of 2021), which directed the Maryland Motor Vehicle Administration to “adopt regulations establishing standards and requirements for aftermarket safety glass replacement that ... meet or exceed the requirements of the American National Standards Institute/Auto Glass Safety Council/Automotive Glass Replacement Safety Standard”. The MVA thus promulgated a regulation, COMAR 11.13.12

Safety Glass Replacement Standards, which became effective on March 7, 2022. The regulation implements the ANSI/AGSC/AGRSS (or AGRSS Standard).

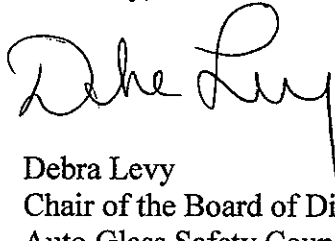
As the language of COMAR 11.13.12 substantially reflected the language of the AGRSS Standard at the time of promulgation, we urge the MVA to review the latest revision and propose a revised regulation based on those revisions. AGSC stands ready to provide assistance and necessary technical support to the MVA for its review.

During the comment period for 11.13.12, the issue of whether the regulation should simply refer to and incorporate the AGRSS Standard or should recite the language of the AGRSS Standard was discussed at length. It was determined that the State could not simply incorporate the AGRSS Standard, an industry living standard subject to revision as technology evolves, into state law. The situation at hand, where the AGRSS Standard is updated, and the State should move forward in considering that update for adoption into the state regulation, is the logical and anticipated result of being unable to incorporate the standard into state law.

It is also worth noting on the topic of calibration that some of the changes in the standard are like provisions included in legislation (SB 428/HB 1460) that was considered in the General Assembly in 2022.

Thank you for your consideration and your continued commitment to safety. If you have any questions, please contact me or Seth Maiman, Public Affairs Director, at [smaiman@agsc.org](mailto:smaiman@agsc.org).

Sincerely,



Debra Levy  
Chair of the Board of Directors  
Auto Glass Safety Council

cc: (electronically)

Mr. Phillip Dacey, MVA

Ms. Tracey Sheffield, MVA

Chairman Kumar Barve, House Environmental Matters Committee

Ms. Kathy Dunn, House Environmental Matters Committee

Delegate David Fraser-Hidalgo

Delegate Courtney Watson

Senator Chris West

Mr. Patrick Carlson, Senate Finance Committee