



Tuesday, March 10, 2026
Economic Matters Committee - Bill Hearing
1:00 PM - House Office Building, Room 230, Annapolis, MD
HB 1429, Consumer Protection - Right to Repair - Motor Vehicles and Farm Equipment

Dear Chair Valderrama, Vice Chair Charkoudian, and Members of the Committee:

Thank you for the opportunity to provide feedback on HB 1429. While the intent to improve repair access is commendable, the bill's current language undermines existing industry-leading solutions and introduces significant risks to consumers, including cybersecurity vulnerabilities, cost burdens, and accountability gaps.

Cybersecurity Risks

HB 1429 mandates a standardized “open data platform” across all vehicles, creating a single point of failure that bad actors and cybercriminals could exploit to compromise every connected vehicle in Maryland simultaneously.

- The uniformity increases the attractiveness of the target.
- Uniformity goes against modern zero trust architectures: Instead of blanket access via one protocol, modern architectures enforce granular, context-specific checks. Diversity supports zero-trust models by assuming no inherent safety in uniformity.
- Expands breach of fallout: A breach of a uniform standard extends fallout to all vehicles in Maryland. Alternatively, in a diversity-based resilience model, when one implementation is compromised, the damage is contained to that specific variant, sparing others. For example, in supply chain attacks like SolarWinds¹, uniform software dependencies amplified the blast radius; diversity could have isolated the impact to affected subsets.

Due to the complexity of modern computer systems, it is no longer a case of if a cybersecurity breach will happen, but when. This risk is not hypothetical -- in 2022, a vulnerability in SiriusXM telematics system allowed unauthorized access to approximately 15 million Honda, Nissan, and Infiniti vehicles globally.

Cost Burdens on Consumers

The bill mandates that manufacturers have a secondary telematics system installed, inflating upfront new vehicle costs for consumers without tangible benefits for independent repairers. Additionally, the recurring cost born by the third party operating the telematics system will presumably be passed along to the consumer.

Misplaced Accountability

The secondary telematics system is not something the vehicle manufacturer designs, installs, or operates. The bill mandates this be done by an independent third-party provider, not the vehicle manufacturer. However, the bill describes a failure of the third-party telematics unit as a violation by the vehicle manufacturer with penalties against the vehicle manufacturer. The bill contemplates no oversight or accountability towards the actual installer or operator of the telematics unit.

¹ [SolarWinds Cyberattack Demands Significant Federal and Private-Sector Response \(infographic\) | U.S. GAO](#)



Reduced Capabilities for Repairers

By mandating a singular standardized “open data platform,” the bill stifles continuous innovation and prevents the inclusion of new capabilities beyond those defined within the standard. The bill results in independent repairers receiving less, not more, capabilities.

The Bill is Unnecessary

Tesla’s service website² is publicly accessible to independent repairers and operators and already provides a wealth of information to diagnose and service Tesla vehicles equally to independent repairers and dealers.

- **Repair Resources:** Free access to service manuals, parts manuals, wiring diagrams, bulletins, do-it-yourself guides.
- **Onboard Service Mode:** A free diagnostic scan tool embedded directly through the touchscreen, eliminating the need for external tools.
- **Third-Party Collaboration:** Partnerships with aftermarket scan tool companies and service information providers to expand repair options.
- **Access to Remote Telemetry Connections:** Upon authorization by the vehicle owner, access to remote diagnostic telemetry, either through Tesla, or through independent third parties.

The capabilities HB 1429 contemplates are already equally available today to dealers and independent repairers alike. Tesla is not alone in the industry in making such offerings; however, the uncertainty generated by HB 1429 discourages manufacturers from expanding their current offerings for fear of future non-compliance. The bill represents unnecessary regulatory overreach.

Unworkable Standardization and Legal Ambiguity

HB 1429 mandates standardized telematics across all manufacturers and ignores technical diversity, creating compatibility issues. Additionally, the bill’s vague definition of “open data platform” leaves enforcement subject to interpretation, risking costly litigation and unintended consequences. Forcing uniformity also contradicts NHTSA’s cybersecurity guidance, which emphasizes manufacturer accountability for system integrity.

Conclusion

Tesla urges the committee to reconsider HB 1429’s approach and protect Marylanders from avoidable risks. Instead, we encourage the committee to adopt a technology-agnostic approach that ensures repair resources are equally accessible to independent repairers.

We remain committed to collaborating on policies that balance repair access with cybersecurity, affordability, and technological progress. Thank you for the opportunity to share Tesla’s perspective.

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² <https://service.tesla.com>