March 10, 2026

The Honorable Kriselda "Kris" Valderrama
House Committee on Economic Matters
Taylor House Office Building, Room 230
6 Bladen Street
Annapolis, MD 21401-1912

RE: MD HB 1429- Consumer Protection - Right to Repair - Motor Vehicles and Farm Equipment (Amendment Request)

Dear Chair Valderrama:

On behalf of the RV Industry Association (RVIA), I am writing to share our industry's concerns regarding HB 1429 and to respectfully request that RV manufacturers be expressly exempted from the bill. The bill establishes right-to-repair requirements for motor vehicles after model year 2002 and heavy-duty vehicles over 14,000 pounds after model year 2013.

RVIA is the national trade association representing over 470 manufacturers and component and aftermarket suppliers who together build more than 98 percent of all RVs produced in the United States. The American-made RV industry contributes $140 billion annually to the U.S. economy and supports 680,000 full-time American jobs. Specifically in Maryland, the RV industry contributes $937 million to state and local economies and supports 5,085 jobs with 143 businesses providing products and services to consumers who utilize RVs for travel and recreation.

Why RVs Are Unique

An RV is a vehicle that combines transportation and temporary living quarters for travel, recreation, and camping. This dual function creates a unique manufacturing, warranty, and service structure unlike that of consumer electronics or traditional motor vehicles. An RV is a complex multi-system vehicle, with many of its systems designed, manufactured, and warranted by component suppliers rather than the RV manufacturer.

As a result, most RV manufacturers do not possess all diagnostic data, repair documentation, or software related to RV components, much of which is owned and controlled by suppliers. Consequently, RV manufacturers cannot provide access to information or tools that they do not own or have the legal right to distribute.

Third-Party Warranties and OEM Responsibility

Many RV components carry separate warranties that are established by the component manufacturer and administered independently of the RV manufacturer. This creates a unique manufacturing, warranty, and service structure unlike relatively integrated products. In many cases, the RV manufacturer does not set the warranty terms and does not control or maintain the repair or diagnostic data for those components. As drafted, HB 1429 would assign compliance responsibility to the RV manufacturer, even though the manufacturer does not set warranty terms for many components and does not maintain the repair or

diagnostic data for those components. This misalignment creates legal and practical obligations that RV manufacturers cannot reasonably fulfill.

Given the unique way that RVs are designed and manufactured, and the industry's supply-chain characteristics, compliance would be impractical for RV manufacturers as drafted. States recognize this unique nature and, in many cases, explicitly exempt RVs from state right-to-repair legislation including the 2013 Massachusetts right-to-repair law. Moreover, the 2014 Memorandum of Understanding (MOU) negotiated between the Automotive Service Association (ASA), the Society of Collision Repair Specialists (SCRS) and the Alliance for Automotive Innovation (AFAI) specifically exempts RVs from the definition of "motor vehicle" for purposes of right-to-repair-provisions. Accordingly, RVIA is seeking an exemption for RV manufacturers.

Proposed Addition to the Bill

RVIA proposes adding definitions for "Recreational Vehicle," and "Park Model Recreation Vehicle" to Section 14-5101 as follows:

- *"Recreational Vehicle" means the same as that term is defined in § 15-1001*
- *"Park Model Recreation Vehicle" means the same as that term is defined in § 11-144.1*

RVIA also proposes amending Section 14-5101 to read as follows:

Nothing in this chapter shall apply to Recreational Vehicles or Park Model Recreation Vehicles.

The goals of right-to-repair legislation is to expand consumer choice by ensuring access to diagnostic and repair information for digital products that manufacturers fully design, control, and monitor. While this framework may be appropriate for moderately integrated products, it is not well-suited for highly complex, multi-component vehicles, like RVs.

Thank you for your consideration. We welcome the opportunity to work with you and the Committee to provide additional information as needed. Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

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