



February 16, 2024

The Honorable C.T. Winston
Chair, House Economic Matters Committee
Room 231
House Office Building
Annapolis, Maryland 21401

HB 695 - Consumer Protection – Notice to Consumers by Manufacturers and Dealers of Motor Vehicles
Position: Unfavorable

Dear Chairman Winston:

On behalf of the Alliance for Automotive Innovation,¹ please accept the following comments in opposition to HB 695, which will cause consumer confusion and waste.

HB 695 would require manufacturers to send service bulletins and notices of “adjustment programs” (a defined term) to vehicle owners and lessees in the state, regardless of whether the consumer asked for it and regardless of whether it means that there is a problem with the consumers vehicle. This would not help consumers and would in fact be a net consumer harm.

Service bulletins are technical repair documents that are written for professional mechanics to give them useful information about repairing particular vehicles. A typical service bulletin will indicate that certain models of vehicles from certain years may exhibit a particular symptom (e.g. rough idling), and then the bulletin will show the repair procedure to fix that problem if the symptom is present on a vehicle in the repairer’s shop. A service bulletin does not mean that all of the vehicles identified in the bulletin have or will develop the symptom. The bulletin is simply a way that useful information learned from experience can be shared with repairers to help them do their jobs and keep their customer happy.

¹ Formed in 2020, the Alliance for Automotive Innovation is the singular, authoritative and respected voice of the automotive industry. Focused on creating a safe and transformative path for sustainable industry growth, the Alliance for Automotive Innovation represents the manufacturers producing nearly 99 percent of cars and light trucks sold in the U.S. The newly established organization, a combination of Global Automakers and Alliance of Automobile Manufacturers, will be directly involved in regulatory and policy matters impacting the light-duty vehicle market across the country. Members include motor vehicle manufacturers, original equipment suppliers, technology and other automotive-related companies and trade associations. The Alliance for Automotive Innovation is headquartered in Washington, DC, with offices in Detroit, MI and Sacramento, CA. For more information, visit our website <http://www.autosinnovate.org>.

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Service bulletins would be less helpful for consumers who are not experts in automotive repair. Consumers would not know what to do if they received multiple service bulletins (a vehicle may have more than one) that are pages of esoteric terminology and diagrams meant for professional technicians. Thus, consumers who receive a service bulletin could assume that something must be wrong with their vehicle, so they would take it to a repair shop only to learn that nothing was wrong and that they have wasted their time and possibly money. That could also cause consumers to confuse important recall notices that require their attention with service bulletins that do not. The state should not adopt policies that impede recall completion because that is contrary to safer driving.

Similarly, notices of adjustment programs are unnecessary and risk confusion because they could lead consumers to think something is wrong with their vehicle when there is nothing wrong with it.

The provisions in HB 695 will ultimately frustrate and confuse consumers rather than help them. Consumers that are interested in seeing service bulletins already have easy access to them. The National Highway Traffic Safety Administration maintains a publicly available database at www.nhtsa.gov/recalls which includes that information.

The Alliance for Automotive Innovation respectfully asks you to vote against this bill. For more information, please contact our local representative, Bill Kress, at (410) 375-8548.

Sincerely,



Josh Fisher
Senior Director, State Affairs
Alliance for Automotive Innovation