

Testimony.pdf

Uploaded by: Christi Boyle

Position: FAV

The Honorable William C. Smith, Jr. Chair, Senate Judicial Proceedings Committee Miller
Senate Office Building Annapolis, Maryland 21401

Re: Senate Bill 789 – Vehicle Laws – Automotive Repair Facilities – Advanced Driver
Assistance Systems

Chair, Vice Chair, and Members of the Judicial Proceedings Committee,

Thank you for the opportunity to testify in strong support of Bill 789.

My name is Christi Boyle, and I am the co-owner of Sensi Auto Technologies, a Maryland-based business specializing in Advanced Driver Assistance Systems (ADAS) diagnostics and calibration. I am also the mother of a young driver. I speak to you today from both perspectives — as a small business owner working directly with these safety systems every day, and as a parent who relies on them to help protect my child on Maryland roads.

According to the National Highway Traffic Safety Administration (NHTSA), human error remains the leading cause of motor vehicle crashes in the United States. Distracted driving alone claims thousands of lives each year, with young and inexperienced drivers disproportionately represented in distraction-related crashes.

Despite education and enforcement efforts, distraction and inattention remain persistent realities. Advanced Driver Assistance Systems were developed specifically to address these human limitations.

ADAS technologies — including forward collision warning, automatic emergency braking, blind-spot detection, lane departure warning, lane keeping assistance, adaptive cruise control, and rear cross-traffic alert — are not convenience features. They are crash-prevention systems.

Research cited by NHTSA and the National Safety Council shows:

- Forward collision warning combined with automatic emergency braking can reduce rear-end crashes by nearly 50%.
- Blind-spot monitoring significantly reduces lane-change crashes.
- Lane departure warning systems reduce single-vehicle and sideswipe crashes.

For parents like me, those statistics are not abstract. They represent real protection for our children during moments of inexperience or distraction.

While ADAS technology is advancing rapidly, public understanding has not kept pace.

Many drivers:

- Do not fully understand what their systems can and cannot do.
- Overestimate capabilities and confuse driver assistance with automation.
- Disable systems due to misunderstanding.

- Assume a vehicle is safe after repair because no warning light is on.

There is also a gap within parts of the repair and insurance industries regarding the technical precision required for calibration.

Even millimeter-level misalignment of a radar sensor or camera can affect braking timing, lane detection accuracy, or object recognition. If a vehicle undergoes collision repair or even windshield replacement without proper recalibration:

- Automatic emergency braking may activate too late — or not at all.
- Lane keeping systems may drift.
- Blind-spot monitoring may fail to detect adjacent vehicles.
- Misinterpret its environment and apply braking or steering corrections.

This bill directly addresses that safety gap.

Section 4 of the Act establishes clear requirements that any auto repair facility performing collision repairs or glass replacement on ADAS-equipped vehicles must:

- Conduct pre-repair diagnostic scans
- Perform calibrations strictly according to Original Equipment Manufacturer (OEM) repair procedures and position statements
- Conduct post-repair scans to verify functionality
- Maintain documented evidence of all scans and calibrations

It also prohibits returning a vehicle to a customer without required calibrations or misrepresenting that calibrations were performed.

These are not burdensome requirements — they are safety standards consistent with manufacturer guidance and national highway safety principles.

This Act also addresses a significant consumer protection issue.

Currently, insurance estimates do not always clearly itemize necessary OEM-recommended diagnostic scans and calibrations. Consumers are often unaware these procedures are required to restore the vehicle's safety systems.

Section 5 ensures that insurance carriers:

- Cannot deny coverage for OEM-recommended repair procedures or calibrations
- Cannot require repair methods that conflict with OEM position statements
- Must include line items for pre-repair scans, post-repair scans, and necessary ADAS calibrations
- Cannot consider a repair complete until required calibrations are performed

Safety procedures should never be optional or negotiable when restoring crash-avoidance systems.

Section 6 addresses the educational gap directly by requiring written disclosure to consumers before repairs begin, including:

- Identification of ADAS features present
- Explanation of which systems may be affected
- Description of required calibration procedures
- Estimated costs
- Safety implications of failing to perform calibrations

Upon completion, consumers must receive documentation verifying that calibrations were properly performed and that OEM prerequisites were met.

As both a business owner and a parent, I believe transparency builds trust and ensures informed decision-making.

This Act responsibly modernizes the industry by establishing licensing requirements beginning January 1, 2027.

ADAS calibration providers must:

- Complete state-approved training
- Pass a written examination
- Maintain proper tools and controlled calibration environments
- Carry liability insurance
- Complete annual continuing education

These systems directly affect life-saving crash-avoidance features. Professional standards and licensing ensure that those performing calibrations are properly trained and equipped.

As a Maryland small business owner, I support these standards because they promote professionalism, accountability, and public safety.

When my young driver leaves the house, I cannot eliminate every risk. I cannot control every distracted driver on the road. But I can advocate for policies that ensure the technologies designed to reduce crashes are functioning exactly as intended.

The Maryland Advanced Driver Assistance Systems Safety and Consumer Protection Act does not create unnecessary regulation. It creates clarity. It aligns insurance coverage with OEM safety standards. It closes the education gap for consumers. It establishes professional accountability. And most importantly, it strengthens roadway safety for Maryland families.

For the safety of our children, our communities, and every driver on Maryland roads, I respectfully urge a favorable report. Thank you for your time and consideration.

Legislative Briefing - Maryland State Senate - ADA

Uploaded by: Don Reynolds

Position: FAV



SENSI AUTO TECHNOLOGIES

ULTIMATE DRIVER SAFETY

MARYLAND ADAS SAFETY & CALIBRATION ACT
Legislative Briefing Document
Prepared for Members of the Maryland Senate

Prepared by: SENSI Auto Technologies

Purpose: To summarize the ADAS calibration gap and the need for Maryland legislation



Executive Summary

Advanced Driver Assistance Systems (ADAS) such as Automatic Emergency Braking (AEB), lane-keeping assistance, and blind-spot monitoring are now standard on most new vehicles. By 2029, NHTSA will require AEB and pedestrian-detection systems on 100% of new vehicles.

These systems prevent crashes and save lives — but only when properly calibrated after collision repairs or glass replacement.

National data shows a dangerous mismatch between the number of vehicles requiring calibration and the number actually receiving it. Even more concerning, poor or incorrect calibrations can be more dangerous than no calibration at all.

Consumers often inherit the consequences, discovering issues only when their safety systems fail. Many pay out of pocket to correct improper repairs.

The Maryland ADAS Safety & Calibration Act addresses these gaps and aligns with SENSI Auto Technologies' mission: *Ultimate Driver Safety*



THE CALIBRATION GAP

What Should Happen After a Collision

OEM repair procedures require calibration when: Cameras or sensors are removed, replaced, or impacted

- Windshields on 2018+ vehicles are replaced
- Bumpers, mirrors, or structural components are repaired
- Mounting brackets move
- Ride height or alignment changes

This means 55–70% of repairs require ADAS calibration.
98% of windshield replacements require camera calibration.

What Actually Happens

National data (CCC Intelligent Solutions):

- Only 23% of vehicles receive calibration
- Only 42% of glass claims include required calibration
- 45% of calibrations show up late on supplements
- Only 21% of shops have optimized calibration processes
- Many lack proper tools, targets, or space

Result: 30–45% of required calibrations are never performed.



POOR CALIBRATION RISKS

Poor Calibration Is More Dangerous Than No Calibration

Ascential Technologies Findings:

- Up to 42% of completed calibrations were done incorrectly
- Many passed shop checks but failed OEM validation
- Sensors often produced no warning lights
- Drivers believed systems were working when they were not

Conclusion: A poor calibration can be more dangerous than none.

Real-World Safety Failures

Improper calibrations can cause:

- AEB to fail
- Lane-keeping to drift
- Blind-spot monitors to miss vehicles
- Phantom braking
- Pedestrian detection loss

These failures are invisible to consumers.



Consumers Absorb the Consequences

When ADAS calibrations are missed or incorrect:

- Consumers must return to the shop
- Repairs are delayed
- Insurance disputes arise
- Many pay out of pocket
- Some never learn calibration was required
- Safety systems silently fail

This is a consumer protection and public safety issue.

Liability Is Rising

Improper calibration lawsuits:

- 3 cases in 2018
- 60+ cases in 2024
- Many settlements exceed \$1 million

Courts consistently rule that failing to follow OEM procedures is negligence.



FEDERAL MANDATES & READINESS

Federal Mandates Expand the Need

FMVSS No. 127 requires:

- AEB
- Pedestrian AEB
- Forward Collision Warning
- Dynamic Brake Support on all new vehicles by 2029.

Federal law does not regulate post-collision calibration.

States must fill this life-safety gap.

Industry Readiness Gaps

- Only 54% of shops have calibration equipment
- Only 25% meet OEM environment requirements
- Technician training is inconsistent
- Many calibration environments are unsuitable

This legislation raises standards and supports qualified professionals.



BILL SUMMARY & GOALS

Goals of the Maryland ADAS Safety & Calibration Act

- Protect Maryland drivers
- Prevent consumers from absorbing repair errors
- Increased awareness and training
- Standardize calibration practices
- Elevate high-quality repair professionals
- Ensure insurers recognize and reimburse OEM-required procedures
- Reduce liability for repairers
- Ensure ADAS systems function on Maryland roads

What the Bill Requires

- OEM procedures for all calibrations
- Licensing for ADAS calibration technicians
- Facility & equipment standards
- Insurance recognition of OEM-required calibrations
- Consumer disclosure requirements
- Full documentation of scans and calibrations
- Enforcement via MDOT MVA



Key Data Sources

- CCC Intelligent Solutions – Crash Course
- AAA Research – ADAS Repair Costs
- Aesimal Technologies / asTech – Calibration Accuracy Study
- NHTSA – FMVSS 127
- I-CAR RTS – OEM Calibration Database
- Repairer Driven News & Autobody News

Sensi Auto Technology Testimony - Don Reynolds.pdf

Uploaded by: Don Reynolds

Position: FAV

The Honorable William C. Smith, Jr.
Chair, Senate Judicial Proceedings Committee
Miller Senate Office Building
Annapolis, Maryland 21401

Re: Senate Bill 789 – Vehicle Laws – Automotive Repair Facilities – Advanced Driver Assistance Systems

Chair, Vice Chair, and Members of the Judicial Proceedings Committee,

Chair, Vice Chair, and members of the Committee, thank you for the opportunity to testify. My name is Don Reynolds, and I am here on behalf of SENSI Auto Technologies in strong support of Senate Bill 789.

Advanced Driver Assistance Systems—like automatic emergency braking, lane-keeping, blind-spot monitoring, and pedestrian detection—are now standard on nearly every new vehicle. Ninety-five percent of cars on the road today include AEB, and by 2029 the federal government will require these systems on *every* new vehicle with even more stringent performance requirements. These technologies save lives every day, but only when they are properly calibrated after repairs.

Right now, Maryland faces a growing safety and consumer-protection gap. National data shows 55 to 70 percent of collision-repaired vehicles require an ADAS calibration, yet only 23 percent actually receive one. In glass replacement, 98 percent of modern windshields require a camera calibration, but only 42 percent are documented. That means 30 to 45 percent of required calibrations are currently being missed.

But the problem is not just missed calibrations, it's incorrect calibrations. A major study by Ascential Technologies found that up to 42 percent of calibrations performed by shops were done incorrectly, often with no dashboard warning to alert the driver. Their conclusion was clear: a poor calibration can be even more dangerous than no calibration at all, because the driver believes the system will respond—and in an emergency, it won't.

And too often, the consumer is the one who pays the price. When an ADAS system fails after a repair, it's the driver who must return to the shop, dispute the insurer, lose time, or even pay out of pocket to fix improper work. Most Marylanders never know calibration was required, leaving them unknowingly driving a car with compromised safety systems.

This legislation is about fixing that. It increases awareness, requires proper training and licensing, enforces OEM procedures, ensures insurers recognize and reimburse required calibrations, and provides clear consumer disclosure. It elevates the professionals who are already doing this work correctly while creating a level playing field across the entire industry.



The federal government mandates these life-saving systems, but it does not regulate how they must be repaired after a crash. That responsibility falls to the states—and Maryland has an opportunity to lead.

This bill ensures ADAS systems work as designed, protects Maryland families, and promotes the highest standards of repair quality and consumer safety.

Thank you for your time and consideration, and I'm happy to answer any questions.

Sincerely,

Donald T Reynolds
Chief Operating Officer

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SB789 Maryland ADAS windshield calibration - AAA L

Uploaded by: Ragina Ali

Position: FAV



AAA Testimony in Support of SB789 Automotive Repair Facilities – Advanced Driver Assistance Systems

March 2, 2026

Dear Chair Smith, Vice Chair Waldstreicher and Members of the Maryland Senate Judicial Proceedings Committee:

On behalf of **AAA Club Alliance**, I write to **support Senate Bill 789**, which establishes professional standards, licensing, and consumer protections for Advanced Driver Assistance System (ADAS) recalibration in Maryland and urge the Committee to issue a **favorable report**.

Why This Bill is Needed Despite the 2023 Windshield Calibration Law

Maryland took an important step in 2023 by passing a law requiring glass shops to notify customers when a windshield repair triggers the need for ADAS recalibration. That statute ensures consumers are informed and that glass repairers adhere to OEM specifications. However, it applies **only to motor vehicle safety glass facilities** and addresses a narrow part of the ADAS ecosystem.

SB789 is needed because the 2023 law does not regulate the full range of repair facilities or repair scenarios that impact ADAS systems. Modern ADAS components extend far beyond the windshield. Collision repairs, bumper replacements, suspension work, cooling/AC repairs, and body-panel adjustments all affect cameras, radars, and sensors, and therefore require precise recalibration. ADAS is now present in an overwhelming share of late-model vehicles, with one report showing that **89% of model year 2023 vehicles require recalibration following a windshield replacement alone**, illustrating how widespread these systems have become.

Key Gaps in the 2023 Law That SB 789 Corrects

The 2023 law does not regulate the majority of repair facilities performing ADAS work.

The earlier statute applies only to glass shops, leaving body shops and mechanical repair facilities, where many ADAS-sensitive repairs occur, completely unregulated in this area.

No licensing, training, or facility standards exist today.

The 2023 law created disclosure requirements but did not establish:

- Licensing of individuals or facilities
- Technical training standards
- Equipment standards
- Requirements for controlled environments (e.g., level floors, proper lighting), which are essential for accurate calibrations
- Legislative testimony in 2023 emphasized that ADAS recalibration requires specialized conditions that many facilities do not currently meet.

The previous law did not address insurer practices.

Insurers can currently deny OEM-required calibrations, exclude necessary scanning from estimates, or pressure shops toward unsafe shortcuts, none of which is addressed in the 2023 statute. SB789 ensures that insurers cannot deny or disregard OEM-specified safety procedures.

There is no meaningful enforcement mechanism.

Without licensing, there is no way to suspend, revoke, or discipline facilities that repeatedly fail to follow OEM procedures. SB789 fixes this by establishing civil penalties, licensing consequences, and enforcement authority.

How SB789 Protects Maryland Drivers

SB789 creates a comprehensive framework to ensure ADAS systems, which include features such as automatic emergency braking, lane keeping assistance, blind-spot detection, and adaptive cruise control, are restored to proper working order after repairs. The bill ensures:

- **Professional standards:** Facilities performing ADAS calibrations must be licensed and must meet OEM tool, equipment, and environmental requirements.
- **Transparency:** Consumers receive detailed pre- and post-repair documentation on scans performed, calibrations completed, and system performance.
- **Safety:** Repairs cannot be considered complete by insurers until all necessary calibrations are properly performed.
- **Accountability:** Violations carry meaningful penalties, including license suspension for repeated offenses.

As ADAS becomes the safety backbone of modern vehicles, accurate calibration is not optional, it is life-saving. Maryland's 2023 law addressed part of the issue, but today's vehicles require a broader, more robust regulatory structure that covers the full repair ecosystem. SB789 closes the gaps, establishes professional standards, and protects both consumers and road safety.

We, at AAA appreciate the Judicial Proceedings Committee's leadership on traffic safety and respectfully urge you to issue a **favorable report on SB789**.

Sincerely,

Ragina Cooper Ali
Public and Government Affairs Manager
AAA Club Alliance
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Ben Perricone
Territory Manager, Approved Auto Repair
AAA Club Alliance
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SB 789_SAFELITE_FWA.pdf

Uploaded by: Bryson Popham

Position: FWA

Bryson F. Popham, P.A.

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March 2, 2026

The Honorable William C. Smith, Jr.
Chair, Senate Judicial Proceedings Committee
2 East Miller Senate Office Building
Annapolis, MD 21401

RE: Senate Bill 789 - *Vehicle Laws - Automotive Repair Facilities - Advanced Driver Assistance Systems*
FAVORABLE W/AMENDMENTS

Dear Chairman Smith and Members of the Committee,

I represent Safelite, the leading provider of vehicle glass repair, replacement and recalibration services in the United States, including Maryland. Safelite supports House Bill 789 with amendments.

With the amendments, Senate Bill 789, has a legislative history in this Committee. Beginning with the passage of House Bill 519 in 2021, which addressed replacement standards for safety glass, the Judicial Proceedings Committee began to address important consumer protection issues surrounding the increasingly sophisticated features in modern automobiles that comprise advance drive assistance systems (ADAS). In 2023, Senator West worked closely with Delegate Courtney Watson to address the subject of necessary consumer notifications about the process of recalibration. This process takes place after an accident to ensure that ADAS systems function properly.

In 2026, Senate Bill 789, as amended, will close the loop by imposing certain requirements on repair facilities that may – or may not – include recalibration as part of their services. As such, it is a portion of national model legislation that has been adopted in several states, and is being considered in others this year. It is common sense consumer protection and we urge its favorable report.

Very truly yours,



Bryson Popham

cc: Tom Tucker

Dear Members of the Senate Judicial Proceedings Co

Uploaded by: David Macholz

Position: FWA



Dear Members of the Senate Judicial Proceedings Committee,

Would you board an airplane if its safety systems functioned correctly only 80 percent of the time?

We would never accept that standard in aviation, and we should not accept it for the vehicles carrying Maryland families on our roads. Advanced Driver Assistance Systems are designed to prevent crashes but only when they are calibrated correctly. If SB789 creates a license without verifying technician competence, we risk mistaking paperwork for public safety.

I am here today as an industry expert in automotive technician education and credentialing. I am also Founder and President of the International Advanced Vehicle Technology Education and Credentialing Coalition, AVTECC.

The central question before you today is not whether to license. It is how to ensure that a license actually means something.

Today, there are no minimum qualifications to enter the automotive field. Legacy industry certification programs rely on multiple-choice exams that test knowledge, but do not verify hands-on performance. Yet ADAS calibration is a precision task that must be performed correctly 100% of the time.

AVTECC administers an independent, third-party, performance-based ADAS certification. Our standards are built through national industry consensus. To pass our certification exam, technicians must demonstrate actual proficiency with 100% accuracy, not just theoretical understanding. Our model can also be delivered remotely, reducing administrative burden while maintaining rigor.

If Maryland proceeds with SB789, AVTECC can serve as an independent validator, provide industry-developed standards, verify performance-based technical skill, and support a defensible licensing framework without building one from scratch.

If the goal of this legislation is public safety, then competence must be the standard.

Thank you for your leadership and your consideration of SB789.

Sincerely,

David Macholz

President / CEO

david.macholz@avtecc.org



How AVTECC Can Assist:

Should Maryland move forward with a technician licensing framework under SB789, AVTECC could serve as an industry validator to support the appropriate regulatory authority.

AVTECC could serve in the following roles:

- Provide validated, industry-developed occupational standards
- Verify performance-based competency
- Support credential alignment with employer demand
- Offer independent validation of qualifications for licensure consideration and act as a clearinghouse to remove the administrative burden from the office responsible for granting technician and shop licenses.

By leveraging an existing, nationally recognized performance certification infrastructure, Maryland could establish a rigorous, defensible, and efficiently implemented licensing program without constructing standards and validation systems from the ground up.

About David Macholz:

David Macholz is an industry expert in automotive technician standards, certification, and workforce development. As an ECMC Foundation Post Secondary CTE Fellow and doctoral student at Old Dominion University, his research centers on automotive certification and credentialing. He is the Founder and President of AVTECC, where he leads national efforts to establish validated, industry-driven standards for advanced vehicle technology professionals.

About AVTECC:

The International Advanced Vehicle Technology Education and Credentialing Coalition (AVTECC) is a 501(c)(3) nonprofit organization dedicated to elevating the professional standards of the automotive and transportation workforce. AVTECC develops industry-aligned technical standards, education program accreditation, **and** performance-based certification to validate real-world skills for technicians working with advanced vehicle technologies, including electric vehicles and advanced driver assistance systems (ADAS). AVTECC's certification model is built on job task analysis and industry consensus to ensure technicians demonstrate hands-on competence, not just theoretical knowledge. AVTECC works with educators, employers, and industry partners nationwide to strengthen workforce readiness, support student success, and increase public confidence in the technicians who maintain and repair today's complex vehicles.

SB 789_MAMIC_FWA.pdf

Uploaded by: Sarah Joan Smith

Position: FWA



191 Main Street, Suite 310 – Annapolis MD 21401 – 410-268-6871

March 2, 2026

The Honorable William C. Smith, Jr., Chairman
Senate Judicial Proceedings Committee
2 East Miller Senate Office Building
Annapolis, MD 21401

RE: Senate Bill 789 - *Vehicle Laws - Automotive Repair Facilities - Advanced Driver Assistance Systems*
FAVORABLE WITH AMENDMENTS

Dear Chairman Smith and Members of the Committee,

On behalf of the Maryland Association of Mutual Insurance Companies (MAMIC), we wish to support Senate Bill 789.

As you may recall, MAMIC is comprised of 12 mutual insurance companies that are headquartered in Maryland and neighboring states. Approximately one-half of our members are domiciled in Maryland and are key contributors and employers in our local communities. Together, MAMIC members offer a wide variety of insurance products and services and provide coverage for thousands of Maryland citizens.

Senate Bill 789 is the third installment of Maryland legislation in recent years that has addressed necessary consumer protections related to the replacement of safety glass that includes elements of ADAS (advance driver assistance systems). As amended, this bill imposes certain disclosure requirements on repair facilities that may undertake repairs on vehicles equipped with ADAS. The amendments to the bill are taken from national model legislation drafted by the National Conference of Insurance Legislators (NCOIL). It has been adopted in several states and is under consideration in several others.

Senate Bill 789 is common sense consumer protection that reflects the needs of consumers as technology continues to evolve.

For these reasons, we respectfully ask for a favorable report on Senate Bill 789, as amended.

Thank you for your consideration.

Very truly yours,

Melissa Shelley
President – MAMIC

cc: Bryson Popham

SB789 WMABA Opposition Letter.pdf

Uploaded by: Jordan Hendler

Position: UNF



Washington Metropolitan Auto Body Association

Representing Maryland Collision Repairers and the Customers they serve.

WMABA OPPOSITION TO SB789:

Why the State Cannot Regulate What It Does Not Understand

While we believe this is a well-intentioned effort, the reality is that SB 789 is proposing to regulate a highly specialized, rapidly evolving technological field without the technical infrastructure, expert staffing, or budget to do so effectively.

By passing this bill, the government is assuming a "duty of care" it cannot fulfill, creating a dangerous and expensive disconnect between the law and the workshop floor.

1. The Fallacy of the "Instant Expert" Regulator

For the Motor Vehicle Administration (MVA) to license a technician or repair facility for ADAS (Advanced Driver Assistance Systems) recalibration, the MVA must first be an expert in ADAS.

- The Argument: There is currently no "Department of Auto Collision Repair or Calibration" within the MVA. To properly enforce Section 15-1103 (Technician Licensure), the state would need to hire Master Technicians away from the private sector—at salaries the state likely cannot match—to develop and grade licensing protocols.
- **The Point: If the state cannot provide an expert to oversee the experts, the license becomes a meaningless "rubber stamp" that adds cost to the shop without adding any actual safety verification for the consumer.**

2. The Speed of Technology vs. The Slowness of Bureaucracy

Modern vehicle technology changes every six months, or less. New sensor arrays, LIDAR systems, and camera elements are introduced with every new model year.

- The Argument: State regulations are notoriously slow to update. By the time a state agency drafts a regulation regarding a specific calibration "tool" or "environment" (Section 15-1104), that technology may already be obsolete.
- **The Point: Government oversight will inevitably be 2–3 years behind the OEMs.** By mandating that shops follow specific state-regulated "standards," the government may be preventing shops from using the newest, safest, and most accurate repair methods simply because those methods haven't been "approved" by the MVA board yet.

3. The Unfunded Mandate of "Heavy Oversight"

To ensure compliance with "controlled environments" and "OEM-specified tools," the state would need to conduct physical inspections of every collision center in Maryland.

- The Argument: Effective oversight requires more than a clerk checking a box; it requires an inspector who understands floor-leveling tolerances, ambient lighting interference, and target-distance mathematics.
- **The Point: Unless the state is prepared to hire a fleet of high-tech "Calibration Inspectors" to roam the state, the law is unenforceable.** If the state *does* hire them, the licensing fees and fines imposed on shops will have to be astronomical to fund this new wing of government, which will directly result in higher repair bills for Maryland drivers.

4. The "Blind Leading the Blind" Liability

The bill grants the power to penalize a shop \$5,000 for a violation of technical standards.

- The Argument: When a government agency without technical expertise adjudicates a technical dispute, it is a violation of due process. How can an MVA administrative judge decide if a "static calibration" was performed correctly on a 2026 electric vehicle if the judge has never seen the car's proprietary software?
- **The Point: This bill puts the "power of the sword" in the hands of bureaucrats who don't know the difference between a radar sensor and a parking sensor.** It creates a "guilty until proven innocent" environment where shops are at the mercy of non-expert oversight.

Conclusion for Legislators:

The State of Maryland is not a car manufacturer, nor is it a collision repair facility. By passing SB 789, the government is pretending to be an expert in a field where it has zero technical staff and zero technical infrastructure.

This legislation doesn't create safety; it creates a **regulatory facade** that will be managed by clerks, funded by struggling small businesses, and ultimately failed by the rapid pace of automotive innovation. **You cannot regulate what you do not understand.**

Submitted by:

Jordan Hendler, Executive Director
Washington Metropolitan Auto Body Association
P: 804-396-0195
E: jordanhendler@wmaba.com

Testimony SB789 auto repai.pdf

Uploaded by: Kirk McCauley

Position: UNF



WMDA/CAR Service Station
and Automotive Repair Association

Chair: William C. Smith Jr. and Member of Judiciary Proceedings Committee

RE: SB789 - Vehicle Laws – Automotive Repair Facilities – Advanced Driver Assistance Systems

Position: Oppose

My name is Kirk McCauley, my employer is WMDA/CAR, we represent service stations, convenience stores, and repair facilities across the state as a non-profit trade group established in 1937.

SB789 would have the state become involved in automotive repair and glass replacement. This looks like a bill driven by manufacturers/dealerships to drive repair business back to their facilities at the expense of independent repair facilities and consumers.

There are many complicated systems in vehicles and independent repair shops have been keeping up with them. Consumers make their choices of where to get service and repairs and save money and time by having those choices.

WMDA/CAR asks for unfavorable vote on SB789.

Kirk McCauley, 301-775-0221 or kmccauley@wmdacar.com

SB 789 APCIA JPR ADV Driver Ass 030426 UNF FINAL

Uploaded by: Nancy Egan

Position: UNF



Testimony of

American Property Casualty Insurance Association (APCIA)

Senate Judiciary Proceedings Committee

Senate Bill 789 - Vehicle Laws--Automotive Repair Facilities--Advanced Driver Assistance Systems

March 4, 2026

Unfavorable

The American Property Casualty Insurance Association (APCIA) is a national trade organization whose members write approximately 67.4% of the personal auto insurance market and 81.5% of the commercial auto policies in Maryland. APCIA supports consumer safety and agrees that repairs, diagnostics, scans, and calibrations should follow a validated and reliable standard to ensure vehicles are returned to safe operating conditions.

However, SB 789 goes beyond what is necessary for safety by requiring the use of any OEM recommendations, including those that are not technical in nature, or simply self-serving recommendations to use only the OEM's parts, or repair facilities. The processes in the bill would also be ripe for abuse by some repair facilities and serve only to drive up repair costs. APCIA opposes the legislation as counter to the interests of consumers who are worried about affordability.

Our concerns are explained in more detail below:

1. Recommended vs. Required Procedures

The bill treats all OEM recommendations and position statements as something they often are not. Many OEM recommendations reflect broad, risk-averse preferences rather than what is technically required to safely restore vehicle function. At worst, some OEM repair guidance are simply designed to sell its own parts or repair services from affiliated repair facilities.

2. Mandatory Coverage for All OEM Recommendations

SB 789 prohibits insurers from questioning or evaluating the necessity of guidance in OEM repair documents. This removes the ability to distinguish between essential safety requirements and optional recommendations, which may increase costs without improving safety outcomes.

3. Restrictions on Safe, Industry-Accepted Alternatives

The bill limits the use of proven, industry-recognized repair methods that safely restore vehicles to pre-loss condition when those methods differ from OEM guidance. This reduces flexibility and may discourage the use of cost-effective, safe alternatives widely accepted across the repair industry.

4. Unclear Standards for Recalibrations and Diagnostics

OEM documents often call for scans and recalibrations beyond what is technically required for proper system operation. The bill does not differentiate between technical and non-technical guidance, creating ambiguity around what is genuinely necessary for safe ADAS performance.

5. Cost Increases from OEM-Only Tools and Processes

Mandating adherence to OEM-specific procedures may significantly increase repair costs due to the need for proprietary tools, specialized equipment, subscription-based access, and environmental requirements. Many safe repairs can be performed using recognized non-OEM methods that do not require these additional expenses.

6. Liability and Compliance Exposure

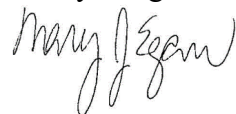
The bill categorizes deviations from OEM recommendations as unfair or deceptive trade practices. This creates substantial regulatory and legal risk, particularly when OEM documents themselves may not clearly distinguish between technical and non-technical guidance.

7. Lack of Cost-Control Safeguards

The bill imposes extensive obligations on insurers but includes no mechanism to ensure repair charges, labor times, diagnostic fees, and calibration costs remain reasonable. Without guardrails, consumers may face higher premiums and increased out-of-pocket expenses.

For these reasons, APCIA urges the Committee to provide an unfavorable report on Senate Bill 789.

Nancy J. Egan



State Government Relations Counsel, DC, DE, MD, VA, WV

Nancy.egan@APCIA.org

Cell: 443-841-4174

SB0789 - LOI - MVA - Vehicle Laws - Automotive Rep

Uploaded by: Patricia Westervelt

Position: INFO

March 4, 2026

The Honorable William C. Smith, Jr.
Chair, Senate Judicial Proceedings
2 East Miller Senate Office Building
Annapolis, MD 21401

***RE: Letter of Information – Senate Bill 789 – Vehicle Laws – Automotive Repair Facilities
– Advanced Driver Assistance Systems***

Dear Chair Smith and Committee Members:

The Maryland Department of Transportation (MDOT) takes no position on Senate Bill 789 but offers the following information for the Committee’s consideration.

SB 789 would require the Maryland Motor Vehicle Administration (MVA) to license and regulate automotive repair facilities in Maryland that perform any action which would impact advanced driver assistance systems (ADAS). The MVA would further have to license any technicians employed by repair facilities that perform the work affecting any ADAS on vehicles. The MVA anticipates that this bill will have a significant impact on the auto repair industry, auto dealers, consumer advocates, insurance companies, and State agencies.

The MVA is keenly aware of the safety benefits of increasing ADAS in vehicles, and the importance of making certain that all safety components of the vehicle operate properly in concert. For example, a misaligned bumper could prevent a vehicle’s Automatic Emergency Braking systems from properly stopping a vehicle.

In 2023, the legislature enacted certain standards for auto glass repair for vehicles with ADAS. The MVA established extensive regulations that set standards for the types of glass, types of bonding, installation process standards, parts utilized, continuing education, and more (COMAR 11.13.12.00 - .09) following the legislation being signed into law. These regulations are currently enforced through the filings of consumer complaints with the Office of the Attorney General Consumer Protection Division and through civil litigation.

SB 789 would require these glass shops and their repair technicians to obtain a formal license from the MVA. The bill would further require all repair shops and technicians doing any repair that could affect ADAS equipment to receive the same license. The MVA anticipates that this would include most repair shops and franchise dealerships in the State. Many of these locations are already separately licensed by the Maryland State Police Automotive Safety Enforcement Division in order to provide Maryland Safety Inspections, potentially subjecting these facilities to dual authorities.

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The MVA recognizes that ensuring proper calibration of ADAS is an increasingly important safety consideration. How to properly fit this into the existing State regulatory scheme is an important topic of discussion that deserves proper consideration and study. The MVA would welcome working on this issue over the interim to bring all stakeholders together to examine the topic that covers such a significant scope of impact. Stakeholders include automotive repair facilities, dealerships, insurance companies, consumer advocates, vehicle manufacturers, and the Maryland State Police. The MVA has communicated this with the bill sponsor and will continue to communicate with their office on this important issue.

The Maryland Department of Transportation respectfully requests the committee consider this information during its deliberation of Senate Bill 789.

Respectfully submitted,

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