

**Direct Reply To:** Robert L. Redding, Jr., Washington Representative  
313 Massachusetts Avenue, N.E., Washington, D.C. 20002, (202) 543-1440, Fax (202) 543-4575

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## AUTOMOTIVE SERVICE ASSOCIATION

Street Address: 1901 Airport Freeway, Bedford, Texas 76021-5732  
Mailing Address: P.O. Box 929, Bedford, Texas, 76095-0929, (800) 272-7467, Fax (817) 685-0225  
E-mail: [asainfo@asashop.org](mailto:asainfo@asashop.org) • Internet: <http://www.asashop.org>



March 4, 2010

The Honorable Ruth Teichman  
Chair  
NCOIL Property-Casualty Committee  
385 Jordan Road  
Troy, New York 12180

Dear Senator Teichman:

The Automotive Service Association (ASA) appreciates the opportunity to comment on Section 6, Choice of Repair Facility, of the Proposed Model Act Regarding Motor Vehicle Crash Parts and Repair. ASA opposes the Model Parts Act and has submitted a written statement outlining problems with other provisions in the proposed Act. The following comments are limited to Section 6 only.

ASA is the largest not-for-profit trade association of its kind dedicated to and governed by independent automotive service and repair professionals. ASA serves an international membership base that includes numerous affiliate, state and chapter groups from both the mechanical and collision repair segments of the automotive service industry.

Section 6 (A) should be revised to limit insurer referrals once the insured has made a decision as to a specific repair facility. At the time the insured makes a repair facility selection, the insurer should refrain from interfering with the insured's selection. ASA supports state licensing of repair facilities which would help assure that the repair facility chosen has the proper equipment and staff training to make the repair in a manner that protects the consumer.

Several states are represented on the Committee that have shop licensing programs in their states including Ohio and Florida. Ohio's collision shop licensing program is one of the best in the nation. These programs help assure that consumers will be protected in the repair process. The U.S. Environmental Protection Agency has a new auto refinishing regulation that will apply to all collision repair facilities in 2011. The EPA regulation requires collision repair facilities to have proper equipment and training.

Section 6 (B) should be deleted.

ASA opposes the Proposed Model Act Regarding Motor Vehicle Crash Parts and Repair.

Please contact me if you have further questions.

Sincerely,

A handwritten signature in black ink that reads "Robert L. Redding, Jr." with a stylized flourish at the end.

Robert L. Redding, Jr.