

Documents for the Record
Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade Hearing
January 13, 2026

Submitted by the Majority

1. U.S. Chamber of Commerce support letter for SELF Drive Act to Chairman Bilirakis and Ranking Member Pallone.
2. American Association of Motor Vehicle Administration support letter for modernizing VIN System to Chairman Guthrie.
3. Association for Uncrewed Vehicle Systems International (AUVSI) support letter for SELF Drive Act to Chairman Bilirakis and Ranking Member Schakowsky.
4. Autonomous Vehicle Industry Association letter in support of SELF Drive Act to Chairman Guthrie and Ranking Member Pallone.
5. Letter from undersigned manufacturers, suppliers, dealers, collision and mechanical repair professionals, and technology innovators in opposition to the REPAIR Act to Chairmen Guthrie and Bilirakis and Ranking Members Pallone and Schakowsky.
6. Collection of letters from auto repair shop owners to Members of Congress, submitted by Representative Harshbarger.
7. Letter from Seth D. Greenstein regarding the REPAIR Act and IP Law, submitted by Representative Harshbarger.
8. Letter from John Bozella, President and CEO of the Alliance for Automotive Innovation, to Administrator Morrison on a federal motor vehicle safety standard for advanced driver assistance system technologies.
9. Letter from the North American Vehicle Rescue Association on emergency response to electric and hybrid vehicle fires to Members of Congress, submitted by Chairman Bilirakis.
10. Letter from ABATE of Wisconsin in support of H.R. 3385 to Chairman Bilirakis.
11. Statement for the Record from American Vehicle Owners Association in support of H.R. 6687, submitted by Representative Harshbarger.
12. Letter from Edgar Chaves Jr, Owner of Britland Auto Body, in support of the SAFE Repair Act, to Representative Kean, submitted by Representative Kean.
13. Statement for the record from MEMA the Vehicle Suppliers Association.
14. Letter from MEMA the Vehicle Suppliers Association in support of vehicle supplier testing or evaluation parity to Chairman Guthrie.
15. Fact sheet from the Motorcycle Industry Council on the economic impact of the powersports industry.
16. Letter from the Motorcycle Riders Foundation in support of H.R. 3385 to Chairman Bilirakis.
17. Letter from NAFA Fleet Management Association to Chairman Bilirakis and Ranking Member Schakowsky.
18. Letter from the National Automotive Service Task Force in support of the right to repair to Chairman Bilirakis and Ranking Member Schakowsky.
19. Letter from the Motorcycle Industry Council in opposition to H.R. 3385 to Chairman Guthrie.
20. Statement from MEMA, the Vehicle Suppliers Association, and the National Consumers League on testing and evaluation parity for vehicle suppliers.
21. Letter from undersigned organizations in support of H.R. 5221 to Chairman Bilirakis and Ranking Member Schakowsky.

22. Letter from the Recycled Materials Association to Chairmen Guthrie and Bilirakis and Ranking Members Pallone and Schakowsky.
23. Fact sheet from the Autonomous Vehicle Industry Association on the SELF DRIVE Act.
24. Letter from the Specialty Equipment Market Association in support of H.R. 6688 to Chairman Bilirakis and Ranking Member Schakowsky, submitted by Representative Harshbarger.
25. Letter from the Transport Workers Union of America in support of the SELF DRIVE Act to Chairmen Guthrie and Bilirakis and Ranking Members Pallone and Schakowsky.
26. Letter from undersigned organizations in support of the SELF DRIVE Act to Chairmen Guthrie and Bilirakis and Ranking Members Pallone and Schakowsky.
27. Letter from United Spinal Association in support of automated wheelchair securement to Chairmen Guthrie and Bilirakis and Ranking Members Pallone and Schakowsky.

Submitted by the Minority

1. Statement from International Brotherhood of Teamsters (Jan. 12, 2026)
2. Letter to Chair Bilirakis and Ranking Member Schakowsky from Advocates for Highway & Auto Safety (Jan. 12, 2026)
3. Letter to Chair Guthrie and Ranking Member Pallone from Autonomous Vehicle Industry Association (Jan. 12, 2026)
4. Letter to Chair Bilirakis and Ranking Member Schakowsky from various safety organizations re: SELF DRIVE Act (Jan. 12, 2026)
5. Letter to Chair Bilirakis and Ranking Member Schakowsky from Chamber of Progress (Jan. 13, 2026)
6. Letter to Chair Guthrie, Ranking Member Pallone, Chair Bilirakis, and Ranking Member Schakowsky from various safety organizations in opposition to H.R. 1566 (Jan. 12, 2026)
7. Letter to subcommittee members from Cory Donenfeld (Jan. 9, 2026)
8. Letter to Chair Bilirakis and Ranking Member Schakowsky from Consumer Reports (Jan. 13, 2026)
9. Letter to Chair Guthrie, Ranking Member Pallone, Chair Cruz and Ranking Member Cantwell from Consortium for Constituents with Disabilities (Dec. 23, 2025)
10. Letter to Chair Guthrie, Ranking Member Pallone from Consortium for Constituents with Disabilities (Jan. 13, 2025)
11. Letter to Administrator Morrison from Alliance for Automotive Innovation (Jan. 9, 2025)
12. Letter to Chair Bilirakis and Ranking Member Schakowsky from various safety organizations including Advocates for Highway and Auto Safety re: SELF DRIVE Act (Jan. 12, 2026)
13. Letter to Chair Bilirakis and Ranking Member Schakowsky from various insurance organizations (Jan. 12, 2026)
14. Letter to Ranking Member Pallone from the New Jersey Coalition of Automotive Retailers (Jan. 13, 2026)
15. Statement from MEMA. The Vehicle Suppliers Association (Jan. 13, 2026)
16. Fact sheet on the powersports industry from Motorcycle Industry Council (2025)
17. Letter to Chair Bilirakis from the Motorcycle Riders Foundation (Jan. 12, 2026)
18. Statement from the National Automobile Dealers Association on the REPAIR Act (Nov. 13, 2025)

19. Fact sheet from National Automobile Dealers Association on the REPAIR Act (Oct. 17, 2025)
20. Fact sheet from National Automobile Dealers Association on the H.R. 5221 (Sept. 10, 2025)
21. Letter from National Automobile Dealers Association (Nov. 8, 2025)
22. Letter to Chair Bilirakis and Ranking Member Schakowsky from NAFA Fleet Management Association (Jan. 12, 2026)
23. Letter to Chair Bilirakis and Ranking Member Schakowsky from National Automotive Service Task Force
24. Statement from National Safety Council
25. Letter to Chair Guthrie, Ranking Member Pallone, Chair Bilirakis and Ranking Member Schakowsky from National Consumers League (Jan. 13, 2026)
26. Letter from New Jersey State AFL-CIO (Oct. 30, 2025)
27. Letter to Chair Guthrie and Ranking Member Pallone from the National League of Cities (Jan. 12, 2026)
28. Letter to Ranking Member Schakowsky from various motorcycle associations (Jan. 11, 2026)
29. Statement from MEMA. The Vehicle Suppliers Association and the National Consumers League
30. Letter to Rep. Latta from the International Union of Police Associations (Jan. 9, 2026)
31. Letter to Chair Guthrie, Ranking Member Pallone, Chair Bilirakis and Ranking Member Schakowsky from the Recycled Materials Association (Jan. 12, 2026)
32. Letter to Chair Bilirakis and Ranking Member Schakowsky from various safety organizations (Jan. 12, 2026)
33. Fact sheet from Autonomous Vehicle Industry Association re: SELF DRIVE Act
34. Letter to Chair Bilirakis and Ranking Member Schakowsky from Specialty Equipment Market Association re: H.R. 6688 (Jan. 12, 2026)
35. Letter to Chair Guthrie, Ranking Member Pallone, Chair Bilirakis and Ranking Member Schakowsky from the Society of Collision Repair Specialists (Jan. 12, 2026)
36. Letter to Chair Bilirakis and Ranking Member Schakowsky from the Transport Workers Union of America, AFL-CIO (Jan. 8, 2026)
37. Letter to Chair Guthrie, Ranking Member Pallone, Chair Bilirakis and Ranking Member Schakowsky from various manufacturing associations (Jan. 12, 2026)
38. Letter to Chair Bilirakis and Ranking Member Schakowsky from family members of automotive-related incident victims (Jan. 12, 2026)



January 13, 2026

The Honorable Gus Bilirakis
Chairman
Subcommittee on Commerce,
Manufacturing, and Trade
U.S. House of Representatives
Washington, DC 20515

The Honorable Jan Schakowsky
Ranking Member
Subcommittee on Commerce,
Manufacturing, and Trade
U.S. House of Representatives
Washington, DC 20515

Re: Letter for the Record: Hearing titled “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership.”

Dear Chairman Bilirakis and Ranking Member Schakowsky:

The U.S. Chamber of Commerce (“Chamber”) strongly supports the SELF DRIVE Act discussion draft announced by Representatives Bob Latta and Debbie Dingell. Their proposal would clarify the federal role in regulating autonomous vehicle (“AV”) technologies, prevent a patchwork of state regulations by clarifying federal, state, and local responsibilities, and require the Department of Transportation to complete crucial rulemakings related to the design and safety of autonomous vehicle technologies in the United States.

Autonomous vehicle technology presents tremendous opportunities for consumers, businesses, and the U.S. economy by enhancing road safety. A recent study by the U.S. Chamber found that the widespread and safe deployment of passenger AVs could prevent 1,442,000 accidents and 12,000 fatalities annually, resulting in \$94 billion in savings.¹ Additionally, AVs would significantly improve mobility for persons with disabilities, elderly Americans, and nondrivers, providing them with better access to jobs, income, and medical care.²

However, regulatory barriers currently impede the development and deployment of autonomous vehicles, creating uncertainty for the private sector. At present, thirty-four states have enacted AV-related laws, resulting in a patchwork of regulations that could limit widespread deployment, compromise

¹ Robert Shapiro & Isaac Yoder, *Innovation Highway: Unlocking the Social and Economic Benefits of Autonomous Vehicles 5* (2023), https://www.uschamber.com/assets/documents/CTEC_InnovationHighwayReport_July23.pdf.

² *Id.*

safety, and erode public trust.³ The SELF DRIVE Act is a crucial step toward preventing this regulatory fragmentation and unlocking the potential of AVs in a safe and innovation-friendly manner.

The SELF DRIVE Act is crucial to ensuring the United States retains its global leadership in autonomous vehicles (AVs) amid growing competition from the People's Republic of China. While U.S. companies are making notable advancements, China currently leads in key metrics such as vehicle miles traveled, cumulative rides, cumulative truckloads, and the number of AVs in operation.⁴ With a clear determination to surpass the U.S. as the global leader, China is aggressively focusing on AV investment, deployment, and scaling. Implementing a robust federal AV framework will empower American companies and technologies to compete effectively and thrive on the global stage.

The Chamber appreciates the Committee's consideration of this transformative bill. We look forward to continued collaboration with Representatives Latta and Dingell, the Committee, and Congress to unlock the full potential of autonomous vehicles (AVs), ensure their safe and routine deployment, and solidify American leadership in this strategic industry.

Sincerely,

A handwritten signature in black ink, reading "Jordan Crenshaw". The signature is fluid and cursive, with the first name "Jordan" being more prominent than the last name "Crenshaw".

Jordan Crenshaw
Senior Vice President
Chamber Technology Engagement Center
U.S. Chamber of Commerce

³ Gregory C. Maddaleni, Autonomous Vehicle Statutes and Regulations Across the 50 States, BAKER DONELSON (Sept. 20, 2024), <https://www.bakerdonelson.com/autonomous-vehicle-statutes-and-regulations-across-the-50-states>.

⁴ Egil Juliussen, AV Status: U.S. vs. China vs. Europe, EE TIMES EUROPE (Oct. 22, 2024), <https://www.eetimes.eu/avstatus-u-s-vs-china-vs-europe/>.



January 6, 2026

The Honorable Brett Guthrie
Chairman
Committee on Energy and Commerce
United States House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Guthrie:

The American Association of Motor Vehicle Administrators (AAMVA) writes to express strong support for legislation modernizing the Vehicle Identification Number (VIN) system under consideration by your committee. This initiative addresses a critical gap in our ability to identify and regulate modern vehicles.

The existing 17-character VIN system was designed for a fundamentally different automotive landscape. Today's vehicles feature electric and hybrid propulsion, advanced driver assistance technologies, over-the-air software updates, vehicle-to-everything connectivity, and varying levels of automated driving capabilities. Yet our primary vehicle identification system remains largely unchanged, creating significant challenges across multiple domains. VIN modernization impacts public safety, regulatory oversight capabilities, and promotes law enforcement and consumer protections.

First responders require immediate access to accurate information about high-voltage batteries, hydrogen fuel cell systems, and autonomous capabilities to safely approach and intervene in crashes. The current VIN system provides insufficient detail about these critical vehicle safety characteristics both prior to and immediately following a crash. VIN modernization would assist law enforcement and enhance public safety by providing important vehicle details prior to on-scene crash engagement.

VIN modernization would assist the States in effectively identifying vehicle characteristics associated with automation levels, software-defined characteristics, engine or propulsion dynamics and crash investigations. It could potentially also assist automakers with recall effectiveness and compliance verification.

Enhanced VIN information could also assist in combatting sophisticated vehicle theft, fraud, illicit modifications, and promoted consumer protections - particularly as vehicles become software-dependent and capable of post-manufacture capability changes. Consumers also deserve accurate information about vehicle specifications in the used vehicle market.

Electric vehicles are rapidly gaining market share, autonomous driving and driver assistance technology continues to advance, and software-defined vehicles are becoming the norm. These are present realities that our regulatory and identification infrastructure must accommodate. Failure to modernize the VIN system will result in growing gaps between vehicle capabilities and our ability to identify, regulate, and safely manage the vehicle fleet. The proposed study represents a prudent, measured approach that recognizes complexity while creating a clear path toward meaningful improvement.

I thank the Committee and your staff for your leadership on this matter. I would welcome the opportunity to provide any additional information that would be helpful as the committee continues its work.

Sincerely,

A handwritten signature in black ink, reading "Ian M. Grossman". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Ian Grossman
AAMVA President & CEO

IMG/sfb



January 12, 2026

Chairman Gus Bilirakis
Subcommittee on Commerce,
Manufacturing, and Trade
House Committee on Energy and Commerce
U.S. House of Representatives
Washington, DC 20515

Ranking Member Jan Schakowsky
Subcommittee on Commerce,
Manufacturing, and Trade
House Committee on Energy and Commerce
U.S. House of Representatives
Washington, DC 20515

Chairman Bilirakis and Ranking Member Schakowsky,

On behalf of the Association for Uncrewed Vehicle Systems International (AUVSI), we write in strong support of the SELF DRIVE Act introduced by Representative Bob Latta. We commend the Subcommittee for convening the upcoming hearing, “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership.” This hearing, together with the introduction of the SELF DRIVE Act, reflects timely and necessary congressional leadership as policymakers evaluate how best to modernize the nation’s motor vehicle safety framework while preserving innovation, affordability, and global competitiveness.

AUVSI is the world’s largest nonprofit organization dedicated to the advancement of uncrewed systems, autonomy, and robotics. Our membership includes more than 400 companies spanning the full autonomy ecosystem, including developers of automated and autonomous vehicle technologies, software and sensing companies, manufacturers, system integrators, and end users. AUVSI members are actively developing and deploying the next generation of automated driving systems that have the potential to significantly reduce roadway fatalities, improve mobility, and enhance the efficiency and competitiveness of the U.S. transportation system.

The SELF DRIVE Act provides a critically needed federal framework to enable the safe testing and deployment of autonomous vehicles in the United States. The bill would take significant steps to establish clear federal performance and safety standards; while preserving the important role of states in regulating vehicle operation and traffic safety, the bill strikes an appropriate balance that promotes innovation without compromising public safety. By clearly delineating federal and state responsibilities, the legislation reduces regulatory fragmentation and uncertainty that currently slow deployment and investment. This clarity is essential for developers and manufacturers investing in advanced vehicle technologies and for regulators and consumers who benefit from consistent safety expectations nationwide.



Importantly, the SELF DRIVE Act recognizes that automation itself is a safety technology. Advanced driver assistance systems (ADAS) and higher levels of vehicle automation offer significant promise in reducing crashes caused by human error, a leading contributor to roadway fatalities. The bill appropriately treats these technologies not as speculative concepts, but as tools that can measurably reduce risk when deployed responsibly. Moreover, by creating a pathway for broader deployment of these technologies, the legislation enables real-world learning, performance validation, and continuous improvement, which will allow for data-driven safety improvements over time and further enhance safety on America's roadways.

The legislation also plays a vital role in cementing U.S. automotive leadership at a time of intense global competition. Other nations are moving aggressively to establish regulatory environments that attract investment and accelerate deployment of autonomous vehicle technologies. Without a modernized federal framework, the United States risks ceding leadership in this strategically important sector. The SELF DRIVE Act sends a clear signal that the United States intends to lead in the development, commercialization, and manufacturing of automated vehicle technologies, helping ensure that innovation, high-skilled jobs, and associated supply chains remain anchored domestically.

AUVSI urges the Subcommittee to take favorable action on the SELF DRIVE Act and to advance legislation that provides regulatory certainty, prioritizes safety, and enables continued U.S. leadership in automated and autonomous vehicle technologies. As Congress considers next steps, AUVSI stands ready to serve as a resource to the Subcommittee and its Members by providing technical expertise, industry perspectives, and insights from across the autonomy ecosystem.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael Robbins". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Michael Robbins
President & CEO
AUVSI



January 12, 2026

The Honorable Brett Guthrie
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone, Jr.
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Guthrie and Ranking Member Pallone,

On behalf of the Autonomous Vehicle Industry Association (“AVIA”), I am writing to express our strong support for Representatives Bob Latta’s and Debbie Dingell’s *Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution* (“SELF DRIVE”) Act of 2026. AVIA commends Representatives Latta and Dingell for their leadership on this issue and we strongly encourage the Committee to move forward with this important piece of legislation.

As an organization, AVIA is committed to bringing the tremendous safety and mobility benefits of autonomous vehicles (“AVs”) to consumers in a safe, responsible, and expeditious manner. AVIA’s membership is comprised of the world’s leading technology, automotive, ridesharing, trucking, and transportation companies.¹ Vehicles operated by AVIA members have driven more than 145 million autonomous miles on U.S. public roads, a distance roughly equivalent to the average distance between Earth and Mars or driving around the Earth 5,600 times.² This figure is growing every day. AVs will play a pivotal role in addressing critical challenges facing our nation, including by reducing the persistent and unacceptable level of traffic fatalities in our country, increasing transportation access, enhancing supply chain efficiency, reviving our industrial capacity, creating jobs, and expanding economic output. To fully realize these benefits, however, a supportive federal policy framework that helps accelerate the safe deployment of the technology across the country is essential.

The SELF DRIVE Act of 2026 would further this goal by enabling the safe and timely deployment of AV technology nationwide and solidifying the United States as the global leader in this transformative field. American leadership on AVs is being challenged by strategic competitors,

¹ Our members include Amazon, Aurora, AVRS, Avride, Bot Auto, Cavue, Discount Tire, DoorDash, Ford, Gatik, GM, Honda; International, J.D. Power, Kodiak, Lyft, Motional, NGV, Nuro, Plus, Stack, Tier IV, Torc Robotics, TaskUs, Terawatt Infrastructure; Uber, UPS, Volkswagen Group of America, Volvo Cars, Volvo Autonomous Solutions, Waabi, Waymo, and Zoox. See *Our Mission and Members*, AUTONOMOUS VEHICLE INDUS. ASS’N, <https://www.theavindustry.org/about> (last visited January 12, 2026).

² AUTONOMOUS VEHICLE INDUS. ASS’N, STATE OF AV 2025, (May 2025), https://cdn.prod.website-files.com/67ee2ad971d86c70d02ed03f/683802d318db2c77d4ce3d43_2025_StateOfAV_AnnualReport_Web.pdf.

including the People's Republic of China. China is determined to supplant U.S. leadership on AVs and set global technological standards in the future. Congress can support U.S. ingenuity and innovation by passing the SELF DRIVE Act.

The Act would update key regulations and establish statutory programs to support the ongoing development and deployment of AVs by:

- Requiring manufacturers of automated driving systems (“ADS”) and ADS-equipped vehicles to produce an ADS “Safety Case” that provides documented, reviewable safety justifications for their ADS, including set minimum operational competencies, before their systems or vehicles can be sold or deployed in the United States.
- Ensuring the security of AVs by requiring manufacturers to produce a written cybersecurity plan describing how the manufacturer detects, prevents, and responds to cyberattacks, unauthorized intrusions, and malicious vehicle control commands.
- Allowing ADS-dedicated vehicles—which are designed to be operated exclusively by an ADS within specific operational parameters—to be manufactured without traditional human driver controls, while requiring that, when designed to carry an occupant, such vehicles include a means for an occupant to command a vehicle to safely stop and allow them to exit the vehicle. This provision would greatly advance the ability of autonomous vehicle companies to develop accessible vehicles for people with disabilities.
- Establishing a National AV Safety Data Repository to formalize and standardize ADS crash reporting, which would improve access to safety data for federal and state agencies and increase public transparency. The National AV Safety Data Repository would also provide state transportation regulators with a greater understanding of incidents involving autonomous vehicles.
- Modernizing federal law related to vehicle testing and evaluation to accommodate AVs and allow for carefully controlled commercial activity as part of AV testing, while protecting testing exemptions from being misused as a substitute for regulatory compliance at scale.
- Allowing AVs to temporarily deactivate human driver controls during automated operation, without violating existing “make inoperative” restrictions under federal regulations, while preserving the requirement that human controls can be restored if needed. This provision is important to ensure that innovative safety and technical developments can be adopted into vehicles in autonomous operation.

AVIA appreciates in advance the Committee's consideration of this transformative bill. AVIA looks forward to working with Representatives Latta and Dingell, the Committee, and Congress more broadly to ensure the safe and timely deployment of AVs and American leadership in this critical technology.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Jeff Farrah', with a stylized, cursive flourish at the end.

Jeff Farrah, CEO
Autonomous Vehicle Industry Association



January 12, 2026

The Honorable Brett Guthrie
Chairman
Committee on Energy and Commerce
U.S. House of Representatives

The Honorable Frank Pallone
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives

The Honorable Gus M. Bilirakis
Chairman
Subcommittee on Commerce,
Manufacturing, and Trade
U.S. House of Representatives

The Honorable Janice D. Schakowsky
Ranking Member
Subcommittee on Commerce,
Manufacturing, and Trade
U.S. House of Representatives

Dear Chairmen Guthrie and Bilirakis and Ranking Members Pallone and Schakowsky:

Our organizations represent manufacturers, suppliers, dealers, collision and mechanical repair professionals, and technology innovators working together to serve America's drivers. We support

a competitive repair marketplace and share a common goal of ensuring consumers can keep their vehicles safely and affordably maintained. That is exactly why we are united today in strong opposition to H.R. 1566, the “Right to Equitable and Professional Auto Industry Repair” (REPAIR) Act.

The United States already has one of the most open and competitive repair ecosystems in the world. For passenger cars, independent repairers perform 74% of out-of-warranty repairs, and every piece of information needed to diagnose and repair today’s vehicles is available through existing service information tools, scan solutions, and established industry data-sharing programs.

For commercial vehicles, the unique business-to-business relationship between manufacturers and their customers relies on exceptional service repair performance – which may be the most highly competitive aspect of the commercial vehicle industry. As noted in previous federal analyses, the motor vehicle sector has long been recognized as the model for self-regulation to expand repair access and consumer choice.

Unfortunately, the REPAIR Act would not strengthen that system. Instead, it would disrupt it in ways that increase consumer risk, weaken safety protections, expand commercial access to sensitive driver data and expose vehicle systems to cyber vulnerabilities.

Below are our most serious concerns:

1. The bill mandates broad access to full streams of vehicle telematics data, far beyond what is necessary for repair.

Modern vehicles generate vast amounts of sensitive information: location, driving behavior, cabin interactions, biometric indicators, personal contacts, and more. The REPAIR Act would force automakers to make that data remotely accessible to any designated third party, without limiting access to information actually needed to repair a vehicle. The bill also lacks meaningful restrictions on how third parties may use, resell, store or monetize that data, creating major privacy and commercial exploitation risks for millions of drivers.

2. The bill gives insurers and large commercial enterprises new avenues to harvest vehicle data for non-repair purposes.

Despite claims that the legislation is about small repair shops, the entities that stand to gain the most are insurance carriers and big-box retailers whose business models increasingly depend on access to telematics data. Nothing in the bill prevents entities with no role in hands-on repair from using the data to steer consumers, influence claims decisions, adjust premiums, or build profit-driven data products. This is an enormous step beyond “repair,” and it happens with no consumer transparency or meaningful consent expectations.

3. The technical framework contemplated by the REPAIR Act creates significant safety and cybersecurity vulnerabilities.

Federal safety regulators have consistently warned about the dangers of remote interfaces capable of sending commands into critical vehicle systems. The proponents of the REPAIR Act have long advocated for a universal access channel into millions of vehicles, which would generate new attack surfaces for malicious actors, create the possibility of large-scale cyber events, and weaken decades of investment in vehicle safety architecture. The bill opens the door to the government mandating technology that independent experts have said is fundamentally unsafe.

4. The bill attempts to federalize issues far outside right-to-repair and would give the FTC authority to expand access to even more categories of data.

The bill empowers federal regulators to require access to additional data “for additional purposes” even when unrelated to repair. This is not a repair-market policy; it is a sweeping federal mandate for data access without consumer safeguards, guardrails or clarity on downstream use. It also undermines ongoing bipartisan work in Congress on broader national data privacy legislation.

5. The legislation jeopardizes consumer trust in the rapidly evolving connected vehicle ecosystem.

The widespread adoption of advanced safety systems, electrification, connectivity and over-the-air updates depends on the public trusting that their information is secure, and their vehicles cannot be manipulated remotely. Policies that facilitate open access to vehicle operating environments threaten that trust and risk chilling the deployment of life-saving technologies. This puts drivers, technicians and the entire transportation system in a more vulnerable position.

6. The REPAIR Act’s harmful provisions are not limited to passenger vehicles or individual consumers, but would also disrupt the heavy-duty industry.

As drafted, the bill would apply equally to heavy-duty and commercial vehicles, where vehicles are operated by fleets, data is integral to logistics and safety systems, and “automobile” and “consumer” assumptions simply do not apply. These vehicles operate in fundamentally different environments with distinct safety, cybersecurity, and operational considerations

7. The bill ignores existing voluntary solutions that are already working and that respect safety, privacy and security.

The most effective path forward is continued collaboration among manufacturers, dealers, technicians and independent repairers. Today’s vehicles can be repaired safely without granting commercial parties unrestricted access to sensitive driver information.

We all want consumers to have access to safe, fair and high-quality vehicle repair options. But the REPAIR Act does not advance that goal. It introduces major risks to safety and cybersecurity, gives insurers and retailers access to sensitive data they do not need for repair, and undermines consumer privacy at a time when trust in connected technologies has never mattered more.

On behalf of the millions of American workers, consumers and businesses we represent, we respectfully urge the Committee to reject the REPAIR Act and focus instead on policies that strengthen vehicle repair access without compromising privacy, security or safety.

Sincerely,

Alliance for Automotive Innovation
American Truck Dealers
American Automotive Policy Council
American International Automobile Dealers Association
Association of Equipment Manufacturers
Associated Equipment Distributors
Autos Drive America
Equipment Leasing and Finance Association
International Association of Machinists (IAM Union)
National Automobile Dealers Association
National Association of Manufacturers
National Association of Minority Automobile Dealers
Outdoor Power Equipment Institute
Society of Collision Repair Specialists
Truck and Engine Manufacturers Association (EMA)

January 9, 2026

The Honorable
U.S. House of Representatives
Washington, DC 20515

Dear Representatives,

My name is Cory Donenfeld and I am the owner of Northwest Auto Body, a family-owned independent repair facility founded by my father in 1976 in Sandpoint, Ponderay and Bonner Ferry Idaho. Today, I have the privilege of running this small business alongside my Co- owner, serving customers throughout the Northwest, Bonner County, and surrounding communities.”

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family’s safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn’t provide independent auto repair shops like mine with anything we don’t already have to properly fix your vehicle. Frankly, I’m tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being “locked out” by automakers is not true. It’s a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), and

the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,

Cory Donenfeld





The Honorable Brett Guthrie
US House of Representatives
Rayburn Building, Room 2161
Washington, D.C 20515
Dear Representative Guthrie,

My name is Robert McSherry, and I own North Haven Auto Body, Sabo Auto Body, and Woodbridge Auto Body — independent repair facilities that have served Connecticut continuously since 1938, 1947, and 1960. For generations, our businesses have focused on one principle: performing safe, manufacturer-correct repairs using the proper equipment, procedures, and trained professionals.

We invest heavily in OEM tools, training, and repair procedures, all of which are already available directly from vehicle manufacturers. Independent repairers are not “locked out” of the information needed to properly and safely repair vehicles. That claim is simply not true.

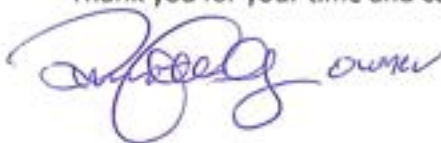
The REPAIR Act does not give shops like mine access to anything we do not already have. Instead, it risks weakening accountability and repair standards while benefiting large insurance interests that profit when consumers are pressured toward lower-cost parts and shortcuts — often at the expense of required repair procedures and vehicle safety.

What small businesses and consumers need is protection from legislation that lowers safety standards, not laws that blur responsibility in the name of convenience or corporate profit.

I urge you to oppose the REPAIR Act and instead support the SAFE Repair Act, developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation. This proposal preserves consumer choice while protecting proper repair standards and public safety.

I would welcome the opportunity to host you at our North Haven facility to demonstrate the investments we have made and the realities our customers face when seeking quality repairs in today's increasingly complex vehicles.

Thank you for your time and consideration.

 1/9/2024



"We meet by Accident"

January 9, 2026

The Honorable Brett Guthrie
U.S. House of Representatives
Rayburn House Office Building, Room 2161
Washington, DC 20515

Dear Representative Guthrie,

Our names are Tony Cavallaro Jr. and Joe Cavallaro, and our family owns and operates Airport Auto Body, a family-owned independent repair facility in Hartford, CT founded by our parents in 1983.

Our mission has always been to perform safe, high-quality repairs using the proper tools, training, and OEM repair procedures. We have invested heavily to ensure we can repair today's complex vehicles correctly, and our customers trust us with their family's safety every time they hand over their keys.

As you familiarize yourself with issues affecting the automotive repair industry, we want to clearly state our position. We strongly oppose the REPAIR Act as currently written and urge you to oppose it as well.

Independent repair shops like ours already have access to the data and tools needed to properly repair vehicles. The claim that we are being "locked out" by automakers is simply not true. That narrative benefits large insurers and corporations that profit by steering repairs toward cheaper alternatives, often at the expense of safety and consumer choice. The truth is that independent repair businesses like ours already have access to all the data and tools we need to safely repair a vehicle.

What small businesses like ours need is protection from policies that blur accountability, erode repair standards, and jeopardize vehicle safety.

We encourage you to support the SAFE Repair Act, developed by the Society of Collision Repair Specialists and the Alliance for Automotive Innovation. This proposal meaningfully addresses real consumer and repairer challenges while preserving safety, accountability, and proper repair standards.

We would welcome the opportunity to host you at our facility to show you firsthand how independent shops have invested in the same equipment and systems used by dealerships. Our customers want their vehicles restored to pre-accident condition using proper procedures, tools, and parts, which is already available to our industry.

Thank you for your time and consideration. We hope we can count on your opposition to the REPAIR Act and your support of the SAFE Repair Act.

Sincerely,

Airport Auto Body
Tony Cavallaro Jr.
Joe Cavallaro

75 Locust Street, Hartford, CT 06114

From: [REDACTED]
Sent: Saturday, January 10, 2026 10:58 AM
To: Falconer, Susan <[REDACTED]>; Stein, Peter <[REDACTED]>
Cc: 'Bristol Dealership' <[REDACTED]>, 'TC Baker' <[REDACTED]>
Subject: ****Upcoming Bills in Energy and Commerce Committee - Tri-Cities Business Owners Concerns About Right to Repair, DRIVES Act Legislation****
Importance: High

Susan and Peter -

We are reaching out as constituents of Congresswoman Harshbarger regarding bills that will be considered in the coming weeks in Washington. My name is John Baker and have included my father, Tim Baker, and my brother, TC Baker, - we own and operate the Wallace Auto Group in Tri-Cities, Tennessee.

We appreciate the Congresswoman's leadership for our region, but we did want to share concerns about 2 bills that may come before the Energy and Commerce Committee.

As background, we are a fourth-generation business and have multiple new car dealerships in Bristol/Kingsport/Johnson City (Wallace Auto Group – representing, Volkswagen, Subaru, Kia, Ford, Nissan, and Mitsubishi) and also have our own independent collision center, which is certified by 25+ OEM's (many of these OEM's we are certified in at our collision center, we do not own a corresponding dealership; for example: Tesla, Porsche, BMW, Jaguar Land Rover, Rivian, and Lucid – which has broadened our scope of business as an independent repairer as well as a dealer). Between our various businesses, we employ over 280 hardworking people in the area. Our experience is unique in that we have both sides of the business. We think our experience makes us experts on specific concerns about two bills that might come before the House Energy and Commerce Committee in the next few weeks.

REPAIR Act:

We are committed to safety for our customers and believe the so-called Right to Repair bill does not actually serve the purpose of helping consumers. We strongly oppose the REPAIR Act as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like our collision center with anything we don't already have to properly fix a car, the issue is that many independent repair facilities are choosing to not purchase access to OEM information such as repair procedures, diagnostic tooling, and other OEM special

tools, and instead are crying wolf by stating they do not have access to the information/tooling equipment as dealers. The idea that independent repairers are being “locked out” by automakers is simply not true and a complete fallacy. We desire to better explain the current independent repairer landscape and set the record straight on what we believe the proposed bill is completely missing the mark in regard to the bill’s proponents of a competitive market. We aim to better educate our lawmakers on this issue before the bill is voted on as if it were to pass as it is currently written, would be a major step in the wrong direction for our business and many others within Tennessee and across the country. Our businesses have continually invested in training, tooling/equipment, and our facilities to perform proper and safe repairs. The passing of this bill as currently written would be a severe detriment to our business, both our dealerships and our independent collision repair facility. The truth is that independent repair businesses like our collision center, already have access to all the data and tools we need to repair today’s complex vehicles safely and properly. The difference is, our independent repair facility has chosen to invest in the tooling, diagnostic equipment, and access to OEM repair information versus the independent repair facilities/companies that are supporting this bill that either have not made a similar investment and/or have spread a false narrative about the marketplace not being competitive due to a complete lie of lack of access to the resources needed to fix complex vehicles.

The REPAIR Act doesn’t provide independent auto repair shops like mine with anything we don’t already have to properly fix your vehicle. Frankly, I’m tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being “locked out” by automakers is not true. It’s a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today’s complex vehicles.

I would welcome the opportunity to host you at our facility, Wallace Collision Center. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we’ve made in our capability and also

examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

DRIVES Act:

Secondly, we appreciate Congressman Harshbarger's effort to stop China from getting our customer data. You are right when you say China is one of the biggest threats to America. However, we have significant concerns that the DRIVES Act goes beyond the China problem - it includes problematic language on how customer data is handled. We believe that the bill would provide data to third parties who will not serve the best interest of the US car owner and instead serve their interests at the expense of the vehicle owner. Specifically, the bill would enable insurance carriers to monopolize consumer choice at the detriment of the consumer and also drastically increase the cost of vehicle ownership, which is already increasing at a historic rate.

We would welcome the opportunity to visit Congresswoman Harshbarger in the district and/or talk on the phone about our concerns. My cell phone is [REDACTED]. We are happy to have you visit our dealerships as well as our collision center to see first-hand some of the issues.

Sincerely,

John Russell Baker
Owner/Manager

Wallace Auto Group:

- Wallace Subaru of Bristol
- Wallace Volkswagen of Bristol
- Wallace Kia of Bristol
- Wallace Subaru of Johnson City
- Wallace Volkswagen of Johnson City
- Wallace Mitsubishi of Johnson City
- Wallace Ford of Kingsport
- Wallace Nissan of Kingsport
- Wallace Mitsubishi of Kingsport
- Wallace Volkswagen of Kingsport
- Wallace Collision Center

Work Phone: [REDACTED]
Mobile Phone: [REDACTED]
Email: [REDACTED]

January 9, 2026

The Honorable Erin Houchin
U.S. House of Representatives
Room 342, Cannon House Office Building
25 Independence Ave SE
Washington, DC 20515

Dear Representative Houchin,

My name is Abbie Ziegler, and I am one of the owners of Enneking Auto Body, Inc, a family-owned independent repair facility in southeastern Indiana. My grandfather started the business in Oldenburg, IN in 1954, my father, uncle, and mother took it over from him, added a second location in Greensburg, IN in 2003, and now my sisters, brother, and I are the third generation to run the company.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facilities have invested in all the tools and training to perform repairs properly, and we utilize the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourself with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where I stand. I strongly **oppose the REPAIR Act** as currently introduced, and I urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like my family's with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – our customers to purchase alternative vehicle parts, rather than the parts our customers want.

The truth is that independent repair businesses like my family's already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which we are a member of, and the Alliance for Automotive Innovation (Auto Innovators). I believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our shop in either Batesville or Greensburg, IN. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs, and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit one of our facilities soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Abbie Ziegler". The signature is written in a cursive, flowing style.

Abbie Ziegler

From: Jerry McNee [REDACTED]
Sent: Thursday, January 8, 2026 4:31 PM
To: [REDACTED]@mail.house.gov
Cc: Mike Anderson [REDACTED], Aaron Schulenburg [REDACTED]
Subject: Oppose the REPAIR Act

January 8, 2026

The Honorable Dan Scharfenberger
U.S. House of Representatives
Room 251, Cannon House
Office Building 25
Independence Ave, SE, Washington, DC 20515-3307

Dear Representative Tom Kean,

My name is Gerald McNee, and I am the owner of Ultimate Collision Repair, a family-owned independent repair facility 1115 US HWY 1, Edison, NJ 08837 founded 1988. Today, I have the privilege of running this small business alongside my children, serving customers throughout Edison NJ, Middlesex County, and surrounding communities.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility anytime in 2026. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a safe, quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act and support the SAFE Repair Act proposal.**

Thank you for your time and consideration.

Sincerely,
Jerry McNee

Sent from Jerry's iPad

January 9th, 2026



The Honorable Kelly Robin
U.S. House of Representatives
2329 Rayburn House Office Building
Washington, DC 20515

Dear Representative Robin,

My name is Beth Seberger, and I am a third-generation repairer in my family's business. I currently serve my second term as President of our state automotive service association here in Illinois, AASPI.

I grew up in this industry. I've watched it evolve from steel and welders to advanced materials, electronics, sensors, and software. Through all of that change, one thing has never changed for my family or my shop: our responsibility to protect the people who trust us with their vehicles and their safety.

Our facility has invested heavily in the training, equipment, and OEM-provided repair information required to properly repair today's complex vehicles. We follow manufacturer procedures because modern vehicles demand it — and because our customers expect their cars to be returned to pre-accident condition, not "close enough." These are the vehicles that carry families, teens, and first responders, and we take that responsibility seriously.

In Illinois, I am actively engaged in legislative work focused on consumer protection — specifically, ensuring that vehicle owners are entitled to a fair, transparent evaluation of their vehicles and their insurance claims. This work is not about increasing costs or creating barriers; it is about fairness, accountability, and making sure consumers are not disadvantaged during one of the most stressful events they experience as vehicle owners. This perspective directly informs how I view federal policy proposals impacting this industry.

I understand that you are working to familiarize yourself with key issues affecting the automotive service and repair industry. As someone who is directly impacted by these policies every day, I want to be clear about where we stand. On behalf of our association and the independent repairers we represent, we strongly oppose the REPAIR Act as it is currently introduced, and we respectfully urge you to oppose it as well.

Despite what has been suggested by its supporters, the REPAIR Act does not provide independent repair shops like mine with access to information or tools we do not already have. The narrative that independent repairers are “locked out” by automakers does not reflect the reality of how professional collision repair facilities operate today.

What the REPAIR Act *does* is blur accountability, weaken repair standards, and create pathways that benefit large corporate interests, particularly insurance companies at the expense of consumers. In practice, these pressures often result in consumers being steered toward alternative or lower-quality parts and repairs that do not meet manufacturer requirements, all in the name of cost savings.

Independent repair businesses like mine do not need shortcuts. What we need is protection. Protection for consumers, safety, and repair standards that reflect the complexity of modern vehicles.

That is why we ask that you instead review and support the SAFE Repair Act, an alternative framework developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation (Auto Innovators). We believe this proposal more accurately addresses the real challenges facing consumers and small businesses, while preserving access to the information, tools, training, and equipment necessary to perform repairs safely and correctly.

I would welcome the opportunity to host you at our facility in New Lenox, IL. I would be proud to show you firsthand how an independent shop invests in the same systems, equipment, and repair information available to dealerships — and to share real-world examples of the pressures consumers face when trying to choose safe, proper repairs.

At the end of the day, our customers want one thing: their vehicles to be restored properly and safely, using correct repair procedures, proper tools, and the parts they choose. The SAFE Repair Act supports that goal. It protects consumer choice and supports repairers who refuse to cut corners, even when doing the right thing is harder.

Thank you for your time and consideration. I hope we can count on your support for policies that truly protect consumers and roadway safety, and I look forward to continuing this conversation.

Sincerely,

Beth Seberger

Proud President

AASPI

Probst Collision, LLC.

Opposition to the REPAIR Act and Support for the SAFE Repair Act

January 9, 2026

The Honorable Kevin Mullin
U.S. House of Representatives
Room 1404 Longworth House Office Building
Washington, DC 20515

Dear Representative Mullin,

My name is Todd Hesford, and I am the owner of MVAC Inc, a family-owned pair of collision centers in South Orange County. You may not know us as you do not represent our district but you are in our state. My mother, who passed away in 2025, founded our business back in 1983. Our team has taken over and grown it over the years into two trust worthy, and quality minded, family oriented collision centers. We are a well known reliable name in our communities.

Our focus has remained the same for over 40 years. Provide safe and proper repairs that are in accordance with and follow OEM guidance. Basically that means, fix the car the way we would for our own family. I think we can all agree that modern vehicle technology is not slowing down. Likewise, our resolve to continually invest in proper training, equipment and tooling to repair these vehicles does not slow down. Our clients are expecting us to deliver on this commitment to safe and proper repairs. We deliver on this promise regularly by accessing and utilizing the repair information that is provided to us from the OEM.

I give the House of Representatives a lot of credit, you are asked to review a lot of issues and legislation. Some of which may be completely foreign to you, and then, you make what you think is a good decision for the country. As a small business owner, I do not have a major voice when it comes to these things. But I felt compelled to speak up on the REPAIR Act, as I strongly oppose it. It will have major negative impacts throughout our collision industry. I urge you to oppose it also.

The REPAIR Act in its current form, does absolutely nothing for collision repair centers such as ours, that we do not already have access to. Honestly, I am beyond disappointed with the individuals and organizations who are claiming to “Speak up” on behalf of businesses such as ours.

The claim that the authors of the REPAIR Act are making is that we, the collective service and collision industry do not have access to or are being locked out of

- The correct tools
- The correct education
- Or the correct parts

All of this is an absolute fraud, made up in lies and misdirection. This is promoted by insurance companies, and large corporations who will profit from the same insurance companies that will direct where and how a car is repaired. Often times pressuring the consumer to accept it or they will be left on their own to pay for the repair.

The truth is that for decades now, businesses like mine have had access to all of these things. We as upstanding businesses have to make a choice to actively train and purchase the correct tools or parts. We do not need more legislation on this, we need better policy protection from the bad actors and the likes of the authors of the REPAIR Act. Something that instills consistent accountability and does not leave the safety of our customer in jeopardy in exchange for a better financial bottom line.

I would offer as an alternative that you review and support SAFE Repair Act as opposing legislation. This has been developed by the Alliance for Automotive Innovation, along with the Society of Collision Repair Specialists (SCRS), of which I am a board member. Their proposal addresses the real challenges facing consumers and small repair businesses while preserving safety, accountability, and access to the information, tools, equipment, and training required to repair modern vehicles properly.

If you or your counterparts have the time, we would proudly welcome you here in Orange County to show you how we have and continue to invest in all of the things laid out in this letter. Repair centers like ours are proof that the independent repairer already possesses the ability to access everything needed to perform the safe and proper repair. We do have challenges in this industry, but they rarely ever come from a vehicle manufacturer. They come from downward pressure for cost cutting measures.

In closing, our customers and our team want the same thing, restore their vehicle back to pre-accident condition following OEM repair procedures and utilizing proper tools and parts. We cannot get this with the REPAIR Act. I implore you to familiarize yourself with SAFE Repair Act, take the time to visit local service and collision center so you can understand this matter better. We can offer you references anywhere in the country to facilities who will make the time so you can make an educated decision.

Thank you for your time and consideration.

Sincerely,

Todd M Hesford

Mission Viejo Auto Collision

Opposition to the REPAIR Act and Support for the SAFE Repair Act

January 9, 2026

The Honorable Jay Obernolte
U.S. House of Representatives
Room 2433 Rayburn House Office Building
Washington, DC 20515

Dear Representative Mullin,

My name is Todd Hesford, and I am the owner of MVAC Inc, a family-owned pair of collision centers in South Orange County. You may not know us as you do not represent our district but you are in our state. My mother, who passed away in 2025, founded our business back in 1983. Our team has taken over and grown it over the years into two trust worthy, and quality minded, family oriented collision centers. We are a well known reliable name in our communities.

Our focus has remained the same for over 40 years. Provide safe and proper repairs that are in accordance with and follow OEM guidance. Basically that means, fix the car the way we would for our own family. I think we can all agree that modern vehicle technology is not slowing down. Likewise, our resolve to continually invest in proper training, equipment and tooling to repair these vehicles does not slow down. Our clients are expecting us to deliver on this commitment to safe and proper repairs. We deliver on this promise regularly by accessing and utilizing the repair information that is provided to us from the OEM.

I give the House of Representatives a lot of credit, you are asked to review a lot of issues and legislation. Some of which may be completely foreign to you, and then, you make what you think is a good decision for the country. As a small business owner, I do not have a major voice when it comes to these things. But I felt compelled to speak up on the REPAIR Act, as I strongly oppose it. It will have major negative impacts throughout our collision industry. I urge you to oppose it also.

The REPAIR Act in its current form, does absolutely nothing for collision repair centers such as ours, that we do not already have access to. Honestly, I am beyond disappointed with the individuals and organizations who are claiming to “Speak up” on behalf of businesses such as ours.

The claim that the authors of the REPAIR Act are making is that we, the collective service and collision industry do not have access to or are being locked out of

- The correct tools
- The correct education
- Or the correct parts

All of this is an absolute fraud, made up in lies and misdirection. This is promoted by insurance companies, and large corporations who will profit from the same insurance companies that will direct where and how a car is repaired. Often times pressuring the consumer to accept it or they will be left on their own to pay for the repair.

The truth is that for decades now, businesses like mine have had access to all of these things. We as upstanding businesses have to make a choice to actively train and purchase the correct tools or parts. We do not need more legislation on this, we need better policy protection from the bad actors and the likes of the authors of the REPAIR Act. Something that instills consistent accountability and does not leave the safety of our customer in jeopardy in exchange for a better financial bottom line.

I would offer as an alternative that you review and support SAFE Repair Act as opposing legislation. This has been developed by the Alliance for Automotive Innovation, along with the Society of Collision Repair Specialists (SCRS), of which I am a board member. Their proposal addresses the real challenges facing consumers and small repair businesses while preserving safety, accountability, and access to the information, tools, equipment, and training required to repair modern vehicles properly.

If you or your counterparts have the time, we would proudly welcome you here in Orange County to show you how we have and continue to invest in all of the things laid out in this letter. Repair centers like ours are proof that the independent repairer already possesses the ability to access everything needed to perform the safe and proper repair. We do have challenges in this industry, but they rarely ever come from a vehicle manufacturer. They come from downward pressure for cost cutting measures.

In closing, our customers and our team want the same thing, restore their vehicle back to pre-accident condition following OEM repair procedures and utilizing proper tools and parts. We cannot get this with the REPAIR Act. I implore you to familiarize yourself with SAFE Repair Act, take the time to visit local service and collision center so you can understand this matter better. We can offer you references anywhere in the country to facilities who will make the time so you can make an educated decision.

Thank you for your time and consideration.

Sincerely,

Todd M Hesford

Mission Viejo Auto Collision

January 7, 2026

The Honorable Rep. Jay Obernolte (R-CA-23)
U.S. House of Representatives
2186 Rayburn House Office Building
Washington, DC 20515-0523

Dear Representative Obernolte,

My name is Andrew Batenhorst, and I am the operator of Pacific Collision Center, a family-owned independent repair facility founded in 2014, which serves the greater Glendale, CA community. We specialize in certified collision repairs of the latest, advanced technology EV and ICE vehicles on the market today.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which

I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility Glendale. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Andrew Batenhorst

January 8, 2026

The Honorable Frank Pallone
U.S. House of Representatives
Room 2107 Rayburn House Office Building
Washington, DC 20515

Dear Representative Pallone,

My name is Paul Sgro, and I am the owner of Lee's Garage Inc., a family-owned independent repair facility located in West Long Branch. As you know, we are a local business with deep roots in the community. I had the privilege of taking over this company from my father in 1981, and over the past four decades, I have grown it into a trusted leader in our area—focused on protecting lives by ensuring safe and proper vehicle repairs.

Our mission has always been the same: to provide safe, high-quality repairs performed according to the standards required by modern vehicle technology. Our facility has invested heavily in the tools, equipment, and ongoing training necessary to repair today's complex vehicles properly. We utilize the same repair information provided by automakers and follow OEM procedures as intended. Our customers trust us with their families' safety, and we take that responsibility very seriously.

I understand that you are working to familiarize yourself with key issues in the automotive service and repair industry. As a local small business owner directly impacted by these policies, I want to be clear about where we stand. We strongly oppose the REPAIR Act as it is currently introduced, and we respectfully urge you to oppose it as well.

The REPAIR Act does not provide independent repair facilities like mine with access to anything we do not already have to properly and safely repair vehicles. Frankly, I am frustrated by individuals and

organizations that represent businesses nothing like mine claiming to speak on behalf of independent repairers.

The narrative that independent repair shops are being "locked out" by automakers is simply not true. This claim is a myth promoted by interests that stand to benefit the most from the REPAIR Act—namely large insurance companies and corporate entities that profit when insurers pressure, and in reality often require, consumers to accept alternative or non-OEM parts instead of the parts they prefer or that are required for proper repairs.

The truth is that independent repair businesses like mine already have access to the data, tools, and information needed to repair vehicles safely and correctly. What we need from policymakers is protection—not from automakers, but from legislation that blurs accountability, erodes repair standards, and jeopardizes vehicle safety in the name of convenience and corporate profit.

Instead, I urge you to closely review and support the SAFE Repair Act, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, and the Alliance for Automotive Innovation. This framework addresses the real challenges facing consumers and small repair businesses while preserving safety, accountability, and access to the information, tools, equipment, and training required to repair modern vehicles properly.

I would welcome the opportunity to host you at our facility in West Long Branch. I would be proud to show you how we have invested in the same equipment, systems, and capabilities available to franchised dealerships. We are proof that independent repairers already have access to what is needed to perform safe, proper repairs. We would also welcome the opportunity to demonstrate the real pressures our customers face when trying to choose quality repairs over cost-cutting alternatives.

At the end of the day, our customers want one thing: their vehicles restored to pre-accident condition using proper repair procedures, proper tools, and proper parts. The SAFE Repair Act protects and preserves consumer repair choice and supports repairers like us who refuse to cut corners—despite constant pressure from insurance companies to do so.

I hope you will consider visiting our facility, and I respectfully ask that you oppose the REPAIR Act and support the SAFE Repair Act.

Thank you for your time and consideration.

Sincerely,

Paul Sgro
President
Lee's Garage Inc.

Paul R Sgro

Driven to win in 25 !!

Lee's Garage Inc.
853 Broadway
West Long Branch NJ 07764


January 9th, 2026



The Honorable Jan Schakowsky
U.S. House of Representatives
2408 Rayburn House Office Building
Washington, DC 20515

Dear Representative Schakowsky,

My name is Beth Seberger, and I am a third-generation repairer in my family's business. I currently serve my second term as President of our state automotive service association here in Illinois, AASPI.

I grew up in this industry. I've watched it evolve from steel and welders to advanced materials, electronics, sensors, and software. Through all of that change, one thing has never changed for my family or my shop: our responsibility to protect the people who trust us with their vehicles and their safety.

Our facility has invested heavily in the training, equipment, and OEM-provided repair information required to properly repair today's complex vehicles. We follow manufacturer procedures because modern vehicles demand it — and because our customers expect their cars to be returned to pre-accident condition, not "close enough." These are the vehicles that carry families, teens, and first responders, and we take that responsibility seriously.

In Illinois, I am actively engaged in legislative work focused on consumer protection — specifically, ensuring that vehicle owners are entitled to a fair, transparent evaluation of their vehicles and their insurance claims. This work is not about increasing costs or creating barriers; it is about fairness, accountability, and making sure consumers are not disadvantaged during one of the most stressful events they experience as vehicle owners. This perspective directly informs how I view federal policy proposals impacting this industry.

I understand that you are working to familiarize yourself with key issues affecting the automotive service and repair industry. As someone who is directly impacted by these policies every day, I want to be clear about where we stand. On behalf of our association and the independent repairers we represent, we strongly oppose the REPAIR Act as it is currently introduced, and we respectfully urge you to oppose it as well.

Despite what has been suggested by its supporters, the REPAIR Act does not provide independent repair shops like mine with access to information or tools we do not already have. The narrative that independent repairers are “locked out” by automakers does not reflect the reality of how professional collision repair facilities operate today.

What the REPAIR Act *does* is blur accountability, weaken repair standards, and create pathways that benefit large corporate interests, particularly insurance companies at the expense of consumers. In practice, these pressures often result in consumers being steered toward alternative or lower-quality parts and repairs that do not meet manufacturer requirements, all in the name of cost savings.

Independent repair businesses like mine do not need shortcuts. What we need is protection. Protection for consumers, safety, and repair standards that reflect the complexity of modern vehicles.

That is why we ask that you instead review and support the SAFE Repair Act, an alternative framework developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation (Auto Innovators). We believe this proposal more accurately addresses the real challenges facing consumers and small businesses, while preserving access to the information, tools, training, and equipment necessary to perform repairs safely and correctly.

I would welcome the opportunity to host you at our facility in New Lenox, IL. I would be proud to show you firsthand how an independent shop invests in the same systems, equipment, and repair information available to dealerships — and to share real-world examples of the pressures consumers face when trying to choose safe, proper repairs.

At the end of the day, our customers want one thing: their vehicles to be restored properly and safely, using correct repair procedures, proper tools, and the parts they choose. The SAFE Repair Act supports that goal. It protects consumer choice and supports repairers who refuse to cut corners, even when doing the right thing is harder.

Thank you for your time and consideration. I hope we can count on your support for policies that truly protect consumers and roadway safety, and I look forward to continuing this conversation.

Sincerely,

Beth Seberger

Proud President

AASPI

Probst Collision, LLC.



Haury's Collision & Vintage
11514 Lake City Way NE
Seattle, WA 98125
Phone: (206) 365-1565
Website: www.hauryscollision.com

January 9, 2026

The Honorable Representative Kim Schrier
U.S. House of Representatives
Room 1110, Longworth House Office Building
Washington, DC 20515

Dear Representative Schrier,

I am the owner of Haury's Collision and Vintage in Seattle. We are an OEM factory certified collision repair shop and pride ourselves in OEM specification repairs. Our repair facility serves consumers at one of the most stressful moments they face, after a vehicle collision. Our customers families depend on for safety, mobility, and peace of mind, and we believe public policy must prioritize those same values.

Haury's is writing to formally express our **opposition to the REPAIR Act** as currently introduced.

Our independent collision repair facility is committed to quality and safety are not facing a lack of access to repair information or tools. We already obtain manufacturer repair procedures, diagnostic capabilities, and specialized training necessary to safely repair today's increasingly complex vehicles. The infrastructure for safe and proper repair already exists in the current marketplace.

Our concern lies in the downstream consequences the REPAIR Act would create for consumers.

By reducing clarity around responsibility and weakening established repair standards, the REPAIR Act risks shifting the burden of safety away from accountable parties and onto vehicle owners. Consumers are already required to navigate insurance processes, technical repair decisions, and cost disputes they are not equipped to fully evaluate. This legislation would further complicate that landscape rather than improve it.

In real-world application, our repair facility is pressured to accept repair decisions driven by cost containment rather than vehicle safety or manufacturer requirements. **Policies that lower guardrails or broaden discretion in repair practices make it more difficult for consumers to ensure their vehicle is restored to pre-loss condition.**

Safe and proper repairs are not theoretical. They are being performed every day by independent repairers who invest in training, tooling, and compliance with OEM standards. Any legislation that weakens the expectation of those standards undermines consumer safety and confidence in the repair process.

For these reasons, Haury's Collision & Vintage encourages a more measured approach. We ask that you review the SAFE Repair Act framework developed by the Society of Collision Repair Specialists (SCRS) in collaboration with the Alliance for Automotive Innovation. This proposal better aligns with the realities of modern vehicle repair by preserving accountability, safety standards, and consumer protections without sacrificing access or choice.

Consumers want certainty that their vehicle has been repaired correctly, safely, and according to established standards. Any legislative action should reinforce and not erode that expectation.

Thank you for your consideration and for your continued work on issues affecting Washington consumers. Haury's Collision & Vintage respectfully urges you to oppose the REPAIR Act and support policies that place safety, accountability, and consumer protection first.

Respectfully,

Jeff Butler, AIC
Insurance Claims Expert
Vehicle repair expert, ASE Master Technician
Haury's Collision & Vintage
11514 Lake City Way NE | Seattle, WA
P: (206)365-1565 | www.hauryscollision.com



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January 8, 2026

The Honorable Representative Kim Schrier
U.S. House of Representatives
Room 1110, Longworth House Office Building
Washington, DC 20515

Dear Representative Schrier,

My name is Justin Lewis. I own Accurate Auto Body, a family-owned independent collision repair facility in Redmond, Washington, founded by my parents in 1994. Today, I have the privilege of running the business alongside my wife, serving families throughout Redmond, Bellevue, King County, and the surrounding communities.

For more than six years, I have been actively involved in advocating for stronger consumer protections here in Washington State. This work finally resulted in meaningful legislation passing this last session as SB 5721 was signed into law. That effort was driven by one simple goal: making sure consumers can receive safe, proper repairs on increasingly complex vehicles.

Every day, families trust my business with one of their most important assets, their vehicle and, ultimately, their safety. We take that responsibility seriously. Our shop has made significant investments in equipment, training, certifications, and OEM repair information so that we can repair vehicles according to manufacturer requirements, not shortcuts or outdated practices.

Those resources already exist in today's market, and independent repairers like us are using them successfully.

I understand you are working to become familiar with key issues affecting the automotive repair industry, and I appreciate your willingness to engage. As someone directly impacted by these policies and who works face-to-face with consumers navigating claims, costs, and safety concerns, I want to clearly share why we **strongly oppose the REPAIR Act** as currently written.

The REPAIR Act does not solve a problem that consumers or independent repairers are experiencing today. Independent shops already have access to the tools, data, and information necessary to repair modern vehicles correctly.

The notion that we are "locked out" by automakers simply does not reflect reality in my shop or many others like it.

What does concern me deeply is how the REPAIR Act would impact consumers. By lowering guardrails and blurring accountability, the bill risks increasing pressure to prioritize convenience and cost over safety and proper repair standards. In practice, this would make it harder—not easier—for consumers to receive repairs that restore their vehicle to pre-accident condition.

My customers already face enough challenges: navigating insurance claims, understanding technical repair requirements, and advocating for what is truly necessary to keep their families safe. The REPAIR Act would further distance consumers from that goal by empowering large

corporate interests—particularly insurers—who benefit financially when repair standards are diluted and cheaper alternatives are pushed, often against a customer's wishes.

What consumers actually need is protection, not from automakers, but from policies that unintentionally undermine repair quality and safety. Safe and proper repairs are obtainable today, and they depend on clear standards, trained professionals, and accountability. Any legislation that weakens those pillars ultimately harms the very people it claims to help.

For these reasons, I encourage you to take a close look at the **SAFE Repair Act** framework developed by the Society of Collision Repair Specialists (SCRS), of which I serve on the board of directors, in collaboration with the Alliance for Automotive Innovation.

The SAFE Repair Act framework proposal more accurately reflects the real-world needs of consumers and repairers alike, while preserving access to repair information, tools, training, and most importantly, safety.

I would welcome the opportunity to host you at our facility in Redmond. We would be proud to show you firsthand how independent repairers like us have invested in the same advanced equipment and systems used by dealerships, and to share real examples of the pressures our customers face when safety and proper repairs are challenged.

At the end of the day, our customers want one thing: their vehicle returned to pre-accident condition using proper procedures, proper tools, and proper parts. That goal should unite all of us.

Thank you for your time and consideration. I hope we can count on your support in **opposing the REPAIR Act** and advancing solutions that truly protect consumers and public safety.

Sincerely,

Justin Lewis

Owner, Accurate Auto Body

8710 Willows Road NE

Redmond, WA 98052

January 9th, 2026

The Honorable Kim Schrier
U.S. House of Representatives
Room 1110, Longworth House Office Building, 15 Independence Ave, SE
Washington, DC 20515

Dear Representative Kim Schrier,

My name is Micah Strom, I am the collision chair for NWACA representing over 35 collision shops and the owner of Modern Collision Rebuild & Service, a family-owned independent repair facility on Bainbridge Island in our great state of Washington. I am a second generation shop owner which was founded by my parents in 1974. Today, I have the privilege of running this small business alongside my brother, serving customers throughout Bainbridge Island and the Olympic Peninsula.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What our customers need from policymakers is consumer protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility on Bainbridge Island. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Micah Strom

January 6, 2026

The Honorable Representative Kim Schrier
U.S. House of Representatives
Room 1110, Longworth House Office Building
Washington, DC 20515

Dear Representative Kim Schrier,

My name is Justin Henderson, and I am the owner of ProStar Collision LLC, a family-owned independent repair facility that I started from ground up in 2014. Today, I have the privilege of running this small business alongside my wife, serving customers throughout Ellensburg, WA and surrounding communities.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where I stand. I strongly **oppose the REPAIR Act** as currently introduced, and I urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility in Ellensburg, WA. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Justin Henderson



January 8, 2026

The Honorable Darren Soto
U.S. House of Representatives
Room 2353, Rayburn House Office Building
50 Independence Avenue, SW
Washington, DC 20515

Dear Representative Soto,

My name is Nader Akbari, and I am the owner of Central Florida Paint & Body, an independent repair facility in Orlando founded in 2021 specializing in OEM certified, high quality collision repair. We pride ourselves on repairing vehicles properly and safely by investing in training and tooling to ensure our staff and our organization are up to date with the frequently changing landscape of the automotive industry and the technology used in today's vehicles, while also providing the best possible service to our guests during the stressful circumstances vehicle accidents create in their lives. We also partner with local trade schools like Orange Technical College and UTI to recruit and invest in the new generation entering the workforce and help guide these students both professionally and personally.

Our mission has remained consistent since day one: delivering safe, high-quality repairs that meet the requirements of today's advanced vehicle systems. We have made substantial investments in specialized equipment and ongoing training, and we rely on the repair information and procedures already made available by vehicle manufacturers to restore vehicles as they were designed to be repaired. Our customers entrust us with the safety of their families, and we approach that responsibility with the seriousness it deserves.

I recognize that you are in the process of reviewing issues that impact the automotive service and repair sector. As a small business owner who is directly affected by this legislation, I want to clearly state our position. We oppose the REPAIR Act in its current form and respectfully ask that you do the same.

The REPAIR Act does not provide independent repair facilities like mine with any additional access or capability beyond what already exists to properly and safely repair vehicles. I am increasingly frustrated by organizations claiming to represent independent repairers when their business models and realities bear little resemblance to shops like ours.

The claim that independent repair shops are being "locked out" by automakers is inaccurate. That narrative is being driven by parties who stand to benefit most from the REPAIR Act—namely large insurance carriers and corporate entities that profit when

consumers are steered, or effectively forced, toward non-OEM or alternative parts instead of the parts vehicle owners actually prefer.

Independent repair businesses already have access to the data, diagnostic information, and tools required to perform safe and proper vehicle repairs.

What we need from lawmakers is not intervention against automakers, but protection from legislation that weakens accountability, lowers repair standards, and compromises vehicle safety in favor of speed, convenience, or corporate cost-cutting.

Rather than advancing the REPAIR Act, I encourage you to review and support the SAFE Repair Act—an alternative proposal developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation. This approach more accurately addresses the real concerns facing consumers and independent repairers while preserving access to the information, tools, equipment, and training necessary to repair today's increasingly complex vehicles correctly.

I would welcome the opportunity to invite you to our facility at a time that works for your schedule. We would be proud to demonstrate the level of investment we've made in equipment and systems that mirror those used by franchised dealerships.

Our operation demonstrates that independent repairers already possess the access and capability needed to perform safe, manufacturer-compliant repairs. We would be glad to walk you through our processes and also share real-world examples of the pressures and obstacles consumers face when trying to choose a repair that prioritizes quality and safety.

Ultimately, vehicle owners want one outcome: a properly restored vehicle returned to its pre-loss condition using correct repair procedures, appropriate tools, and the right parts.

The SAFE Repair Act upholds consumer choice and supports repairers who are committed to doing the job correctly—even when faced with ongoing pressure from insurance companies to take shortcuts.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Nader Akbari
Managing Partner, Central Florida Paint & Body



January 12, 2026

The Honorable Lori Trahan
U.S. House of Representatives
Room 2233, Rayburn House Office Building

50 Independence Ave, SW,
Washington, DC 20515-2103

RE: Concerns of Massachusetts Collision Repairers Regarding the REPAIR Act

Dear Representative Trahan,

My name is Evangelos "Lucky" Papageorg, and I serve as the Executive Director of the Alliance of Automotive Service Providers of Massachusetts (AASP-MA), doing business as the Massachusetts Auto Body Association (MABA). Our association represents independent collision repair businesses across the Commonwealth—family-owned small businesses that employ thousands of skilled workers and serve communities throughout Massachusetts.

Our members share a common mission: to restore vehicles safely and correctly, in accordance with manufacturer repair procedures and the realities of modern vehicle technology. Independent collision repairers have made substantial investments in OEM tools, training, equipment, and repair information to ensure that vehicles are repaired properly and safely. Our members take seriously the trust placed in them by consumers, whose safety depends on the quality of these repairs.

We understand that you are familiarizing yourself with key issues affecting the automotive service and repair industry. As the voice of independent collision repairers in Massachusetts, we want to be clear about where our members stand. AASP-MA/MABA strongly opposes the REPAIR Act as currently introduced, and we urge you to oppose it as well.

Contrary to claims made by its proponents, the REPAIR Act does not provide independent collision repair shops with access to information or tools they do not already have. The narrative that independent repairers are being "locked out" by automakers is simply not accurate. That claim is being advanced primarily by entities whose business models and interests differ significantly from those of local, independent repair shops—and who stand to benefit financially from

AASP-MA dba MABA

P O BOX 850210 BRAINTREE, MA. 02185 Tel# 617.574.0741

www.aaspmma.org

(Pg 2)

legislation that weakens repair standards and accountability.

The reality is that independent collision repair businesses already have access to the OEM repair data, tools, and training necessary to safely repair today's vehicles. What our members need from policymakers is protection—not from automakers, but from legislation that blurs responsibility, undermines established repair standards, and places consumer safety at risk in the name of convenience or corporate profit.

For that reason, we encourage you to carefully review and support the SAFE Repair Act, an alternative legislative framework developed collaboratively by the Society of Collision Repair Specialists (SCRS) and the Alliance for Automotive Innovation. This proposal more accurately reflects the realities of today's vehicles and repair environment, while preserving accountability, safety, and consumer choice.

We believe the SAFE Repair Act better addresses the real challenges facing consumers and independent repair businesses, ensuring appropriate access to information, tools, equipment, and training without compromising vehicle safety or repair integrity.

AASP-MA/MABA would welcome the opportunity to arrange a visit for you at one of our member facilities here in Massachusetts. Such a visit would demonstrate firsthand that independent collision repairers have already invested in the same technologies and systems used by dealerships and would also illustrate the pressures our members and their customers face—particularly from insurance-driven cost controls that often conflict with proper repairs.

At the end of the day, consumers want their vehicles returned to pre-accident conditions using proper repair procedures, proper tools, and proper parts. The SAFE Repair Act protects that expectation. It supports responsible repairers who refuse to cut corners, even when facing daily pressure to do so.

We appreciate your time and consideration, and we hope we can count on your support in opposing the REPAIR Act and advancing the SAFE Repair Act. We look forward to continuing this important conversation.

Sincerely,



Evangelos "Lucky" Papageorg
Executive Director

Alliance of Automotive Service Providers of Massachusetts
d/b/a Massachusetts Auto Body Association (AASP-MA / MABA)

AASP-MA dba MABA
P O BOX 850210 BRAINTREE, MA. 02185 Tel# 617.574.0741
www.aaspma.org



The Honorable Gus Bilirakis
US House of Representatives
Rayburn Building, Room 2306
Washington, D.C. 20515
Dear Representative Bilirakis,

My name is Robert McSherry, and I own North Haven Auto Body, Sabo Auto Body, and Woodbridge Auto Body — independent repair facilities that have served Connecticut continuously since 1938, 1947, and 1960. For generations, our businesses have focused on one principle: performing safe, manufacturer-correct repairs using the proper equipment, procedures, and trained professionals.

We invest heavily in OEM tools, training, and repair procedures, all of which are already available directly from vehicle manufacturers. Independent repairers are not “locked out” of the information needed to properly and safely repair vehicles. That claim is simply not true.

The REPAIR Act does not give shops like mine access to anything we do not already have. Instead, it risks weakening accountability and repair standards while benefiting large insurance interests that profit when consumers are pressured toward lower-cost parts and shortcuts — often at the expense of required repair procedures and vehicle safety.

What small businesses and consumers need is protection from legislation that lowers safety standards, not laws that blur responsibility in the name of convenience or corporate profit.

I urge you to oppose the REPAIR Act and instead support the SAFE Repair Act, developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation. This proposal preserves consumer choice while protecting proper repair standards and public safety.

I would welcome the opportunity to host you at our North Haven facility to demonstrate the investments we have made and the realities our customers face when seeking quality repairs in today’s increasingly complex vehicles.

Thank you for your time and consideration.



"We meet by Accident"

January 9, 2026

The Honorable Gus Bilirakis
U.S. House of Representatives
Rayburn House Office Building, Room 2306
Washington, DC 20515

Dear Representative Bilirakis,

Our names are Tony Cavallaro Jr. and Joe Cavallaro, and our family owns and operates Airport Auto Body, a family-owned independent repair facility in Hartford, CT founded by our parents in 1983.

Our mission has always been to perform safe, high-quality repairs using the proper tools, training, and OEM repair procedures. We have invested heavily to ensure we can repair today's complex vehicles correctly, and our customers trust us with their family's safety every time they hand over their keys.

As you familiarize yourself with issues affecting the automotive repair industry, we want to clearly state our position. We strongly oppose the REPAIR Act as currently written and urge you to oppose it as well.

Independent repair shops like ours already have access to the data and tools needed to properly repair vehicles. The claim that we are being "locked out" by automakers is simply not true. That narrative benefits large insurers and corporations that profit by steering repairs toward cheaper alternatives, often at the expense of safety and consumer choice. The truth is that independent repair businesses like ours already have access to all the data and tools we need to safely repair a vehicle.

What small businesses like ours need is protection from policies that blur accountability, erode repair standards, and jeopardize vehicle safety.

We encourage you to support the SAFE Repair Act, developed by the Society of Collision Repair Specialists and the Alliance for Automotive Innovation. This proposal meaningfully addresses real consumer and repairer challenges while preserving safety, accountability, and proper repair standards.

We would welcome the opportunity to host you at our facility to show you firsthand how independent shops have invested in the same equipment and systems used by dealerships. Our customers want their vehicles restored to pre-accident condition using proper procedures, tools, and parts, which is already available to our industry.

Thank you for your time and consideration. We hope we can count on your opposition to the REPAIR Act and your support of the SAFE Repair Act.

Sincerely,

Airport Auto Body
Tony Cavallaro Jr.
Joe Cavallaro



75 Locust Street, Hartford, CT 06114

January 7, 2026

The Honorable Members of the CMT Subcommittee, and the Honorable Tim Burchett of Tennessee

U.S. House of Representatives

Washington, DC 20515

Dear CMT Subcommittee,

My name is Jerry Dalton and I am the owner of Dalton Collision a family-owned independent repair facility's in Knoxville Tennessee and serve the greater Knoxville area with quality, SAFE, OEM certified repairs.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly oppose the REPAIR Act as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts

my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and support the SAFE Repair Act, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility's Dalton Collision in Knoxville or Blaine, I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to oppose the REPAIR Act and support the SAFE Repair Act proposal.

Thank you for your time and consideration.

Sincerely,

Jerry Dalton

From: LYNSEY MARTIN [REDACTED]
Date: Fri, Jan 9, 2026 at 10:49 AM
Subject: Hello from Finks Unlimited
To: <[REDACTED]@mail.house.gov>, <[REDACTED]@mail.house.gov>, CCA Info
<info@carolinascollisionassociation.com>

January 9, 2026

The Honorable Russell Fry

U.S. House of Representatives

25 Independence Avenue

Cannon House Office Building Room 345

Washington, DC 20515

Dear Representative Russell Fry,

My name is Lynsey Fink Martin, and I am the owner of Finks Unlimited Collision, a family-owned independent repair facility that started in Concord, North Carolina by my father and continues to serve our community today. Today, I have the privilege of running this small business in honor of my family and in hopes to have a continued future in the community.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly oppose the REPAIR Act as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and support the SAFE Repair Act, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

We are proof that independents already have access to what we need to perform safe, proper repairs. At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to oppose the REPAIR Act and support the SAFE Repair Act proposal.

Thank you for your time and consideration.

Sincerely,

Lynsey Fink-Martin

Owner/Operator

Finks Unlimited Collision, Inc.

236 Hwy 49 South

Concord, NC 28025

January 9, 2026

The Honorable Russell Fry
U.S. House of Representatives
25 Independence Avenue
Cannon House Office Building Room 345
Washington, DC 20515

Dear Representative Russell Fry,

My name is Kaitlyn George, and I am the Executive Director of the Carolinas Collision Association, a non-profit organization who is dedicated to safe and correct collision repairs in North and South Carolina. We support many shops in the Carolinas through education and resources and encourage our members to share their voice when support is needed.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. We invest in tools and training to help local independent shops perform repairs properly, and utilize the information already provided by the automakers to conduct those repairs as intended by the OEM. Customers trust these businesses with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a voice for many local business owners directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like these with anything they don't already have to properly fix your vehicle. Frankly, I'm tired of people who have little understanding of the day to day struggles of these shops and customers speaking for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – customers to purchase alternative vehicle parts, rather than the parts the customers want to properly restore their vehicle.

The truth is that independent repair businesses already have access to all the data and tools they need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which we are a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

At the end of the day, customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Kaitlyn George

ADDENDUM 1

Seth D. Greenstein

202-204-3514

sgreenstein@constantinecannon.com

January 2, 2026

The REPAIR Act Is Consistent with Patent, Copyright, and Trade Secret Law

Executive Summary

The REPAIR Act requires motor vehicle OEMs to provide the same instructions, data, and tools that they use and provide to their dealers or authorized repair facilities to independent repair facilities and replacement parts manufacturers. These pro-competitive and pro-consumer provisions are thoroughly consistent with long-established intellectual property laws and principles. Since the mid-1800s, the judiciary and Congress have affirmed that patent, copyright, and trade secret laws do not and cannot prevent lawfully-acquired products from being maintained, repaired, and upgraded using independent services and replacement parts.

The faulty premise behind the OEM-proposed amendments to the REPAIR Act is that somehow “digital” makes it different—that more intellectual property (“IP”) protections are needed simply because repair of modern-day motor vehicles uses software and downloaded digital data, instead of physical parts and manuals. Congress should reject this canard here just as it has in other IP contexts. There is no legitimate reason to deny vehicle owners their historical right to repair merely because manufacturers replace mechanical parts with chips and software, or rely on data and software to implement rather than hardware parts and tools. As a matter of policy, consumers should *benefit* from the transition to digital technology, not lose their historically-recognized rights to repair the products they own.

Proposed amendments to the bill proposed by the Alliance stakeholder—and particularly the new subsections of the “Rules of Construction”—would violate longstanding intellectual property principles that guarantee the public’s right to repair. Subsection (A) of the Rules of Construction keeps all federal intellectual property policies intact and is IP neutral, and that is all that is needed. The remaining proposed subsections expand established law in ways that deny consumers their existing right to repair the motor vehicles they own using the repair shop and replacement parts of their choice.

Finally, and importantly, these REPAIR Act provisions have parallels in other federal legal regimes enacted to protect transportation and public safety and fair competition for maintenance and repair. Congress has used its authority to secure the right of repair in these other contexts, and there is no evidence that these prior legislative actions have prejudiced OEM intellectual property rights. It should continue to achieve these important policy objectives here through the REPAIR Act.

1. The right to repair is fully consistent with sound patent and IP policy. Since the 1800s, it has been a core principle of patent law that patent owners cannot prevent users from

repairing patented products.¹ This principle has been reaffirmed multiple times in the automotive context by the Supreme Court and federal courts of appeal, which consistently have protected the right of consumers and independent service facilities to repair a broad variety of patented auto parts such as ignition systems, axles, clutches, and convertible tops.²

Similarly, **the REPAIR Act allows competitors to make replacement parts within the limits of existing IP law.** It is well understood in the law that the right to repair does not supersede lawful patent rights. Aftermarket parts manufacturers have always been free to make non-patented parts. And where patents do cover vehicle parts, aftermarket parts manufacturers can innovate around the patent claims so as not to infringe, or can seek a license from the patent owner. All of these options are thoroughly consistent with the basic constitutional goal of the U.S. patent system—to promote progress and stimulate innovation in alternative technologies. Nothing in the REPAIR Act changes the IP law status quo, and Subsection (A) preserves it.

Subsection (B) suggests there exists some notion that acts of repair and competitive production of replacement parts facilitated by the Act might compel a “license” or “transfer” of patent rights. In fact, this provision is as disingenuous as it is unnecessary. As noted above, under Subsection (A) independent servicers and replacement parts manufacturers would continue to compete as they historically have done within the limits of IP law. However, Subsection (B) threatens to excuse anticompetitive patent licensing conduct that currently is proscribed by antitrust and unfair competition law, such as OEM refusals to license only independent repair facilities and parts manufacturers in the exercise of market power. This is precisely the type of anticompetitive conduct targeted by the FTC’s *Nixing the Fix* report, and intended to be addressed by the REPAIR Act.³ And federal courts have long held that leveraging access to patented parts to monopolize the separate service market constitutes unlawful tying arrangements that violate the Sherman Act.⁴ Subsection (A) of the REPAIR Act is sufficient to secure OEM IP rights, and to ensure fair competition by requiring OEMs to make available to independent

¹ *Wilson v. Simpson*, 50 U.S. 109 (1850) (repair of wood-planing machine); *See also Impression Products, Inc. v. Lexmark Int’l*, 581 U.S. 360 (2017) (repair and replacement parts for computer printer cartridges). Similarly, it has long been held that anyone can repair a copy of a book, film, or tape consistent with copyright laws. *See Doan v. American Book Co.*, 105 F. 772 (7th Cir. 1901).

² *Aro Mfg Co. v. Convertible Top Replacement Co.*, 365 U.S. 336 (1961) (replacing fabric convertible tops); *Dana Corp. v. American Precision Co.*, 827 F.2d 755 (Fed. Cir. 1987) (rebuilding automobile clutches using new parts and used parts from many disassembled worn clutches held permissible repair); *Electric Auto-Lite Co. v. P. & D. Mfg. Co.*, 109 F. 2d 566 (2d Cir. 1940) (permitting under patent law replacement of worn ignition system parts); *Automotive Parts Co. v. Wisconsin Axle Co.*, 81 F.2d 125 (6th Cir. 1935) (reaffirming right to repair or replace broken parts to make axles operative).

³ *Nixing the Fix*, https://www.ftc.gov/system/files/documents/reports/nixing-fix-ftc-report-congress-repair-restrictions/nixing_the_fix_report_final_5521_630pm-508_002.pdf, at 15.

⁴ *See Image Technical Services v. Eastman Kodak*, 125 F.3d 1195 (9th Cir. 1997) (finding violations of antitrust law by tying access to OEM patented parts to provision of unpatented OEM repair and maintenance services).

services and parts manufacturers the same licenses and rights they make available to their dealerships and authorized services, on reasonable and nondiscriminatory terms.

2. The REPAIR Act is consistent with the purposes of copyright and the letter of the Copyright Act. Copyright protection under U.S. law has a low threshold. Almost any writing, illustration, or photograph could qualify as “copyrighted material.”⁵ However, as explained below, copyright does *not* protect functionality, facts, and data—which are the keys to enabling the right of repair.

That was the conclusion of the Copyright Office in the Register’s December 2016 Report on Software-Enabled Consumer Products:

The Office recognizes the value of allowing the public to freely repair defective consumer products and tinker with products to improve their function. ... Properly understood, existing copyright law doctrines—including the idea/expression dichotomy, fair use, merger, *scènes à faire*, and section 117—should continue to facilitate these types of activities.⁶

The most fundamental of these doctrines is the “idea/expression dichotomy”—that **copyright protects only original expression, *not* facts or data, ideas, systems, or functions.**⁷ The REPAIR Act focuses on these *non*-copyrightable functional aspects: the ability to access factual information on how to repair and service motor vehicles, and to restore, repair, or improve the functionality of a product controlled by software and relying on data.

Fair use is a right preserved for the public. The Copyright Act explicitly makes all rights of copyright owners “subject to” fair use, so does not grant copyright owners any right to prevent socially beneficial uses (such as repair) that do not conflict with the purposes of copyright.⁸ The first sale doctrine preserves the public’s right to use, give away, or sell their copy of a copyrighted work, including to repair that copy.⁹ Section 117 likewise allows the owner of software to copy or adapt the software as necessary to use, maintain, or repair a machine.

⁵ *Feist Publications, Inc. v. Rural Tel. Serv. Co.*, 499 U.S. 340, 362 (1991). *See, e.g., Innovation Ventures, LLC v. N2G Distributing, Inc.*, 779 F. Supp. 2d 671 (E.D. Mich. 2011) (affording copyright protection to an energy drink warning label).

⁶ *Id.*, Executive Summary at ii (hereafter, “Copyright Office Report”)

⁷ 17 U.S.C. § 102(a) and (b).

⁸ 17 U.S.C. §§ 106-107.

⁹ 17 U.S.C. § 109. In most products, embedded control software is sold, not licensed and therefore the purchaser of the product owns the copy of the software. *See* Copyright Office Report at 28 (“representatives of auto manufacturers ‘conceded . . . that with the exception of the software controlling the entertainment and telematics systems, ECU [electronic control unit] software is not subject to written licensing agreements.’”).

Functional software is different from books, music, and movies. Not all copyrighted works are viewed equally under the law. As the Supreme Court observed, software copyright protection is “thin” because it serves a utilitarian function.¹⁰ Granting overbroad protection to software that controls motor vehicle functionality would impermissibly protect functionality, *contrary* to the purposes of copyright to protect only expression.

Proposed Subsection (C) threatens to negate the rights guaranteed the public under Copyright law. Data are facts and are not protectable by copyright, and in-vehicle data generated and retained by the operation of a motor vehicle are the property of the motor vehicle owner, not the vehicle manufacturer.¹¹ Software in electronic control units or microchips commonly acts on data, such as stored parameters used to calibrate vehicle systems and regulate vehicle functions. Making copies of software for the purpose of accessing non-protectable data, processes, functions, or ideas has long been deemed fair use.¹² Moreover, modifying software to reinstall, refine, or replace covered data or other unprotectable data during maintenance and repair does not infringe any copyrightable expression.

Subsection (A) is sufficient to preserve the status quo of the right to repair in the REPAIR Act, and nothing in the Act otherwise detracts from the rights of copyright owners or the public. Proposed Subsection (C) is, at best, superfluous and unnecessary.

3. Proposed Subsection (D) on “trade secrets” is another fig leaf to deny competition for lawful vehicle repair. “Trade secrets” comprise any business information that a party keeps confidential to obtain a business advantage, including by license terms that require confidential treatment. If that information is generally known, or becomes generally known through lawful means such as reverse engineering and not through unlawful disclosure or misappropriation, then that information is not subject to trade secret protection.¹³ For example, in *Bonito Boats, Inc. v. Thunder Craft Boats, Inc.*, the Court affirmed that the “public at large remained free to discover and exploit the trade secret through reverse engineering of products in the public domain or by independent creation.” 489 U.S. 141, 155 (1989) (finding no IP right violation from reverse engineering of unpatented boat hull design).

Similarly, the Defend Trade Secrets Act explicitly declares that reverse engineering is *not* an improper means.¹⁴ Additionally, the comments to the Uniform Trade Secrets Act, which most states have adopted in some form, recognize that it is lawful to conduct reverse engineering,

¹⁰ *Google LLC v. Oracle America, Inc.*, 593 U.S. 1 (2021).

¹¹ 17 U.S.C. § 102(b).

¹² *Sega Ent. Ltd. v. Accolade, Inc.*, 977 F.2d 1510, 1522-28 (9th Cir. 1992).

¹³ *Kewanee Oil Co. v. Bicron Corp.*, 416 U.S. 470, 476 (1971).

¹⁴ 18 U.S.C. § 1839(6)(B).

provided that the analyzed product was obtained “by a fair and honest means, such as purchase of the item on the open market.”¹⁵

4. Proposed Subsection (F) likewise could thwart the effectiveness of the REPAIR Act. The Digital Millennium Copyright Act includes carefully crafted provisions against unauthorized circumvention of technological measures that protect copyrighted works (TPMs), balanced with procedures to ensure that these measures did not harm legitimate consumer interests such as fair use and right to repair. Congress thus sought in the DMCA to promote digital markets to sell and to rent access to copyrighted works – not to allow copyright owners to monopolize markets to repair physical products.¹⁶ To the extent that what is being protected is not a copyrighted work (e.g., data parameters that need to be reset or changed), the DMCA does not apply at all.¹⁷ And since 2010, the Copyright Office has granted vehicle owners the right to circumvent TPMs to allow diagnosis, repair, and lawful modification of a vehicle, including access to and use of operational data obtained from the vehicle in any format, including by telematics.

Subsection (F) goes much further than the DMCA, and unnecessarily so; and domestic laws already are compliant with international treaty obligations. Subsection (A) fully protects copyright owners in a proper and balanced manner under existing law.

5. There is nothing new or improper about Congress requiring OEMs to provide materials necessary to repair to independent repair services and replacement parts manufacturers. The requirement to make all necessary repair instructions, manuals and data available to vehicle owners and to competing independent repair shops has clear precedent in the law. For decades, Federal Aviation Administration regulation 14 CFR § 21.50(b) has required that the “design approval holder” (usually the OEM) of every aircraft and of all aircraft parts must furnish to each aircraft owner and to make available to independent competitors for maintenance and repair a complete set of all manuals and repair instructions covering every part of the aircraft. Similarly, regulations promulgated in 2003 by the Environmental Protection Agency under the Clean Air Act require that automobile manufacturers provide maintenance and diagnostic information to aftermarket repair shops at “fair and reasonable” prices subject to review by the EPA. 40 C.F.R. § 89.1808-1(f). In these cases, as here, the purpose of these

¹⁵ UTSA, comment to § 1.

¹⁶ *Lexmark Int’l v. Static Control Components*, 387 F.3d 522, 552 (6th Cir. 2004) (Merritt, J. concurring) (“Congress did not intend to allow the DMCA to be used offensively” to “create monopolies for replacement parts” through lock-out mechanisms). A construction of the DMCA that precluded repairs “would allow virtually any company to attempt to leverage its sales into aftermarket monopolies—a practice that both the antitrust laws and the doctrine of copyright misuse normally prohibit.” *Chamberlain Group v. Skylink Techs.*, 381 F.3d 1178, 1201 (Fed. Cir. 2004).

¹⁷ *Ford Motor Company v. AUTEL US Inc.*, No. 14-13760, Opinion and Order, (E.D. Mich. Sept. 30, 2015).

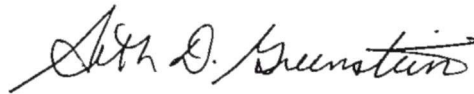
CONSTANTINE CANNON LLP

WASHINGTON | NEW YORK | SAN FRANCISCO

The REPAIR Act and IP Law
January 2, 2026
Page 6

disclosures is to promote public safety and fair competition. These are the same purposes served by the REPAIR Act.

Respectfully submitted,

A handwritten signature in black ink, reading "Seth D. Greenstein". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Seth D. Greenstein



January 9, 2026

The Honorable Jonathan Morrison
Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Administrator Morrison:

Motor vehicle safety is a top priority for the members of Alliance for Automotive Innovation.¹ We appreciate the National Highway Traffic Safety Administration's (NHTSA) continued leadership in advancing motor vehicle safety.

This Association's members recognize that, if NHTSA establishes future FMVSS covering Advanced Driver Assistance System (ADAS) technologies, it can alter the obligations of entities that might engage in aftermarket modifications of vehicles as a business where those modifications affect vehicle performance required by FMVSS. Given increased public and policymaker interest in aftermarket vehicle modifications and their interactions with ADAS, we believe there is value in NHTSA convening a workshop, technical working group, or other forum with vehicle manufacturers, the aftermarket equipment industry, and other stakeholders to examine how vehicle modification may affect ADAS performance.

As ADAS and other crash avoidance features continue to be deployed in the market, this is likely to remain a long-term issue. This presents an important opportunity for NHTSA to examine this complex issue and identify a balanced path forward to ensure that the ADAS of modified vehicles can continue to operate as originally designed. Safe vehicles are a top priority. NHTSA's expertise and leadership on this issue would be valuable in ensuring the continued effectiveness of ADAS technologies when deployed in the U.S. market.

We look forward to continued engagement with NHTSA on this important and evolving safety issue. Thank you for your commitment to a safe and innovative automotive industry in America.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Bozzella".

John Bozzella
President & CEO
Alliance for Automotive Innovation

¹ Alliance for Automotive Innovation represents the full auto industry, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing over 5 percent of the country's GDP, responsible for supporting nearly 11 million jobs, and driving \$1.5 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector.



North American Vehicle Rescue Association

“Preparing the Vehicle Rescuers of Tomorrow”



Strategic Partnership Proposal: Advancing Vehicle Safety Through Collaboration Between Fire-Rescue and the Automotive Industry

From: North American Vehicle Rescue Association (NAVRA)

To: Members of the United States Congress

Executive Summary

As vehicle technology advances at an unprecedented pace, the safety landscape for first responders, motorists, and the public is evolving just as quickly. Electric and hybrid vehicles are now commonplace on American roads, yet the emergency response strategies and tools available to our nation’s firefighters and rescue personnel have not kept pace. The North American Vehicle Rescue Association (NAVRA) urges the establishment of a strategic partnership between the U.S. fire-rescue community and domestic/ foreign automotive manufacturers — facilitated through leading national organizations such as our non-profit organization, the **International Association of Fire Fighters (IAFF)** and the **International Association of Fire Chiefs (IAFC)** — to close this critical gap and improve safety outcomes for all.

Lessons from Global Collaboration

A successful international model already exists. In France, **Renault** partnered with the national fire service to integrate emergency response considerations directly into vehicle design. This collaboration produced innovative solutions such as the “**firefighter access port**,” a standardized feature that allows water to be delivered directly into the battery compartment of electric vehicles.

This simple yet transformative design change reduces fire suppression times from **hours to under 10 minutes**, dramatically lowering risk to vehicle occupants, bystanders, and first responders. It also lessens environmental contamination and economic impact resulting from prolonged EV fires.

The Case for a U.S. Partnership

The United States — a global leader in both automotive innovation and emergency response — is uniquely positioned to replicate and expand upon this model. A structured partnership between manufacturers and the fire-rescue community would:



North American Vehicle Rescue Association

"Preparing the Vehicle Rescuers of Tomorrow"



- **Improve Life Safety:** Accelerated suppression and extrication reduce risks to the public and responders while enabling faster patient transport and increasing survival rates.
- **Reduce Environmental and Economic Costs:** Faster control of EV and hybrid fires minimizes hazardous runoff, air pollution, property damage, cleanup costs and loss of income due to highway closures for extended periods of time.
- **Standardize Emergency Design Considerations:** Integrating first-responder input early in the design process ensures vehicles remain safe *after* a crash or fire — not just during normal operation.
- **Shift from Reactive to Proactive Response:** Historically, fire-rescue agencies have adapted tactics after new technologies reach the streets. A partnership ensures that future vehicles are engineered with emergency operations in mind from the outset.

Call to Action

We respectfully urge Congress to support initiatives that bring together the **U.S. automotive industry, fire-rescue leadership, and public safety organizations** in a formalized collaboration. This partnership is more than a safety measure — it is a national imperative. It represents a forward-thinking approach to public safety, technological innovation, and environmental responsibility, ensuring that American vehicles are not only safer to drive but also safer to respond to when accidents occur.

By aligning engineering innovation with emergency response expertise, we can save lives, protect communities, and set a global standard for vehicle safety and rescue readiness.

Thank you for your time,

Greg Tabeek

Treasurer@NAVRAUS.org

954-445-7065



The Honorable Gus Bilirakis
Chairman Subcommittee on Commerce, Manufacturing and Trade
United States House of Representatives
Washington, DC 20515

Dear Chairman Bilirakis:

On behalf of ABATE of Wisconsin and the motorcyclists we represent throughout the state, I write to express our strong support for H.R. 3385, legislation to update the federal definition of a motorcycle.

The current federal definition has not kept pace with modern vehicle design and technology. As a result, riders, regulators, manufacturers, and state agencies are left navigating outdated language that creates confusion and inconsistency. H.R. 3385 provides a much-needed update to ensure motorcycles are clearly distinguished from other vehicle categories and regulated appropriately.

In recent years, a new type of vehicle commonly referred to as an *autocycle* has entered our roadways. These vehicles are currently classified as motorcycles under federal law, despite bearing little resemblance to traditional motorcycles and possessing vastly different operational characteristics.

Recognizing this problem, Wisconsin has taken steps to update its own vehicle definitions. While this has helped clarify matters within our state, it has also highlighted the need for a consistent federal standard that applies across all 50 states. ABATE of Wisconsin believes the continued ambiguity at the federal level has created an unnecessary patchwork of rules related to licensing, insurance, safety statistics, registration, and training requirements from state to state.

Clear and accurate vehicle definitions are critical as federal agencies continue to develop safety, environmental, and transportation regulations. When motorcycles are improperly grouped with other vehicle classes, riders face unintended regulatory burdens that do not reflect the realities of motorcycling.

We respectfully urge you to support and advance H.R. 3385. ABATE of Wisconsin stands ready to work with you to ensure federal transportation policy provides clarity, consistency, and fairness for riders nationwide.

Thank you for your time and your commitment to America's motorcyclists.

Sincerely,

John Reblin
ABATE of Wisconsin, Inc. – Executive Director



Statement for the Record
Submitted to the House Energy & Commerce Committee
Subcommittee on Commerce, Manufacturing, and Trade
Hearing Title: Examining Legislative Options to Strengthen Motor Vehicle
Safety, Ensure Consumer Choice and Affordability, and Cement U.S.
Automotive Leadership

Submitted by: American Vehicle Owners Alliance (AVOA)
January 13, 2026

Chairman Bilirakis, Ranking Member Schakowsky and Members of the Subcommittee on Commerce, Manufacturing, and Trade:

The American Vehicle Owners Alliance (AVOA) appreciates the opportunity to submit this statement for the record in connection with the Subcommittee’s hearing on “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership.” AVOA is a national coalition of consumer, insurance, rental, fleet, and mobility organizations committed to protecting vehicle owners’ rights to access and control the data generated by their vehicles.

AVOA strongly supports the **Data Rights to Information and Vehicle Electronic Records (DRIVER) Act (H.R. 6687)**, legislation introduced by Representatives Harshbarger, Weber, and Perry. The DRIVER Act establishes clear, technology neutral federal protections ensuring that vehicle owners, not manufacturers, control access to the data generated by their own vehicles.

We commend the Subcommittee for its leadership in examining ways to strengthen motor vehicle safety and continuing to advance American automotive leadership. We urge Members to consider how owner access to and control of vehicle-generated data is fundamental to the safety, rights, and responsibilities of vehicle owners.

First Principles: Ownership, Safety, and Affordability

As today’s modern and connected vehicles become increasingly dependent on digital systems and data transmission, federal policy must ensure that vehicle owners retain full access to and control over the information generated by or necessary to operate their vehicles. Protecting that control also protects affordability by ensuring robust competition for repair, insurance, fleet management, and mobility services.

Put simply: **it is your car; it is your data.**

Vehicle Data Access Is a Core Safety Issue

Vehicle-generated data is essential to safe operation, preventative maintenance, and crash avoidance. Access allows owners to monitor vehicle health, diagnose issues, address defects promptly, and improve driving behavior. For fleet operators, access enables real time visibility into asset utilization, faster responses to roadside incidents, and targeted safety interventions.

When access is restricted or monetized through proprietary systems, safety outcomes suffer. Delayed diagnostics, limited maintenance options, and reduced transparency increase risk for drivers and the traveling public.

The DRIVER Act Is Not “Right to Repair”—It Is Broader

Some stakeholders have suggested that vehicle data access legislation is synonymous with so-called “right to repair” proposals. It is not. Right to repair addresses a narrow subset of data (~20%) related to maintenance and diagnostics. The DRIVER Act codifies the broader and more fundamental principle that vehicle owners control **all** data generated by or necessary to fully enjoy their vehicles.

While the DRIVER Act would resolve most policy concerns raised by right-to-repair advocates by allowing owners to share data with repair shops of their choosing, narrower proposals fall short by:

- Limiting access to a small fraction of total vehicle-generated data;
- Allowing manufacturers to charge owners for access to their own information; and
- Failing to affirm that owners, not OEMs, decide how vehicle data is used, shared, or monetized.

Ownership, Property Rights, and Consumer Choice

When consumers purchase a vehicle, they title it, insure it, and assume responsibility for its operation. It becomes their property, not the manufacturer’s. The same principle applies to the data generated by that vehicle through the owner’s use.

This is consistent with well-established norms in other sectors. Smartphone manufacturers do not own a user’s contacts, location history, or photos. Health technology companies do not own a patient’s medical records. Innovation enables data collection, but it does not transfer ownership of the resulting information.

Restricting owner access through proprietary systems or contracts of adhesion undermines property rights, distorts competition, and limits consumer choice.

What “Access and Control” Means in Practice

The DRIVER Act does not mandate open access to vehicle control systems or proprietary software. It requires that owners receive, direct, real-time, secure access to their data through application programming interfaces or in-vehicle portals.

In practice, this:

- Preserves competition in the aftermarket repair sector;
- Enables fleet owners to choose among competing mobility and data-management providers; and
- Prevents a future where owners must pay recurring fees to access basic operational information such as oil levels, tire pressure, or fuel mileage.

Addressing Cost, Competition, and Cybersecurity Concerns

Some have argued that vehicle data access requirements would increase vehicle costs or impose new burdens on manufacturers. The opposite is true. OEMs already collect, transmit, and monetize vehicle data. The infrastructure exists. Ensuring owners can access their own data does not require new investment. It enhances pricing transparency, preventing owners from being charged to buy back information they already paid to generate.

This promotes affordability over a vehicle lifecycle by supporting competition in repair, insurance, and fleet services—particularly benefiting rural, low-income, and small business owners.

The DRIVER Act also does not compromise cybersecurity or intellectual property. It does not require disclosure of proprietary algorithms, source code, or vehicle control systems. OEMs may use the same secure channels they already employ to share data with dealers and third parties.

Why Federal Action Is Necessary

Clear federal rules are necessary to protect vehicle owners’ rights and prevent data control from becoming a competitive bottleneck that harms consumers and suppresses innovation.

The DRIVER Act establishes predictable, uniform rules of the road that protect ownership principles while allowing manufacturers, service providers, and consumers to innovate in a fair and competitive marketplace.

Conclusion

Connected vehicle technology has changed how information is collected, but it has not changed who owns it. The DRIVER Act reflects longstanding principles of property rights, consumer protection, and market competition adapted for modern vehicles.



AVOA respectfully urges the Subcommittee to support strong vehicle data access and ownership protections in the Surface Transportation reauthorization and to advance the DRIVER Act as part of that effort. We look forward to building bipartisan support for the bill and stand ready to work with Members of the Committee to ensure policies that protect vehicle owners, promote innovation, and enhance roadway safety.

Thank you for your consideration.

Respectfully submitted,

Richard J. Ward III

Executive Director, American Vehicle Owners Alliance (AVOA)

www.americanvehicleownersalliance.org

January 8, 2026

The Honorable Tom Kean
U.S. House of Representatives
Room 251
Cannon House Office Building
25 Independence Avenue, SE
Washington, DC 20515

Dear Representative Kean,

My name is Edgar Chaves Jr, and I am the owner of Britland Auto Body, a family-owned independent repair facility in Somerset & Hunterdon Counties. Twenty years ago, my parents took a leap of faith by entering automotive collision repair industry. Since then, we've grown to three locations, and I now have the privilege of working alongside my parents and brothers as we support our communities in Bridgewater, Green Brook, Ringoes and surrounding communities.

During our twenty-year journey, our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has been able to do this by having open relationship with the vehicle manufacturers and investing in the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit. These same corporations are making decisions on behalf of small businesses and give no one an option to appeal or reject their decisions with zero accountability to potential issues on their behalf.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility in Bridgewater. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,

Edgar Chaves Jr
Owner
Britland Auto Body



Written Statement for the Record from MEMA. The Vehicle Suppliers Association
Submitted to the U.S. House of Representatives Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade

“Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership.”

January 13, 2026

Background

MEMA, The Vehicle Suppliers Association, is the leading trade association in the U.S. for vehicle suppliers, parts manufacturers, and remanufacturers. The mobility sector depends on the resiliency and strength of suppliers, and MEMA has been the voice of the supplier industry since 1904. MEMA’s members design and manufacture the technology, components, and services that enable the production of new vehicles, as well as the essential maintenance and repair of the more than 295 million highway vehicles that are currently on the road in the U.S. The vehicle supplier sector shares the Administration’s objectives of strengthening the domestic manufacturing base, growing U.S. manufacturing jobs, and ensuring more opportunities for communities across the U.S. With more than 932,000 individuals employed across the nation, vehicle suppliers represent the largest sector of manufacturing jobs in the U.S.

MEMA and its member companies appreciate the opportunity to provide comments to the Subcommittee on Commerce, Manufacturing, and Trade.

The Supplier Industry’s Central Role in Vehicle Safety

Vehicle suppliers are the designers and innovators at the forefront of motor vehicle safety technology development. They play a foundational role in creating, testing, and manufacturing many of the critical safety systems integrated into modern vehicles. From traditional safety features such as airbags, seat belts, braking systems, and electronic stability control, to the newest generation of advanced driver assistance systems (ADAS), suppliers bring the technical expertise and manufacturing precision essential to saving lives on U.S. roads.

Suppliers invest heavily in research and development, pioneering technologies that are subsequently incorporated into vehicles and provided to consumers. Their deep understanding of component design, integration challenges, and real-world operational dynamics allows suppliers

to innovate solutions that improve crash prevention, reduce the severity of accidents, and enhance occupant protection. Many safety innovations first emerge at the supplier level before being adopted as standard equipment by Original Equipment Manufacturers (OEMs), underscoring the supplier industry's pivotal role in advancing vehicle safety.

Beyond engineering and innovation, suppliers are integral partners throughout the vehicle lifecycle. They collaborate closely with OEMs, regulatory agencies like the National Highway Traffic Safety Administration (NHTSA), and other stakeholders to ensure that new safety technologies meet rigorous performance standards and regulatory requirements. This partnership ensures that components and systems are not only effective, but also reliable and durable under diverse driving conditions.

Suppliers also contribute significantly to safety validation and testing. Through extensive laboratory testing, simulation, and real-world evaluation, they help verify that safety systems perform as intended under a wide range of scenarios. This testing expertise supports regulatory compliance and provides critical data used to refine and enhance safety standards and consumer information programs such as the New Car Assessment Program (NCAP).

Moreover, suppliers are actively engaged in ongoing monitoring and improvement of vehicle safety post-production to identify emerging safety issues quickly and develop corrective measures. This continuous improvement cycle enables faster response to potential defects, supports efficient recall processes, and fosters the ongoing enhancement of vehicle safety technologies.

The complex, interconnected nature of modern vehicle systems requires a collaborative safety framework. No single entity—OEM, supplier, regulator, or infrastructure provider—can fully ensure vehicle safety alone. MEMA believes that a modern, effective motor vehicle safety framework must recognize and support the shared responsibility among all stakeholders, with suppliers playing a critical and proactive role in every stage from design to deployment and beyond.

As the industry embraces transformative technologies such as greater levels of automation, vehicle connectivity and advanced human machine interfaces, the role of suppliers becomes even more crucial. Suppliers develop cameras, sensors, software, cybersecurity protections, and advanced electronic systems that enable these innovations to function safely and reliably. MEMA and its members are committed to working closely with Congress, federal agencies, and industry partners to ensure that these cutting-edge safety technologies are rigorously tested, properly regulated, and widely deployed to protect all road users.

MEMA appreciates the legislation noticed for this hearing and looks forward to continuing to work with the sponsors as this process moves forward. MEMA would also like to highlight and convey its support for several bills and provisions that will be discussed at the hearing.

Motor Vehicle Modernization Act (Discussion Draft/Chairman Brett Guthrie)

Federal Motor Vehicle Safety Standards (FMVSS) have been central to reducing roadway fatalities and injuries for decades, but many standards have not kept pace with rapid advances in technology or the evolution of modern driver-assistance systems. Several FMVSS still rest on design assumptions that no longer reflect how today's software-defined, sensor-intensive, electrified vehicles function. As global markets modernize their regulatory frameworks more quickly, the United States risks lagging behind, creating uncertainty for manufacturers and slowing deployment of safety technologies validated elsewhere.

New Car Assessment Program (NCAP) Reform

The U.S. New Car Assessment Program once set the global benchmark for vehicle safety information but now trails programs in Europe, Japan, and Korea, which have progressed to incorporate evaluations of advanced driver-assistance systems, pedestrian protection, and emerging crash-avoidance technologies. As the U.S. NCAP does not reflect modern safety technologies in its rating system, consumers are left without clear, comparable information about the features that can help to prevent crashes and save lives. Global misalignment also increases complexity for companies, which are subsequently required to navigate multiple safety rating regimes.

MEMA supports the NCAP provisions in the legislation which would:

- Establish a dedicated NCAP Office within NHTSA led by an Associate Administrator.
 - Responsibilities include:
 - Creating roadmaps for expanding NCAP testing.
 - Administering voluntary performance testing.
 - Conducting consumer education about vehicle safety technologies.
 - Creation of a new NCAP Advisory Committee with stakeholders, including dedicated seats for vehicle supplier representatives.
- Require NHTSA to submit to the relevant congressional committees a report that assesses the feasibility of establishing a public-private partnership, a private entity, or any other similar entity to NCAP, including by assessing the various factors, including motor vehicle safety ratings used internationally that are similar to NCAP as well as Monroney label considerations.

In its official priorities for the surface transportation reauthorization, MEMA called for Congress to direct NHTSA to publish a transparent, forward-looking roadmap for NCAP modernization that fully incorporates supplier technical expertise. Suppliers design and manufacture the majority of the technologies addressed by the NCAP program and roadmap. The supplier industry's participation in this process is essential to ensuring that performance metrics reflect real-world capabilities. MEMA also called for the NCAP program to actively incorporate ADAS technologies into the vehicle star rating and the Monroney labels so that consumers can easily understand a vehicle's safety technologies and ratings at the point of sale. MEMA further indicated that supplier representation should be included in any advisory committee to ensure a comprehensive and technically sound modernization effort.

MEMA is pleased that the reforms included in Chairman Guthrie's bill will move us towards these goals and we thank the Chairman for his leadership on these critical issues.

Vehicle Safety Rulemaking and Research Priority Plan

The U.S. Congress has called upon NHTSA to update its standards and ensure that the U.S. keeps pace with other key nations and regions around the world. However, numerous rulemakings required by Congress remain incomplete—some years overdue—including updates to headlamp performance, alignment requirements, and implementation of Adaptive Driving Beam headlights; minimum performance requirements for lane-keeping and lane-departure warning systems; heavy-vehicle automatic emergency braking standards; battery safety requirements for electrified vehicles; and standards enabling camera-based mirror systems. Additional updates are needed to ensure compatibility with automated vehicle designs that diverge from legacy assumptions about controls, interiors, and system architecture.

Regulatory stagnation discourages investment, impedes innovation and slows progress toward next-generation safety performance.

Chairman Guthrie's legislation will require NHTSA to create a rulemaking and research priority plan that:

- Lists all planned safety rulemakings over the next 36 months, including:
 - Statutory authority.
 - Research status and links to supporting data.
 - Whether related technologies are assessed in NCAP.
 - Whether industry performance criteria exist.
 - Expected rulemaking milestones (advanced notice, proposed rule, final rule).
 - Lists research priorities with objectives and timelines.
 - Compares current vs. previous priority plans (except the first one).

- Public posting and submission to congressional committees are required.
- If the plans fail to be delivered on time, then NHTSA must report the reason and a revised timeline.

MEMA's surface transportation priority document urged Congress to direct NHTSA to address the challenges of unfinished congressionally mandated rules and guidance. MEMA is pleased that Chairman Guthrie's bill emphasizes the importance of this work, which will provide much needed stability and certainty for companies.

Testing and Evaluation of Motor Vehicle Equipment: Parity for Vehicle Suppliers

The 2015 FAST Act granted automakers—but not suppliers—the authority to test and evaluate certain vehicles on public roads under defined conditions. Although intended to accelerate innovation, this statutory framework inadvertently excluded the companies responsible for designing and creating important safety systems as well as relevant hardware and software. As a result, under current federal law, suppliers are limited in what they can test—such as braking systems, advanced sensors, powertrain components, and by-wire steering and braking—without partnering with a vehicle manufacturer. This limitation slows safety validation, impedes innovation timelines, restricts competition, and creates unnecessary dependency within the development process.

MEMA members develop and seek to test a wide range of technologies on public roads, including but not limited to, highway navigation systems that manage lane keeping, lane changes, overtaking, and routing with minimal driver input; urban navigation systems that manage traffic lights, stop signs, and complex intersections while still requiring the driver to remain ready to intervene; lane keep assist systems; sensor fusion for automatic emergency braking, including pedestrian and cyclist protection; road departure mitigation; high beam switch assist; traffic jam assist; and highway assist systems.

Public roads expose technologies to unpredictable driver behavior and everyday operating scenarios that cannot be fully replicated on closed test tracks. While test tracks remain essential for controlled, repeatable, and safety-focused testing, real-world data gathered on public roads is critical for identifying comfort- and safety-related issues before products reach consumers.

MEMA's surface transportation priority document requested that Congress amend current law to provide parity to suppliers concerning the ability to conduct public-road testing and evaluation of advanced vehicle technologies. We are pleased to be joined in this effort by the National Consumers League (NCL), and MEMA strongly supports the provision included in the Motor Vehicle Modernization Act of 2025.

SELF Drive Act (Discussion Draft/Rep. Bob Latta and Rep. Debbie Dingell)

Suppliers develop the majority of technologies that are fundamental for automated driving, including cameras, radar, lidar, ultrasonic sensors, by-wire steering and braking systems, control software, computing platforms, and sensor fusion algorithms. Despite this central role, existing federal frameworks do not consistently recognize suppliers' essential contributions. Suppliers are often excluded from direct testing authority and performance assessment processes, even though they design, manufacture, and refine the systems at the core of automated vehicle functionality.

The discussion draft of the SELF Drive Act noticed for this hearing would establish a comprehensive national framework for the regulation of vehicles equipped with automated driving systems (ADS), including vehicles capable of partial or fully automated operation. The bill sets uniform federal safety requirements for ADS and ADS-equipped vehicles. It is intended to facilitate the safe testing, evaluation, and deployment of automated vehicles while avoiding a patchwork of conflicting state regulations by preempting certain state laws in favor of consistent federal standards.

To accomplish these goals, the Act amends Title 49 of the U.S. Code to grant the Department of Transportation and the National Highway Traffic Safety Administration clear authority over ADS oversight. This includes establishing requirements for manufacturer safety cases, defining conditions for testing and limited commercial operation, permitting ADS-dedicated vehicles without traditional manual controls under specified safety conditions, and creating a national automated vehicle safety data repository for crash and mileage reporting. Together, these provisions are intended to enable data-driven federal safety oversight of automated vehicles throughout their development and deployment lifecycle.

MEMA's surface transportation priority document urged Congress to create a modernized AV framework that would enable suppliers to independently test and evaluate ADS technologies on public roads with appropriate requirements. MEMA is supportive of this discussion draft and looks forward to continuing to engage with Representatives Latta and Dingell as the process moves forward to ensure that vehicle suppliers' priorities are reflected.



MEMA Aftermarket Support for the REPAIR Act (H.R. 1566/Rep. Neal Dunn and Rep. Marie Gluesenkamp Perez)

MEMA Aftermarket represents the manufacturers that produce the parts, tools, diagnostic equipment, and service technologies required to maintain vehicles throughout their complete lifespan. As vehicles rely increasingly on software and embedded electronics, safety-critical maintenance depends on timely access to diagnostic and repair information. Without such access, many vehicles may become difficult or impossible to service, reducing consumer choice and increasing the risk that vehicles remain on the road in unsafe conditions.

As vehicles become increasingly complex and software-driven, access to diagnostic and repair data is critical for consumers and independent repair shops alike. Without clear standards and protections, there is a risk of enabling monopolistic control over repair information, which drives up costs for consumers, limits choice, and stifles innovation. The REPAIR Act prevents this anti-consumer scenario by ensuring that vehicle owners maintain the right to access and control their own vehicle data and choose where and how their vehicle is repaired.

By curbing potential anti-competitive behavior and safeguarding access to essential repair tools and information, the REPAIR Act creates a level playing field for the entire aftermarket industry—including thousands of small businesses and repair shops across the country. These provisions are not only vital for affordability and convenience, but also for ensuring that the free market determines decisions in the repair sector.

The bipartisan REPAIR Act (H.R. 1566), sponsored by Representatives Neal Dunn and Marie Gluesenkamp Perez, establishes a secure, standardized framework to ensure that suppliers, independent repairers, and authorized service providers can access the information necessary to diagnose and repair vehicles safely and effectively.

MEMA Aftermarket strongly supports inclusion of the REPAIR Act in the surface transportation reauthorization. Preserving access to critical repair and diagnostic data promotes competition, reduces repair costs for consumers, and, most importantly, keeps vehicles in safe operating condition across their full lifespan.

Conclusion

Vehicle suppliers are the foundation of automotive safety innovation and a critical pillar of the U.S. manufacturing economy. The policies outlined in this statement are essential to maintaining U.S. leadership in safety technology and accelerating the deployment of innovations that save lives and prevent injuries on the nation's roads.

MEMA and its members stand ready to work with Congress, NHTSA, and all stakeholders to advance these priorities, support a strong domestic manufacturing base, and ensure that American roads remain among the safest in the world.

Thank you for the opportunity to provide this statement for the record.



January 9, 2026

Honorable Brett Guthrie
Chairman
Committee on Energy & Commerce
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Guthrie,

On behalf of MEMA, The Vehicle Suppliers Association, I write to express our appreciation for the inclusion of the vehicle supplier testing or evaluation parity provision in your discussion draft legislation, the Motor Vehicle Modernization Act of 2025. MEMA supports maintaining this provision as Congress moves forward with highway reauthorization.

Vehicle suppliers design, engineer, and manufacture the vast majority of parts and components used in modern vehicles, including many of the most safety- and performance-critical systems. A critical shortcoming in current law, however, stems from the 2015 FAST Act, which granted automakers—but not suppliers—the authority to test and evaluate vehicles on public roads under defined conditions. While this provision was intended to accelerate innovation, it inadvertently excluded the companies responsible for developing these essential components and technologies.

As a result, under current federal law, suppliers are limited in what they can test—such as braking systems, advanced sensors, powertrain components, and by-wire steering and braking—without partnering with a vehicle manufacturer. This limitation has tangible impacts on the development process, slowing safety validation, impeding innovation timelines, restricting competition, and creating unnecessary dependency within the technology ecosystem. Without parity in testing authority, delays cascade throughout the development cycle, slowing the deployment of proven technologies and ultimately delaying safety benefits for consumers.

MEMA members develop and seek to test a wide range of technologies on public roads, including but not limited to, highway navigation systems that manage lane keeping, lane changes, overtaking, and routing with minimal driver input; urban navigation systems that manage traffic lights, stop signs, and complex intersections while still requiring the driver to remain ready to intervene; lane keep assist systems; sensor fusion for automatic emergency braking, including pedestrian and cyclist protection; road departure mitigation; high beam switch assist; traffic jam assist; and highway assist systems.

Public roads expose technologies to unpredictable driver behavior and everyday operating scenarios that cannot be fully replicated on closed test tracks. While test tracks remain essential



for controlled, repeatable, and safety-focused testing, real-world data gathered on public roads is critical for identifying comfort- and safety-related issues before products reach consumers.

MEMA strongly supports the provision included in the discussion draft that would grant vehicle suppliers independent authority to conduct public-road testing and evaluation vehicle technologies.

We appreciate your leadership and look forward to continuing to work with you and your staff to advance policies that promote innovation, competition, and safety for all road users.

Sincerely,

Jon Gentile
Vice President, Legislative Affairs
MEMA. The Vehicle Suppliers Association

POWERSPORTS INDUSTRY



2025 ECONOMIC IMPACT IN U.S. TOTAL

\$50.9 Billion

THE VALUE OF THE POWERSPORTS
RETAIL MARKETPLACE

1,261,300

ESTIMATED NEW POWERSPORTS
RETAIL SALES

DIRECT ECONOMIC CONTRIBUTIONS OF POWERSPORTS RETAILERS

10,690

NUMBER OF POWERSPORTS
RETAILERS

116,000

PEOPLE EMPLOYED AT
DEALERSHIPS

\$5.0 B

TOTAL PAYROLL

2023 U.S. ON-ROAD MOTORCYCLE PURCHASERS 35 YEARS & YOUNGER



46% were first-time buyers



\$70K was their median income



9% were interested in
electric motorcycles



41% primarily used their motorcycle for
commuting to work/school

For more information about the motorcycle and powersports industry in your district, please contact the MIC's Government Relations Office at (703) 416-0444. To receive our weekly Ride Report, please visit mic.org.



MOTORCYCLE
INDUSTRY
COUNCIL®

Source: 2023 MIC Retail Outlet Audit
2022 MIC Retail Outlet Profile Study
2023 Motorcycle Consumer
Experience Study

2023 MIC Motorcycle Statistical Annual
2023 Estimated New Powersports Retail Sales, Motorcycle Industry Council, Inc., Irvine, CA
U.S. Department of Transportation, Federal Highway Administration, November 2024

Motorcycle Riders Foundation

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*"The only national motorcyclists' rights organization
dedicated to on-street riders"*



January 12, 2026

The Honorable Gus Bilirakis
Chairman Subcommittee on Commerce, Manufacturing and Trade
United States House of Representatives
Washington, DC 20515

Dear Chairman Bilirakis:

On behalf of the Motorcycle Riders Foundation (MRF) and the millions of motorcyclists we represent nationwide, I write to express our strong support for H.R. 3385, legislation to update the federal definition of a motorcycle.

The current federal definition of a motorcycle has not kept pace with modern vehicle design and technology. Over time, outdated language has created confusion for regulators, manufacturers, state agencies, and most importantly riders. H.R. 3385 provides a necessary update to this definition, ensuring that motorcycles are clearly distinguished from other vehicle categories and regulated appropriately.

In recent years, a new type of vehicle has entered our roadways, commonly referred to as an *autocycle*. These autocycles are currently classified as motorcycles under federal law, yet they bear little resemblance to a traditional motorcycle and possess vastly different operational characteristics.

The Motorcycle Riders Foundation believes this ambiguity surrounding autocycles has created an unnecessary patchwork of rules and regulations from state to state regarding licensing, insurance, safety statistics, registration, and training requirements. This inconsistent approach undermines both rider safety and sound policymaking and further demonstrates why a modernized federal definition is long overdue.

This clarity is especially important as federal agencies continue to develop and implement safety, environmental, and transportation rules. When motorcycles are inaccurately grouped with passenger vehicles or emerging vehicle classes, riders can face unintended regulatory burdens, and standards that do not reflect the unique performance, design, and use of motorcycles. H.R. 3385 helps prevent these unintended consequences by establishing a commonsense definition rooted in how motorcycles are actually built and operated.

The MRF has long advocated for fair and accurate treatment of motorcycles in federal policy. Riders deserve regulations that enhance safety and mobility without imposing one-size-fits-all

Motorcycle Riders Foundation

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*"The only national motorcyclists' rights organization
dedicated to on-street riders"*



rules designed for cars and trucks. Updating the federal definition of a motorcycle is a foundational step toward that goal.

We respectfully urge you to support and advance H.R. 3385. The Motorcycle Riders Foundation stands ready to work with you and your colleagues to ensure that federal transportation policy reflects the realities of motorcycling in the 21st century.

Thank you for your continued commitment to America's riders.

Sincerely,

Kirk "Hardtail" Willard
President
Motorcycle Riders Foundation



Creating Efficient, Sustainable, Safe Fleets

GENERAL CORRESPONDENCE

180 Talmadge Road
IGO Bldg Suite#558
Edison, NJ 08817

PAYMENTS AND CHECKS

P.O. Box 412963
Boston, MA 02241-2963

609-720-0882

info@nafa.org

January 12, 2026,

Chairman Bilirakis and Ranking Member Schakowsky:

As the leading national association representing public and private fleet managers, NAFA appreciates your attention to critical fleet issues in your upcoming hearing, Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership. We respectfully request that this letter be included in the hearing record.

NAFA is the national association of private and public fleet managers. Fleets purchase approximately 20 percent of all vehicles sold in the United States, move more than \$10 trillion in goods annually, and contribute roughly \$800 billion to the U.S. economy. Fleets provide critical public services, including fire and police response, school transportation, public transit, and road and utility maintenance and repair. Fleets also ensure that manufacturers receive the raw materials they need, grocery and retail stores remain stocked, and packages are delivered to homes and businesses. Because of this scale, policies affecting fleet operations have direct implications for economic stability, public safety, and consumer affordability nationwide.

With respect to the issues before the Committee, catalytic converter theft and unfettered fleet access to the data their vehicles generate are both operationally and economically consequential for fleet operators.

Thieves steal catalytic converters from vehicles and sell them to scrap dealers for the value of metals such as platinum. This leaves vehicles unusable, and replacement can cost thousands of dollars per incident. The Preventing Auto Recycling Theft (PART) Act, by requiring converters to bear clearly marked identification numbers, permitting them to be associated with individual vehicles, and requiring entities purchasing converters in the secondary (scrap) market to keep transaction records, would meaningfully deter this criminal activity. The legislation also establishes criminal penalties for theft or resale of converters, creating consequences for what is currently a low-risk activity for thieves. NAFA supports these provisions as a practical, enforcement-focused approach to disrupting illicit resale channels and reducing catalytic converter theft nationwide.

Another critical issue for fleets is access to the extensive data that modern vehicles generate. This data includes vehicle component performance, such as battery health, as well as vehicle usage information, including acceleration, braking, and speed. Fleets rely on this data to ensure safe operation, timely maintenance, cost control, and efficient deployment of vehicles. This

information is increasingly transmitted via telematics—over-the-air, cellular-based systems that allow remote access to vehicle data.

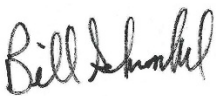
Vehicle manufacturers are increasingly using telematics systems to control and monetize access to data generated by vehicles that fleets own or lease. While manufacturers design the hardware and software systems, fleets operate the vehicles, bear the operational risk, and depend on continuous access to this data to meet safety, service, and compliance obligations. Restricting or paywalling access to essential vehicle data raises fleet operating costs and can negatively affect maintenance, uptime, and safety outcomes.

Both the Data Rights for Information and Vehicle Electronics in Real-Time (DRIVER) Act and the Auto Data Privacy and Autonomy Act would ensure that fleets have appropriate access to critical data generated by the vehicles they own or lease without being forced to repurchase their own operational data. NAFA supports these approaches as balanced, pro-competition policies that protect safety and consumer affordability.

The REPAIR Act, by contrast, would explicitly authorize manufacturers to charge for vehicle data access, effectively granting manufacturers exclusive control over customer vehicle data. This approach would undermine fleets' ability to manage their vehicles efficiently and safely while increasing costs across both public and private fleets. NAFA has consistently opposed this framework.

We appreciate your attention to these important policy matters and stand ready to serve as a technical and operational resource to the Committee as it considers legislative options affecting fleet safety, consumer affordability, and U.S. automotive leadership.

Respectfully,



Bill Schankel
CEO
NAFA Fleet Management Association



The Honorable Gus Bilirakis
Chairman
Subcommittee on Commerce, Manufacturing,
and Trade
House Committee on Energy and Commerce
2306 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Jan Schakowsky
Ranking Member
Subcommittee on Commerce, Manufacturing,
and Trade
House Committee on Energy and Commerce
2408 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Bilirakis and Ranking Member Schakowsky,

On behalf of the **National Automotive Service Task Force (NASTF)**, we appreciate the committee's commitment to ensuring that Americans have the tools and data needed to fix their vehicles. That is a commitment we share and, in fact, is NASTF's purpose.

As you consider legislation affecting automotive right to repair, we wanted to provide background on the role NASTF plays in ensuring an equal playing field for all automotive service professionals.

Background on NASTF

The National Automotive Service Task Force (NASTF) is a not-for-profit, 501(c)(6), established in 2000 to facilitate the identification and correction of gaps in the availability and accessibility of automotive service information, service training, diagnostic tools and equipment, and communications.

NASTF is the largest automotive repair trade association with 53,892 members and over 8,000 vehicle security professionals who perform over 300,000 secure transactions per year.

NASTF is a cooperative effort among the automotive service industry, the equipment and tool industry and automobile manufacturers (OEMs). There is no cost to participate in NASTF, which is open to professional auto service technicians, shop owners, service writers, OEM service employees or any other automotive industry professional.

NASTF helps to ensure an equal playing field for all automotive service professionals and serves as an intermediary between the technician and OEMs.

NASTF's Role in Ensuring Automotive Right to Repair

NASTF operates under the Automotive Service Information Standards (ASIS) agreement signed by nearly all automakers in 2008. The agreement requires automakers to offer all information and tools available to their franchise dealer to independent repairers. It also establishes NASTF as the resource for delivery of vehicle security information related to repair and producing keys for the aftermarket.

Further, the 2013 Massachusetts Right to Repair law and the 2014 industry wide Memorandum of Understanding (the “MOU”) require automobile manufacturers (OEMs) to make available for purchase to owners and independent repair facilities, at a fair and reasonable cost, the tools and data necessary to diagnosis and repair vehicles. This must be the same diagnostic and repair information provided to dealers.

NASTF is named in the 2013 Massachusetts Repair law and the 2014 MOU as the mediator for aftermarket technicians and automakers when the above information is unavailable. When a technician encounters an issue where information is missing or a support system is broken, they can submit a request for assistance¹ and NASTF will contact the correct individual at the automaker for assistance. **NASTF receives an average of 140 requests per year and has a 90% resolution rate.**

The majority of automakers have very good systems in place to support repairers. NASTF assists with the occasional issue that affects everyone using the system, oftentimes independent and dealer alike. Technicians facing the same or similar problems are encouraged to add their experience to the original request. This helps automakers understand the scope of the issue, most of which are related to information technology (IT). NASTF also employs a number of specialist members who inform us of issues so that we can take them to the appropriate brand before they cause significant downtime for the impacted technicians.

NASTF is aware of additional efforts² in the industry to gather technician concerns with repair information, specifically from the Auto Care Association. We have proactively reached out to provide support and ensure the concerns collected are addressed by manufacturers through the established “service information request” process. We are disappointed that the Auto Care Association has recently declined our request to support resolving these technicians’ concerns as we are confident that we could resolve the majority of these issues with the help of our OEM partners.

¹ https://wp.nastf.org/?page_id=842

² <https://www.autocare.org/government-relations/resources/toolkit/right-to-repair-media-kit-for-drivers-and-shops>

Secure Data Release Model

NASTF also operates the Secure Data Release Model (SDRM).³ This system allows automakers to share security related information and tool functions with independent repairers and locksmiths

Background checked, credentialed Vehicle Security Professionals (VSPs) using the SDRM process can purchase key and immobilizer codes, PIN numbers and special tool access from automaker websites. Each transaction is monitored and validated by NASTF.

As always, NASTF will continue to work to ensure that the tools and data needed for owners and independent repair facilities to repair vehicles is available and to solve industry-wide concerns.

Please reach out with any further questions about NASTF's work and our role in ensuring automotive right to repair.

Sincerely,

Donny Seyfer
Executive Officer
National Automotive Service Task Force
dseyfer@nastf.org
303-994-8643

³ https://wp.nastf.org/?page_id=367



**MOTORCYCLE
INDUSTRY
COUNCIL®**

January 11, 2026

The Honorable Brett Guthrie
House Energy & Commerce Subcommittee on
Commerce, Manufacturing, and Trade
2125 Rayburn House Office Building
Washington, DC 20515

RE: Oppose H.R. 3385, which directs the Secretary of Transportation to issue certain regulations to update the definition of motorcycle.

Dear Representative Guthrie:

The Motorcycle Industry Council (MIC)¹, represents several hundred companies in the powersports industry. H.R. 3385 will be considered on January 13 at the House Energy and Commerce Subcommittee on Commerce, Manufacturing, and Trade. We write to express our strong opposition to H.R. 3385, as the legislation threatens to eliminate an entire category of innovative American-made products from commerce and jeopardize thousands of domestic jobs.

H.R. 3385 seeks to narrow the federal definition of a "motorcycle" by excluding three-wheeled vehicles equipped with steering wheels, pedals, and bucket seats—commonly referred to as autocycles. This is not a mere administrative adjustment; it is a de facto ban on an established and successful motorcycle market segment. Federal law currently lacks a separate "autocycle" safety category. By removing these vehicles from the motorcycle definition, H.R. 3385 places them in "classification limbo," making it illegal to sell or register them.

Our opposition is based on the following critical impacts:

Total Market Elimination

Current federal safety standards and registration laws rely on the broad motorcycle definition to classify three-wheeled vehicles. By excluding autocycles from this definition without creating a viable, alternative federal safety category, H.R. 3385 would effectively make it illegal to sell or operate autocycles.

This would result in the immediate withdrawal of these product lines from the U.S. market, which could result in certain manufacturers going out of business while others would suffer massive financial harm.

Conflicts with Several State Laws

Several state laws tie their definitions of motorcycles to federal law in order to register motorcycles in their states and H.R. 3385's passage would throw those state laws into chaos. For instance, Alabama law² defines "autocycle" as a motor vehicle that is manufactured and certified to comply with the applicable federal motorcycle safety standards under 49 C.F.R. Part 571. This directly ties registration

¹ The Motorcycle Industry Council (MIC) is a not-for-profit, national trade association representing several hundred manufacturers, distributors, dealers and retailers of motorcycles, scooters, motorcycle parts, accessories and related goods, and allied trades.

² [Alabama Code § 32-6A-1](#): Operation of Autocycles.

and operation of autocycles to that product's federal definition of a motorcycle. Similar to Alabama, 14 other states would have their state registration and operation laws upended if H.R. 3385 were to become law, resulting in tens of thousands of current state autocycle registrations being invalidated. Florida, Idaho, and Illinois' state laws would be impacted similarly to Alabama, as each of these jurisdictions ties the legal registration and operation of autocycles directly to their compliance with federal motorcycle safety standards.

Severe Economic Impact

The autocycle segment represents hundreds of millions of dollars in domestic investment. Forcing these products out of commerce would lead to immediate plant closures, the loss of skilled manufacturing and engineering jobs, and a significant hit to dealership revenue across all 50 states. In 2025, the value of the powersports retail marketplace in the United States was \$51 billion, with an estimated 1.2 million new powersports retail sales and 10,690 powersports retailers.

Safety Standards Disruption

Autocycles have been engineered, tested, and validated to meet or exceed the safety requirements for the motorcycle category. Forcing these vehicles into "classification limbo" ignores a decade of proven safety performance on American roads and penalizes manufacturers for innovating within the existing regulatory framework.

A Deviation from Free-Market Principles

Similar to our concerns with the REPAIR Act (H.R. 1566), we believe H.R. 3385 is unnecessary government overreach that picks winners and losers in the marketplace. Innovation should be driven by consumer demand and safety performance, not by arbitrary reclassifications that destroy established industries.

We respectfully urge you to protect American innovation and jobs that support the manufacturing sector and oppose H.R. 3385. We believe that regulatory clarity should support market growth, not act as a "death knell" to a thriving sector of the powersports industry. We look forward to providing your staff with technical data regarding the economic and safety value of the autocycle segment.

Thank you for considering our comments. Should you have any questions, please contact me at 571-684-6144.

Sincerely,



Scott P. Schloegel

Senior Vice President, Government Relations

Testing & Evaluation Parity for Vehicle Suppliers

A Safety-Focused, Innovation-Enabling Update for the Highway Bill Reauthorization

Vehicle suppliers—auto parts manufacturers—design and build many of the systems that directly determine a vehicle’s safety, efficiency, and performance, including braking systems, emissions controls, sensors, and powertrain components. These technologies must be validated in real-world driving conditions before reaching consumers.

The 2015 FAST Act granted automakers authority to conduct independent testing and evaluation on public roads under controlled and responsible conditions. That authority did not extend to suppliers, even though they develop critical technologies that also require on-road evaluation. As a result, suppliers may only conduct such testing at the national level when partnered with an automaker, slowing safety verification and delaying improvements that benefit consumers.

A federal framework would allow suppliers to do this at their facility locations around the country, which is particularly important as vehicle supplier presence has expanded throughout the United States in recent years.

Expanding federal authority is a narrow, practical update that strengthens safety and supports innovation without altering any existing automaker obligations or exemptions.

Why This Matters for Safety and Consumers

Strengthening Real-World Safety Validation

Many safety-critical systems cannot be fully validated through laboratory or closed-track testing. Controlled access to public roads allows suppliers to evaluate components in the same conditions Americans drive every day—different weather, terrain, road surfaces, and traffic environments. This leads to more complete safety data, faster identification of issues, and technologies that are better prepared to meet federal safety requirements and consumer expectations.

Advancing Innovation

Suppliers are responsible for a significant share of the innovation that improves vehicle safety and performance. Without the ability to independently test on public roads, development slows and consumers wait longer for safety-enhancing technologies. Testing parity would allow suppliers to validate innovations more efficiently while remaining fully accountable under the same controlled framework Congress established for automakers in 2015.

MEMA. The Vehicle Suppliers Association and the National Consumers League support extending this authority to suppliers to ensure that technologies are tested as thoroughly and safely as possible before reaching the public.

January 13, 2026

The Honorable Gus Bilirakis
Chair
Subcommittee on Commerce, Manufacturing,
and Trade
U.S. House of Representatives
Washington, DC 20515

The Honorable Jan Schakowsky
Ranking Member
Subcommittee on Commerce, Manufacturing,
and Trade
U.S. House of Representatives
Washington, DC 20515

Dear Chair Bilirakis and Ranking Member Schakowsky:

We, the undersigned organizations representing a cross-section of industry and interested stakeholders are writing in strong support of H.R. 5221, the “Preventing Auto Recycling Theft” (PART) Act, a bill to combat the national problem of catalytic converter theft. Law enforcement has called for federal legislation to help trace stolen catalytic converters and make the market more transparent to deter their theft. We respectfully urge the House Energy and Commerce Committee to protect consumers and small businesses from catalytic converter theft and include the PART Act in the upcoming surface transportation reauthorization legislation.

As you may be aware, catalytic converters contain valuable metals, such as rhodium, platinum and palladium. Thieves can easily and quickly steal catalytic converters from vehicles, and since they are not readily traceable, there is a lucrative market for these stolen parts. These thefts are costing millions of dollars to businesses and vehicle owners alike. In addition, replacing a catalytic converter is costly and often difficult due to the part’s skyrocketing demand and supply chain shortages.

The lack of traceable identifying marks on a catalytic converter allows criminals to launder the parts by selling to local middlemen, often referred to as “core buyers,” who buy stolen parts to then sell to scrap yards or smelters. Stolen catalytic converters can command up to \$350 each on the black market, while the replacement cost to vehicle owners can be as high as \$2,500. Repair costs are often higher because thieves regularly damage other parts of the vehicle when removing the catalytic converter.

While reported theft has dropped since the high of the pandemic-era rates, catalytic converter theft is significantly higher than pre-2019 levels and continues to affect communities nationwide. Data on catalytic converter theft is generated mostly from insurance claims, but many thefts simply go unreported as not all insurance policies cover the replacement of a stolen converter. Unreported theft is particularly prevalent among older, less valuable vehicles, where deductibles and premium increases may exceed the value of the claim. This leads to expensive catalytic converter replacements, potential secondary damage, and significant vehicle downtime - burdens that disproportionately affect car owners who can least afford them.

H.R. 5221 provides a national framework to help law enforcement combat rising catalytic converter theft. Because this crime frequently involves trafficking stolen parts across state lines, a federal law is needed to aid the efforts of local law enforcement.¹ The bill also provides that catalytic converter transactions are recorded and made readily accessible to law enforcement officials to ensure bad actors are caught within the chain of commerce.

¹“Justice Department Announces Takedown of Nationwide Catalytic Converter Theft Ring,” *U.S. Department of Justice*, Nov. 2, 2022, <https://www.justice.gov/opa/pr/justice-department-announces-takedown-nationwide-catalytic-converter-theft-ring>

Additionally, the legislation requires new vehicles to have unique, traceable identifying numbers stamped on catalytic converters at the time of assembly. Currently, unless a thief is caught in the act of stealing a catalytic converter, there is no way to tie the stolen part to a specific vehicle.

According to law enforcement, marking catalytic converters would preserve their resources and give local law enforcement the tools they need to prosecute thieves while also acting as a theft deterrent. The bill also establishes a federal criminal penalty for the theft, sale, trafficking or known purchase of stolen catalytic converters of up to five years in jail. H.R. 5221 includes non-controversial [revisions](#) in this Congress to improve clarity and enhance enforcement.

We urge Congress to include the bipartisan PART Act in the surface transportation reauthorization to help local law enforcement trace stolen catalytic converters, deter theft, protect consumers, and conserve valuable law enforcement resources nationwide. Thank you for your consideration.

Sincerely,

National Automobile Dealers Association
American Car Rental Association
American Property and Casualty Insurance Association
American Rental Association
American Truck Dealers
American Trucking Associations
Automotive Recyclers Association
Carvana
Elite Catering and Event Professionals
FBI Agents Association
Federal Law Enforcement Officers Association
Major Cities Chiefs Association
Major County Sheriffs of America
NAFA Fleet Management Association
National Association of Mutual Insurance Companies
National Auto Auction Association
National Automatic Merchandising Association
National Consumers League
National District Attorneys Association
National Independent Automobile Dealers Association
National Insurance Crime Bureau
National Private Truck Council
National RV Dealers Association
National Salvage Vehicle Reporting Program
National Sheriffs' Association
National Tank Truck Carriers
NTEA The Association for the Work Truck Industry
Truck Renting and Leasing Association
UPS

Cc: The Honorable Brett Guthrie, Chairman, House Energy and Commerce Committee
The Honorable Frank Pallone, Ranking Member, House Energy and Commerce Committee
The Honorable Jim Jordan, Chairman, House Judiciary Committee
The Honorable Jamie Raskin, Ranking Member, House Judiciary Committee
The Honorable Sam Graves, Chairman, House Transportation and Infrastructure Committee
The Honorable Rick Larsen, Ranking Member, House Transportation and Infrastructure Committee



January 12, 2026

The Honorable Brett Guthrie
Chair, House Energy & Commerce
Committee
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Frank Pallone
Ranking Member, House Energy & Commerce Committee
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Gus Bilirakis
Chairman, Subcommittee on Commerce,
Manufacturing and Trade
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Jan Schakowsky
Ranking Member, Subcommittee on Commerce,
Manufacturing and Trade
2125 Rayburn House Office Building
Washington, D.C. 20515

Re: Statement for the Record by the Recycled Materials Association – House Energy & Commerce Subcommittee on Commerce, Manufacturing and Trade Hearing, “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership”

Dear Chairman Guthrie, Ranking Member Pallone, Chairman Bilirakis, and Ranking Member Schakowsky,

The Recycled Materials Association (ReMA), the leading organization dedicated to promoting safe, economically sustainable, and environmentally responsible recycling, writes to express concerns with H.R. 5221, the Preventing Auto Recycling Theft (PART) Act. ReMA represents 1,700 companies that play a critical role in supplying recycled materials to U.S. manufacturers, generating \$169 billion in economic impact and supporting nearly 600,000 jobs nationwide in 2024.¹

ReMA is the only national trade association representing the full end-of-life chain of custody for catalytic converters, including auto dismantlers, metal recyclers, downstream processors and smelters. It is estimated that more than 30 million catalytic converters are legally recycled every year – mainly through the recycling of end-of-life automobiles - returning those precious metals back to the manufacturing supply chain. These platinum group metals are critical inputs for a wide range of products, from biomedical supplies to capacitors needed for data center growth, and more.

The recycled materials industry recognizes the significant financial burden and distress that catalytic converter thefts impose on American families and has long worked with state and local governments and law enforcement to prevent these stolen materials from entering the marketplace. While ReMA supports strong, enforceable measures to deter catalytic converter theft, the PART Act as introduced does not fully account for the practical realities of the end-of-life vehicle supply chain or established chain of custody practices. As a result, certain provisions risk unintentionally disrupting legitimate recycling operations and the supply of critical materials without meaningfully strengthening theft prevention or improving enforcement outcomes.

¹ [Economic Impact Study - U.S. Based Recycled Materials Industry, 2024 Executive Summary](#)

While catalytic converter theft imposes real hardship on victims, theft-related material represents a small fraction of the catalytic converters recycled annually, underscoring the importance of targeted enforcement that disrupts criminal activity without impeding legitimate commerce. ReMA members believe that limiting purchase points and clearly defining who may lawfully possess detached catalytic converters are among the most effective ways to eliminate the black market that fuels this crime. Consistent with this approach, and to support these efforts, the industry developed ScrapTheftAlert.com, a voluntary tool that enables law enforcement to quickly notify recyclers of major thefts, share identifying information, and prevent stolen materials from reentering the legitimate supply chain.

Accordingly, ReMA respectfully requests the Committee consider the following targeted changes to ensure the legislation is workable, effective, and advances the shared goal of eliminating catalytic converter theft while reflecting the realities of, and without risking the disruption of, the end-of-life catalytic converter supply chain:

- **Tailor recordkeeping requirements to reflect the practical differences between business-to-business transactions and transactions involving individuals.** This section in particular must be clarified to indicate what information should be transferred at point of sale across the supply chain. Currently, there are 19 states² that have established separate recordkeeping requirements for individual vs. business sellers. Uniform recordkeeping requirements that fail to distinguish between individuals and business-to-businesses transactions would impose unnecessary burdens on lawful commerce without improving theft detection.

1) PURCHASES FROM INDIVIDUALS. — For transactions in which the seller is an individual, the purchaser must maintain a record of the following:

- (A) The name, address, telephone number and a photocopy of a government issued identification of the seller;*
- (B) the make, model, and vehicle identification number (VIN) of the vehicle from which the catalytic converter was removed, if available;*
- (C) a statement signed by the seller attesting that the catalytic converter is not stolen and is free of any liens or encumbrances and the seller has the right to sell it;*

2) PURCHASES FROM BUSINESSES. —For transactions between businesses that lawfully possess a catalytic converter or converter substrate the purchaser must maintain a record of the following:

- (A) a record of the transaction date, location of the transaction, and volume in accordance with the custom of the trade for the type of transaction*

- **Remove the reference to “motor vehicle parts that contain precious metals,”** to ensure the provision remains tailored to catalytic converters. ReMA supports strong, enforceable measures to deter and address catalytic converter theft, however, inclusion of this broader language risks

² AL, AZ, CA, CT, GA, IA, IN, KY, MN, MS, NC, NJ, NV, OK, OR, SC, TN, TX, WI. To note, ME does not set different recordkeeping requirements, but instead requires that catalytic converters be marked when they are removed from a vehicle, with different marking requirements for vehicle recyclers (VIN or the recycler’s license and stock number) vs from other persons (VIN). Additionally, 4 states only allow business sellers: DE, ID, MD, PA.

sweeping in lawful recycling of non-targeted vehicle components and imposing unnecessary compliance burdens on lawful automobile dismantlers and recyclers.

- **Preserve the recycling of catalytic converters, including those that may lack a VIN or Unique Identifying Number.** As drafted, the bill's recordkeeping requirements require the purchaser to obtain "the vehicle identification number or a unique part identification number marked, etched, or engraved on the converter that can be tied directly to the vehicle identification number of the vehicle," "while also including prohibition on the sale of catalytic converters that have had identifying markings "removed or otherwise tampered with." Together, these provisions fail to account for catalytic converters that were manufactured and placed into use prior to the enactment of the bill and its related regulatory requirements.

As a result, lawful catalytic converters that were never marked may be excluded from the legitimate recycling system through no fault of the recycler. While the legislation would require new catalytic converters to be marked with a VIN or Unique Identifying Number at the point of sale, and establishes a grant program to support marking, neither the marking requirements nor the grant program can take effect immediately. Given that vehicles typically take 12-15 years to reach a recycler – and that the average light vehicle on the road today is approximately 12.8 years old³ – there will be a lengthy transition period during which many catalytic converters would remain without marking and could be unintentionally excluded from the recycling system.

- **Reconsider classifying catalytic converters as "major parts" under federal law as it could conflict with – and potentially undermine – existing state frameworks.** Our laboratories of democracy have repeatedly demonstrated both the capacity and willingness to enact, strengthen, and revise catalytic converter laws to deter theft, target bad actors in the supply chain, equip law enforcement with the appropriate tools to investigate and prosecute these crimes, and ensure victims have access to meaningful recourse.

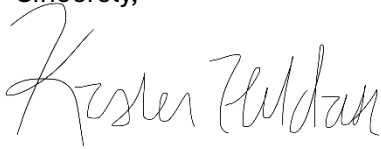
Every state except Wyoming regulates catalytic converter purchases through metals purchase requirements or related statutes, and in each case imposes additional or heightened restrictions beyond those applied to other recycled (or scrap) metal such as unique documentation, proof of ownership, and reporting requirements. The majority of these laws treat catalytic converters as restricted metal property, rather than as automobile parts governed under vehicle dismantling statutes. This very important distinction is a necessary tool for limiting legitimate purchase points that helps limit the black marketplace in which this crime thrives. In direct response to stakeholder concerns, 45 states have updated catalytic converter laws in the last five years. This provision would layer a duplicative federal recordkeeping and enforcement framework on top of an already robust and evolving state system. Even though well-intentioned, an additional federal overlay may complicate investigations and create unnecessary confusion, duplication, and potential loopholes without improving on-the-ground enforcement outcomes for crimes traditionally handled at the state and local level.

³ U.S. Department of Transportation, Bureau of Transportation Statistics, Average Age of Automobiles and Trucks in Operation in the United States (data table, including average age of passenger cars and light trucks), available at <https://www.bts.gov/content/average-age-automobiles-and-trucks-operation-united-states>

A more effective federal approach would support state enforcement efforts, improve information-sharing within law enforcement, and avoid imposing a one-size-fits-all federal transaction regime on a system already regulated at the state level.

ReMA stands ready to work with the Committee to strengthen the PART Act in a manner that effectively deters criminal activity without disrupting legitimate recycling operations or existing state enforcement frameworks. With targeted, practical adjustments, Congress can advance meaningful theft prevention while preserving lawful catalytic converter recycling infrastructure. Should you have any questions or wish to discuss these concerns further, please contact me at khildreth@recycledmaterials.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristen Hildreth". The signature is fluid and cursive, with the first name "Kristen" written in a larger, more prominent script than the last name "Hildreth".

Kristen Hildreth
VP of Government Relations & Public Policy



The SELF DRIVE Act

The SELF DRIVE Act from Representatives Bob Latta and Debbie Dingell is bipartisan, groundbreaking legislation that enhances safety, strengthens U.S. technological competitiveness, expands mobility, and grows American jobs.

Need to Know

- Establishes appropriate federal and state authority to regulate autonomous vehicles. More than half of U.S. states have autonomous vehicle deployment statutes and these laws will remain in force going forward, providing states an important role in AV regulation as the federal government moves forward on vehicle design and performance policy.
- Raises the bar on safety of autonomous vehicles by requiring that the National Highway Traffic Safety Administration (NHTSA) enact federal rules requiring a safety case and establishing driving competency requirements.
- Promotes vehicle accessibility for people with disabilities by modernizing AV design regulations on manual controls, which will facilitate the development of next-generation vehicle platforms that better serve Americans.
- Strengthens autonomous vehicle incident reporting by enshrining requirements in statute, requiring NHTSA to codify particular requirements, and establishing information sharing with state transportation authorities.

Key Provisions in the SELF DRIVE Act

Section 3 requires manufacturers of automated driving systems (ADS) and ADS-equipped vehicles to develop and document a formal “safety case” before selling or importing those systems or vehicles in the U.S. It creates a mandatory, enforceable framework for automated driving systems, shifting ADS oversight toward documented, reviewable safety justifications before these systems can be sold or deployed in the U.S. Section 3 also defines what a required “safety case” for an automated driving system (ADS) must contain and sets minimum competencies an ADS must demonstrate.

Section 3 establishes a new National AV Safety Data Repository to formalize and standardize ADS incident and mileage reporting, improves federal and state access to safety data, and replaces the current crash reporting requirements with a permanent regulatory system.



The SELF DRIVE Act

Section 3 establishes cybersecurity protections by requiring a written cybersecurity plan describing how the manufacturer detects, prevents, and responds to cyberattacks, unauthorized intrusions, and malicious vehicle control commands. It also requires oversight and congressional reporting on the implementation of federal rules protecting the cybersecurity and supply chain security of connected vehicles.

Section 3 ensures that ADS-dedicated vehicles carrying human occupants include a way for occupants to command a safe stop and exit, while preventing regulators from forcing traditional human-driver controls onto ADS-dedicated vehicles.

Section 4 modernizes federal law around testing and evaluation to accommodate automated driving systems, allows carefully controlled commercial activity as part of testing, and gives the U.S. Department of Transportation tools to prevent testing exemptions from being used as a substitute for full regulatory compliance at scale.

Section 5 allows ADS-equipped vehicles to temporarily deactivate human-driver controls during automated operation, without violating “make inoperative” rules, while preserving the requirement that human control can be promptly restored and that overall ADS safety requirements are met.

Section 6 protects the security of connected vehicles by requiring that the Secretary of Commerce review the implementation of the final rule, Securing the Information and Communications Technology and Services Supply Chain, and briefing congressional committees following that review.

The SELF DRIVE Act is a massive step forward for American autonomous vehicle leadership. AVIA encourages strong support of the legislation.

WWW.THEAVINDUSTRY.ORG



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General Counsel

David P. Goch

* Executive Committee

January 12, 2026

Congressman Gus Bilirakis
Chairman
Subcommittee on Commerce,
Manufacturing, and Trade
2125 Rayburn House Office
Building Washington, DC 20515

Congresswoman Jan Schakowsky
Ranking Member
Subcommittee on Commerce,
Manufacturing, and Trade
2322 Rayburn House Office
Building Washington, DC 20515

RE: H.R. 6688, the "ADAS Functionality and Integrity Act"

Dear Chairman Bilirakis, Ranking Member Schakowsky, and Members of the Subcommittee:

Thank you for holding this important hearing on "Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership." I write on behalf of the Specialty Equipment Market Association (SEMA) and its 7,000 members in support of H.R. 6688, the "ADAS Functionality and Integrity Act," an important, bipartisan bill to ensure that vehicle owners and automotive businesses can properly and safely customize, modify, and calibrate motor vehicles with advanced driver assistance systems (ADAS).

ADAS is increasingly available throughout our nation's fleet of vehicles, with most new cars, trucks, and SUVs now featuring some advanced safety systems, such as forward collision warning (FCW), lane departure warning (LDW), and automatic emergency braking (AEB). Each automaker has their own way of implementing this new technology, whether through cameras, radar, LiDAR, or ultrasonic sensors. What remains consistent across the various ways of incorporating ADAS into a vehicle is the crucial step of calibrating and testing these systems to ensure they remain fully functional, thereby keeping drivers, passengers, other drivers, and pedestrians safe.

H.R. 6688 is integral to ensuring that ADAS is properly calibrated and tested for the full lifecycle of the vehicle, including when owners modify or customize their vehicles. The sensors and cameras that support ADAS can be taken out of calibration from everyday driving (such as hitting a pothole); post collision repair; and when common modifications are made, including the addition of bike racks, wraps to advertise a business, adjusting a vehicle's ride height to navigate difficult terrain on a farm or ranch, or other changes to the external profile to upgrade bumpers, lights, or add a snowplow.

1575 S. Valley Vista Dr.
Diamond Bar, CA 91765-3914

909-610-2030

E-mail: sema@sema.org
Website: www.sema.org

Millions of Americans modify and customize their vehicles to enhance their vehicles' safety, performance, and comfort. Their reasons for modifying vary. For some, it's a means for doing business and earning a livelihood; for others, it's how they recreate or express themselves. **Regardless of their needs and preferences, it is imperative that evidence-based calibration and testing procedures are in place to ensure that ADAS is properly functioning for the protection of people both inside and outside the vehicle.**

Currently, ADAS calibration and testing procedures are only available for stock vehicles, which haven't been altered since coming off the assembly line. Now is the time to address the information gap in ADAS functionality to ensure that modified and customized vehicles can be properly calibrated and tested, which H.R. 6688 will help accomplish.

It cannot be overstated how our nation's ability to support existing ADAS in our national fleet is a crucial step toward the safety of autonomous vehicles (AVs) and the public's future, wide adoption of these next-generation vehicles.

SEMA thanks Representative Diana Harshbarger and original sponsors Representatives Jay Obernolte, Gabe Vasquez, and Norma Torres for introducing the ADAS Functionality and Integrity Act. Their bill requires the National Highway Traffic Safety Administration (NHTSA) to create guidelines for model year 2028 and future vehicles that outline modification ranges and tolerances that maintain ADAS functionality. It also requires NHTSA to create test procedures to ensure vehicle service providers can properly calibrate ADAS.

SEMA strongly supports H.R. 6688, which is a critical step toward ensuring the safety of Americans on our nation's roads and highways.

Background on SEMA

SEMA is a non-profit trade association representing over **7,000 businesses that form the backbone of the specialty automotive aftermarket industry in the U.S.** Our members, many of whom are small businesses, drive innovation through the manufacturing, distribution, sale, and installation of specialty automotive aftermarket parts and components. SEMA is proud to represent an industry that supports over **1.3 million American jobs across every congressional district, while annually contributing \$337 billion to the American economy.** Our industry's scope is seen each year in Las Vegas, when SEMA holds its most well-known for putting on the world-famous Las Vegas SEMA Show, North America's largest trade show, with over 2,500 exhibitors and more than 160,000 industry attendees for a B2B-only showcase of our nation's engineering prowess.

SEMA members produce, sell, and install parts and equipment that enable the American people to modify and customize their vehicles for work and play, improving the safety, performance, and aesthetics of the cars and trucks they rely on each day. From simple

modifications like adding a tow hitch to haul a bike, boat, or camper, to attaching a snowplow to the front of a truck, to wrapping a work van as a way to advertise a small business, aftermarket modifications help the American people to put food on their table and to live their best lives.

I am proud of SEMA's work in helping the automotive aftermarket industry better understand how their products interact with ADAS and the steps needed to ensure the full functionality of these safety systems.

SEMA is the only organization that has dedicated the time, money, and resources to study the impact of modifications on the performance of ADAS. Our commitment to maintaining ADAS performance has been supported by significant financial investment of association funds. This includes the expansion of our SEMA Garage program in 2022, marked by our largest capital expenditure to date, which features a 45,000-square-foot, state-of-the-art engineering facility located outside of Detroit. The SEMA Garage Detroit houses SEMA's ADAS R&D Technology Center, with two dedicated ADAS labs designed to perform OEM-level and independent aftermarket calibrations, along with system diagnostics for both stock and modified vehicles. The SEMA Garage Detroit is the only aftermarket facility of its kind.

Last year, at the Detroit SEMA Garage, we hosted more than 70 professionals from the customization, collision, and repair industries for a robust gathering where stakeholders sought to address the most growing and pressing challenges associated with ADAS calibrations. What resulted was a clear, industry-wide roadmap to ensure ADAS functions safely and reliably in every vehicle, which we've shared with industry leaders, federal regulators, and lawmakers throughout Congress.

The SEMA Garage continues to advance our understanding of how aftermarket modifications impact ADAS performance across popular vehicles, including a series of white papers that look at the performance of ADAS in modified vehicles like the Chevrolet Silverado 1500, Ford F-150, Ford Bronco, Toyota Tacoma, and the Ram 1500. SEMA's research provides clear, data-driven insights into how sensor reliability is influenced by modifications such as lift kits, wheels, and suspension components. These findings help manufacturers, installers, and enthusiasts understand when recalibration is needed to preserve full ADAS functionality and have led to our conclusion that more needs to be done to ensure the proper functionality of these safety systems for the full lifecycle of a vehicle.

ADAS Guidelines for Modified Vehicles Must be Established

ADAS features are standard in most model year (MY) 2026 vehicles, providing peace of mind to safety-conscious consumers and offering the potential to significantly reduce crashes and road fatalities. **According to SEMA's [trend research](#), more than 90% of MY 2023 and newer vehicles are equipped with ADAS features.**

ADAS is a crucial tool for preventing vehicle crashes. However, **there are currently no**

standard procedures for automotive businesses to follow to properly test ADAS in modified vehicles, ensure calibration is complete and successful, or even determine when and whether calibration is necessary. Without reasonable pathways to calibrate, test, and validate ADAS functionality in modified vehicles, owners will not fully benefit from this technology.

ADAS sensors and cameras are subject to degradation and misalignment over time and can be impacted by even the most common modifications, such as adding bike racks, wrapping a vehicle, adding a winch to the front bumper, or lifting a vehicle to navigate rocky terrain, which is especially important for driving on farms, ranches, and other off-road environments. Given that common modifications, which have been relied upon for decades by millions of Americans, can impact ADAS features, such as FCW, LDW, and AEB, **now is the time for NHTSA to create guidelines that ensure vehicle owners and their automotive professionals have the information needed to maintain the safety and performance integrity of ADAS.** This includes having clear information to determine ADAS tolerances as well as establish proper testing and validation to confirm that the calibration was performed properly and successfully.

We commend automakers for their considerable investments in ADAS technology, which has the potential to save thousands of lives. However, it's no secret that the cost of new vehicles has rapidly increased over the last decade, and the inclusion of ADAS features are a significant factor in those costs. Given the reality that vehicle owners are paying for these safety features in their vehicles, **those who choose to modify or customize their vehicles are no less deserving of enjoying the safety benefits of ADAS than vehicle owners who choose to keep their vehicles in their stock condition.**

Additionally, as ADAS functions combine to form higher levels of self-driving capabilities, it is critical that these safety systems can be properly calibrated and tested. Transparency and guidelines to fill ADAS gaps will only increase trust in existing and future safety systems, including those found in AVs, which are increasingly present in our major cities.

H.R. 6688, the “ADAS Functionality and Integrity Act”

The ADAS Functionality and Integrity Act, if enacted into law, would ensure that vehicle owners and automotive businesses have the information needed to properly calibrate and test ADAS. This legislation is crucial for safely making common modifications, such as installing bike racks, wrapping a vehicle, replacing larger wheels and tires, or installing a winch or aftermarket bumpers, without compromising the functionality of ADAS.

The bill would require NHTSA to work with automakers, parts manufacturers, the aftermarket, and dealers to create guidelines that provide modification ranges and tolerances in terms of changes to ride height, wheel and tire sizes, overall static

geometry, physical displacement parameters, and sensor and camera function that maintain proper calibration for new vehicles starting in model year 2028.

H.R. 6688 requires NHTSA to create guidelines that establish ADAS test procedures, allowing the automotive businesses that owners choose to engage to properly test and validate that vehicle systems have been properly calibrated. The bill would also create a process for manufacturers to provide vehicle tolerance and system sensitivity information relevant to modification and calibration to vehicle owners and NHTSA within 30 days after the release of a passenger motor vehicle.

In addition to providing NHTSA with up to two years to develop guidelines, the bill would also require the agency to publish a study within one year of enactment on the resources needed to create and maintain guidelines annually for new vehicles.

Closing

Thank you again to the Subcommittee for holding this important hearing on motor vehicle safety, consumer choice, and affordability.

Americans deserve confidence that ADAS works as intended for the entire life of their vehicle. Currently, the industry lacks clear standards governing ADAS calibration and testing, and aftermarket businesses and vehicle owners need access to the necessary information and procedures needed to keep modern safety features functioning. This bill marks a critical step forward in the name of vehicle safety and in protecting the American people's ability to continue modifying and customizing the vehicles they own.

The ability to calibrate and test is deeply intertwined with ensuring that Americans can modify their vehicles to meet their needs, as it is key to maintaining vehicle quality and keeping owners and other road users safe. When vehicle owners and service professionals are not able to access the vehicle information needed to properly service, calibrate, and validate ADAS performance, those barriers impede vehicle owners' rights.

I appreciate your consideration of these comments and thank the Subcommittee for its consideration of H.R. 6688 for potential inclusion in the vehicle safety title of the surface transportation reauthorization bill.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Spagnola", with a horizontal line underneath.

Mike Spagnola
President and CEO



Transport Workers Union of America, AFL-CIO

John Samuelson
International President

Alex Garcia
International Executive
Vice President

Jerome Lafragola
International
Secretary-Treasurer

Curtis Tate
International Administrative
Vice President

Mike Mayes
International Administrative
Vice President

"AMERICA'S FIGHTING DEMOCRATIC UNION"

January 8, 2026

The Honorable Gus Bilirakis
Chairman
Subcommittee on Commerce,
Manufacturing, and Trade
House Committee on Energy and
Commerce

The Honorable Jan Schakowsky
Ranking Member
Subcommittee on Commerce,
Manufacturing, and Trade
House Committee on Energy and
Commerce

RE: Statement for the Record: Hearing on Examining Legislative Options to
Strengthen Motor Vehicle Safety, Ensure Consumer Choice, and Cement U.S.
Automotive Leadership

Dear Chairman Bilirakis and Ranking Member Schakowsky,

On behalf of more than 160,000 members of the Transport Workers Union of America (TWU), I offer this statement for the record as part of the above-mentioned hearing. Specifically, the TWU is encouraged by two pieces of legislation on the subcommittee's agenda which attempt to address ongoing issues caused by autonomous vehicles (AVs): the draft legislation offered by Representatives Latta and Dingell (SELF DRIVE Act of 2026) and the AV Safety Data Act offered by Representative Mullin. Actions to regulate AVs are long overdue and these bills both deserve serious consideration as part of the subcommittee's work on the next surface transportation reauthorization.

TWU members operate, maintain, and service more than half of all public transportation trips in the United States. Additionally, our members work alongside and within areas congested with motor vehicles – including ground workers on airport tarmacs and bikeshare workers whose job site is on city streets. Seriously regulating and overseeing AVs is essential to both the safety of these workers and their long-term economic well-being. The AV Safety Data Act, which the TWU has endorsed, and the SELF DRIVE Act would both take critical steps to ensure workers' safety is never at risk due to AVs, both as drivers and as pedestrians on the surrounding streets.

Unregulated AVs are the most significant threat to roadway safety today. The overly permissive atmosphere created by federal inaction over the past decade has allowed thousands of driverless cars to be deployed with next to no enforceable safety standards. Manufacturers have been allowed to market “full self-driving” vehicles while arguing in court that these vehicles are meant solely to assist humans. An entire transportation industry is developing with the philosophy of failing fast and asking questions later – tenets anathema to both safety and job creation. Absent strong federal leadership to set standards and hold innovators accountable for their actions, this wild west atmosphere will continue to expand and undermine the safety of our national infrastructure.

We are encouraged that the SELF DRIVE Act would, for the first time, set enforceable safety standards on AVs. The discussion draft would ensure humans retain oversight and the ability to intervene to keep vehicles safe and preserve the existing division of responsibility between federal and state regulators. It is not comprehensive of all that the federal government should be doing to rein in the excesses of the AV industry and the TWU will continue to seek additional protections for worker safety and economic security with regard to AVs. However, the SELF DRIVE Act, especially in combination with the AV Safety Data Act, would be a start.

Minimum federal safety standards for AVs are urgently needed

Under our current regulatory structure, AV safety standards are in free fall. A patchwork of inadequate and dangerously lenient state laws is encouraging a race to the bottom, and a complacent federal government has allowed far too many risks into the system. Several times a week, new videos become available of AVs driving through police cordons, rolling over firefighting equipment, ignoring school bus stop signals, and engaging in other unsafe activities. As more AVs have been deployed, the situation has not gotten better, rather the dangers they pose have become more widespread. With no realistic minimum safety standard in place and with more AV developers entering the market as time goes on, it would be naïve to expect any safety improvements across the system without federal intervention.

Establishing a federal safety standard, enforced by NHTSA, will ensure that AVs meet our safety expectations *before* they are deployed onto our streets. Many of the AVs currently deployed do not meet the standards envisioned by SELF DRIVE Act and would have to be immediately withdrawn from service were this enacted. It is long past time that the federal government acknowledge its responsibility for these vehicles in the same manner it does for traditional cars, trucks, and buses.

Humans must retain oversight and the ability to intervene to keep vehicles safe

The most essential component of transportation safety is well-trained, qualified workers professionally conducting their duties. AVs, just like every other piece of equipment, will malfunction. The hardware and the software of these vehicles will break down. When this happens, humans must have the ability to intervene to prevent disaster.

These are not theoretical concerns in our transportation systems. In two crashes in 2019 and 2020, automated systems on the Boeing 737-MAX aircraft overrode human commands after failing to correctly respond to the environment, crashing at full speed and killing 346 people. In 2009, 9 people were killed, including the operator, on the Washington, DC Metro's Red Line when the positive train control system ignored the operator's command to brake and accelerated into a parked train just north of the U.S. Capitol. In both instances, had humans been allowed to intervene the crashes would have been avoided.

In addition to the obvious safety benefits of allowing human oversight and intervention in automated systems, AV developers must face a practical matter that many commercial vehicles will continue to require humans onboard even if they are not expected to operate their vehicle. Public transportation systems are obligated to provide services for the disabled community. Tour bus operators and other service companies may continue to want humans present to provide the services they do today for paying customers. In these cases, disallowing workers from accessing the controls to these vehicles would effectively hold them hostage. These workers would be trapped, entirely at the mercy of their employer and the competency of the automated system. It seems obvious that such situations should be prohibited.

The TWU does not believe that all vehicles must forever utilize the same methods of control present on our current fleets. We believe that equipment will change as safety improvements are developed. Certified operators will be able to work with any system to safely navigate our roads, provided the technology enables them to oversee and intervene as the workers deem necessary.

States and localities should continue to make operational decisions for AVs

NHTSA is poorly equipped to regulate car use at the street level. The agency's expertise has, since its inception, centered around the safety of the manufacturer and the products available in the market. It would be impossible for the NHTSA to review or assess the millions of corners, intersections, school zones, taxi stands, bus stops, and other commonplace traffic realities across the U.S.

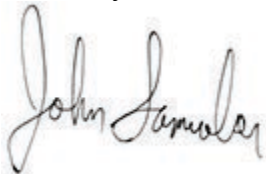
The current division of labor between NHTSA and state/local regulators works and should be applied to AVs. The safety of the vehicle itself should be solely a federal responsibility. However, where and how these vehicles are allowed to operate, what certifications are necessary for the operators, minimum amounts of insurance coverage, where it is safe for a vehicle to stop, and many (*many*) other decisions must be left up to state and local authorities who already have these rules in place. None of these issues should be interpreted to be part of an AVs “performance” and covered under NHTSA’s preemption powers.

More legislation is needed to fully regulate AVs

Unregulated AVs are the most significant threat to roadway safety today. Bad actors have been enabled by a patchwork of inadequate and dangerously lenient state laws which encourage a race to the bottom on standards and a complacent federal government that has allowed far too many risks into the system. Our institutions, including Congress, must do much more to ensure that AV profiteers, including Big Tech companies and their billionaire investors, actually live up to their own marketing claims on safety and job creation.

While the SELF DRIVE Act presented to the committee would take a long-overdue first step towards addressing the threats inherent in AV deployment, it leaves many issues left to be addressed. Mandating commercial motor vehicles continue to be overseen by qualified, certified human operators, ensuring that new jobs being created by this industry are good, union jobs, and requiring AVs to demonstrate an increased level of safety in our public transportation systems are some of the outstanding issues that must be tackled to truly regulate the industry. Many of these issues are outside of the Energy and Commerce committee’s jurisdiction and will need to be handled in other forums. The TWU will fight to ensure that every arm of our government ensures workers are the primary beneficiaries of AV deployment and that safety is never at risk from unproven technologies.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Samuelson". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Samuelson".

John Samuelson
International President



January 12, 2026

The Honorable Brett Guthrie, Chair and the Honorable Frank Pallone, Ranking Member
Committee on Energy and Commerce

The Honorable Gus Bilirakis, Chair and the Honorable Jan Schakowsky, Ranking Member
Subcommittee on Commerce, Manufacturing and Trade

U.S. House of Representatives

Washington, DC 20515

Dear Chairman Guthrie, Ranking Member Pallone, Chairman Bilirakis and Ranking Member Schakowsky:

The undersigned organizations write to voice our support for the progress made on the bipartisan SELF DRIVE Act discussion draft, which was recently announced by Representatives Bob Latta and Debbie Dingell. The SELF DRIVE Act would help ensure that millions of Americans are able to access the benefits of autonomous vehicles (“AVs”), which provide safer roads, greater supply chain resilience, create new economic and enhanced accessibility opportunities.

Autonomous vehicles have [driven](#) more than 145 million autonomous miles on U.S. public roads, a distance roughly equivalent to the distance between Earth and Mars. These vehicles undertake diverse operations, carrying passengers across major cities like Phoenix, Austin, Los Angeles, and San Francisco,

assisting with transit access in rural communities in the Midwest, filling in middle mile cargo roles in Arkansas, and hauling freight across Texas and beyond.

The SELF DRIVE Act makes strides toward enabling the safe and timely deployment of AV technology and solidifying the U.S. as the global leader in this transformative field. While AVs have been deployed in recent years, the United States lacks a federal policy framework to set uniform rules of the road for these vehicles. The SELF DRIVE Act would advance this objective in key ways.

First, the legislation authorizes key rulemakings related to AV safety. Second, it establishes cybersecurity requirements to make sure that AVs are secure from outside threats. Third, the proposal modernizes federal motor vehicle safety standards for the modern era by addressing standards for vehicles that operate without a human driver.

The SELF DRIVE Act will help the United States remain the global leader on AVs amidst fierce competition with the People's Republic of China. China is the United States's closest strategic competitor on autonomous vehicles and determined to replace the U.S. as the global leader. A strong federal policy framework will allow U.S. companies to compete and win in the global race on AVs.

Finally, autonomous vehicles are an opportunity to re-imagine how Americans move, but the federal government's rules must keep pace with the opportunity before us to build vehicles that are accessible for people with disabilities, including wheelchair users and nonvisual accessibility, and address new use cases. Legislation like the SELF DRIVE Act will lay the foundation for years of growth of AV technology and allow U.S. companies to lead the pack in developing standards and practices worldwide.

The undersigned organizations appreciate the Committee's consideration of this important bill to transform transportation as we know it. We look forward to working with Representatives Latta and Dingell, the Committee, and Congress on appropriate revisions throughout the process and more broadly to ensure the safe and timely deployment of AVs and American leadership in this game-changing technology.

Sincerely,

United for Autonomy

ITS America

U.S. Chamber of Commerce

American Council for the Blind

MEMA. The Vehicle Suppliers Association

United Spinal Association

American Trucking Associations

National Association of Manufacturers

Zero Emission Transportation Association

Autonomous Vehicle Industry Association

National Federation of the Blind

Association for Uncrewed Vehicle Systems International (AUVSI)

National Venture Capital Association

Reason Foundation

Bay Area Council

TechNet

Chamber of Progress

Truck & Engine

Dallas Regional Chamber

Manufacturers Association



January 9, 2026

The Honorable Brett Guthrie
Chairman
Energy and Commerce Committee
U. S. House of Representatives
Washington, DC 20515

The Honorable Frank Pallone
Ranking Member
Energy and Commerce Committee
U. S. House of Representatives
Washington, DC 20515

The Honorable Gus Bilirakis
Chairman, Commerce,
Manufacturing and Trade Subcommittee
Energy and Commerce Committee
U. S. House of Representatives
Washington, DC 20515

The Honorable Jan Schakowsky
Ranking Member, Commerce,
Manufacturing and Trade Subcommittee
Energy and Commerce Committee
U. S. House of Representatives
Washington, DC 20515

Dear Chairman Guthrie, Ranking Member Pallone, Chairman Bilirakis and Ranking Member Schakowsky,

Thank you for including the automated wheelchair securement research provision in the discussion draft of the Motor Vehicle Modernization Act as the Commerce, Manufacturing and Trades Subcommittee develops the safety title of the upcoming surface transportation reauthorization measure. As you know, safe automated wheelchair securement has been a significant challenge to the autonomous vehicle industry in developing a purpose-built fully accessible autonomous vehicle (AV).

United Spinal has almost 70,000 members, 40 chapters, 107 support groups, and over 120 rehabilitation facilities and hospital partners nationwide. Founded by paralyzed veterans in 1946, we are dedicated to enhancing the quality of life of all people living with spinal cord injuries and disorders (SCI/D), paralysis, neurological conditions and other mobility disabilities, including veterans, and providing support and information to loved ones, care providers and professionals. We also work collaboratively with Spinal Cord Injury Model (SCI) System Centers and the Model Systems Knowledge Translation Center that provide innovative research and support in the field of SCI, traumatic brain and burn injuries.

United Spinal has a long history of supporting accessible transportation for America's 5.5 million wheelchair users. We are acutely aware that wheelchair accessible AVs (WAVs) can be a true game changer in elevating the quality of lives of wheelchair users. For untold numbers of wheelchair users, especially those living in rural areas, the lack of transportation options serves as a major obstacle to gain entry to the job market or to sustain employment. WAVs would help level the playing field for wheelchair users.

In fact, a recent [analysis](#) based on "the estimated change in labor force participation by people with disabilities facilitated by an increase in mobility due to AV adoption" has found that under a moderate scenario, "an increase in the labor force participation by people with disabilities of 15%, is projected to result in 4.4 million direct jobs for people with disabilities and 9.2 million total jobs across the US. The US GDP and output are projected to increase by \$868, billion and \$1.6 trillion, respectively. Direct income, those associated with the wages and earnings of people with disabilities, is projected to increase by \$160 billion, while total income is projected to increase by almost \$417 billion." Further the analysis found that under the same moderate scenario, "Total federal tax revenue, associated with the increase in direct, indirect, and induced employment is projected to be almost \$93 billion, or a 1.8% increase in total federal tax revenue."

As you know, the research you are supporting will vastly expand the applicability of the automated wheelchair securement system, based on the Universal Deployable Integrated Geometry (UDIG) standard, currently being refined with federal support to an array of motor vehicle types. Two National Highway Traffic Safety Administration (NHTSA) Small Business Innovation Research (SBIR) Grant recipients are working to bring the securement system to commercialization. United Spinal also helped forge the SecureRide Coalition which is working to further the adoption of the UDIG standard thru technical assistance and advocacy efforts. SecureRide is also providing a letter of support for the research provision.

The additional research will not only aid more flexible passenger configurations for WAV design and development, but it will also help usher in more seamless transportation between transportation modes. That seamlessness for wheelchair users will also quickly translate into time savings for transit and paratransit services. The time savings between tying down four straps verses independent automated wheelchair will be significant.

United Spinal looks forward to advocating on behalf of the research provision in the Motor Vehicle Modernization Act of 2025.

Sincerely,

A handwritten signature in black ink that reads "Stephen Lieberman". The script is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Stephen Lieberman
Senior Director, Advocacy and Policy

Statement of the Honorable Neal Dunn, M.D.
Subcommittee on Commerce, Manufacturing, & Trade (CMT)
House Energy & Commerce Committee
“Legislative Hearing on Surface Transportation Reauthorization & Related Auto Bills”
Tuesday, January 13, 2025, at 2:00 p.m. ET

[Upon recognition from Chairman Bilirakis]

Thank you, Mr. Chairman.

I am here to discuss a critical consumer choice &
automotive safety issue affecting every American!

& If you own a car, truck, or motorcycle, this matters
to you!! I’m referring to the Right to Automotive
Repair.

I applaud my Colleagues on E&C for supporting my
legislation, H.R. 1566, the Right to Equitable &
Professional Auto Industry Repair (“REPAIR”) Act.

It is one of the most bipartisan bills in Congress this
year & including a bipartisan Senate bill (for the
1st time)!

I want to thank my colleagues sitting on this Subcommittee, Diana Harshbarger, Cliff Bentz, & Dr. Kim Schrier for cosponsoring this year.

For most Floridians, car ownership is essential.

However, as some colleagues have mentioned today, our automotive sector is facing significant marketplace & regulatory challenges.

As cars continue to become increasingly complex, they've turned into computers on wheels.

Which is great for innovation. However, it's imperative we protect consumer choice about where we take our cars for repairs, or repair it yourself!

My bill is motivated by the preservation of consumer choice, as well as the restoration of a fair & open marketplace in the automobile repair industry.

Where traditionally, independent repair technicians could plug in to the OBD-Port or easily analyze critical repair & maintenance data, the phase-out of this tool in newer vehicles & connected-vehicles is incredibly problematic, among other tech restrictions.

If you own your car, then you should own the data generated by your car, specifically critical repair, maintenance, wear & tear, calibration & recalibration of parts.

This is the basic concept of ownership! You own it, it's yours!

I have worked with both the Auto Care Assoc. & the Alliance, both furnishing witnesses here today, as well as dozens of other stakeholders from the AV industry, rental car industry, heavy duty vehicle industry, independent business groups, & consumer advocates.

This legislation has been improved through this process, incorporating many suggestions from automakers & franchised dealers alike.

I am pleased that this legislation is on the agenda today, & I appreciate the support of so many of my colleagues on this Subcommittee & at Full Committee.

I am committed to advancing this legislation in a way that it gets included in the Safety Title of the Highway Bill.

I am also committed to working with all of my colleagues should they have concerns with this legislation.

We need to get this done right, get this done now & finally ensure that if you own the car, you own the data it generates.

Question 1:

Ms. Cain [Auto Alliance representing the OEMs],

In a document circulated to policy makers in September last year on Alliance letterhead, you state & I quote “Automotive right-to-repair *already exists* in the US.

Vehicle owners can get their vehicles serviced in well-equipped shops by well-trained technicians: anytime, anywhere, any place.

I am curious, if this is the case, which I & the witness representing the independent repair shops dispute wholeheartedly, why are you here now proposing competing legislation, which according to the documentation you’ve been shopping for a year with no success, says,

& I quote “SAFE Repair Act guarantees that independent repair facilities will continue to have the “same ability to perform diagnostic & repair services as franchised dealers.”

It seems like the Alliance is saying both, “this isn’t a problem” & “but here’s the solution.”

Furthermore, I need to address a concern often brought up again here today in Ms. Cain’s testimony, that somehow, consumers choosing to get their repairs performed at an independent shop are somehow choosing a risky & less safe option than dealership repairs.

To be blunt, this unwarranted & unfounded claim makes my blood boil.

I am one of those millions of vehicle owners who chooses to support my local small business, I am offended that the Alliance would claim I am making an uninformed or unsafe decision for me, my children, & grandchildren who ride in my vehicle.

The simple fact is that local repair shops have less expensive repair because they offer safe, fast, accessible & the competitive environment in the automotive aftermarket drives innovation up & costs down!

The attempt to obfuscate this fact by belittling these workers & business owners does not sit well with me.

Ms. Cain,

How much money have automakers spent in the Commonwealth of Massachusetts opposing the ballot initiative that passed with 75% of voter support in 2020?

I've read that it's in the tens of millions of dollars? Do the manufacturers continue to fight in federal court to overturn the ballot initiative?

& Ms. Cain, when an automotive right-to-repair ballot initiative passed in Maine with 84% of voter support, did the manufacturers oppose this effort, & if so, does that opposition remain today?

Question 2:

Ms. Cain [[Auto Alliance representing OEMs](#)],

I recall that Stellantis (formerly Chrysler) had established an entire new division of its company to monetize data & that department expected revenue to be close to \$20 Billion annually by 2030.

& I know there have been actions taken against other manufacturers for selling data without notice to owners too.

Can you tell us how much revenue, collectively, is generated annually from auto makers selling vehicle generated data?

WAIT FOR RESPONSE

Rebuttal: With these kinds of dollars at stake selling owner's data, I guess it's no surprise that auto makers would spend unlimited money to protect such a cash cow.

While I think the process of collecting & selling this data is one that we should look at, my friend from Tennessee has authored legislation to do, I would point out that my REPAIR Act only requires repair & maintenance data be made available for the aftermarket.

Thank you, & I yield back.

Statement for the Record
International Brotherhood of Teamsters
House Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer
Choice and Affordability, and Cement U.S. Automotive Leadership
January 12, 2026



International Brotherhood of Teamsters
25 Louisiana Avenue
Washington, DC 20015

On behalf of 1.3 million members of the International Brotherhood of Teamsters, including hundreds of thousands of professional drivers, we appreciate the effort of Representatives Dingell and Latta to finally move forward legislation on autonomous vehicles.

As the Teamsters have long stated, for both our members and the public, the federal government cannot continue to permit a Wild West for autonomous vehicles, wherein they are subjected to no rules, no standards, and operate free from any oversight. Congress must consider threats posed by autonomous vehicles to the livelihoods of millions of Americans, and to the safety of other road users and pedestrians across the country.

This Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution (SELF DRIVE) Act of 2026 represents a first step in developing a comprehensive national framework, by creating safety requirements for autonomous vehicle manufacturers before those vehicles may be sold and operated. By entrusting the Department of Transportation to evaluate the safety of these vehicles, it begins to put an end to the unfortunate era of allowing companies to deploy AVs at will while demanding public trust with no verification. Critically, the legislation also considers the rights of states and preserves necessary authorities for local governments to make their own decisions concerning how autonomous vehicles may operate on their own roads, and what conditions they may be subject to.

The Teamsters would also like to use the consideration of this legislation to remind the Committee and Congress that the increasing deployment of autonomous vehicles unequivocally require further Congressional action. Essential issues, including the regulation of commercial operations and safety, the critical role of certified human operators, and workforce impacts must be addressed in additional legislation – a federal framework which fails to address these issues is fundamentally incomplete and inadequate.

Finally, we appreciate the consideration by Representatives Dingell and Latta of Teamsters priorities, and welcome the opportunity to work with any member of the Committee on issues concerning autonomous vehicles moving forward



January 12, 2026

The Honorable Gus Bilirakis, Chair
The Honorable Jan Schakowsky, Ranking Member
Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
U.S. House of Representatives
Washington, D.C. 20515

Dear Chair Bilirakis and Ranking Member Schakowsky:

Thank you for convening tomorrow's hearing, "Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership." Advocates for Highway and Auto Safety (Advocates) urges this Subcommittee to advance proven solutions to improve safety on our Nation's roads. Advocates respectfully requests this letter be included in the hearing record.

Motor Vehicle Deaths Remain Historically High

America's roads are moving an ever-increasing number of people and goods.¹ This activity comes with a significant yet preventable human toll as well as infrastructure challenges and a robust price tag. On average, 112 people were killed every day on roads in the U.S., totaling nearly 41,000 fatalities in 2023.² This is a 24 percent increase in deaths in just a decade.³ An additional 2.44 million people were injured.⁴ Early projections for 2024 traffic fatalities remain at a similar historic high level; over 39,000 people are estimated to have been killed that year.⁵

In addition to the physical and emotional repercussions and infrastructure damage due to motor vehicle crashes, the annual economic cost is approximately \$340 billion (2019 dollars).⁶ This figure equates to every person living in the U.S. essentially paying an annual "crash tax" of over \$1,000. Moreover, the total value of societal harm from motor vehicle crashes in 2019, which includes loss of life, pain and decreased quality of life, was nearly \$1.4 trillion.⁷ When adjusted solely for inflation, this figure amounts to over \$1.79 trillion.⁸ Research from the Network of Employers for Traffic Safety (NETS) finds motor vehicle crashes cost employers \$72.2 billion in direct crash-related expenses in 2019.⁹

These devastating crashes impact millions of Americans each year including the families of U.S. Department of Transportation (U.S. DOT) Secretary Duffy and Members of Congress. These tragedies result in long-lasting effects which often are not accounted for in statistics alone. For every single death and serious injury, there is a horrific ripple effect forever changing the lives of children, parents, friends and communities. We know the solutions to meaningfully reduce its impact which includes vehicle safety improvements.

Federal Safety Standards Prevent Motor Vehicle Crashes, Save Lives, Avert Injuries and Reduce Associated Costs

Advocates always has enthusiastically championed proven vehicle safety technology and for good reason -- it is one of the most effective strategies for preventing deaths and injuries. According to the National Highway Traffic Safety Administration (NHTSA), “[t]he FMVSS [Federal Motor Vehicle Safety Standards] remain NHTSA’s core way of ensuring that all motor vehicles provide the requisite level of safety performance and provide it within a technical timeframe.”¹⁰ In fact, the agency has estimated that from 1968 through 2019, NHTSA’s safety standards have prevented more than 860,000 deaths, 49 million nonfatal injuries and damage to 65 million vehicles.¹¹ In addition, during that time frame the comprehensive societal benefits amounted to \$17.3 trillion, using 2019 dollars.¹²

In 1991, Advocates led the coalition that supported enactment of the bipartisan Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991¹³ which included a mandate for front seat airbags as standard equipment. As a result, by 1997, every new car sold in the United States was equipped with this technology and the lives saved have been significant. Airbags have saved an estimated 50,457 lives from 1987 to 2017, according to NHTSA.¹⁴

Advocates built on this success by supporting additional proven lifesaving technologies as standard equipment in all vehicles in other federal legislation and regulatory proposals. These efforts include: tire pressure monitoring systems;¹⁵ rear outboard 3-point safety belts;¹⁶ electronic stability control;¹⁷ rear safety belt reminder systems;¹⁸ brake transmission interlocks;¹⁹ safety belts on motorcoaches;²⁰ rear-view cameras;²¹ safer power window switches;²² advanced driver assistance systems (ADAS);²³ advanced impaired driving prevention technology;²⁴ rear designated seating position alert (hot cars);²⁵ enhanced vehicle hood and bumpers to better protect vulnerable road users;²⁶ and, advanced head lamps.²⁷

The recent regulatory action undertaken by NHTSA to require pedestrian automatic emergency braking (PAEB) on light passenger vehicles is an excellent example of the benefits of requiring effective safety systems as standard equipment. The agency predicts that PAEB will save 362 lives, mitigate over 24,000 injuries annually and result in a yearly cost benefit of between \$5.8-\$7.2 billion. The Final Rule for PAEB issued in 2024 also noted that the end user price for the safety technology for a popular make and model vehicle, a Toyota Camry, is \$240.24.²⁸ This cost is modest, particularly given the returns on the investment. Moreover, research performed by the Insurance Institute for Highway Safety (IIHS) has found that AEB can reduce front-to-rear crashes with injuries by 56 percent. Any delay in implementing the Final Rule is an unnecessary safety setback.

Legislation on Hearing Agenda: Advocates supports the Safety Is Not for Sale Act of 2026 which helps to ensure vehicle safety technologies are available to more consumers purchasing a new car by limiting the ability of manufacturers to package

these lifesaving systems with non-safety and costly items such as heated steering wheels and panoramic roofs.

Major Contributors of Crashes Must be Addressed with Effective Solutions

We urge this Subcommittee to continue to address the leading contributing factors to motor vehicle crashes. In 2023, alcohol impaired driving resulted in 12,429 people killed;²⁹ speeding resulted in 11,775 people killed;³⁰ 10,484 vehicle occupants killed in crashes were unrestrained;³¹ and, crashes in which at least one driver was distracted resulted in 3,275 fatalities.³² In 2023, 7,314 pedestrians and 1,166 pedalcyclists were killed in traffic crashes.³³ Motorcycles continue to be the most hazardous form of motor vehicle transportation;³⁴ 6,335 riders were killed in 2023.³⁵ From 2013-2023, fatalities involving pedestrian increased 53 percent, pedalcyclists increased 55 percent and motorcycles increased 35 percent.³⁶ Additionally, in 2021, the most recent year for which data is available according to the Non-Traffic Surveillance (NTS) system, an estimated 3,990 people were killed in non-traffic motor vehicle crashes, an increase of 26 percent from 2020.³⁷ These issues are persistent, and the solutions are known and available, yet remain underused, underfunded or are not required as standard equipment in vehicles.

Advanced driver assistance systems (ADAS) can mitigate the issues of impairment, speeding, distraction and fatigue

Crashes, including those that result from some of the leading contributors to fatalities, can be prevented or mitigated by AEB and other ADAS systems. Research by IIHS has demonstrated crash reductions.³⁸

We urge this Subcommittee to conduct oversight to ensure the U.S. DOT issues the Final Rule for AEB in heavy vehicles and lane departure warning (LDW) and lane keeping assist (LKA) in passenger vehicles, as Congressionally mandated. Additionally, we urge Congress to direct NHTSA to enhance the AEB rule by including bicycle and motorcycle rider detection and response in all lighting conditions. Research conducted by IIHS earlier this year found that clothing which makes pedestrians stand out to human drivers may make them invisible to automated crash prevention systems, so ensuring AEB operates properly in all lighting conditions is essential.³⁹ As noted, the Final Rule for AEB in passenger vehicles must be swiftly complied with, absent added delay.

We also urge Congress to direct U.S. DOT to issue standards and requirements for other vehicle safety technologies shown by research to reduce crashes and impacts, including as noted by IIHS research, blind spot detection, rear AEB and rear cross traffic alert.

Impaired Driving

In 2019, the total comprehensive cost of drunk driving over the .08 percent blood alcohol concentration (BAC) limit was estimated at nearly \$296 billion.⁴⁰ Adjusted for inflation only, that amounts to \$373 billion in 2025 dollars.⁴¹ The total cost to employers of motor vehicle crashes with an alcohol-impaired employee or dependent driving (both on-the-job and off-

the-job) was \$8 billion in 2018 (expressed in 2019 dollars).⁴² Accounting for inflation only, that amounts to over \$10 billion in 2025 dollars.⁴³

According to NHTSA, between 2011-2020, an average of almost 10,500 people were killed each year due to alcohol impaired driving crashes.⁴⁴ The IIJA directed NHTSA to issue a FMVSS requiring passenger motor vehicles to be equipped with impaired driving prevention technology by 2024.⁴⁵ IIHS research estimates that passive impaired driving prevention technology will save more than 10,000 lives each year, once widely deployed.⁴⁶ The agency issued an Advanced Notice of Proposed Rulemaking (ANPRM) in January 2024 but has taken no further regulatory action.⁴⁷ Until NHTSA completes this overdue rulemaking, lives will continue to be needlessly lost, injuries suffered and associated costs expended. As such, we urge this Subcommittee to employ its oversight authority to ensure NHTSA swiftly issues a Final Rule.

Legislation on Hearing Agenda: Advocates supports the DRIVE to HALT Drunk Driving Act (H.R. 6850) and opposes the No Kill Switches in Cars Act (H.R. 1137).

Speeding

Speeding-related crashes cause \$46.4 billion in economic costs and \$225 billion in comprehensive costs (2019).⁴⁸ These costs account for 14 percent of all economic costs and 16 percent of all societal harm (measured as comprehensive costs) from motor vehicle crashes.⁴⁹ If these costs were updated for inflation alone, in 2025 they would equate to \$58.6 billion in economic costs and \$284 billion in comprehensive costs.⁵⁰ Speeding-related crashes cost employers nearly \$10 billion in 2018 (expressed in 2019 dollars); the majority are a result of off-the-job crashes.⁵¹ If this cost were updated for inflation alone, in 2025 it would equate to \$12.6 billion.⁵²

Excess speed can contribute to both the frequency and severity of motor vehicle crashes. At higher speeds, additional time is required to stop a vehicle, and more distance is traveled before corrective maneuvers can be implemented. Speeding reduces a driver's ability to react to emergencies created by driver inattention, unsafe maneuvers of other vehicles, roadway hazards, vehicle issues (such as tire blowouts) or perilous weather conditions. Increases in speed also can mean life or death for vulnerable road users (VRUs) who lack the protective structure of a vehicle. While many drivers have a proclivity to exceed posted speed limits or may approve of higher speed limits, AAA has found that raising speed limits leads to a very minimal reduction in time on the road noting, "Raising speed limits is often thought of as a way to improve traffic flow and to allow drivers to get to their destinations more quickly. However, AAA research shows that driving at higher speeds increases risk which can outweigh the potential benefits of saving a few minutes of time."⁵³

Intelligent speed assistance (ISA) can provide information to drivers about present speed limits, warn drivers when a vehicle speed is above the limit, prevent a vehicle from exceeding the speed limit, or maintain a set speed.⁵⁴ The U.S. DOT Volpe Center released

research, “New York City Intelligent Speed Assistance Pilot Evaluation,” in 2024 which showed “ISA produced a 64 percent reduction in overall speeding and an 82 percent decrease on high-speed roads.”⁵⁵ The IIHS found that more than “60% of drivers would find it acceptable if their vehicle provided an audible and visual warning when they exceeded the posted speed limit.”⁵⁶ The National Transportation Safety Board (NTSB) has recommended that NHTSA require ISA in all new vehicles that, at a minimum, warns drivers when they exceed the speed limit. States have already started acting on this technology; Washington State, Virginia and the District of Columbia have enacted laws for ISA use for repeat and/or extreme speeding offenders. All states should be incentivized to follow suit, and ISA should be required on all new vehicles in the next surface transportation reauthorization bill.

Occupant Protection

Seat belt use is a proven lifesaver. From 1975 to 2019, seat belts prevented over 403,000 fatalities and saved society approximately \$2.5 trillion in economic costs.⁵⁷ Seat belts serve as the first line of defense against injury or death for vehicle occupants when crashes occur. According to NHTSA, the combination of an airbag plus a lap and shoulder belt reduces the risk of death in frontal crashes by 61 percent.⁵⁸ Sadly, for passenger vehicle occupant fatalities in 2023, it is estimated that nearly half (49 percent) were unrestrained.⁵⁹

Seat belt reminder systems have been proven to improve seat belt use and save lives.⁶⁰ Congress as part of the Moving Ahead for Progress in the 21st Century Act (MAP-21) directed NHTSA to amend federal safety standards to require these systems in the rear seats of passenger vehicles (previously these systems were only required for the front driver’s seat although most automakers also equipped the front passenger seat).⁶¹ NHTSA recently issued a Final Rule requiring a seat belt use warning system for rear seats by September 1, 2027. The rule also updates and enhances the current seat belt warning requirements for the driver’s seatbelt and extends these requirements to the front outboard passenger seat by September 1, 2026.⁶² We urge the Subcommittee to conduct oversight to ensure it is implemented without delay to improve vehicle occupant safety.

Legislation on Hearing Agenda: Advocates supports the Securing Accessible Functional Emergency (SAFE) Exit Act which would require new motor vehicles to be equipped with a manual door release allowing timely exit regardless of failure of any electrical system. This important legislation will help to ensure that electric door hatches that can fail to properly function in a crash will not trap occupants inside a vehicle and inhibit first responders.

Distracted Driving

Crashes in which at least one driver was identified as being distracted imposed an economic cost of \$98.2 billion in 2019.⁶³ Adjusted for inflation only, that amounts to \$123.9 billion in 2025 dollars.⁶⁴ In 2018, distracted driving crashes cost employers nearly \$19 billion.⁶⁵

Driver distraction is known to be a major contributor to motor vehicle crashes.⁶⁶ However, the true impact of distracted driving remains unclear due to issues with the underreporting of crashes involving distraction, including differences in police crash report coding and database limitations.⁶⁷

In 2023, over two trillion text and multimedia messages were sent or received in the U.S. Mobile wireless data traffic has risen dramatically over the last decade, from 3 trillion megabytes in 2010 to 100.1 trillion in 2023.⁶⁸ Research has shown that because of the degree of cognitive distraction these devices cause, the behavior of drivers using mobile phones (whether handheld or hands-free) is equivalent to the behavior of drivers at the threshold of the legal limit for alcohol in most states (0.08 percent BAC).⁶⁹ Crash risk increases dramatically – as much as four times higher – when a driver is using a mobile phone, with no significant safety difference between handheld and hands-free phones observed in many studies.⁷⁰ A study by the Virginia Tech Transportation Institute found that text messaging increased the risk of a safety-critical driving event (i.e., crashes, near-crashes, crash-relevant conflicts and unintentional lane deviations) by 23.2 times.⁷¹ Sending or receiving a text message causes the driver's eyes to be off the road for an average of 4.6 seconds. When driving 55 miles per hour (mph), this is the equivalent of driving the entire length of a football field with one's eyes closed.⁷²

The IIJA directed U.S. DOT to conduct research regarding the installation and use of driver support systems, also known as driver monitoring systems, to minimize or eliminate driver distraction and automation complacency within three years and report to Congress within six months of the completion of the research.⁷³ The Euro NCAP is already evaluating these systems including for non-fatigue impairment detection.⁷⁴ In addition, several major automakers include some type of driver monitoring/ driver support technologies in their vehicles sold in the U.S.⁷⁵

Legislation on Hearing Agenda: Advocates supports the Driver Technology and Pedestrian Safety Act of 2025 (H.R. 3360) which directs U.S. DOT to study the distraction that can result from driver controlled technology including touch screen-based systems.

Vulnerable Road User (VRU) Safety

Crashes involving pedestrians resulted in \$17.6 billion in economic costs and \$112.5 billion in comprehensive costs in 2019.⁷⁶ Accounting for inflation alone, this would equate to \$22.2 billion in economic costs and \$142 billion in comprehensive costs in 2025.⁷⁷ Crashes involving bicyclists resulted in \$5.6 billion in economic costs and \$32.2 billion in comprehensive costs in 2019.⁷⁸ Accounting for inflation alone, this would equate to \$7 billion in economic costs and \$40.6 billion in comprehensive costs in 2025.⁷⁹

Lack of conspicuity is a roadway safety issue, especially for VRUs. Of the 7,314 pedestrians killed in traffic crashes in 2023, 77 percent occurred in dark conditions.⁸⁰ Also in 2023, there were 1,166 pedalcyclists fatalities, and 53 percent occurred in dark

conditions.⁸¹ Improvements to vehicle lighting would afford drivers additional time to identify and respond accordingly to pedestrians, bicycle riders and other VRUs in the roadway. The IIJA directed U.S. DOT to issue a Final Rule updating the headlamp standard (FMVSS 108) and permitting adaptive driving beam (ADB) headlamps within two years. ADB headlights are a lighting technology which uses headlight beam modification to increase illumination of the road while avoiding glare to other traffic. While the U.S. DOT has taken action to allow use of ADB, it should improve the standard and require them.⁸² This action has been recommended by the NTSB and others.⁸³ According to IIHS, 44 percent of headlight systems tested on model year 2024 vehicles earned a good rating.⁸⁴ About 23 percent of the systems tested were rated marginal or poor because of inadequate visibility, excessive glare from low beams for oncoming drivers, or both.⁸⁵ Ensuring that the U.S. DOT takes action to improve the headlamp standard and advance a requirement should be pursued by the Subcommittee.

Additionally, the IIJA included a provision directing NHTSA to issue a Notice for Public Comment on updating hood and bumper standards for passenger vehicles to “to reduce the number of injuries and fatalities suffered by pedestrians, bicyclists, or other vulnerable road users.”⁸⁶ In September 2024, NHTSA issued a Notice of Proposed Rulemaking (NPRM) to establish a new FMVSS to ensure passenger vehicles are designed to mitigate the risks of serious injuries and fatalities in crashes involving pedestrians including children.⁸⁷ The standard proposed in the NPRM would save 67 lives annually with the benefits far outpacing the costs by establishing test procedures simulating a head-to-hood impact and performance requirements to minimize the risk of head injury.⁸⁸ While this is a step in the right direction, we urge the Subcommittee to ensure that the U.S. DOT pursues a comprehensive upgrade.

Annually, motorcycle crashes cost nearly \$17 billion in economic impacts and \$107 billion in societal harm as measured by comprehensive costs based on 2019 data.⁸⁹ Accounting for inflation alone, in 2025, this would equate to over \$21 billion in economic impacts and over \$135 billion in societal harm.⁹⁰ Serious injuries and fatalities accounted for 83 percent of total comprehensive costs of motorcycle crashes, compared to 60 percent of the total comprehensive costs of all motor vehicle crashes.⁹¹

Motorcycle riders continue to be overrepresented in fatal traffic crashes.⁹² IIHS evaluated on-road data and found motorcycle anti-lock braking systems (ABS) were associated with a 22 percent reduction in the rate of fatal crash involvements.⁹³ Requiring ABS as standard equipment via a FMVSS on new motorcycles will prevent and mitigate crashes. European Union General Safety Regulation (EU GSR) has required ABS fitment on motorcycles since 2016. IIHS most recently filed a Petition for Rulemaking to require ABS on motorcycles with NHTSA in 2023.⁹⁴ We urge the Subcommittee to pursue a standard for this safety improvement in the next surface transportation reauthorization.

Legislation on Hearing Agenda: Advocates supports the Magnus White Cyclist Safety Act (H.R. 3649) and the Safe Streets for Everyone Act of 2026 to strengthen the performance requirements of AEB and enhance VRU safety.

Child Passenger Safety

Since 1990, over 1,100 unattended children have been killed in “hot cars,” and 7,500 more have been injured.⁹⁵ Cost effective technology exists to prevent these tragedies now. The IIJA directed U.S. DOT to issue a Final Rule within two years requiring all new passenger motor vehicles weighing less than 10,000 pounds to be equipped with a system to alert the operator to check rear-designated seating positions after the vehicle engine or motor is deactivated by the operator. The U.S. DOT has not taken regulatory action and should issue a Final Rule which requires the system to detect occupants in the entire passenger compartment rather than rely on reminder systems which are less effective. Of note, Euro New Car Assessment Program (NCAP) added testing of child detection systems in 2023 (protocol), and from 2025 onwards will only be assigning points for direct sensing systems.⁹⁶ We urge the Subcommittee to direct U.S. DOT to comprehensively elevate NCAP and minimally adopt protocols from global NCAPs which have advanced beyond the U.S. program.

Legislation on Hearing Agenda: Advocates opposes the Motor Vehicle Modernization Act which fails to address many of NCAP’s most serious shortcomings.

Experimental Autonomous Driving Technology Remains Unproven, and the U.S. is Not Lagging Behind Other Countries in Deployment

In stark contrast to the effectiveness of federal standards and proven safety technology, cars equipped with various levels of automated driving systems (ADS), for which there are no FMVSS, already have been involved in numerous serious and deadly crashes, many of which have been subject to investigation by the NTSB and NHTSA.⁹⁷ As NHTSA noted in the 2025 Notice of Proposed Rulemaking (NPRM) on the ADS-Equipped Vehicle Safety, Transparency, and Evaluation Program (AV STEP), vehicles equipped with automated driving systems (ADS) “...often struggle with driving tasks that humans consider relatively simple.”⁹⁸ Furthermore, according to data collected by NHTSA’s Standing General Order (SGO) 2021-1 requiring manufacturers to report certain crashes involving vehicles equipped with ADS or SAE Level 2 ADAS, there have been approximately 1,874 crashes involving ADS and 3,003 with ADAS. These include 51 crashes resulting in a fatality.⁹⁹

In addition, several San Francisco transportation agencies submitted comments to the California Public Utilities Commission in 2023 detailing numerous dangerous incidents involving AVs operating in the city.¹⁰⁰ These events include:

- Interfering with emergency response operations including 18 incidents documented by the San Francisco Fire Department in which AVs put firefighters and the public at risk.

- Making planned and unplanned stops in travel lanes that have interfered with transit service and blocked traffic.
- Intrusions into construction zones where City employees were working.
- Obstructions caused by AVs having to interpret and respond to human traffic control officers.
- Erratic driving.¹⁰¹

According to recent media reports, similar issues continue to occur including failing to stop for school buses,¹⁰² ceasing operating in the middle of city streets during a power outage¹⁰³ and traveling on light rail tracks causing the robotaxi's passenger to flee.¹⁰⁴

Many promises have been touted about AVs bringing reductions in motor vehicle crashes and resultant deaths and injuries, lowering traffic congestion and vehicle emissions, expanding mobility and accessibility, improving efficiency, and creating more equitable transportation options and opportunities.¹⁰⁵ However, as auto industry leaders have acknowledged, these outcomes are far from certain.¹⁰⁶

Additionally, supporters of AVs often assert that these vehicles will improve roadway safety by inaccurately stating that 94 percent of crashes are due to human error pointing to a report from NHTSA as support for this misleading claim. However, the agency stated in the same document with this statistic that “[a]lthough the critical reason is an important part of the description of events leading up to the crash, **it is not intended to be interpreted as the cause of the crash nor as the assignment of the fault to the driver, vehicle, or environment.**”¹⁰⁷ [*Emphasis added.*] In addition, NTSB Chair Jennifer Homendy has declared that using the statistic in such a manner is “dangerous” and “[a]t the same time it relieves everybody else of responsibility they have for improving safety, including DOT.”¹⁰⁸ Proponents of AVs also have made the claim that these vehicles will prevent 90 percent of crash fatalities.¹⁰⁹ Yet, as NHTSA states in the AV STEP NPRM, “[t]his proposal recognizes that the potential of ADS is still largely unproven.”¹¹⁰

In sharp contrast to what is happening in the U.S., other countries are taking a more calculated, careful and cautious approach to the development of AVs.¹¹¹ Often-repeated claims about the U.S. “falling behind” other countries in the “race” for AVs are simply not true nor supported by research. For example:

- China continues to require permits or restricts operations of AVs on its roads to only those areas approved by the authorities.¹¹² In fact, the nation recently delayed plans for production of AVs after a deadly crash.¹¹³
- Germany continues to require permits, approvals, and limits areas of operation for AVs.¹¹⁴
- In Japan, the introduction of Level 4 vehicles will be controlled and limited to specific, lightly populated areas.¹¹⁵

- The latest United Nations Economic Commission for Europe (UNECE) regulations will limit operations to restrict risks and oversee approval through testing and other requirements.¹¹⁶

In sum, no country is selling fully automated vehicles for unfettered use to the public and by many accounts, none will be for a significant amount of time.¹¹⁷ According to the most recent KPMG analysis, the U.S. ranks fourth in the world for AV readiness, while China stands at number twenty.¹¹⁸ The U.S. is not lagging behind other countries in allowing AVs to go to market, but we are behind in establishing comprehensive regulations to ensure public safety will not be jeopardized or diminished.

Legislation on Hearing Agenda: Advocates opposes the Discussion Draft of the Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution (SELF DRIVE) Act of 2026 because it fails to address the known safety issues with AVs and recklessly preempts states from enacting commonsense protections for their citizens. It also includes a new data collection program which is less comprehensive than NHTSA's Standing General Order. Advocates supports the AV Safety Data Act, H.R. 4376, which will help to ensure U.S DOT is getting important data on the operations of AVs. In addition, Advocates supports the Know Before You Drive Act which will ensure consumers have accurate information on the capabilities of partially automated driving systems and AVs.

The AV Tenets Offer a Sound and Sensible People-and-Safety-First Approach to AV Deployment

To identify a people-and-safety-first path forward on AVs, Advocates and numerous stakeholders developed the “AV Tenets.”¹¹⁹ These sound and sensible policy positions should be a foundational part of any national AV policy. The AV Tenets are based on expert analysis, real-world experience, and public opinion. They have four main categories including: 1) prioritizing safety of all road users; 2) guaranteeing accessibility and equity; 3) preserving consumer and worker rights; and, 4) ensuring local control and sustainable transportation. They are supported by a coalition of more than 65 organizations representing consumers, public health and safety experts, pedestrians, bicyclists, disability rights activists, emergency responders, law enforcement, labor and others. Requiring that AVs meet minimum performance standards, including for cyber security and a “vision test” to ensure the vehicle can respond to all people, vehicles and objects in the roadway environment, is essential. In addition, AV operations must be subject to adequate oversight, including a comprehensive database accessible by vehicle identification number (VIN) with basic safety information. These are fundamental prerequisites to prevent crashes caused by AVs and boost consumer confidence in this burgeoning technology.

Thank you for your consideration of these issues. We look forward to working with you to address the public health crisis of motor vehicle crashes.

Sincerely,



Catherine Chase
President

cc: The Honorable Brett Guthrie, Chair, Committee on Energy and Commerce
The Honorable Frank Pallone, Ranking Member, Committee on Energy and Commerce
Members of the Subcommittee on Commerce, Manufacturing, and Trade

Encls: Safety Concerns with the SELF DRIVE Act and Motor Vehicle Safety Act, January
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Safety Concerns with the SELF DRIVE Act and Motor Vehicle Safety Act January 2026 Draft Legislation

Advocates for Highway and Auto Safety (Advocates) does not oppose the advancement of vehicles equipped with an automated driving system (ADS). We are opposed to actions, including the identified below, which fail to proactively address the developing technology to ensure the safety of road users. According to data collected by the National Highway Traffic Safety Administration's (NHTSA) Standing General Order (SGO) 2021-1 requiring manufacturers to report certain crashes involving vehicles equipped with ADS or SAE Level 2 advanced driver assistance systems (ADAS), there have been approximately 1,874 crashes involving ADS and 3,003 with ADAS. These include 51 crashes resulting in a fatality.ⁱ The SGO safety data collection and access must be strengthened, and safeguards and improvements to ensure that vehicles equipped with an ADS only operate on roadways and in scenarios for which they are designed to safely do so must be advanced.

No New Safety Standards for Foundational Safety Technologies or the ADS (SELF DRIVE Act)

- The legislation does not establish safety standards to ensure that the ADS will “see” and safely respond to all road users, vehicles and infrastructure in the roadway environment (aka a “Vision Test”). These basic protections are needed for all road users on America’s public roadways.
- The language focuses on the manufacturers establishing a “safety case” which will neither be required to be submitted (rather, submitted upon request by the U.S. Department of Transportation (U.S. DOT) Secretary), nor are there requirements to independently verify the safety case and operations of the ADS.
- Regulatory directives for the safety case are not required as the legislative language uses “may” rather than “shall.”

Mass Exemptions from Federal Motor Vehicle Safety Standards (FMVSS) (Motor Vehicle Modernization Act)

- Permits up to 90,000 vehicles (currently 2,500 allowed) to be exempted from FMVSS including for human controls and extends the length of exemptions to five years (currently one year).
- Requires U.S. DOT to rule on exemption application within one year of receipt of application or automatically approved.

State Preemption (SELF DRIVE Act)

- For manufacturers that establish a safety case, states are broadly preempted from taking actions that can be interpreted as hampering operations. These may include state level requirements to report safety and crash data and to limit operations due to safety deficiencies. It also may impact enforcement of traffic safety laws and limit crash investigations.
- This unprecedented provision would result in a state being preempted from taking action to protect its citizens on its roads in the absence of federal action or conflict and would be predicated on the development of a “safety case” that is not required to be submitted to any regulatory body.

Restricts Public Access to Safety Data, Weakens Data Collection and Repeals the Standing General Order (SGO) (SELF DRIVE Act)

- The language proposes a new safety data collection which is more limited than the National Highway Traffic Safety Administration's (NHTSA) SGO and needlessly applies confidential business information (CBI) protections to data submitted to NHTSA which have been used previously to keep critical basic crash information out of public view.
- Allows state DOTs to potentially review data from AV manufacturers but restricts them from discussing what they learn about potential safety issues due to CBI restrictions.

- Repeals the SGO once the data repository is established. This will enshrine a system in which NHTSA and the public are not getting sufficient information about the operations of AVs on public roads. The SGO should be strengthened, not repealed.

Expands Allowances for Testing and Demonstration (SELF DRIVE Act)

- Under current law, motor vehicle manufacturers can introduce vehicles that do not comply with federal safety standards into interstate commerce for the sole purposes of testing and evaluation. The bill expands the current law to allow manufacturers of ADS, ADS-equipped vehicles and components of ADS which may result in more vehicles equipped with unproven ADS, absent minimum safeguards on our roadways.
- Expands current law to also allow manufacturers using this provision to engage in commercial operations including the carrying of members of the public as passengers and the transportation of freight.

No Workforce Protections Are Included (SELF DRIVE Act)

- The bill allows for payment for testing operations potentially exacerbating workforce issues for certain working drivers.

No Accessibility Requirements Are Established (SELF DRIVE Act and Motor Vehicle Modernization Act)

- While the AV industry has consistently included accessibility and mobility improvements for people with disabilities as a top priority, the SELF DRIVE Act does not advance such and may hamper states' ability to uphold such protections already established.
- The Motor Vehicle Modernization Act includes a study on wheelchair securement, but this is insufficient considering the issue has been known and discussed for over a decade and should have been addressed by the AV industry.

No Establishment of Safety Considerations for Remote Operators (SELF DRIVE Act)

- AV operations are using remote operators (ROs) to overcome deficiencies in their ADS and bolster their operations.
- Information on the scope of ROs and the safety deficiencies they are addressing is currently undocumented, yet needs to be, to understand the safety and readiness of related ADS.
- Safety issues related to use of ROs must be addressed including but not limited to restrictions on the number of vehicles each RO is managing, limitations on hours of service (HOS), requirements for a commercial drivers license (CDL) and experience operating related vehicles.

Fails to ensure that the U.S. New Car Assessment Program (NCAP) is upgraded to meet its international counterparts (Motor Vehicle Modernization Act)

- By any measure NCAP has been exceedingly successful. The program has been copied the world over and has provided necessary safety information to consumers for decades. While NHTSA did implement some important updates to NCAP in recent years, the program remains woefully outdated, particularly its five-star rating program and is in need of substantial upgrades to ensure that the program is both keeping pace with the current state of technology and maximizing its benefits to safety.

ⁱ Standing General Order on Crash Reporting: For Incidents Involving ADS and Level 2 ADAS, NHTSA, available at <https://www.nhtsa.gov/laws-regulations/standing-general-order-crash-reporting>, last accessed Dec. 17, 2025.



January 12, 2026

The Honorable Brett Guthrie
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone, Jr.
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Guthrie and Ranking Member Pallone,

On behalf of the Autonomous Vehicle Industry Association (“AVIA”), I am writing to express our strong support for Representatives Bob Latta’s and Debbie Dingell’s *Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution* (“SELF DRIVE”) Act of 2026. AVIA commends Representatives Latta and Dingell for their leadership on this issue and we strongly encourage the Committee to move forward with this important piece of legislation.

As an organization, AVIA is committed to bringing the tremendous safety and mobility benefits of autonomous vehicles (“AVs”) to consumers in a safe, responsible, and expeditious manner. AVIA’s membership is comprised of the world’s leading technology, automotive, ridesharing, trucking, and transportation companies.¹ Vehicles operated by AVIA members have driven more than 145 million autonomous miles on U.S. public roads, a distance roughly equivalent to the average distance between Earth and Mars or driving around the Earth 5,600 times.² This figure is growing every day. AVs will play a pivotal role in addressing critical challenges facing our nation, including by reducing the persistent and unacceptable level of traffic fatalities in our country, increasing transportation access, enhancing supply chain efficiency, reviving our industrial capacity, creating jobs, and expanding economic output. To fully realize these benefits, however, a supportive federal policy framework that helps accelerate the safe deployment of the technology across the country is essential.

The SELF DRIVE Act of 2026 would further this goal by enabling the safe and timely deployment of AV technology nationwide and solidifying the United States as the global leader in this transformative field. American leadership on AVs is being challenged by strategic competitors,

¹ Our members include Amazon, Aurora, AVRS, Avride, Bot Auto, Cavue, Discount Tire, DoorDash, Ford, Gatik, GM, Honda; International, J.D. Power, Kodiak, Lyft, Motional, NGV, Nuro, Plus, Stack, Tier IV, Torc Robotics, TaskUs, Terawatt Infrastructure; Uber, UPS, Volkswagen Group of America, Volvo Cars, Volvo Autonomous Solutions, Waabi, Waymo, and Zoox. See *Our Mission and Members*, AUTONOMOUS VEHICLE INDUS. ASS’N, <https://www.theavindustry.org/about> (last visited January 12, 2026).

² AUTONOMOUS VEHICLE INDUS. ASS’N, STATE OF AV 2025, (May 2025), https://cdn.prod.website-files.com/67ee2ad971d86c70d02ed03f/683802d318db2c77d4ce3d43_2025_StateOfAV_AnnualReport_Web.pdf.

including the People's Republic of China. China is determined to supplant U.S. leadership on AVs and set global technological standards in the future. Congress can support U.S. ingenuity and innovation by passing the SELF DRIVE Act.

The Act would update key regulations and establish statutory programs to support the ongoing development and deployment of AVs by:

- Requiring manufacturers of automated driving systems (“ADS”) and ADS-equipped vehicles to produce an ADS “Safety Case” that provides documented, reviewable safety justifications for their ADS, including set minimum operational competencies, before their systems or vehicles can be sold or deployed in the United States.
- Ensuring the security of AVs by requiring manufacturers to produce a written cybersecurity plan describing how the manufacturer detects, prevents, and responds to cyberattacks, unauthorized intrusions, and malicious vehicle control commands.
- Allowing ADS-dedicated vehicles—which are designed to be operated exclusively by an ADS within specific operational parameters—to be manufactured without traditional human driver controls, while requiring that, when designed to carry an occupant, such vehicles include a means for an occupant to command a vehicle to safely stop and allow them to exit the vehicle. This provision would greatly advance the ability of autonomous vehicle companies to develop accessible vehicles for people with disabilities.
- Establishing a National AV Safety Data Repository to formalize and standardize ADS crash reporting, which would improve access to safety data for federal and state agencies and increase public transparency. The National AV Safety Data Repository would also provide state transportation regulators with a greater understanding of incidents involving autonomous vehicles.
- Modernizing federal law related to vehicle testing and evaluation to accommodate AVs and allow for carefully controlled commercial activity as part of AV testing, while protecting testing exemptions from being misused as a substitute for regulatory compliance at scale.
- Allowing AVs to temporarily deactivate human driver controls during automated operation, without violating existing “make inoperative” restrictions under federal regulations, while preserving the requirement that human controls can be restored if needed. This provision is important to ensure that innovative safety and technical developments can be adopted into vehicles in autonomous operation.

AVIA appreciates in advance the Committee's consideration of this transformative bill. AVIA looks forward to working with Representatives Latta and Dingell, the Committee, and Congress more broadly to ensure the safe and timely deployment of AVs and American leadership in this critical technology.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Jeff Farrah', with a stylized, flowing script.

Jeff Farrah, CEO
Autonomous Vehicle Industry Association

January 12, 2026

The Honorable Gus Bilirakis, Chair
The Honorable Jan Schakowsky, Ranking Member
Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
United States House of Representatives
Washington, D.C. 20510

RE: Disregard for consumer safety, state and local law, and civil justice in the SELF DRIVE Act

Dear Chair Bilirakis and Ranking Member Schakowsky:

We the undersigned, on behalf of the members of each of our groups individually, and all drivers, passengers, pedestrians and other road users nationwide, write today with grave concerns about the broad and unnecessary assertion of federal authority and omission of vital consumer protections by the proposed SELF DRIVE Act.

Amongst a host of provisions that would degrade consumer safety, the vague and incredibly broad preemption clause in the proposed language would have wide ranging consequences on state and local laws crafted to ensure the responsible introduction of novel autonomous vehicles (AVs) into the varying transportation ecosystems of US cities. Additionally, at a time when so much is unknown about the safety performance of these vehicles in the real world, there is no provision which prohibits the inclusion of a mandatory arbitration clause into contracts with consumers using AVs, which would sequester consumer claims in secretive courts of arbitration that are ultimately designed to protect companies from legal scrutiny and accountability.

States and their political subdivisions are already preempted from exercising their powers in the area of motor vehicle performance to ensure that Federal Motor Vehicle Safety Standards and other safety rules administered by the National Highway Traffic Safety Administration (NHTSA) are the law of the land. However, the broad reach of the preemption clause in the proposed SELF DRIVE Act extends far beyond the federal government's traditional authority to regulate vehicle performance and ensure consistent national performance standards to help ensure vehicle safety.

The proposed act's preemption language would infringe on traditional state and local authorities to regulate traffic law, auto dealers, insurance, registration, licensing, crash investigation, safety and emissions inspections, congestion management, environmental laws, and various consumer protections. Not only does the preemption provision prevent state law enforcement from enforcing the rules of the road, it prevents them from even *investigating* a crash. The bill prohibits states from requiring manufacturers to provide video crash data for any serious crash. Critically, the proposed preemption language would also threaten state negligence and product liability laws as they would apply to AVs, given the extremely ambiguous language in the savings clause.

Ultimately, the preemption scheme envisioned by the proposed SELF DRIVE Act would act to ensure that local authorities are powerless to protect citizens while weakening those citizens' ability to pursue effective claims against irresponsible AV companies. Federal preemption is traditionally used as a tool for ensuring that federal statutes or regulations, once enacted, are able to operate without conflict across the country. But the proposed SELF DRIVE Act's preemption scheme turns this model on its head, ensuring that even in the absence of federal safety regulations governing AV performance or safety, consumers will have nowhere to turn when the inevitable problems raise their head.

The coup de gras is that the proposed SELF DRIVE Act neither proposes nor mandates ANY federal safety regulations that would ensure autonomous vehicle safety. The only thing the proposed language requires is that AV companies produce a "safety case" in order to trigger this massive preemptive effect. Safety cases would be retained internally by manufacturers with no submission to DOT required, hidden from the public, and unavailable to federal regulators unless subpoenaed by NHTSA pursuant to an investigation. The safety case is essentially a quiz that the manufacturers write themselves, grade themselves, and never have to turn in—and if they say they did it, then states and individuals can't hold them accountable when AVs break the rules of the road and hurt someone.

In the absence of any federal safety regulations geared to ensure that AVs don't kill and injure road users, and a preemption scheme that prevents state authorities from stepping up to the plate to protect residents, injured parties would typically be able to turn to the civil justice system as a last resort. But the proposed SELF DRIVE Act contains no language that would stop the proliferation of mandatory arbitration clauses across the AV landscape.

Whether they are in the terms of service of autonomous vehicle rideshare companies or those that will surely reside in future potential ownership or leasing agreements absent a legislative prohibition, mandatory arbitration clauses should not be allowed as a means to shield irresponsible AV companies from civil claims.

As you know, forced arbitration contract terms require consumers to adjudicate claims in forums that do not have the protections of the legal system—the rules of evidence and discovery do not apply, there is no requirement that arbitrators follow the law, there are no juries, and there is little to no opportunity for witness depositions. Moreover, arbitration proceedings are secretive, and the findings of arbitrators are seldom appealable. Additionally, because arbitration firms rely on repeat customers for their profits, it is unlikely that arbitrators will find for a consumer over the corporation likely to provide additional business in the future.

The potential for inserting forced arbitration clauses into a contract between an AV operator or manufacturer and an individual consumer is ever present and creates an alternate system of justice when the inevitable defects in new technology occur. Such a result would create yet another incentive for unscrupulous manufacturers to put shareholders' interests ahead of safety concerns.

For years now the auto industry has been emboldened by the intrusion of forced arbitration in other fields. As a result, it is all too common for consumers to be deprived of their federal and state rights by contracts conditioned on acceptance of forced arbitration as a means to resolve disputes. We have long believed that when a company makes a defective vehicle, they should

use their engineers to build a better vehicle, and not their lawyers to find a legal loophole to avoid responsibility. To be clear, forced arbitration has no place in rideshare agreements or in the sale or lease of automobiles, be they used or new, human driven or autonomous.

Arbitration, when voluntarily consented to by both parties post-dispute is a fine dispute resolution mechanism. Yet, the use of binding arbitration clauses continues to proliferate. Waymo's partnership with Uber to provide autonomous rideshare raises significant questions in this area, since Uber has zealously defended binding arbitration clauses at the expense of consumers for many years now, and Waymo currently uses forced arbitration as well. Future self-driving vehicles may be purchased or leased directly by consumers from multi-national manufacturers, creating an even greater power imbalance than when buying from a local dealership, enabling foreign manufacturers to insert forced arbitration provisions directly into consumer sales contracts.

This moment presents an opportunity to ensure that a practice designed to deprive consumers of their constitutional rights not be allowed to continue into the next generation of vehicles. Importantly, there is precedent in the area of forced arbitration and cars: 15 U.S.C. § 1226, the Motor Vehicle Franchise Contract Dispute Resolution Process Act. Passed into law in 2002, this law prevents auto manufacturers from forcing arbitration clauses on their franchisees, without consent. Consumers deserve the same rights when it comes to driverless vehicles.

In another blow to accountability and safety, the legislation itself defines the automated driving system itself—hardware and software—as the "driver." This provision alone would effectively exempt automated vehicle manufacturers from thousands of state laws regulating the driver of a motor vehicle. The ADS can't be ticketed, can't have its license suspended, and can't be held responsible when it runs a red light or ignores a school crossing guard or interferes with emergency vehicles. Similarly, the ADS can't be held responsible in court or in arbitration for negligence that causes injury or death. Only a person or a company can be held accountable for safe driving and following the rules of the road – not a hardware and software system. The bill must be changed to provide that the driver of the AV is the *manufacturer* of the ADS, not the ADS itself.

Together the preemption language and lack of a prohibition on mandatory arbitration in the proposed SELF DRIVE Act would leave consumers without access to the civil justice system, unable to turn to state and local authorities to address the many negative consequences that AVs have and will continue to bring to our cities, and ultimately relying on a federal authority that has no plans to issue comprehensive AV safety regulations.

Under the proposed bill, consumers and localities would ultimately be forced to rely on the DOT's limited and oftentimes incredibly slow and ineffective defect enforcement authority to address safety issues after they occur, while local authorities would be prohibited from regulating AV safety. These local authorities would also be prohibited from current or future regulation of AVs in the large range of other concern areas where states and cities have long used their authorities to minimize the negative impact of automobiles. This arrangement is unacceptable, and this moment presents an opportunity to ensure that consumers remain the highest priority as autonomous travel continues to develop.

Thank you for your attention to this important matter,

Salena Zellers Schmidtke, Biomechanical Engineer
BioInjury, LLC

Michael Brooks, Executive Director
Center for Auto Safety

Joanne Doroshow, Executive Director
Center for Justice & Democracy

Carmen Balber, Executive Director
Consumer Watchdog

Rosemary Shahan, President
Consumers for Auto Reliability and Safety

Janette E Fennell, President
Kids and Car Safety

Caron Whitaker, Deputy Executive Director
League of American Bicyclists

Christine Hines, Senior Policy Director
National Association of Consumer Advocates

Laurie Woodward Garcia, Leader
People Power United

Joan Claybrook, President Emeritus
Public Citizen

Robert Weissman, Co-President
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Ware Wendell, Executive Director
Texas Watch

Zach Cahalan, Executive Director
Truck Safety Coalition, Citizens for Reliable and Safe Highways (CRASH), and Parents Against
Tired Truckers (P.A.T.T.)

Melissa Millar, Policy Director
Tzedek DC



January 13, 2026

The Honorable Gus Bilirakis
Chair
House Subcommittee on Commerce,
Manufacturing, and Trade
2306 Rayburn HOB
Washington, DC 20515

The Honorable Jan Schakowsky
Ranking Member
House Subcommittee on Commerce,
Manufacturing, and Trade
2408 Rayburn HOB
Washington, DC 20515

RE: *Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership and SELF DRIVE Act*

Dear Chair Bilirakis and Ranking Member Schakowsky,

On behalf of Chamber of Progress, a tech industry association supporting public policies to build a society in which all people benefit from technological advances, I write to thank you for convening this hearing on motor vehicle safety, consumer choice, and affordability. We are particularly pleased to see the Subcommittee's consideration of the Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution (SELF DRIVE) Act of 2026.

We appreciate the Subcommittee's attention to this issue and thank Representatives Latta and Dingell for their bipartisan leadership on this legislation. As the autonomous vehicle industry reaches a critical inflection point, the need for clear federal policy has never been greater. This hearing represents an important step in establishing the regulatory clarity needed to support innovation and unlock the safety, accessibility, and economic benefits of autonomous vehicles.

Autonomous vehicles are increasingly being deployed across the country, logging millions of autonomous miles and demonstrating measurable, real-world safety improvements. This growing track record underscores the technology's potential to reduce crashes and injuries and the need for timely federal policy to ensure those benefits are realized safely, equitably, and affordably. Without clear federal policy, the United States risks ceding leadership in this transformative technology and delaying the safety and economic benefits it promises.

Thank you again for bringing this important issue before the Subcommittee. We believe the SELF DRIVE Act offers a thoughtful approach to federal autonomous vehicle policy.

We appreciate the opportunity to contribute to this discussion and look forward to supporting the Subcommittee's work as you evaluate the best path forward for federal AV legislation.

Sincerely,

A handwritten signature in black ink that reads "Hope Ledford". The script is fluid and cursive, with the first letters of "Hope" and "Ledford" being capitalized and prominent.

Hope Ledford
Director of Civic Innovation Policy



January 12, 2026

The Honorable Brett Guthrie
Chairman
Committee on Energy and Commerce
U.S. House of Representatives

The Honorable Frank Pallone
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives

The Honorable Gus M. Bilirakis
Chairman
Subcommittee on Commerce,
Manufacturing, and Trade
U.S. House of Representatives

The Honorable Janice D. Schakowsky
Ranking Member
Subcommittee on Commerce,
Manufacturing, and Trade
U.S. House of Representatives

Dear Chairmen Guthrie and Bilirakis and Ranking Members Pallone and Schakowsky:

Our organizations represent manufacturers, suppliers, dealers, collision and mechanical repair professionals, and technology innovators working together to serve America's drivers. We support

a competitive repair marketplace and share a common goal of ensuring consumers can keep their vehicles safely and affordably maintained. That is exactly why we are united today in strong opposition to H.R. 1566, the “Right to Equitable and Professional Auto Industry Repair” (REPAIR) Act.

The United States already has one of the most open and competitive repair ecosystems in the world. For passenger cars, independent repairers perform 74% of out-of-warranty repairs, and every piece of information needed to diagnose and repair today’s vehicles is available through existing service information tools, scan solutions, and established industry data-sharing programs.

For commercial vehicles, the unique business-to-business relationship between manufacturers and their customers relies on exceptional service repair performance – which may be the most highly competitive aspect of the commercial vehicle industry. As noted in previous federal analyses, the motor vehicle sector has long been recognized as the model for self-regulation to expand repair access and consumer choice.

Unfortunately, the REPAIR Act would not strengthen that system. Instead, it would disrupt it in ways that increase consumer risk, weaken safety protections, expand commercial access to sensitive driver data and expose vehicle systems to cyber vulnerabilities.

Below are our most serious concerns:

1. The bill mandates broad access to full streams of vehicle telematics data, far beyond what is necessary for repair.

Modern vehicles generate vast amounts of sensitive information: location, driving behavior, cabin interactions, biometric indicators, personal contacts, and more. The REPAIR Act would force automakers to make that data remotely accessible to any designated third party, without limiting access to information actually needed to repair a vehicle. The bill also lacks meaningful restrictions on how third parties may use, resell, store or monetize that data, creating major privacy and commercial exploitation risks for millions of drivers.

2. The bill gives insurers and large commercial enterprises new avenues to harvest vehicle data for non-repair purposes.

Despite claims that the legislation is about small repair shops, the entities that stand to gain the most are insurance carriers and big-box retailers whose business models increasingly depend on access to telematics data. Nothing in the bill prevents entities with no role in hands-on repair from using the data to steer consumers, influence claims decisions, adjust premiums, or build profit-driven data products. This is an enormous step beyond “repair,” and it happens with no consumer transparency or meaningful consent expectations.

3. The technical framework contemplated by the REPAIR Act creates significant safety and cybersecurity vulnerabilities.

Federal safety regulators have consistently warned about the dangers of remote interfaces capable of sending commands into critical vehicle systems. The proponents of the REPAIR Act have long advocated for a universal access channel into millions of vehicles, which would generate new attack surfaces for malicious actors, create the possibility of large-scale cyber events, and weaken decades of investment in vehicle safety architecture. The bill opens the door to the government mandating technology that independent experts have said is fundamentally unsafe.

4. The bill attempts to federalize issues far outside right-to-repair and would give the FTC authority to expand access to even more categories of data.

The bill empowers federal regulators to require access to additional data “for additional purposes” even when unrelated to repair. This is not a repair-market policy; it is a sweeping federal mandate for data access without consumer safeguards, guardrails or clarity on downstream use. It also undermines ongoing bipartisan work in Congress on broader national data privacy legislation.

5. The legislation jeopardizes consumer trust in the rapidly evolving connected vehicle ecosystem.

The widespread adoption of advanced safety systems, electrification, connectivity and over-the-air updates depends on the public trusting that their information is secure, and their vehicles cannot be manipulated remotely. Policies that facilitate open access to vehicle operating environments threaten that trust and risk chilling the deployment of life-saving technologies. This puts drivers, technicians and the entire transportation system in a more vulnerable position.

6. The REPAIR Act’s harmful provisions are not limited to passenger vehicles or individual consumers, but would also disrupt the heavy-duty industry.

As drafted, the bill would apply equally to heavy-duty and commercial vehicles, where vehicles are operated by fleets, data is integral to logistics and safety systems, and “automobile” and “consumer” assumptions simply do not apply. These vehicles operate in fundamentally different environments with distinct safety, cybersecurity, and operational considerations

7. The bill ignores existing voluntary solutions that are already working and that respect safety, privacy and security.

The most effective path forward is continued collaboration among manufacturers, dealers, technicians and independent repairers. Today’s vehicles can be repaired safely without granting commercial parties unrestricted access to sensitive driver information.

We all want consumers to have access to safe, fair and high-quality vehicle repair options. But the REPAIR Act does not advance that goal. It introduces major risks to safety and cybersecurity, gives insurers and retailers access to sensitive data they do not need for repair, and undermines consumer privacy at a time when trust in connected technologies has never mattered more.

On behalf of the millions of American workers, consumers and businesses we represent, we respectfully urge the Committee to reject the REPAIR Act and focus instead on policies that strengthen vehicle repair access without compromising privacy, security or safety.

Sincerely,

Alliance for Automotive Innovation
American Truck Dealers
American Automotive Policy Council
American International Automobile Dealers Association
Association of Equipment Manufacturers
Associated Equipment Distributors
Autos Drive America
Equipment Leasing and Finance Association
International Association of Machinists (IAM Union)
National Automobile Dealers Association
National Association of Manufacturers
National Association of Minority Automobile Dealers
Outdoor Power Equipment Institute
Society of Collision Repair Specialists
Truck and Engine Manufacturers Association (EMA)

January 9, 2026

The Honorable
U.S. House of Representatives
Washington, DC 20515

Dear Representatives,

My name is Cory Donenfeld and I am the owner of Northwest Auto Body, a family-owned independent repair facility founded by my father in 1976 in Sandpoint, Ponderay and Bonner Ferry Idaho. Today, I have the privilege of running this small business alongside my Co- owner, serving customers throughout the Northwest, Bonner County, and surrounding communities.”

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family’s safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn’t provide independent auto repair shops like mine with anything we don’t already have to properly fix your vehicle. Frankly, I’m tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being “locked out” by automakers is not true. It’s a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), and

the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,

Cory Donenfeld





The Honorable Brett Guthrie
US House of Representatives
Rayburn Building, Room 2161
Washington, D.C 20515
Dear Representative Guthrie,

My name is Robert McSherry, and I own North Haven Auto Body, Sabo Auto Body, and Woodbridge Auto Body — independent repair facilities that have served Connecticut continuously since 1938, 1947, and 1960. For generations, our businesses have focused on one principle: performing safe, manufacturer-correct repairs using the proper equipment, procedures, and trained professionals.

We invest heavily in OEM tools, training, and repair procedures, all of which are already available directly from vehicle manufacturers. Independent repairers are not “locked out” of the information needed to properly and safely repair vehicles. That claim is simply not true.

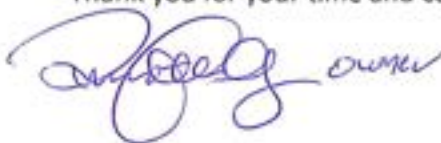
The REPAIR Act does not give shops like mine access to anything we do not already have. Instead, it risks weakening accountability and repair standards while benefiting large insurance interests that profit when consumers are pressured toward lower-cost parts and shortcuts — often at the expense of required repair procedures and vehicle safety.

What small businesses and consumers need is protection from legislation that lowers safety standards, not laws that blur responsibility in the name of convenience or corporate profit.

I urge you to oppose the REPAIR Act and instead support the SAFE Repair Act, developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation. This proposal preserves consumer choice while protecting proper repair standards and public safety.

I would welcome the opportunity to host you at our North Haven facility to demonstrate the investments we have made and the realities our customers face when seeking quality repairs in today's increasingly complex vehicles.

Thank you for your time and consideration.

 1/9/2024



"We meet by Accident"

January 9, 2026

The Honorable Brett Guthrie
U.S. House of Representatives
Rayburn House Office Building, Room 2161
Washington, DC 20515

Dear Representative Guthrie,

Our names are Tony Cavallaro Jr. and Joe Cavallaro, and our family owns and operates Airport Auto Body, a family-owned independent repair facility in Hartford, CT founded by our parents in 1983.

Our mission has always been to perform safe, high-quality repairs using the proper tools, training, and OEM repair procedures. We have invested heavily to ensure we can repair today's complex vehicles correctly, and our customers trust us with their family's safety every time they hand over their keys.

As you familiarize yourself with issues affecting the automotive repair industry, we want to clearly state our position. We strongly oppose the REPAIR Act as currently written and urge you to oppose it as well.

Independent repair shops like ours already have access to the data and tools needed to properly repair vehicles. The claim that we are being "locked out" by automakers is simply not true. That narrative benefits large insurers and corporations that profit by steering repairs toward cheaper alternatives, often at the expense of safety and consumer choice. The truth is that independent repair businesses like ours already have access to all the data and tools we need to safely repair a vehicle.

What small businesses like ours need is protection from policies that blur accountability, erode repair standards, and jeopardize vehicle safety.

We encourage you to support the SAFE Repair Act, developed by the Society of Collision Repair Specialists and the Alliance for Automotive Innovation. This proposal meaningfully addresses real consumer and repairer challenges while preserving safety, accountability, and proper repair standards.

We would welcome the opportunity to host you at our facility to show you firsthand how independent shops have invested in the same equipment and systems used by dealerships. Our customers want their vehicles restored to pre-accident condition using proper procedures, tools, and parts, which is already available to our industry.

Thank you for your time and consideration. We hope we can count on your opposition to the REPAIR Act and your support of the SAFE Repair Act.

Sincerely,

Airport Auto Body
Tony Cavallaro Jr.
Joe Cavallaro

75 Locust Street, Hartford, CT 06114

From: [REDACTED]
Sent: Saturday, January 10, 2026 10:58 AM
To: Falconer, Susan <[REDACTED]>; Stein, Peter
<[REDACTED]>
Cc: 'Bristol Dealership' <[REDACTED]>, 'TC Baker'
<[REDACTED]>
Subject: ****Upcoming Bills in Energy and Commerce Committee - Tri-Cities Business Owners Concerns About Right to Repair, DRIVES Act Legislation****
Importance: High

Susan and Peter -

We are reaching out as constituents of Congresswoman Harshbarger regarding bills that will be considered in the coming weeks in Washington. My name is John Baker and have included my father, Tim Baker, and my brother, TC Baker, - we own and operate the Wallace Auto Group in Tri-Cities, Tennessee.

We appreciate the Congresswoman's leadership for our region, but we did want to share concerns about 2 bills that may come before the Energy and Commerce Committee.

As background, we are a fourth-generation business and have multiple new car dealerships in Bristol/Kingsport/Johnson City (Wallace Auto Group – representing, Volkswagen, Subaru, Kia, Ford, Nissan, and Mitsubishi) and also have our own independent collision center, which is certified by 25+ OEM's (many of these OEM's we are certified in at our collision center, we do not own a corresponding dealership; for example: Tesla, Porsche, BMW, Jaguar Land Rover, Rivian, and Lucid – which has broadened our scope of business as an independent repairer as well as a dealer). Between our various businesses, we employ over 280 hardworking people in the area. Our experience is unique in that we have both sides of the business. We think our experience makes us experts on specific concerns about two bills that might come before the House Energy and Commerce Committee in the next few weeks.

REPAIR Act:

We are committed to safety for our customers and believe the so-called Right to Repair bill does not actually serve the purpose of helping consumers. We strongly oppose the REPAIR Act as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like our collision center with anything we don't already have to properly fix a car, the issue is that many independent repair facilities are choosing to not purchase access to OEM information such as repair procedures, diagnostic tooling, and other OEM special

tools, and instead are crying wolf by stating they do not have access to the information/tooling equipment as dealers. The idea that independent repairers are being “locked out” by automakers is simply not true and a complete fallacy. We desire to better explain the current independent repairer landscape and set the record straight on what we believe the proposed bill is completely missing the mark in regard to the bill’s proponents of a competitive market. We aim to better educate our lawmakers on this issue before the bill is voted on as if it were to pass as it is currently written, would be a major step in the wrong direction for our business and many others within Tennessee and across the country. Our businesses have continually invested in training, tooling/equipment, and our facilities to perform proper and safe repairs. The passing of this bill as currently written would be a severe detriment to our business, both our dealerships and our independent collision repair facility. The truth is that independent repair businesses like our collision center, already have access to all the data and tools we need to repair today’s complex vehicles safely and properly. The difference is, our independent repair facility has chosen to invest in the tooling, diagnostic equipment, and access to OEM repair information versus the independent repair facilities/companies that are supporting this bill that either have not made a similar investment and/or have spread a false narrative about the marketplace not being competitive due to a complete lie of lack of access to the resources needed to fix complex vehicles.

The REPAIR Act doesn’t provide independent auto repair shops like mine with anything we don’t already have to properly fix your vehicle. Frankly, I’m tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being “locked out” by automakers is not true. It’s a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today’s complex vehicles.

I would welcome the opportunity to host you at our facility, Wallace Collision Center. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we’ve made in our capability and also

examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

DRIVES Act:

Secondly, we appreciate Congressman Harshbarger's effort to stop China from getting our customer data. You are right when you say China is one of the biggest threats to America. However, we have significant concerns that the DRIVES Act goes beyond the China problem - it includes problematic language on how customer data is handled. We believe that the bill would provide data to third parties who will not serve the best interest of the US car owner and instead serve their interests at the expense of the vehicle owner. Specifically, the bill would enable insurance carriers to monopolize consumer choice at the detriment of the consumer and also drastically increase the cost of vehicle ownership, which is already increasing at a historic rate.

We would welcome the opportunity to visit Congresswoman Harshbarger in the district and/or talk on the phone about our concerns. My cell phone is [REDACTED]. We are happy to have you visit our dealerships as well as our collision center to see first-hand some of the issues.

Sincerely,

John Russell Baker
Owner/Manager

Wallace Auto Group:

- Wallace Subaru of Bristol
- Wallace Volkswagen of Bristol
- Wallace Kia of Bristol
- Wallace Subaru of Johnson City
- Wallace Volkswagen of Johnson City
- Wallace Mitsubishi of Johnson City
- Wallace Ford of Kingsport
- Wallace Nissan of Kingsport
- Wallace Mitsubishi of Kingsport
- Wallace Volkswagen of Kingsport
- Wallace Collision Center

Work Phone: [REDACTED]
Mobile Phone: [REDACTED]
Email: [REDACTED]

January 9, 2026

The Honorable Erin Houchin
U.S. House of Representatives
Room 342, Cannon House Office Building
25 Independence Ave SE
Washington, DC 20515

Dear Representative Houchin,

My name is Abbie Ziegler, and I am one of the owners of Enneking Auto Body, Inc, a family-owned independent repair facility in southeastern Indiana. My grandfather started the business in Oldenburg, IN in 1954, my father, uncle, and mother took it over from him, added a second location in Greensburg, IN in 2003, and now my sisters, brother, and I are the third generation to run the company.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facilities have invested in all the tools and training to perform repairs properly, and we utilize the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourself with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where I stand. I strongly **oppose the REPAIR Act** as currently introduced, and I urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like my family's with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – our customers to purchase alternative vehicle parts, rather than the parts our customers want.

The truth is that independent repair businesses like my family's already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which we are a member of, and the Alliance for Automotive Innovation (Auto Innovators). I believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our shop in either Batesville or Greensburg, IN. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs, and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit one of our facilities soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Abbie Ziegler". The signature is written in a cursive, flowing style.

Abbie Ziegler

From: Jerry McNee [REDACTED]
Sent: Thursday, January 8, 2026 4:31 PM
To: [REDACTED]@mail.house.gov
Cc: Mike Anderson [REDACTED], Aaron Schulenburg [REDACTED]
Subject: Oppose the REPAIR Act

January 8, 2026

The Honorable Dan Scharfenberger
U.S. House of Representatives
Room 251, Cannon House
Office Building 25
Independence Ave, SE, Washington, DC 20515-3307

Dear Representative Tom Kean,

My name is Gerald McNee, and I am the owner of Ultimate Collision Repair, a family-owned independent repair facility 1115 US HWY 1, Edison, NJ 08837 founded 1988. Today, I have the privilege of running this small business alongside my children, serving customers throughout Edison NJ, Middlesex County, and surrounding communities.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility anytime in 2026. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a safe, quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act and support the SAFE Repair Act proposal.**

Thank you for your time and consideration.

Sincerely,
Jerry McNee

Sent from Jerry's iPad

January 9th, 2026



The Honorable Kelly Robin
U.S. House of Representatives
2329 Rayburn House Office Building
Washington, DC 20515

Dear Representative Robin,

My name is Beth Seberger, and I am a third-generation repairer in my family's business. I currently serve my second term as President of our state automotive service association here in Illinois, AASPI.

I grew up in this industry. I've watched it evolve from steel and welders to advanced materials, electronics, sensors, and software. Through all of that change, one thing has never changed for my family or my shop: our responsibility to protect the people who trust us with their vehicles and their safety.

Our facility has invested heavily in the training, equipment, and OEM-provided repair information required to properly repair today's complex vehicles. We follow manufacturer procedures because modern vehicles demand it — and because our customers expect their cars to be returned to pre-accident condition, not "close enough." These are the vehicles that carry families, teens, and first responders, and we take that responsibility seriously.

In Illinois, I am actively engaged in legislative work focused on consumer protection — specifically, ensuring that vehicle owners are entitled to a fair, transparent evaluation of their vehicles and their insurance claims. This work is not about increasing costs or creating barriers; it is about fairness, accountability, and making sure consumers are not disadvantaged during one of the most stressful events they experience as vehicle owners. This perspective directly informs how I view federal policy proposals impacting this industry.

I understand that you are working to familiarize yourself with key issues affecting the automotive service and repair industry. As someone who is directly impacted by these policies every day, I want to be clear about where we stand. On behalf of our association and the independent repairers we represent, we strongly oppose the REPAIR Act as it is currently introduced, and we respectfully urge you to oppose it as well.

Despite what has been suggested by its supporters, the REPAIR Act does not provide independent repair shops like mine with access to information or tools we do not already have. The narrative that independent repairers are “locked out” by automakers does not reflect the reality of how professional collision repair facilities operate today.

What the REPAIR Act *does* is blur accountability, weaken repair standards, and create pathways that benefit large corporate interests, particularly insurance companies at the expense of consumers. In practice, these pressures often result in consumers being steered toward alternative or lower-quality parts and repairs that do not meet manufacturer requirements, all in the name of cost savings.

Independent repair businesses like mine do not need shortcuts. What we need is protection. Protection for consumers, safety, and repair standards that reflect the complexity of modern vehicles.

That is why we ask that you instead review and support the SAFE Repair Act, an alternative framework developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation (Auto Innovators). We believe this proposal more accurately addresses the real challenges facing consumers and small businesses, while preserving access to the information, tools, training, and equipment necessary to perform repairs safely and correctly.

I would welcome the opportunity to host you at our facility in New Lenox, IL. I would be proud to show you firsthand how an independent shop invests in the same systems, equipment, and repair information available to dealerships — and to share real-world examples of the pressures consumers face when trying to choose safe, proper repairs.

At the end of the day, our customers want one thing: their vehicles to be restored properly and safely, using correct repair procedures, proper tools, and the parts they choose. The SAFE Repair Act supports that goal. It protects consumer choice and supports repairers who refuse to cut corners, even when doing the right thing is harder.

Thank you for your time and consideration. I hope we can count on your support for policies that truly protect consumers and roadway safety, and I look forward to continuing this conversation.

Sincerely,

Beth Seberger

Proud President

AASPI

Probst Collision, LLC.

Opposition to the REPAIR Act and Support for the SAFE Repair Act

January 9, 2026

The Honorable Kevin Mullin
U.S. House of Representatives
Room 1404 Longworth House Office Building
Washington, DC 20515

Dear Representative Mullin,

My name is Todd Hesford, and I am the owner of MVAC Inc, a family-owned pair of collision centers in South Orange County. You may not know us as you do not represent our district but you are in our state. My mother, who passed away in 2025, founded our business back in 1983. Our team has taken over and grown it over the years into two trust worthy, and quality minded, family oriented collision centers. We are a well known reliable name in our communities.

Our focus has remained the same for over 40 years. Provide safe and proper repairs that are in accordance with and follow OEM guidance. Basically that means, fix the car the way we would for our own family. I think we can all agree that modern vehicle technology is not slowing down. Likewise, our resolve to continually invest in proper training, equipment and tooling to repair these vehicles does not slow down. Our clients are expecting us to deliver on this commitment to safe and proper repairs. We deliver on this promise regularly by accessing and utilizing the repair information that is provided to us from the OEM.

I give the House of Representatives a lot of credit, you are asked to review a lot of issues and legislation. Some of which may be completely foreign to you, and then, you make what you think is a good decision for the country. As a small business owner, I do not have a major voice when it comes to these things. But I felt compelled to speak up on the REPAIR Act, as I strongly oppose it. It will have major negative impacts throughout our collision industry. I urge you to oppose it also.

The REPAIR Act in its current form, does absolutely nothing for collision repair centers such as ours, that we do not already have access to. Honestly, I am beyond disappointed with the individuals and organizations who are claiming to “Speak up” on behalf of businesses such as ours.

The claim that the authors of the REPAIR Act are making is that we, the collective service and collision industry do not have access to or are being locked out of

- The correct tools
- The correct education
- Or the correct parts

All of this is an absolute fraud, made up in lies and misdirection. This is promoted by insurance companies, and large corporations who will profit from the same insurance companies that will direct where and how a car is repaired. Often times pressuring the consumer to accept it or they will be left on their own to pay for the repair.

The truth is that for decades now, businesses like mine have had access to all of these things. We as upstanding businesses have to make a choice to actively train and purchase the correct tools or parts. We do not need more legislation on this, we need better policy protection from the bad actors and the likes of the authors of the REPAIR Act. Something that instills consistent accountability and does not leave the safety of our customer in jeopardy in exchange for a better financial bottom line.

I would offer as an alternative that you review and support SAFE Repair Act as opposing legislation. This has been developed by the Alliance for Automotive Innovation, along with the Society of Collision Repair Specialists (SCRS), of which I am a board member. Their proposal addresses the real challenges facing consumers and small repair businesses while preserving safety, accountability, and access to the information, tools, equipment, and training required to repair modern vehicles properly.

If you or your counterparts have the time, we would proudly welcome you here in Orange County to show you how we have and continue to invest in all of the things laid out in this letter. Repair centers like ours are proof that the independent repairer already possesses the ability to access everything needed to perform the safe and proper repair. We do have challenges in this industry, but they rarely ever come from a vehicle manufacturer. They come from downward pressure for cost cutting measures.

In closing, our customers and our team want the same thing, restore their vehicle back to pre-accident condition following OEM repair procedures and utilizing proper tools and parts. We cannot get this with the REPAIR Act. I implore you to familiarize yourself with SAFE Repair Act, take the time to visit local service and collision center so you can understand this matter better. We can offer you references anywhere in the country to facilities who will make the time so you can make an educated decision.

Thank you for your time and consideration.

Sincerely,

Todd M Hesford

Mission Viejo Auto Collision

Opposition to the REPAIR Act and Support for the SAFE Repair Act

January 9, 2026

The Honorable Jay Obernolte
U.S. House of Representatives
Room 2433 Rayburn House Office Building
Washington, DC 20515

Dear Representative Mullin,

My name is Todd Hesford, and I am the owner of MVAC Inc, a family-owned pair of collision centers in South Orange County. You may not know us as you do not represent our district but you are in our state. My mother, who passed away in 2025, founded our business back in 1983. Our team has taken over and grown it over the years into two trust worthy, and quality minded, family oriented collision centers. We are a well known reliable name in our communities.

Our focus has remained the same for over 40 years. Provide safe and proper repairs that are in accordance with and follow OEM guidance. Basically that means, fix the car the way we would for our own family. I think we can all agree that modern vehicle technology is not slowing down. Likewise, our resolve to continually invest in proper training, equipment and tooling to repair these vehicles does not slow down. Our clients are expecting us to deliver on this commitment to safe and proper repairs. We deliver on this promise regularly by accessing and utilizing the repair information that is provided to us from the OEM.

I give the House of Representatives a lot of credit, you are asked to review a lot of issues and legislation. Some of which may be completely foreign to you, and then, you make what you think is a good decision for the country. As a small business owner, I do not have a major voice when it comes to these things. But I felt compelled to speak up on the REPAIR Act, as I strongly oppose it. It will have major negative impacts throughout our collision industry. I urge you to oppose it also.

The REPAIR Act in its current form, does absolutely nothing for collision repair centers such as ours, that we do not already have access to. Honestly, I am beyond disappointed with the individuals and organizations who are claiming to “Speak up” on behalf of businesses such as ours.

The claim that the authors of the REPAIR Act are making is that we, the collective service and collision industry do not have access to or are being locked out of

- The correct tools
- The correct education
- Or the correct parts

All of this is an absolute fraud, made up in lies and misdirection. This is promoted by insurance companies, and large corporations who will profit from the same insurance companies that will direct where and how a car is repaired. Often times pressuring the consumer to accept it or they will be left on their own to pay for the repair.

The truth is that for decades now, businesses like mine have had access to all of these things. We as upstanding businesses have to make a choice to actively train and purchase the correct tools or parts. We do not need more legislation on this, we need better policy protection from the bad actors and the likes of the authors of the REPAIR Act. Something that instills consistent accountability and does not leave the safety of our customer in jeopardy in exchange for a better financial bottom line.

I would offer as an alternative that you review and support SAFE Repair Act as opposing legislation. This has been developed by the Alliance for Automotive Innovation, along with the Society of Collision Repair Specialists (SCRS), of which I am a board member. Their proposal addresses the real challenges facing consumers and small repair businesses while preserving safety, accountability, and access to the information, tools, equipment, and training required to repair modern vehicles properly.

If you or your counterparts have the time, we would proudly welcome you here in Orange County to show you how we have and continue to invest in all of the things laid out in this letter. Repair centers like ours are proof that the independent repairer already possesses the ability to access everything needed to perform the safe and proper repair. We do have challenges in this industry, but they rarely ever come from a vehicle manufacturer. They come from downward pressure for cost cutting measures.

In closing, our customers and our team want the same thing, restore their vehicle back to pre-accident condition following OEM repair procedures and utilizing proper tools and parts. We cannot get this with the REPAIR Act. I implore you to familiarize yourself with SAFE Repair Act, take the time to visit local service and collision center so you can understand this matter better. We can offer you references anywhere in the country to facilities who will make the time so you can make an educated decision.

Thank you for your time and consideration.

Sincerely,

Todd M Hesford

Mission Viejo Auto Collision

January 7, 2026

The Honorable Rep. Jay Obernolte (R-CA-23)
U.S. House of Representatives
2186 Rayburn House Office Building
Washington, DC 20515-0523

Dear Representative Obernolte,

My name is Andrew Batenhorst, and I am the operator of Pacific Collision Center, a family-owned independent repair facility founded in 2014, which serves the greater Glendale, CA community. We specialize in certified collision repairs of the latest, advanced technology EV and ICE vehicles on the market today.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which

I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility Glendale. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Andrew Batenhorst

January 8, 2026

The Honorable Frank Pallone
U.S. House of Representatives
Room 2107 Rayburn House Office Building
Washington, DC 20515

Dear Representative Pallone,

My name is Paul Sgro, and I am the owner of Lee's Garage Inc., a family-owned independent repair facility located in West Long Branch. As you know, we are a local business with deep roots in the community. I had the privilege of taking over this company from my father in 1981, and over the past four decades, I have grown it into a trusted leader in our area—focused on protecting lives by ensuring safe and proper vehicle repairs.

Our mission has always been the same: to provide safe, high-quality repairs performed according to the standards required by modern vehicle technology. Our facility has invested heavily in the tools, equipment, and ongoing training necessary to repair today's complex vehicles properly. We utilize the same repair information provided by automakers and follow OEM procedures as intended. Our customers trust us with their families' safety, and we take that responsibility very seriously.

I understand that you are working to familiarize yourself with key issues in the automotive service and repair industry. As a local small business owner directly impacted by these policies, I want to be clear about where we stand. We strongly oppose the REPAIR Act as it is currently introduced, and we respectfully urge you to oppose it as well.

The REPAIR Act does not provide independent repair facilities like mine with access to anything we do not already have to properly and safely repair vehicles. Frankly, I am frustrated by individuals and

organizations that represent businesses nothing like mine claiming to speak on behalf of independent repairers.

The narrative that independent repair shops are being "locked out" by automakers is simply not true. This claim is a myth promoted by interests that stand to benefit the most from the REPAIR Act—namely large insurance companies and corporate entities that profit when insurers pressure, and in reality often require, consumers to accept alternative or non-OEM parts instead of the parts they prefer or that are required for proper repairs.

The truth is that independent repair businesses like mine already have access to the data, tools, and information needed to repair vehicles safely and correctly. What we need from policymakers is protection—not from automakers, but from legislation that blurs accountability, erodes repair standards, and jeopardizes vehicle safety in the name of convenience and corporate profit.

Instead, I urge you to closely review and support the SAFE Repair Act, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, and the Alliance for Automotive Innovation. This framework addresses the real challenges facing consumers and small repair businesses while preserving safety, accountability, and access to the information, tools, equipment, and training required to repair modern vehicles properly.

I would welcome the opportunity to host you at our facility in West Long Branch. I would be proud to show you how we have invested in the same equipment, systems, and capabilities available to franchised dealerships. We are proof that independent repairers already have access to what is needed to perform safe, proper repairs. We would also welcome the opportunity to demonstrate the real pressures our customers face when trying to choose quality repairs over cost-cutting alternatives.

At the end of the day, our customers want one thing: their vehicles restored to pre-accident condition using proper repair procedures, proper tools, and proper parts. The SAFE Repair Act protects and preserves consumer repair choice and supports repairers like us who refuse to cut corners—despite constant pressure from insurance companies to do so.

I hope you will consider visiting our facility, and I respectfully ask that you oppose the REPAIR Act and support the SAFE Repair Act.

Thank you for your time and consideration.

Sincerely,

Paul Sgro
President
Lee's Garage Inc.

Paul R Sgro

Driven to win in 25 !!

Lee's Garage Inc.
853 Broadway
West Long Branch NJ 07764


January 9th, 2026



The Honorable Jan Schakowsky
U.S. House of Representatives
2408 Rayburn House Office Building
Washington, DC 20515

Dear Representative Schakowsky,

My name is Beth Seberger, and I am a third-generation repairer in my family's business. I currently serve my second term as President of our state automotive service association here in Illinois, AASPI.

I grew up in this industry. I've watched it evolve from steel and welders to advanced materials, electronics, sensors, and software. Through all of that change, one thing has never changed for my family or my shop: our responsibility to protect the people who trust us with their vehicles and their safety.

Our facility has invested heavily in the training, equipment, and OEM-provided repair information required to properly repair today's complex vehicles. We follow manufacturer procedures because modern vehicles demand it — and because our customers expect their cars to be returned to pre-accident condition, not "close enough." These are the vehicles that carry families, teens, and first responders, and we take that responsibility seriously.

In Illinois, I am actively engaged in legislative work focused on consumer protection — specifically, ensuring that vehicle owners are entitled to a fair, transparent evaluation of their vehicles and their insurance claims. This work is not about increasing costs or creating barriers; it is about fairness, accountability, and making sure consumers are not disadvantaged during one of the most stressful events they experience as vehicle owners. This perspective directly informs how I view federal policy proposals impacting this industry.

I understand that you are working to familiarize yourself with key issues affecting the automotive service and repair industry. As someone who is directly impacted by these policies every day, I want to be clear about where we stand. On behalf of our association and the independent repairers we represent, we strongly oppose the REPAIR Act as it is currently introduced, and we respectfully urge you to oppose it as well.

Despite what has been suggested by its supporters, the REPAIR Act does not provide independent repair shops like mine with access to information or tools we do not already have. The narrative that independent repairers are “locked out” by automakers does not reflect the reality of how professional collision repair facilities operate today.

What the REPAIR Act *does* is blur accountability, weaken repair standards, and create pathways that benefit large corporate interests, particularly insurance companies at the expense of consumers. In practice, these pressures often result in consumers being steered toward alternative or lower-quality parts and repairs that do not meet manufacturer requirements, all in the name of cost savings.

Independent repair businesses like mine do not need shortcuts. What we need is protection. Protection for consumers, safety, and repair standards that reflect the complexity of modern vehicles.

That is why we ask that you instead review and support the SAFE Repair Act, an alternative framework developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation (Auto Innovators). We believe this proposal more accurately addresses the real challenges facing consumers and small businesses, while preserving access to the information, tools, training, and equipment necessary to perform repairs safely and correctly.

I would welcome the opportunity to host you at our facility in New Lenox, IL. I would be proud to show you firsthand how an independent shop invests in the same systems, equipment, and repair information available to dealerships — and to share real-world examples of the pressures consumers face when trying to choose safe, proper repairs.

At the end of the day, our customers want one thing: their vehicles to be restored properly and safely, using correct repair procedures, proper tools, and the parts they choose. The SAFE Repair Act supports that goal. It protects consumer choice and supports repairers who refuse to cut corners, even when doing the right thing is harder.

Thank you for your time and consideration. I hope we can count on your support for policies that truly protect consumers and roadway safety, and I look forward to continuing this conversation.

Sincerely,

Beth Seberger

Proud President

AASPI

Probst Collision, LLC.



Haury's Collision & Vintage
11514 Lake City Way NE
Seattle, WA 98125
Phone: (206) 365-1565
Website: www.hauryscollision.com

January 9, 2026

The Honorable Representative Kim Schrier
U.S. House of Representatives
Room 1110, Longworth House Office Building
Washington, DC 20515

Dear Representative Schrier,

I am the owner of Haury's Collision and Vintage in Seattle. We are an OEM factory certified collision repair shop and pride ourselves in OEM specification repairs. Our repair facility serves consumers at one of the most stressful moments they face, after a vehicle collision. Our customers families depend on for safety, mobility, and peace of mind, and we believe public policy must prioritize those same values.

Haury's is writing to formally express our **opposition to the REPAIR Act** as currently introduced.

Our independent collision repair facility is committed to quality and safety are not facing a lack of access to repair information or tools. We already obtain manufacturer repair procedures, diagnostic capabilities, and specialized training necessary to safely repair today's increasingly complex vehicles. The infrastructure for safe and proper repair already exists in the current marketplace.

Our concern lies in the downstream consequences the REPAIR Act would create for consumers.

By reducing clarity around responsibility and weakening established repair standards, the REPAIR Act risks shifting the burden of safety away from accountable parties and onto vehicle owners. Consumers are already required to navigate insurance processes, technical repair decisions, and cost disputes they are not equipped to fully evaluate. This legislation would further complicate that landscape rather than improve it.

In real-world application, our repair facility is pressured to accept repair decisions driven by cost containment rather than vehicle safety or manufacturer requirements. **Policies that lower guardrails or broaden discretion in repair practices make it more difficult for consumers to ensure their vehicle is restored to pre-loss condition.**

Safe and proper repairs are not theoretical. They are being performed every day by independent repairers who invest in training, tooling, and compliance with OEM standards. Any legislation that weakens the expectation of those standards undermines consumer safety and confidence in the repair process.

For these reasons, Haury's Collision & Vintage encourages a more measured approach. We ask that you review the SAFE Repair Act framework developed by the Society of Collision Repair Specialists (SCRS) in collaboration with the Alliance for Automotive Innovation. This proposal better aligns with the realities of modern vehicle repair by preserving accountability, safety standards, and consumer protections without sacrificing access or choice.

Consumers want certainty that their vehicle has been repaired correctly, safely, and according to established standards. Any legislative action should reinforce and not erode that expectation.

Thank you for your consideration and for your continued work on issues affecting Washington consumers. Haury's Collision & Vintage respectfully urges you to oppose the REPAIR Act and support policies that place safety, accountability, and consumer protection first.

Respectfully,

Jeff Butler, AIC
Insurance Claims Expert
Vehicle repair expert, ASE Master Technician
Haury's Collision & Vintage
11514 Lake City Way NE | Seattle, WA
P: (206)365-1565 | www.hauryscollision.com



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January 8, 2026

The Honorable Representative Kim Schrier
U.S. House of Representatives
Room 1110, Longworth House Office Building
Washington, DC 20515

Dear Representative Schrier,

My name is Justin Lewis. I own Accurate Auto Body, a family-owned independent collision repair facility in Redmond, Washington, founded by my parents in 1994. Today, I have the privilege of running the business alongside my wife, serving families throughout Redmond, Bellevue, King County, and the surrounding communities.

For more than six years, I have been actively involved in advocating for stronger consumer protections here in Washington State. This work finally resulted in meaningful legislation passing this last session as SB 5721 was signed into law. That effort was driven by one simple goal: making sure consumers can receive safe, proper repairs on increasingly complex vehicles.

Every day, families trust my business with one of their most important assets, their vehicle and, ultimately, their safety. We take that responsibility seriously. Our shop has made significant investments in equipment, training, certifications, and OEM repair information so that we can repair vehicles according to manufacturer requirements, not shortcuts or outdated practices.

Those resources already exist in today's market, and independent repairers like us are using them successfully.

I understand you are working to become familiar with key issues affecting the automotive repair industry, and I appreciate your willingness to engage. As someone directly impacted by these policies and who works face-to-face with consumers navigating claims, costs, and safety concerns, I want to clearly share why we **strongly oppose the REPAIR Act** as currently written.

The REPAIR Act does not solve a problem that consumers or independent repairers are experiencing today. Independent shops already have access to the tools, data, and information necessary to repair modern vehicles correctly.

The notion that we are "locked out" by automakers simply does not reflect reality in my shop or many others like it.

What does concern me deeply is how the REPAIR Act would impact consumers. By lowering guardrails and blurring accountability, the bill risks increasing pressure to prioritize convenience and cost over safety and proper repair standards. In practice, this would make it harder—not easier—for consumers to receive repairs that restore their vehicle to pre-accident condition.

My customers already face enough challenges: navigating insurance claims, understanding technical repair requirements, and advocating for what is truly necessary to keep their families safe. The REPAIR Act would further distance consumers from that goal by empowering large

corporate interests—particularly insurers—who benefit financially when repair standards are diluted and cheaper alternatives are pushed, often against a customer's wishes.

What consumers actually need is protection, not from automakers, but from policies that unintentionally undermine repair quality and safety. Safe and proper repairs are obtainable today, and they depend on clear standards, trained professionals, and accountability. Any legislation that weakens those pillars ultimately harms the very people it claims to help.

For these reasons, I encourage you to take a close look at the **SAFE Repair Act** framework developed by the Society of Collision Repair Specialists (SCRS), of which I serve on the board of directors, in collaboration with the Alliance for Automotive Innovation.

The SAFE Repair Act framework proposal more accurately reflects the real-world needs of consumers and repairers alike, while preserving access to repair information, tools, training, and most importantly, safety.

I would welcome the opportunity to host you at our facility in Redmond. We would be proud to show you firsthand how independent repairers like us have invested in the same advanced equipment and systems used by dealerships, and to share real examples of the pressures our customers face when safety and proper repairs are challenged.

At the end of the day, our customers want one thing: their vehicle returned to pre-accident condition using proper procedures, proper tools, and proper parts. That goal should unite all of us.

Thank you for your time and consideration. I hope we can count on your support in **opposing the REPAIR Act** and advancing solutions that truly protect consumers and public safety.

Sincerely,

Justin Lewis

Owner, Accurate Auto Body

8710 Willows Road NE

Redmond, WA 98052

January 9th, 2026

The Honorable Kim Schrier
U.S. House of Representatives
Room 1110, Longworth House Office Building, 15 Independence Ave, SE
Washington, DC 20515

Dear Representative Kim Schrier,

My name is Micah Strom, I am the collision chair for NWACA representing over 35 collision shops and the owner of Modern Collision Rebuild & Service, a family-owned independent repair facility on Bainbridge Island in our great state of Washington. I am a second generation shop owner which was founded by my parents in 1974. Today, I have the privilege of running this small business alongside my brother, serving customers throughout Bainbridge Island and the Olympic Peninsula.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What our customers need from policymakers is consumer protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility on Bainbridge Island. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Micah Strom

January 6, 2026

The Honorable Representative Kim Schrier
U.S. House of Representatives
Room 1110, Longworth House Office Building
Washington, DC 20515

Dear Representative Kim Schrier,

My name is Justin Henderson, and I am the owner of ProStar Collision LLC, a family-owned independent repair facility that I started from ground up in 2014. Today, I have the privilege of running this small business alongside my wife, serving customers throughout Ellensburg, WA and surrounding communities.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where I stand. I strongly **oppose the REPAIR Act** as currently introduced, and I urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility in Ellensburg, WA. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Justin Henderson



January 8, 2026

The Honorable Darren Soto
U.S. House of Representatives
Room 2353, Rayburn House Office Building
50 Independence Avenue, SW
Washington, DC 20515

Dear Representative Soto,

My name is Nader Akbari, and I am the owner of Central Florida Paint & Body, an independent repair facility in Orlando founded in 2021 specializing in OEM certified, high quality collision repair. We pride ourselves on repairing vehicles properly and safely by investing in training and tooling to ensure our staff and our organization are up to date with the frequently changing landscape of the automotive industry and the technology used in today's vehicles, while also providing the best possible service to our guests during the stressful circumstances vehicle accidents create in their lives. We also partner with local trade schools like Orange Technical College and UTI to recruit and invest in the new generation entering the workforce and help guide these students both professionally and personally.

Our mission has remained consistent since day one: delivering safe, high-quality repairs that meet the requirements of today's advanced vehicle systems. We have made substantial investments in specialized equipment and ongoing training, and we rely on the repair information and procedures already made available by vehicle manufacturers to restore vehicles as they were designed to be repaired. Our customers entrust us with the safety of their families, and we approach that responsibility with the seriousness it deserves.

I recognize that you are in the process of reviewing issues that impact the automotive service and repair sector. As a small business owner who is directly affected by this legislation, I want to clearly state our position. We oppose the REPAIR Act in its current form and respectfully ask that you do the same.

The REPAIR Act does not provide independent repair facilities like mine with any additional access or capability beyond what already exists to properly and safely repair vehicles. I am increasingly frustrated by organizations claiming to represent independent repairers when their business models and realities bear little resemblance to shops like ours.

The claim that independent repair shops are being "locked out" by automakers is inaccurate. That narrative is being driven by parties who stand to benefit most from the REPAIR Act—namely large insurance carriers and corporate entities that profit when

consumers are steered, or effectively forced, toward non-OEM or alternative parts instead of the parts vehicle owners actually prefer.

Independent repair businesses already have access to the data, diagnostic information, and tools required to perform safe and proper vehicle repairs.

What we need from lawmakers is not intervention against automakers, but protection from legislation that weakens accountability, lowers repair standards, and compromises vehicle safety in favor of speed, convenience, or corporate cost-cutting.

Rather than advancing the REPAIR Act, I encourage you to review and support the SAFE Repair Act—an alternative proposal developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation. This approach more accurately addresses the real concerns facing consumers and independent repairers while preserving access to the information, tools, equipment, and training necessary to repair today's increasingly complex vehicles correctly.

I would welcome the opportunity to invite you to our facility at a time that works for your schedule. We would be proud to demonstrate the level of investment we've made in equipment and systems that mirror those used by franchised dealerships.

Our operation demonstrates that independent repairers already possess the access and capability needed to perform safe, manufacturer-compliant repairs. We would be glad to walk you through our processes and also share real-world examples of the pressures and obstacles consumers face when trying to choose a repair that prioritizes quality and safety.

Ultimately, vehicle owners want one outcome: a properly restored vehicle returned to its pre-loss condition using correct repair procedures, appropriate tools, and the right parts.

The SAFE Repair Act upholds consumer choice and supports repairers who are committed to doing the job correctly—even when faced with ongoing pressure from insurance companies to take shortcuts.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Nader Akbari
Managing Partner, Central Florida Paint & Body



January 12, 2026

The Honorable Lori Trahan
U.S. House of Representatives
Room 2233, Rayburn House Office Building

50 Independence Ave, SW,
Washington, DC 20515-2103

RE: Concerns of Massachusetts Collision Repairers Regarding the REPAIR Act

Dear Representative Trahan,

My name is Evangelos "Lucky" Papageorg, and I serve as the Executive Director of the Alliance of Automotive Service Providers of Massachusetts (AASP-MA), doing business as the Massachusetts Auto Body Association (MABA). Our association represents independent collision repair businesses across the Commonwealth—family-owned small businesses that employ thousands of skilled workers and serve communities throughout Massachusetts.

Our members share a common mission: to restore vehicles safely and correctly, in accordance with manufacturer repair procedures and the realities of modern vehicle technology. Independent collision repairers have made substantial investments in OEM tools, training, equipment, and repair information to ensure that vehicles are repaired properly and safely. Our members take seriously the trust placed in them by consumers, whose safety depends on the quality of these repairs.

We understand that you are familiarizing yourself with key issues affecting the automotive service and repair industry. As the voice of independent collision repairers in Massachusetts, we want to be clear about where our members stand. AASP-MA/MABA strongly opposes the REPAIR Act as currently introduced, and we urge you to oppose it as well.

Contrary to claims made by its proponents, the REPAIR Act does not provide independent collision repair shops with access to information or tools they do not already have. The narrative that independent repairers are being "locked out" by automakers is simply not accurate. That claim is being advanced primarily by entities whose business models and interests differ significantly from those of local, independent repair shops—and who stand to benefit financially from

AASP-MA dba MABA

P O BOX 850210 BRAINTREE, MA. 02185 Tel# 617.574.0741

www.aaspmma.org

(Pg 2)

legislation that weakens repair standards and accountability.

The reality is that independent collision repair businesses already have access to the OEM repair data, tools, and training necessary to safely repair today's vehicles. What our members need from policymakers is protection—not from automakers, but from legislation that blurs responsibility, undermines established repair standards, and places consumer safety at risk in the name of convenience or corporate profit.

For that reason, we encourage you to carefully review and support the SAFE Repair Act, an alternative legislative framework developed collaboratively by the Society of Collision Repair Specialists (SCRS) and the Alliance for Automotive Innovation. This proposal more accurately reflects the realities of today's vehicles and repair environment, while preserving accountability, safety, and consumer choice.

We believe the SAFE Repair Act better addresses the real challenges facing consumers and independent repair businesses, ensuring appropriate access to information, tools, equipment, and training without compromising vehicle safety or repair integrity.

AASP-MA/MABA would welcome the opportunity to arrange a visit for you at one of our member facilities here in Massachusetts. Such a visit would demonstrate firsthand that independent collision repairers have already invested in the same technologies and systems used by dealerships and would also illustrate the pressures our members and their customers face—particularly from insurance-driven cost controls that often conflict with proper repairs.

At the end of the day, consumers want their vehicles returned to pre-accident conditions using proper repair procedures, proper tools, and proper parts. The SAFE Repair Act protects that expectation. It supports responsible repairers who refuse to cut corners, even when facing daily pressure to do so.

We appreciate your time and consideration, and we hope we can count on your support in opposing the REPAIR Act and advancing the SAFE Repair Act. We look forward to continuing this important conversation.

Sincerely,



Evangelos "Lucky" Papageorg
Executive Director

Alliance of Automotive Service Providers of Massachusetts
d/b/a Massachusetts Auto Body Association (AASP-MA / MABA)

AASP-MA dba MABA
P O BOX 850210 BRAINTREE, MA. 02185 Tel# 617.574.0741
www.aaspma.org



The Honorable Gus Bilirakis
US House of Representatives
Rayburn Building, Room 2306
Washington, D.C. 20515
Dear Representative Bilirakis,

My name is Robert McSherry, and I own North Haven Auto Body, Sabo Auto Body, and Woodbridge Auto Body — independent repair facilities that have served Connecticut continuously since 1938, 1947, and 1960. For generations, our businesses have focused on one principle: performing safe, manufacturer-correct repairs using the proper equipment, procedures, and trained professionals.

We invest heavily in OEM tools, training, and repair procedures, all of which are already available directly from vehicle manufacturers. Independent repairers are not “locked out” of the information needed to properly and safely repair vehicles. That claim is simply not true.

The REPAIR Act does not give shops like mine access to anything we do not already have. Instead, it risks weakening accountability and repair standards while benefiting large insurance interests that profit when consumers are pressured toward lower-cost parts and shortcuts — often at the expense of required repair procedures and vehicle safety.

What small businesses and consumers need is protection from legislation that lowers safety standards, not laws that blur responsibility in the name of convenience or corporate profit.

I urge you to oppose the REPAIR Act and instead support the SAFE Repair Act, developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation. This proposal preserves consumer choice while protecting proper repair standards and public safety.

I would welcome the opportunity to host you at our North Haven facility to demonstrate the investments we have made and the realities our customers face when seeking quality repairs in today’s increasingly complex vehicles.

Thank you for your time and consideration.



"We meet by Accident"

January 9, 2026

The Honorable Gus Bilirakis
U.S. House of Representatives
Rayburn House Office Building, Room 2306
Washington, DC 20515

Dear Representative Bilirakis,

Our names are Tony Cavallaro Jr. and Joe Cavallaro, and our family owns and operates Airport Auto Body, a family-owned independent repair facility in Hartford, CT founded by our parents in 1983.

Our mission has always been to perform safe, high-quality repairs using the proper tools, training, and OEM repair procedures. We have invested heavily to ensure we can repair today's complex vehicles correctly, and our customers trust us with their family's safety every time they hand over their keys.

As you familiarize yourself with issues affecting the automotive repair industry, we want to clearly state our position. We strongly oppose the REPAIR Act as currently written and urge you to oppose it as well.

Independent repair shops like ours already have access to the data and tools needed to properly repair vehicles. The claim that we are being "locked out" by automakers is simply not true. That narrative benefits large insurers and corporations that profit by steering repairs toward cheaper alternatives, often at the expense of safety and consumer choice. The truth is that independent repair businesses like ours already have access to all the data and tools we need to safely repair a vehicle.

What small businesses like ours need is protection from policies that blur accountability, erode repair standards, and jeopardize vehicle safety.

We encourage you to support the SAFE Repair Act, developed by the Society of Collision Repair Specialists and the Alliance for Automotive Innovation. This proposal meaningfully addresses real consumer and repairer challenges while preserving safety, accountability, and proper repair standards.

We would welcome the opportunity to host you at our facility to show you firsthand how independent shops have invested in the same equipment and systems used by dealerships. Our customers want their vehicles restored to pre-accident condition using proper procedures, tools, and parts, which is already available to our industry.

Thank you for your time and consideration. We hope we can count on your opposition to the REPAIR Act and your support of the SAFE Repair Act.

Sincerely,

Airport Auto Body
Tony Cavallaro Jr.
Joe Cavallaro



75 Locust Street, Hartford, CT 06114

January 7, 2026

The Honorable Members of the CMT Subcommittee, and the Honorable Tim Burchett of Tennessee

U.S. House of Representatives

Washington, DC 20515

Dear CMT Subcommittee,

My name is Jerry Dalton and I am the owner of Dalton Collision a family-owned independent repair facility's in Knoxville Tennessee and serve the greater Knoxville area with quality, SAFE, OEM certified repairs.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly oppose the REPAIR Act as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts

my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and support the SAFE Repair Act, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility's Dalton Collision in Knoxville or Blaine, I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to oppose the REPAIR Act and support the SAFE Repair Act proposal.

Thank you for your time and consideration.

Sincerely,

Jerry Dalton

From: **LYNSEY MARTIN** <[REDACTED]>
Date: Fri, Jan 9, 2026 at 10:49 AM
Subject: Hello from Finks Unlimited
To: <[REDACTED]@mail.house.gov>, <[REDACTED]@mail.house.gov>, CCA Info
<info@carolinascollisionassociation.com>

January 9, 2026

The Honorable Russell Fry

U.S. House of Representatives

25 Independence Avenue

Cannon House Office Building Room 345

Washington, DC 20515

Dear Representative Russell Fry,

My name is Lynsey Fink Martin, and I am the owner of Finks Unlimited Collision, a family-owned independent repair facility that started in Concord, North Carolina by my father and continues to serve our community today. Today, I have the privilege of running this small business in honor of my family and in hopes to have a continued future in the community.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly oppose the REPAIR Act as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and support the SAFE Repair Act, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

We are proof that independents already have access to what we need to perform safe, proper repairs. At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to oppose the REPAIR Act and support the SAFE Repair Act proposal.

Thank you for your time and consideration.

Sincerely,

Lynsey Fink-Martin

Owner/Operator

Finks Unlimited Collision, Inc.

236 Hwy 49 South

Concord, NC 28025

January 9, 2026

The Honorable Russell Fry
U.S. House of Representatives
25 Independence Avenue
Cannon House Office Building Room 345
Washington, DC 20515

Dear Representative Russell Fry,

My name is Kaitlyn George, and I am the Executive Director of the Carolinas Collision Association, a non-profit organization who is dedicated to safe and correct collision repairs in North and South Carolina. We support many shops in the Carolinas through education and resources and encourage our members to share their voice when support is needed.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. We invest in tools and training to help local independent shops perform repairs properly, and utilize the information already provided by the automakers to conduct those repairs as intended by the OEM. Customers trust these businesses with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a voice for many local business owners directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like these with anything they don't already have to properly fix your vehicle. Frankly, I'm tired of people who have little understanding of the day to day struggles of these shops and customers speaking for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – customers to purchase alternative vehicle parts, rather than the parts the customers want to properly restore their vehicle.

The truth is that independent repair businesses already have access to all the data and tools they need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which we are a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

At the end of the day, customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Kaitlyn George



January 13, 2026

The Honorable Gus Bilirakis, Chairman
The Honorable Jan Schakowsky, Ranking Member
Subcommittee on Commerce, Manufacturing, and Trade
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Bilirakis and Ranking Member Schakowsky:

Consumer Reports (CR), the independent, nonprofit, and nonpartisan member organization, writes regarding the January 13, 2026, hearing, “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership.” We ask that this letter be included in the hearing record.

For over 85 years, CR has used rigorous research, independent testing, and evidence-based advocacy to advance vehicle safety innovations that protect consumers. We have championed everything from seat belts and crash avoidance technologies to protections for people outside the vehicle. Strong safety standards not only save lives and prevent injuries, but also deliver lasting benefits for consumers and the transportation system as a whole.

As the Subcommittee considers legislative proposals to shape the future of vehicle safety, we offer the following perspectives on key bills and discussion drafts under consideration.

Motor Vehicle Modernization Act (Chairman Guthrie)

Consumer Reports appreciates the intent behind the Motor Vehicle Modernization Act to reform, update, and better equip the National Highway Traffic Safety Administration (NHTSA) to oversee motor vehicle safety into the future. We support provisions that aim to promote transparency and accountability, such as the requirement for a recurring safety rulemaking and research priority plan, which would be a welcome step toward improving the timeliness and coordination of NHTSA’s rulemaking processes. We also urge the Subcommittee to support increased appropriations for NHTSA, which remains significantly underfunded.

Updating the five-star safety ratings program, including through the establishment of a dedicated New Car Assessment Program (NCAP) office, an NCAP advisory committee, and consumer education components, would help to improve public understanding of vehicle safety technologies and address longstanding concerns that the program has not kept pace with rapidly evolving vehicle safety features. The new advisory committee should be transparent, balanced, and accountable, including through full compliance with the Federal Advisory Committee Act.

The bill also directs the advisory committee to study the feasibility of shifting some functions of the program to a public-private partnership or private entity. NCAP plays a vital role in informing and protecting consumers, and its independence, transparency, and public accountability must be preserved. We think the program is best situated within NHTSA, but if its structure were to change, we would emphasize the need for strong safeguards and a meaningful role for public interest advocates and independent safety experts to ensure it continues to serve its consumer information mission.

The bill's provisions around rulemaking transparency and project management reinforce timely, accountable regulatory processes, and we support them. In addition, we conditionally support the bill's provisions requiring a recurring review of existing safety standards, which would help standards keep pace with evolving vehicle designs. These reviews should include consideration of standards that need to be strengthened, and in making a determination about potentially revising a standard, the NHTSA Administrator should be required to consider the benefits to the public related to the standard, not just the costs for manufacturers.

However, we are concerned about provisions that would drastically expand the number of vehicles allowed to receive general exemptions from federal motor vehicle safety standards (FMVSS) under 49 U.S.C. 30113. The bill would dramatically increase the volume of allowable exempt vehicles from 2,500 to 90,000, and shorten review timelines. Perhaps most problematic is the "deemed approved" provision that would automatically grant an exemption if NHTSA fails to decide on an exemption application within one year. This is a departure from current law, which requires NHTSA to make certain findings before granting exemptions.

These changes raise significant safety concerns, as they could allow vehicle deployments without a full safety review or explicit agency finding that the exemption is in the public interest and maintains motor vehicle safety. We especially oppose these changes in relation to clause (iv) of section 30113(b)(3)(B), which is a vague and misguided provision of law. While NHTSA will certainly need to gauge equivalence of an AV's novel safety feature with the level of safety provided by an individual FMVSS, it is unrealistic to expect the agency to be able to establish a well-reasoned, impartial, and widely-agreed-upon meaning of "overall safety level at least equal to the overall safety level of nonexempt vehicles."

The bill also expands the ability of manufacturers to put new vehicle technology on public roads solely for purposes of testing or evaluation, by allowing introduction of "motor vehicle equipment" for these purposes in addition to full motor vehicles. While some clarification around testing and evaluation is reasonable, any such use must be narrowly scoped, rigorously overseen, and not used as a backdoor to avoid necessary safety standards.

With respect to recalls, we are unclear what the intention is behind the proposed revisions to 49 U.S.C. 30118, and we are uncertain what their real-world impact would be if the bill were enacted. We would oppose this provision if it were likely to contribute to manufacturer delays in addressing a safety defect. Regardless, if this bill ultimately were to amend section 30118, the priority should not be tweaking subsection (c), but rather granting NHTSA efficient and effective imminent hazard authority that it could use to protect the public quickly when there are vehicles on the road with a condition that substantially increases the likelihood of injury or death.

Finally, we support the bill's attention to recall completion and notification methods, as well as consumer education around automation. These are key components to building a modern vehicle safety ecosystem, especially as driving automation systems become more common and more complex.

Safety is Not For Sale Act (Ranking Member Pallone)

In 2020, CR issued a report that found automakers routinely bundled core safety technologies with expensive, non-safety features, forcing consumers to pay thousands more for protection that should be standard; for example, access to automatic emergency braking with pedestrian detection often required upgrades costing \$2,000 or more.¹ A separate 2023 analysis of blind spot warning found a similar pattern, with consumers typically paying over \$1,500 to get a vehicle with the feature, particularly on popular SUVs and trucks, which may present greater risks to pedestrians and others outside motor vehicles.²

The Safety is Not For Sale Act addresses this issue by requiring that optional safety features be offered either as standard trim equipment or separately from non-safety features. This would rightly prevent automakers from restricting access to life-saving technologies to those customers who pay for luxury add-on packages.

While the bill would deliver meaningful progress, CR's position continues to be that many of these features—and particularly those with well-established safety benefits—should simply be standard across all new vehicles. In our view, blind spot warning, rear cross traffic warning, advanced drunk and impaired driving prevention technology, and automatic crash notification should come standard on all new vehicles (including all trims), and consumers should not be required to pay extra for them. We also note that, as the bill is currently written, it could still permit manufacturers to bundle safety features with other safety features, resulting in affordability barriers if key protections are locked behind add-on or higher-trim safety packages.

Finally, we note that adaptive cruise control and lane centering technologies (which appear to be described in Sec. 2 (e)(6)(B)(i)) are not proven to deliver safety benefits and should be considered convenience features, not safety features.

SELF DRIVE Act (Reps. Latta and Dingell)

Consumer Reports welcomes the opportunity to work toward a federal safety framework for automated vehicles, but the SELF DRIVE Act as currently written raises serious concerns. While this discussion draft requires manufacturers to submit structured “safety cases” demonstrating how their systems meet core safety competencies, it lacks requirements for independent

¹ Consumer Reports, “A High Price on Safety: How Automakers Require Consumers to Pay a Premium for Proven Vehicle Safety Features.” (June 2020) (online at: advocacy.consumerreports.org/wp-content/uploads/2020/06/CR-A-High-Price-on-Safety-June-2020.pdf).

² Consumer Reports, “A Blind Spot in Safety: An analysis of blind spot warning in popular heavy vehicles in the U.S.” (Aug. 24, 2023) (online at: advocacy.consumerreports.org/wp-content/uploads/2023/08/CR-Blind-Spot-Warning-Analysis-August-2023.pdf).

verification or certification of those safety cases. It appears manufacturers could satisfy the safety elements of the legislation simply by developing and self-certifying their safety case without any requirement for it to be made public or even to be submitted to NHTSA unless requested.

The proposed safety data repository builds on existing NHTSA efforts, but appears to deliver weaker provisions compared to the current Standing General Order, such as by narrowing the scope of reportable crashes, loosening reporting timelines, and expanding the ability of manufacturers to treat safety-critical information as confidential.

Crucially, the bill also broadly preempts state authority without ensuring robust federal oversight, stripping states and localities of their role in protecting road users while providing limited tools for NHTSA to ensure meaningful accountability at the federal level. We strongly oppose the breadth of this state preemption provision and urge the Subcommittee to narrow it substantially or remove it entirely.

As Congress considers autonomous vehicle legislation, it should ensure that any federal AV framework includes enforceable safety standards with independent validation of system performance and robust public transparency. Manufacturers should be required to demonstrate how their vehicles meet clearly defined safety benchmarks before deployment. Safety data and crash reporting should be made publicly accessible, and the data should be specific and detailed enough to allow for meaningful analysis of system performance and safety outcomes. Critically, Congress must also preserve the ability of states and localities to protect their residents. Without these core safeguards, AV legislation risks introducing new hazards on our roads and impunity for developers that fail to put safety first.

Finally, it is worth noting that companies in various industries are increasingly adding forced arbitration clauses into their standard contracts and terms of use, stripping consumers of their right to go to court if they are harmed by a product or service. Instead, legal disputes get shunted off to private forums where many basic legal protections do not apply, and the company often has an unfair advantage. Congress should seize the opportunity presented by the SELF DRIVE Act to prohibit the use of forced arbitration in mobility services and the auto industry broadly.

REPAIR Act (Reps. Dunn and Perez)

Consumer Reports takes no position on the REPAIR Act. CR strongly supports the right to repair and strongly opposes broad preemption of state authority to enact or enforce right to repair laws.

AV Safety Data Act (Rep. Mullin)

Consumer Reports supports the goals of the AV Safety Data Act, which would build on NHTSA's existing Standing General Order (SGO) by codifying safety data reporting requirements for both Level 2 and Level 3–5 systems and, importantly, expand those requirements through enhanced monthly reporting of key metrics. These include miles traveled, unplanned stoppage events, and crashes involving injuries to vulnerable road users or occupants

of other vehicles. These would address gaps in reporting such as the lack of standardized data on operational exposure and non-crash safety risks like road obstructions.

However, by simply codifying the existing reporting requirements, the bill would lock in narrower requirements that were introduced under the Third Amended SGO, which came into effect on June 16, 2025.³ This would be a missed opportunity to establish a stronger statutory baseline for the reporting of AV data.

Driver Technology and Pedestrian Safety Act (Rep. Mullin)

Consumer Reports supports the Driver Technology and Pedestrian Safety Act. Our research has long shown that overly complex or poorly designed touchscreen systems can increase driver distraction.⁴ As digital interfaces replace some physical controls, clearer guidelines are needed to ensure these systems minimize cognitive and visual demand. For example, the updated 2026 protocols for the European New Car Assessment Programme (Euro NCAP) will award higher safety ratings to vehicles that retain physical controls for basic functions like turn signals, hazard lights, and windshield wipers, recognizing that touchscreen-only interfaces take drivers' eyes off the road. Directing NHTSA to study the impact of certain non-safety related controls would be a step toward addressing a growing and underregulated risk to road safety.

DRIVER Act (Rep. Harshbarger)

Consumer Reports takes no position on the DRIVER Act. CR strongly supports data access laws, but the provisions in this legislation are vague and would preempt more detailed and specific state laws that are already in effect.

ADAS Functionality and Integrity Act (Reps. Harshbarger, Obernolte, Vazquez, and Torres)

Consumer Reports supports efforts to improve the safety and reliability of advanced driver assistance systems (ADAS) throughout the vehicle lifecycle, including after collisions and repairs. We have advised consumers that advanced driver assistance systems like automatic emergency braking and lane-keeping assist rely on precisely calibrated sensors and cameras, and that even common repairs, such as windshield replacement, may require recalibration to maintain proper system functionality.⁵ This bill, by establishing calibration standards, enhancing transparency around required procedures, and promoting consistent industry practices, could help ensure that ADAS features perform safely and reliably over time, especially if a consumer decides to make significant modifications to their vehicle.

³ NHTSA, "Third Amended Standing General Order 2021-01" (Apr. 24, 2025) (online at: www.nhtsa.gov/sites/nhtsa.gov/files/2025-04/third-amended-SGO-2021-01_2025.pdf)

⁴ Consumer Reports, "The Most and Least Distracting Infotainment Systems" (Nov. 16, 2017) (online at: www.consumerreports.org/car-safety/most-and-least-distracting-infotainment-systems/)

⁵ Consumer Reports, "The Hidden Cost of Car Safety Features" (Nov. 16, 2020) (online at: www.consumerreports.org/car-repair/the-hidden-cost-of-car-safety-features/)

DRIVE to HALT Drunk Driving Act (Rep. Dingell)

The DRIVE to HALT Drunk Driving Act aims to speed up the use of technology to address impaired driving, which remains one of the most persistent causes of preventable roadway deaths. By requiring automakers to equip a portion of their fleets with passive alcohol detection systems that meet DADSS performance specifications and driver attention systems aligned with Euro NCAP's impairment detection protocols, the bill takes an iterative approach to deployment of these technologies. Importantly, the bill establishes minimum deployment requirements while preserving flexibility to adopt updated safety benchmarks, and includes an appropriate sunset clause that would take effect once NHTSA finalizes its rulemaking required under section 24220 of the Infrastructure Investment and Jobs Act. The bill thus would promote near-term deployment using technologies already in use globally, while also maintaining regulatory momentum and flexibility.

No Kill Switches in Cars (Rep. Perry)

We strongly oppose the No Kill Switches in Cars Act because it baselessly undermines critical efforts to prevent impaired driving. As advocates for both consumer safety and consumer privacy, we at Consumer Reports can say unequivocally that the effect of this bill would be to block the rollout of life-saving technology, putting lives at risk and delaying progress on one of the most preventable causes of road deaths. Contrary to arguments made by proponents, the bill would do nothing to improve consumer privacy.

To require an update to the definition of 'motorcycle' (Rep. Van Orden)

Consumer Reports takes no position on Rep. Van Orden's bill to require an update to the statutory definition of "motorcycle."

PART Act (Reps. Baird and McCollum)

Consumer Reports is still reviewing the PART Act and plans to weigh in with comments at a later date.

Safe Vehicle Access for Survivors Act (Reps. Dingell and Crenshaw)

Consumer Reports is still reviewing the Safe Vehicles for Survivors Act and plans to weigh in with comments at a later date.

Know Before You Drive Act (Rep. Schreier)

Confusion over what partially automated driving features can actually do is a known safety risk. CR has raised concerns about system names like "Autopilot" and "Full Self-Driving,"⁶ which can lead drivers to overestimate a vehicle's capabilities. The Know Before You Drive Act would

⁶ Consumer Reports, "Senators Call for Investigation of Tesla's Marketing Claims of Its Autopilot and 'Full Self-Driving' Features" (Aug. 18, 2021) (online at: www.consumerreports.org/advertising-claims/call-to-investigate-tesla-marketing-claims-autopilot-fsd-a1181594362)

appropriately address this issue by requiring automakers to clarify functionality before consumers use these features, and the bill could help reduce misuse and improve public understanding of driving automation.

SAFE Exit Act (Rep. Kelly)

Consumer Reports strongly supports and has already publicly endorsed the SAFE Exit Act, which would require all vehicles with electronic door latches to include accessible, clearly labeled manual releases that function without vehicle power. Tragically, investigations have linked electronic door failures to at least 15 deaths, including horrifying instances where occupants were trapped in burning vehicles as first responders struggled to gain access.⁷ CR has raised concerns about designs that obscure or complicate emergency egress, especially in those situations where power is lost after a crash or fire,⁸ and over 36,000 consumers have signed a petition calling for safer car door handles.⁹ When poorly designed, electronic door latch systems can hinder escape and delay first responder access. This bill addresses a growing safety risk with a straightforward requirement to ensure occupants can always exit the vehicle safely. We urge all members of the Subcommittee to cosponsor this bill.

Safe Streets for Everyone Act (Rep. Clarke)

CR welcomed NHTSA's final rule establishing FMVSS No. 127 to require all new cars and light-duty trucks to be equipped with effective automatic emergency braking (AEB) that includes pedestrian detection technology. CR considers AEB to be one of the most significant auto safety advances of the past two decades. However, the rule does not require detection of cyclists or motorcyclists, which CR had urged NHTSA to include in the final rule.¹⁰ The Safe Streets for Everyone Act—which is based on H.R. 3649, the Magnus White Cyclist Safety Act—would close critical gaps in the current rule and ensure new AEB systems can detect and respond to both bicycles and motorcycles. We strongly support this bill.

Consumer Reports appreciates the Subcommittee's attention to motor vehicle safety and related policy challenges. We look forward to continuing to work with the Subcommittee and full Committee as these proposals move forward, and we stand ready to provide additional research, technical expertise, and consumer-focused perspectives to help ensure that any final legislation meaningfully advances safety outcomes on U.S. roads.

⁷ Consumer Reports, "How to Escape Your Car If the Electronic Door Handle Fails" (Jan. 7, 2026) (online at: www.consumerreports.org/cars/car-safety/how-to-escape-your-car-if-the-electronic-door-release-fails-a8152892189/).

⁸ Consumer Reports, "Proposed Law Takes Aim at Unsafe Electronic Car Door Handles" (Jan. 7, 2026) (online at: www.consumerreports.org/cars/car-safety/unsafe-electronic-car-door-handles-safe-exit-act-a1099298865/).

⁹ Consumer Reports, "Automakers: Make Electronic Door Handles Safer" (online at: action.consumerreports.org/nb-20251203-doorhandlesafety/).

¹⁰ Consumer Reports, "Consumer Reports Submits Comments on Proposed NHTSA Automatic Emergency Braking Systems Rule." (Aug. 15, 2023) (online at: advocacy.consumerreports.org/research/consumer-reports-submits-comments-on-proposed-nhtsa-automatic-emergency-braking-systems-rule/).

Sincerely,

William Wallace
Director
Safety Advocacy

Cooper Lohr
Senior Policy Analyst
Transportation and Safety

cc: Members of the Subcommittee on Commerce, Manufacturing, and Trade



December 23, 2025

The Honorable Brett Guthrie
House Energy & Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone
House Energy & Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Ted Cruz
Senate Commerce Committee
254 Russell Senate Building
Washington, DC 20510

The Honorable Maria Cantwell
Senate Commerce Committee
254 Russell Senate Building
Washington, DC 20510

**RE: Accessibility Considerations to Ensure Access and Safety for Disabled Travelers in
Autonomous Vehicle Legislation and Provisions in Surface Transportation Reauthorization**

Dear Chairs Guthrie and Cruz and Ranking Members Pallone and Cantwell:

The undersigned members of the Consortium for Constituents with Disabilities (CCD) Transportation Task Force and fellow advocates urge you to consider and prioritize the safety and access needs of disabled passengers and pedestrians in any stand-alone autonomous vehicle (AV) legislation or surface transportation provisions. Recommendations in this letter reference Congressman Latta's 2023 SELF DRIVE Act discussion draft (SELF DRIVE Act Draft) and Congresswoman Dingell's AV framework proposal (AV Framework Proposal).¹ We recognize Representative Dingell and Latta's leadership of the Congressional Autonomous Vehicle Caucus and are grateful for their acknowledgement that disability rights advocates must be at the table as AV frameworks are developed.² We are also providing '*Disability Access in AVs and Motor Vehicles*' draft bill text (Access in AVs Draft) for your consideration.

CCD is the largest coalition of national organizations working together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of people with disabilities. The Americans with Disabilities Act (ADA) sought to "provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities." Through AV policymaking Congress has the opportunity to lead, uphold the ADA's mandate, enhance safety, and improve lives and mobility for all.

Disability AV Advocacy, Engagement and Recommendations

The CCD Transportation Task Force has adopted cross-disability AV Principles and provided feedback on past AV legislative drafts.^{3,4} Signatories to the principles included 20 national organizations. Many of our members also participated in 3 days of AV accessibility workshops in 2019 hosted by the Alliance of Automobile Manufacturers (an organization preceding the Alliance for Automotive Innovation) with government, industry and disability stakeholders, and U.S. Department of Transportation (USDOT) and U.S. Department of Labor (USDOL) listening sessions.^{5,6} AVs can improve mobility and quality of life for the disability community, including for those with physical, sensory, intellectual and developmental disabilities and neurological conditions such as epilepsy. For the full potential of AVs to be realized any AV legislation must:

- explicitly include consideration of accessibility and the needs of disabled travelers of all disability types in each rulemaking, including federal motor vehicle safety standards (FMVSS) updates;
- ensure exemptions granted based on improved access address the biggest challenges to accessibility;
- ensure preemptions do not prohibit state or local requirements or performance metrics that would increase the numbers of fully accessible autonomous vehicles and services accessible to people with disabilities, including wheelchair users;
- ensure AV-related ADA or other civil rights claims can be filed in court;
- ensure AVs complement and improve public transit;
- ensure data collected and safety considerations address the needs for accessible sidewalks, crossings, curb cuts, accessible pedestrian signal and related infrastructure;
- and ensure USDOT and the US Access Board have the resources and staff to adopt and implement necessary research, rulemaking and standard setting.

Background

Nearly 1 in 5 people in the U.S. has a disability (more than 57 million). In addition, the age of people over 65+ is set to double by 2050. Many older adults who acquire short or long-term disabilities or health conditions in both rural and urban settings will need accessible transportation options to access healthcare and remain active in their communities. As a result of the passage of the ADA, 99% of public buses are equipped with ramps, curb ramps benefit the public, and there is improved provision of accessible transit to people with sensory disabilities. Yet, significant barriers to accessible, affordable transportation remain across modes.

Many people with disabilities cannot drive because of their specific disability, are currently unable to obtain a driver's license, are denied service or cannot afford to purchase a wheelchair accessible vehicle (WAV).⁷ It's critical that ride-share and on-demand services provide disability access yet there are not adequate WAVs and trip denials for service animal users and other people with disabilities are rampant. There are no purpose-built wheelchair accessible

passenger vehicles on the market today in the United States. Wheelchair users often pay nearly double the price of the vehicle for necessary aftermarket modifications, including to have a ramp installed or other features that require exemptions from the FMVSS.⁸

Without affordable, accessible transportation people with disabilities are unable to travel to work, to school, to contribute to and participate in their communities, to support and spend time with family and friends, and live their lives to the fullest. A report by the National Disability Institute found that a critical barrier to competitive integrated employment and entrepreneurship is a lack of accessible transportation options. Accessible, affordable, and sustainable AVs could lead to an additional 4.4 million jobs for people with disabilities, an additional \$867 billion in U.S. GDP and \$1.6 trillion in U.S. output.⁹

Manufacturers and transportation providers are developing, testing and deploying autonomous shuttles and passenger vehicles. AVs have the potential to dramatically improve access for people with disabilities. The promise and safety of AVs will only be realized if the vehicles and the surrounding infrastructure are fully accessible, and the safety elements consider the needs of all people with disabilities.

Regarding any AV legislation we urge you to:

Retain the Following Provisions from the SELF DRIVE Act Draft and the AV Framework Proposal

Licensing and Insurance – Legislation should prohibit discrimination on the basis of disability by states and any other governmental authorities in licensing and insurance. We strongly support the provisions that prohibit discriminatory licensing laws nationwide.

Highly Automated Vehicles Advisory Council – An Advisory Council comprised of industry, consumer, safety, labor, civil rights and other stakeholders is necessary to continue discussions and identify barriers, unintended impacts and solutions. Disability representation is critical and should be included within any advisory council and should also be required to consider accessibility needs.

Include Accessibility and Strengthen the Following in the SELF DRIVE Act Draft and the AV Framework Proposal

Safety Framework and Self-Assessment Rulemakings – The SELF DRIVE Act Draft and AV Framework Proposal direct NHTSA to initiate safety rulemakings and safety assessments for entities developing AVs. The timelines in the proposals differ. We support the SELF DRIVE Act draft's inclusion of accessibility including non-visual accessibility, in the safety assessment. **The Access to AVs Draft requires a safety rulemaking for accessible AV HMIs and a rule for automated driving systems (ADS) to assess and validate the performance of sensing, perception and response to disabled people outside the vehicle.**

Any safety framework rulemaking must also include a requirement for USDOT to consider the

needs of all disabled travelers, including people with physical, sensory (those that are blind or low vision or Deaf or hard of hearing) and intellectual and developmental disabilities. A mandate from Congress for all AV-related rulemakings would ensure inclusion. The vehicle's ADS HMI and object detection outside the vehicle are critical in any safety framework. HMI must be accessible to people with sensory and cognitive disabilities for AVs to reach their full potential. A Disability Rights Education & Defense Fund brief on ableism in AV AI and algorithms recommends standards be set to ensure AVs can detect all people with disabilities and other members of marginalized communities outside the vehicle.¹⁰ Research and recent anecdotes suggest that not all AVs are being taught to detect people seated in their wheelchairs, service animal users, or people with darker skin tones, among others.

Proposed manufacturer self-assessments require USDOT to identify risks to motor vehicle safety and steps taken to mitigate such risks during the design, development, and introduction into interstate commerce. Accessibility and how the needs of disabled travelers, including non-visual access and access for wheelchair users, are being met must be included in safety self-assessments provided by manufacturers and in any publicly available database.

Updating Existing FMVSS Standards – The SELF DRIVE Act Draft would require a review of FMVSS and initiating or documenting research to evaluate AV safety. The AV Framework Proposal would require updating FMVSS within 3 years.

Existing FMVSS must be updated to ensure the safety of AVs, including level 4 and 5. We strongly encourage Congress to require USDOT to include a review of how updated FMVSS will ensure the safety of fully accessible AVs, including those that are both electric and autonomous, and are built with wheelchair ramps and will require testing and deployment of automatic securement systems.¹¹ The federal safety framework must assume deployment of, and advance progress toward, fully accessible passenger vehicles (both large and small) as well as accessibility standards. These standards will not only increase public trust of AVs, but also a roadmap for those in the industry seeking to develop and deploy the safest, most accessible vehicle.

Examples of FMVSS related standards that require attention for passenger-related accessible ergonomics are active suspension and kneeling capabilities for level entry, vehicle doorway height and width for entry, rear passenger entry for ambulatory self-or assisted passenger transfers, passenger restraint systems, ramps and mobility equipment securement, and grab assistance throughout vehicles that allow for perpendicular movement. Any updates to the FMVSS must maintain the current exemptions to crashworthiness for modified vehicles to install a ramp until vehicles are fully accessible and such modification is no longer required for physical access. **The Access to AVs Draft requires a standard for automated restraint systems for wheelchair users and ramps and ramp installations.**

Exemptions for Vehicles that Benefit People with Disabilities – The SELF DRIVE Act Draft and AV Framework Proposal would allow NHTSA to exempt up to 100,000 and 80,000 AVs per manufacturer each year respectively. Both proposals would allow exemptions to be granted 'if

the vehicle would provide transportation access for individuals with disabilities, including non-visual access for individuals who are blind or visually impaired.'

We support this provision *if* the existing language is strengthened to incentivize manufacturers to address the more difficult accessibility challenges such as vehicles that can effectively communicate with people who are blind or Deaf, are accessible for wheelchair users who remain in their wheelchair, and provide automatic wheelchair securement. **Vehicles eligible for this exemption must be accessible for all people with disabilities and the exemption should clearly define the requirements.**¹²

Exemption Database – The SELF DRIVE Act Draft and AV Framework Proposal require publishing data of exempted vehicles. We urge you to require publishing whether the vehicle was granted an exemption because it would promote access for individuals with disabilities and how it promotes such access.

Public Transportation – The SELF DRIVE Act Draft includes in the definition of AV vehicles that provide public transportation while the AV Framework Proposal does not and requirements in the proposal would not apply to transit vehicles. We encourage any bill to allow use of and permit exemptions for vehicles used in public transportation. We note the ADA requires transportation provider's personnel to assist with the use of securement systems, lifts, and ramps.¹³ We recommend legislation require research into the value of transit employees on transit vehicles who can serve as ambassadors and focus on customer service including wayfinding and emergency assistance. AV use in public transportation ensures AV rideshare providers are under clear civil rights law obligations, including the ADA. Without transit and paratransit providers adopting accessible AVs, a significant market for AVs is lost. It is worth noting that assisting people with disabilities is a universal value consistently expressed by the AV industry.

In addition, permitting AVs to be used in public transit could create opportunities for AV rideshare and transit to work together to ensure on-demand service is complementing rather than replacing transit. Studies have shown that when a rideshare service enters a market and provides what some view as a more convenient alternative to public transit, transit ridership can decrease.¹⁴ Decreased ridership can lead to cuts in fixed bus routes and service hours which also leads to potential cuts in required paratransit service provided for people with disabilities. Finally, many AVs are likely to be electric vehicles. Prohibitions on the use of certain electric vehicle types by transit agencies may create an additional barrier to electrification of paratransit and transit fleets, leaving people with disabilities behind.

Preemption – There is a provision in the SELF DRIVE Act Draft that preempts state or political subdivisions of a state to maintain, enforce, prescribe, or continue in any effect any law or regulation regarding the design, construction, or performance of AVs. The AV Framework Proposal provision creates an interim period of preemption for 10 years unless an AV framework is established. We are concerned these provisions may unintentionally preempt AV accessibility or equity performance measures or requirements at the state or local level,

including state laws that would mandate vehicle environmental standards to mitigate harm. While we understand the need for federal standards of vehicle design and construction, we also encourage allowing states and local jurisdictions to seek higher performance requirements that also ensure the greatest access and benefits for disabled and other historically underserved travelers. Many cities like New York City, Chicago, and San Francisco have taken the lead in defining accessible parity for mobility solutions that use public roads and streets to operate. Their leadership and innovation for service needs to continue to be allowed and local and state levels. **The Access to AVs Draft bill prohibits discrimination on the basis of disability by AV operators that would protect the rights of disabled passengers and pedestrians should preemption be included.**

Forced Arbitration – The SELF DRIVE Act Draft does not reference or prohibit forced arbitration clauses from AV service providers or sellers. The AV Framework Proposal prohibits pre-dispute arbitration agreements related to the use of AVs but does not include remedies available under civil rights laws.

We strongly encourage inclusion of a prohibition on forced arbitration clauses in any AV framework. AV providers must be held accountable for injuries and property damage, and remedies available under applicable civil rights must be made available.¹⁵ Disabled passengers repeatedly face discrimination from rideshare and micromobility services and disabled pedestrians and cyclists routinely have dangerous interactions with vehicles in public streets and rights of way. The rights of disabled travelers should be protected to ensure a safe and quality experience. In order to fully protect their rights, all disabled people must have the option to take their claims, including those under civil rights laws and the ADA, to court. Should forced arbitration be allowed, we urge upholding disabled travelers' rights. **The Access to AVs Draft bill includes a provision and language limiting forced arbitration when involving death or injury of disabled person, unfair practices affecting a disabled person, harm to wheelchairs or service animals.**

USDOT Personnel and Staffing, Resources for Development – The SELF DRIVE Act Draft does not provide funding or staff to USDOT to implement requirements. The AV Framework Proposal authorizes funds to NHTSA and requires a report on the staffing and resource needs for USDOT, including additional personnel or resources needed in the 10-year period following the bill's passage. The Secretary is to consider the staffing of the Highly Automated Systems Safety Center of Excellence. We strongly encourage including in the report the staffing and resource needs required to ensure accessibility and safety are prioritized in the development of AVs, as well as creating a department within the Center for Excellence, or a separate center focused on accessibility of AVs. We also encourage the hiring of experts with disabilities who bring their own lived experience and informed perspective.

Consider Adding Provisions not included in the SELF DRIVE Act draft or AV Framework Proposal

Infrastructure Data and Considerations – For travelers with disabilities to safely utilize, enter and exit an AV the surrounding infrastructure must be accessible. When data is collected

through mapping or other means, AV service providers and government entities should collect and share infrastructure accessibility information, including areas where pick-ups and drop-offs may be unsafe. This data could then be used to identify necessary improvements.

Privacy: Passengers' health, disability status, and locations visited must not be shared or used for commercial or tracking purposes without permission of the individual.

U.S. Access Board AV Standards Mandate – The US Access Board currently provides accessibility guidelines and standards for policymakers and industry for transportation vehicles including buses and vans, rail cars and automated guideway vehicles and public rights of way.¹⁶ There are currently no federal accessibility standards for fully accessible AV passenger vehicles. USDOT has on their Inclusive Design Challenge webpage a list of existing standards, e.g., wheelchair securement, that may be used as a guide for the time being.¹⁷ There is also a summary report from the Alliance of Automobile Manufacturers-hosted *AVs and Increased Accessibility* workshops that identifies accessibility needs in detail.¹⁸ However, these do not hold the same weight nor are they enforceable.

A mandate for the U.S. Access Board to draft AV standards is critical in any legislative framework. In addition, including a deadline within which the Department of Justice and USDOT must adopt the standards and providing sufficient funding for the Access Board to develop the standards is necessary.

Thank you for your consideration. Please contact CT Tyson at ctyson@dredf.org and Sarah Malaier, smalaier@afb.org, with any questions. We are eager to support your efforts to enhance safety and mobility for all.

Sincerely,

CCD Transportation Task Force Co-Chairs

Danica Gonzalves, Paralyzed Veterans of America, danicag@pva.org
Sarah Malaier, American Foundation for the Blind, smalaier@afb.org
Tyler Beck, Epilepsy Foundation of America, tbeck@efga.org
Sarah Bellish, Cure SMA, sarah.bellish@curesma.org
Olivia Keller, Amputee Coalition, okeller@amputee-coalition.org

Signatory Organizations

Access Ready

American Association of People with Disabilities

American Council of the Blind

American Foundation for the Blind

American Printing House for the Blind
Autistic Women & Nonbinary Network
Christopher & Dana Reeves Foundation
Cure SMA
Deaf Equality
Disability Belongs
Disability Rights California
Disability Rights Education & Defense Fund
Easterseals
Epilepsy Foundation of America
Muscular Dystrophy Association
National Council on Independent Living
Paralyzed Veterans of America
Spark Access
TDIforAccess
United Spinal Association

¹ Congressman Latta's 2023 SELF DRIVE Act discussion draft and Congresswoman Dingell's 2023 AV framework proposal were summarized in a July 24, 2023 Energy & Commerce hearing memo: https://d1dth6e84htgma.cloudfront.net/IDC_Memo_Self_Driving_Vehicles_AV_Hearing_2023_07_26_be020b0868.pdf. The full text of Congresswoman Dingell's 2023 AV framework proposal is available at: https://debbiedingell.house.gov/uploadedfiles/dingell_automated_vehicle_discussion_draft.pdf

² Dingell, Latta Statement on DOT AV Framework (April 2025).
<https://debbiedingell.house.gov/news/documentsingle.aspx?DocumentID=5644>

³ Consortium for Constituents with Disabilities Transportation Task Force Autonomous Vehicle Principles, updated May 2022. Available at <https://www.c-c-d.org/fichiers/CCD-Disability-AV-Framework-Hearing-Letter-072523-FINAL.pdf>.

⁴ CCD Transportation Task Force August 23, 2019 feedback on AV Bill Issues, including disability access, advisory committees, rulemakings, exemptions, privacy, safety evaluation reports and accessibility features, crash data, resources for NHTSA, consumer education, studies examining potential impacts, and infrastructure available at <https://www.c-c-d.org/fichiers/CCD-Transpo-TF-Feedback-on-AV-Bill-Issues-082319.pdf>. November 4, 2019 Feedback on AV Legislation Sections, including on a HAV advisory council, and disability exemptions available at: <https://www.c-c-d.org/fichiers/CCD-Transp-TF-Feedback-on-AV-Sections-110419.pdf>. December 9, 2019 Feedback on AV Legislation Sections, including on new FMVSS and licensing and insurance available at <https://www.c-c-d.org/fichiers/CCD-Transp-TF-Feedback-on-AV-Sections-120919.pdf>. February 21, 2020 Feedback on AV Legislation Sections, including on consumer education, cybersecurity, personnel and staffing, and additional considerations available at: <https://www.c-c-d.org/fichiers/CCD-AV-Sections-Response-02-21-20.pdf>.

⁵ Autonomous Vehicles and Increased Accessibility Workshops (May 3, July 19, September 10, 2019). Hosted by the Alliance of Automobile Manufacturers (an organization preceding the Alliance for Automotive Innovation). Washington, D.C. Summary Report, agendas and presentations available at <https://www.autosinnovate.org/avaccessibility>.

⁶ U.S. Department of Labor (October 2019). Autonomous Vehicles: Driving Employment for People with Disabilities. Available at <https://www.dol.gov/odep/topics/AV-Info-Guide-Revised.doc>.

⁷ A Bureau of Transportation Statistics (BTS) study of adults with disabilities found that roughly half of respondents 18 to 64 reported living in a household with income under \$25,000. Bureau of Transportation Statistics (2018). Travel Patterns of American Adults with Disabilities. Available at <https://www.bts.gov/travel-patterns-with-disabilities>.

⁸ The aftermarket modifications for wheelchair accessibility are vitally important for the ability of wheelchair users to travel outside their homes. However, wheelchair users face an uncomfortable tradeoff between that access and their safety since the modifications may decrease the overall crashworthiness of the vehicle. People with disabilities regularly choose access over safety. This tradeoff exists because neither manufacturers nor NHTSA have obligations to make today's passenger vehicles both safe and accessible to all people with disabilities and fail to do so voluntarily. As long as this tension exists, nothing in the proposed legislation should diminish access to after-market modifications of vehicles to provide vehicle access to people with disabilities.

⁹ National Disability Institute (December 30, 2022). Economic Impacts of Removing Transportation Barriers to Employment for Individuals with Disabilities Through Autonomous Vehicle Adoption. Available at <https://www.nationaldisabilityinstitute.org/reports/autonomous-vehicle-adoption/>.

¹⁰ Ian Moura for the Disability Rights Education and Defense Fund (November 2022). Addressing Disability & Ableist Bias in Autonomous Vehicles: Ensuring Safety, Equity & Accessibility in Detection, Collision Algorithms & Data Collection. Available at <https://dredf.org/addressing-disability-and-ableist-bias-in-avs/>.

¹¹ The industry's safety standards for independent wheelchair securement and passenger restraint should be adopted by NHTSA and integrated into the FMVSS.

¹² The SELF DRIVE Act introduced in 2021 included an exemption for vehicles that would improve access for individuals with disabilities. The draft does not reflect how many vehicles could be exempted under this subsection.

¹³ 49 CFR 37.165(f)

¹⁴ UrbanismNext, University of Oregon (2021). Do Transportation Network Companies Increase or Decrease Transit Ridership - Empirical Evidence from San Francisco. Available at <https://www.urbanismnext.org/resources/do-transportation-network-companies-increase-or-decrease-transit-ridership-empirical-evidence-from-san-francisco-2>.

¹⁵ We support provisions prohibiting some predispute arbitration claims. We also encourage remedies available under applicable civil rights laws be included.

¹⁶ The US Access Board is an independent federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards. Learn more and review the guidelines and standards they have developed at <https://www.access-board.gov/>.

¹⁷ US Department of Transportation Inclusive Design Challenge Resources. Available at <https://www.transportation.gov/inclusive-design-challenge/resources>.

¹⁸ Autonomous Vehicles and Increased Accessibility Workshops (2019). Available at <https://www.autosinnovate.org/avaccessibility>.



January 13, 2025

The Honorable Brett Guthrie
House Energy & Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone
House Energy & Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515

RE: Letter for the Record for the Hearing on “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership”

Dear Chairman Guthrie and Ranking Member Pallone:

The Disability Rights Education & Defense Fund and Consortium for Constituents with Disabilities (CCD) Transportation Task Force co-chairs write to submit a letter for the record for today’s hearing on strengthening motor vehicle safety and cementing U.S. automotive leadership. To ensure American leadership in autonomous vehicles (AVs) and automated driving system (ADS)-equipped vehicles, we urge you to consider and prioritize the safety and access needs of disabled passengers and pedestrians.

Recommendations in this letter reference the SELF DRIVE Act of 2026, Congressman Latta’s 2023 SELF DRIVE Act discussion draft (SELF DRIVE Act Draft) and Congresswoman Dingell’s AV framework proposal (AV Framework Proposal).¹ We recognize Representative Dingell and Latta’s leadership of the Congressional Autonomous Vehicle Caucus and are grateful for their acknowledgement that disability rights advocates must be at the table as AV frameworks are developed.² We are also providing “*Disability Access in AVs and Motor Vehicles*” draft bill text (Access in AVs Draft) for your consideration. In addition, we are providing accessibility considerations in AVs signed by 20 disability advocacy organizations submitted on December 23, 2025.

CCD is the largest coalition of national organizations working together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of people with disabilities. The Americans with Disabilities Act (ADA) sought to “provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” Through AV policymaking, Congress has the opportunity to

lead, uphold the ADA's mandate, enhance safety, and improve lives and mobility for all.

Disability AV Advocacy, Engagement and Recommendations

The CCD Transportation Task Force has adopted cross-disability AV Principles and provided feedback on past AV legislative drafts.^{3,4} Signatories to the principles included 20 national organizations. Many of our members also participated in three days of AV accessibility workshops in 2019 hosted by the Alliance of Automobile Manufacturers (an organization preceding the Alliance for Automotive Innovation) with government, industry and disability stakeholders, and U.S. Department of Transportation (USDOT) and U.S. Department of Labor (USDOL) listening sessions.^{5,6} AVs can improve mobility and quality of life for the disability community, including for those with physical, sensory, intellectual and developmental disabilities and neurological conditions such as epilepsy. For the full potential of AVs to be realized any AV legislation must:

- explicitly include consideration of accessibility and the needs of disabled travelers of all disability types in each rulemaking, including federal motor vehicle safety standards (FMVSS) updates;
- ensure preemptions do not prohibit state or local requirements or performance metrics that would increase the numbers of fully accessible autonomous vehicles and services accessible to people with disabilities, including wheelchair users;
- ensure AV-related ADA or other civil rights claims can be filed in court;
- ensure data collected and safety considerations address injury and harm to disabled pedestrians and wheelchair users and their assistive devices or service animals; the needs for accessible sidewalks, crossings, curb cuts, accessible pedestrian signals and related infrastructure; and
- ensure USDOT and the U.S. Access Board have the resources and staff to adopt and implement necessary research, rulemaking and standard setting.

Background

Nearly 1 in 5 people in the U.S. has a disability (more than 57 million). In addition, the age of people over 65+ is set to double by 2050. Many older adults who acquire short or long-term disabilities or health conditions in both rural and urban settings will need accessible transportation options to access healthcare and remain active in their communities. As a result of the passage of the ADA, 99% of public buses are equipped with ramps, curb ramps benefit the public, and there is improved provision of accessible transit to people with sensory disabilities. Yet, there remain significant barriers to accessible, affordable transportation.

Many people with disabilities cannot drive because of their specific disability, are currently unable to obtain a driver's license, are denied transportation services, or cannot afford to purchase a wheelchair accessible vehicle (WAV).⁷ It's critical that ride-share and on-demand services provide disability access yet there are not adequate WAVs and trip denials for service animal users and other people with disabilities are rampant. There are no purpose-built

wheelchair accessible passenger vehicles on the market today in the United States. Wheelchair users often pay nearly double the price of the vehicle for necessary aftermarket modifications, including to have a ramp installed or other features that require exemptions from the FMVSS.⁸

Without affordable, accessible transportation, people with disabilities are unable to travel to work, to school, to contribute to and participate in their communities, to support and spend time with family and friends, and live their lives to the fullest. A report by the National Disability Institute found that a critical barrier to competitive integrated employment and entrepreneurship is a lack of accessible transportation options. Accessible, affordable, and sustainable AVs could lead to an additional 4.4 million jobs for people with disabilities, an additional \$867 billion in U.S. GDP, and \$1.6 trillion in U.S. output.⁹

Manufacturers and transportation providers are developing, testing and deploying autonomous shuttles and passenger vehicles. AVs have the potential to dramatically improve access for people with disabilities. The promise and safety of AVs will only be realized if the vehicles and the surrounding infrastructure are fully accessible, and the safety elements consider the needs of all people with disabilities.

Regarding any AV legislation we urge you to:

Include the Following Provisions from the 2023 SELF DRIVE Act Draft and the 2023 AV Framework Proposal

Licensing and Insurance – Legislation should prohibit discrimination on the basis of disability by states and any other governmental authorities in licensing and insurance. We strongly support the provisions that prohibit discriminatory licensing laws nationwide. We are disappointed to note this provision is missing from the 2026 SELF DRIVE Act which purports to ensure accessibility.

Highly Automated Vehicles Advisory Council – An Advisory Council comprised of industry, consumer, safety, labor, civil rights and other stakeholders is necessary to continue discussions and identify barriers, unintended impacts and solutions. Disability representation is critical and should be included within any advisory council and should also be required to consider accessibility needs. We are disappointed to note this provision is missing from the 2026 SELF DRIVE Act.

Include Accessibility and Strengthen the Following in the 2026 SELF DRIVE Act Draft, 2023 SELF DRIVE Act and the 2023 AV Framework Proposal

Safety Case, Frameworks and Self-Assessment Rulemakings – The 2026 SELF DRIVE Act requires objective content for a safety case from AV manufacturers. Thus, the USDOT Secretary must issue a final rule that prescribes a safety standard to be met. Listed requirements for the safety case do not explicitly include accessibility features that would make the vehicle safe for disabled passengers or pedestrians. We strongly encourage any safety case requirements

include accessible human machine interfaces that would ensure accessibility for people with sensory and cognitive disabilities, as well as physical accessibility of the vehicle for wheelchair users. We support inclusion of ADS detection and appropriate response to any vulnerable road user and encourage strengthening this language to ensure a broad range of disabled and other road users are detected. The 2023 SELF DRIVE Act Draft and 2023 AV Framework Proposal direct NHTSA to initiate safety rulemakings and safety assessments for entities developing AVs. The timelines in the proposals differ. We support the SELF DRIVE Act draft's inclusion of accessibility including non-visual accessibility, in the safety assessment. **The Access to AVs Draft requires a safety rulemaking for accessible AV HMIs and a rule for automated driving systems (ADS) to assess and validate the performance of sensing, perception and response to disabled people outside the vehicle.**

Any safety framework rulemaking must also include a requirement for USDOT to consider the needs of all disabled travelers, including people with physical, sensory (those that are blind or low vision or Deaf or hard of hearing) and intellectual and developmental disabilities. A mandate from Congress for all AV-related rulemakings would ensure inclusion. The vehicle's ADS HMI and object detection outside the vehicle are critical in any safety framework. HMI must be accessible to people with sensory and cognitive disabilities for AVs to reach their full potential. A Disability Rights Education & Defense Fund brief on ableism in AV AI and algorithms recommends standards be set to ensure AVs can detect all people with disabilities and other members of marginalized communities outside the vehicle.¹⁰ Research and recent anecdotes suggest that not all AVs are being taught to detect people seated in their wheelchairs, service animal users, or people with darker skin tones, among others.

Proposed manufacturer self-assessments require USDOT to identify risks to motor vehicle safety and steps taken to mitigate such risks during the design, development, and introduction into interstate commerce. Accessibility and how the needs of disabled travelers, including non-visual access and access for wheelchair users, are being met must be included in safety self-assessments provided by manufacturers and in any publicly available database.

Updating Existing FMVSS Standards – The 2023 SELF DRIVE Act Draft would require a review of FMVSS and initiating or documenting research to evaluate AV safety.

Existing FMVSS must be updated to ensure the safety of AVs, including level 4 and 5. We strongly encourage Congress to require USDOT to include a review of how updated FMVSS will ensure the safety of fully accessible AVs, including those that are both electric and autonomous, and are built with wheelchair ramps and will require testing and deployment of automatic securement systems.¹¹ The federal safety framework must assume deployment of, and advance progress toward, fully accessible passenger vehicles (both large and small) as well as accessibility standards. These standards will not only increase public trust of AVs, but also a roadmap for those in the industry seeking to develop and deploy the safest, most accessible vehicle.

Examples of FMVSS related standards that require attention for passenger-related accessible

ergonomics are active suspension and kneeling capabilities for level entry, vehicle doorway height and width for entry, rear passenger entry for ambulatory self-or assisted passenger transfers, passenger restraint systems, ramps and mobility equipment securement, and grab assistance throughout vehicles that allow for perpendicular movement. Any updates to the FMVSS must maintain the current exemptions to crashworthiness for modified vehicles to install a ramp until vehicles are fully accessible and such modification is no longer required for physical access. **The Access to AVs Draft requires a standard for automated restraint systems for wheelchair users and ramps and ramp installations.**

Preemption – There is a provision in the 2026 SELF DRIVE Act Draft that preempts state or political subdivisions of a state to maintain, enforce, prescribe, or continue in any effect any law or regulation regarding the design, construction, or performance of ADS-equipped vehicles if the manufacturer develops a safety case. We are concerned this provision may unintentionally preempt AV accessibility or equity performance measures or requirements at the state or local level, including state laws that would mandate vehicle environmental standards to mitigate harm. While we understand the need for federal standards of vehicle design and construction, we also encourage allowing states and local jurisdictions to seek higher performance requirements that also ensure the greatest access and benefits for disabled and other historically underserved travelers. Many cities like New York City, Chicago, and San Francisco have taken the lead in defining accessibility parity for mobility solutions that use public roads and streets to operate. Their leadership and innovation for service needs to continue to be allowed and local and state levels. **The Access to AVs Draft bill prohibits discrimination on the basis of disability by AV operators that would protect the rights of disabled passengers and pedestrians should preemption be included.**

Forced Arbitration – The 2026 SELF DRIVE Act Draft does not reference or prohibit forced arbitration clauses from AV service providers or sellers. The 2023 AV Framework Proposal prohibits pre-dispute arbitration agreements related to the use of AVs but does not include remedies available under civil rights laws.

We strongly encourage inclusion of a prohibition on forced arbitration clauses in any AV framework. AV providers must be held accountable for injuries and property damage, and remedies available under applicable civil rights laws must be made available.¹² Disabled passengers repeatedly face discrimination from rideshare and micromobility services and disabled pedestrians and cyclists routinely have dangerous interactions with vehicles in public streets and rights of way. The rights of disabled travelers should be protected to ensure a safe and quality experience. In order to fully protect their rights, all disabled people must have the option to take their claims, including those under civil rights laws and the ADA, to court. Should forced arbitration be allowed, we urge upholding disabled travelers' rights. **The Access to AVs Draft bill includes a provision and language limiting forced arbitration when involving death or injury of a disabled person, unfair practices affecting a disabled person, and harm to wheelchairs or service animals.**

Vehicle Safety Data Repository – The 2026 SELF DRIVE Act requires the establishment of a

National Automated Vehicle Safety Data Repository to receive and store data from a covered crash. Required data includes whether vulnerable road users including pedestrians or wheelchair users were involved. We recommend including whether assistive devices such as wheelchairs, walkers, or service animals were damaged or harmed.

USDOT Personnel and Staffing, Resources for Development – The 2026 SELF DRIVE Act Draft does not provide funding or staff to USDOT to implement requirements. The AV Framework Proposal authorizes funds to NHTSA and requires a report on the staffing and resource needs for USDOT, including additional personnel or resources needed in the 10-year period following the bill's passage. The Secretary is to consider the staffing of the Highly Automated Systems Safety Center of Excellence. We strongly encourage including in the report the staffing and resource needs required to ensure accessibility and safety are prioritized in the development of AVs, as well as creating a department within the Center for Excellence, or a separate center, focused on accessibility of AVs. We also encourage the hiring of experts with disabilities who bring their own lived experience and informed perspective.

Consider Adding Provisions not included in the 2026 SELF DRIVE Act draft

Infrastructure Data and Considerations – For travelers with disabilities to safely utilize, enter and exit an AV the surrounding infrastructure must be accessible. When data is collected through mapping or other means, AV service providers and government entities should collect and share infrastructure accessibility information, including areas where pick-ups and drop-offs may be unsafe. This data could then be used to identify necessary improvements.

Privacy – Passengers' health, disability status, and locations visited must not be shared or used for commercial or tracking purposes without the permission of the individual.

U.S. Access Board AV Standards Mandate – The U.S. Access Board currently provides accessibility guidelines and standards for policymakers and industry for transportation vehicles including buses and vans, rail cars and automated guideway vehicles and public rights of way.¹³ There are currently no federal accessibility standards for fully accessible AV passenger vehicles. USDOT has on their Inclusive Design Challenge webpage a list of existing standards, e.g., wheelchair securement, that may be used as a guide for the time being.¹⁴ There is also a summary report from the Alliance of Automobile Manufacturers-hosted *AVs and Increased Accessibility* workshops that identifies accessibility needs in detail.¹⁵ However, these do not hold the same weight nor are they enforceable.

A mandate for the U.S. Access Board to draft AV standards is critical in any legislative framework. In addition, including a deadline within which the Department of Justice and USDOT must adopt the standards and providing sufficient funding for the Access Board to develop the standards is necessary.

Thank you for your consideration. Please contact CT Tyson at ctyson@dredf.org and Sarah Malaier, smalaier@afb.org, with any questions. We are eager to support your efforts to

enhance safety and mobility for all.

Sincerely,

CT Tyson, Disability Rights Education & Defense Fund, ctyson@dredf.org

CCD Transportation Task Force Co-Chairs

Danica Gonzalves, Paralyzed Veterans of America, danicag@pva.org

Sarah Malaier, American Foundation for the Blind, smalaier@afb.org

Tyler Beck, Epilepsy Foundation of America, tbeck@efga.org

Sarah Bellish, Cure SMA, sarah.bellish@curesma.org

¹ Congressman Latta's 2023 SELF DRIVE Act discussion draft and Congresswoman Dingell's 2023 AV framework proposal were summarized in a July 24, 2023 Energy & Commerce hearing memo: https://d1dth6e84htgma.cloudfront.net/IDC_Memo_Self_Driving_Vehicles_AV_Hearing_2023_07_26_be020b0868.pdf. The full text of Congresswoman Dingell's 2023 AV framework proposal is available at: https://debbiedingell.house.gov/uploadedfiles/dingell_automated_vehicle_discussion_draft.pdf.

² Dingell, Latta Statement on DOT AV Framework (April 2025). <https://debbiedingell.house.gov/news/documentsingle.aspx?DocumentID=5644>.

³ Consortium for Constituents with Disabilities Transportation Task Force Autonomous Vehicle Principles, updated May 2022. Available at <https://www.c-c-d.org/fichiers/CCD-Disability-AV-Framework-Hearing-Letter-072523-FINAL.pdf>.

⁴ CCD Transportation Task Force August 23, 2019 feedback on AV Bill Issues, including disability access, advisory committees, rulemakings, exemptions, privacy, safety evaluation reports and accessibility features, crash data, resources for NHTSA, consumer education, studies examining potential impacts, and infrastructure available at <https://www.c-c-d.org/fichiers/CCD-Transpo-TF-Feedback-on-AV-Bill-Issues-082319.pdf>. November 4, 2019 Feedback on AV Legislation Sections, including on a HAV advisory council, and disability exemptions available at: <https://www.c-c-d.org/fichiers/CCD-Transp-TF-Feedback-on-AV-Sections-110419.pdf>. December 9, 2019 Feedback on AV Legislation Sections, including on new FMVSS and licensing and insurance available at <https://www.c-c-d.org/fichiers/CCD-Transp-TF-Feedback-on-AV-Sections-120919.pdf>. February 21, 2020 Feedback on AV Legislation Sections, including on consumer education, cybersecurity, personnel and staffing, and additional considerations available at: <https://www.c-c-d.org/fichiers/CCD-AV-Sections-Response-02-21-20.pdf>.

⁵ Autonomous Vehicles and Increased Accessibility Workshops (May 3, July 19, September 10, 2019). Hosted by the Alliance of Automobile Manufacturers (an organization preceding the Alliance for Automotive Innovation). Washington, D.C. Summary Report, agendas and presentations available at <https://www.autosinnovate.org/avaccessibility>.

⁶ U.S. Department of Labor (October 2019). Autonomous Vehicles: Driving Employment for People with Disabilities. Available at <https://www.dol.gov/odep/topics/AV-Info-Guide-Revised.doc>.

⁷ A Bureau of Transportation Statistics (BTS) study of adults with disabilities found that roughly half of respondents 18 to 64 reported living in a household with income under \$25,000. Bureau of Transportation Statistics (2018). Travel Patterns of American Adults with Disabilities. Available at <https://www.bts.gov/travel-patterns-with-disabilities>.

⁸ The aftermarket modifications for wheelchair accessibility are vitally important for the ability of wheelchair users to travel outside their homes. However, wheelchair users face an uncomfortable tradeoff between that access and their safety since the modifications may decrease the overall crashworthiness of the vehicle. People with disabilities regularly choose access over safety. This tradeoff exists because neither manufacturers nor NHTSA have obligations to make today's passenger vehicles both safe and accessible to all people with disabilities and fail to do

so voluntarily. As long as this tension exists, nothing in the proposed legislation should diminish access to after-market modifications of vehicles to provide vehicle access to people with disabilities.

⁹ National Disability Institute (December 30, 2022). Economic Impacts of Removing Transportation Barriers to Employment for Individuals with Disabilities Through Autonomous Vehicle Adoption. Available at <https://www.nationaldisabilityinstitute.org/reports/autonomous-vehicle-adoption/>.

¹⁰ Ian Moura for the Disability Rights Education and Defense Fund (November 2022). Addressing Disability & Ableist Bias in Autonomous Vehicles: Ensuring Safety, Equity & Accessibility in Detection, Collision Algorithms & Data Collection. Available at <https://dredf.org/addressing-disability-and-ableist-bias-in-avs/>.

¹¹ The industry's safety standards for independent wheelchair securement and passenger restraint should be adopted by NHTSA and integrated into the FMVSS.

¹² We support provisions prohibiting some predispute arbitration claims. We also encourage remedies available under applicable civil rights laws be included.

¹³ The US Access Board is an independent federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards. Learn more and review the guidelines and standards they have developed at <https://www.access-board.gov/>.

¹⁴ US Department of Transportation Inclusive Design Challenge Resources. Available at <https://www.transportation.gov/inclusive-design-challenge/resources>.

¹⁵ Autonomous Vehicles and Increased Accessibility Workshops (2019). Available at <https://www.autosinnovate.org/avaccessibility>.



January 9, 2026

The Honorable Jonathan Morrison
Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Administrator Morrison:

Motor vehicle safety is a top priority for the members of Alliance for Automotive Innovation.¹ We appreciate the National Highway Traffic Safety Administration's (NHTSA) continued leadership in advancing motor vehicle safety.

This Association's members recognize that, if NHTSA establishes future FMVSS covering Advanced Driver Assistance System (ADAS) technologies, it can alter the obligations of entities that might engage in aftermarket modifications of vehicles as a business where those modifications affect vehicle performance required by FMVSS. Given increased public and policymaker interest in aftermarket vehicle modifications and their interactions with ADAS, we believe there is value in NHTSA convening a workshop, technical working group, or other forum with vehicle manufacturers, the aftermarket equipment industry, and other stakeholders to examine how vehicle modification may affect ADAS performance.

As ADAS and other crash avoidance features continue to be deployed in the market, this is likely to remain a long-term issue. This presents an important opportunity for NHTSA to examine this complex issue and identify a balanced path forward to ensure that the ADAS of modified vehicles can continue to operate as originally designed. Safe vehicles are a top priority. NHTSA's expertise and leadership on this issue would be valuable in ensuring the continued effectiveness of ADAS technologies when deployed in the U.S. market.

We look forward to continued engagement with NHTSA on this important and evolving safety issue. Thank you for your commitment to a safe and innovative automotive industry in America.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Bozzella".

John Bozzella
President & CEO
Alliance for Automotive Innovation

¹ Alliance for Automotive Innovation represents the full auto industry, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing over 5 percent of the country's GDP, responsible for supporting nearly 11 million jobs, and driving \$1.5 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector.

January 12, 2026

The Honorable Gus Bilirakis, Chair
The Honorable Jan Schakowsky, Ranking Member
Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
U.S. House of Representatives
Washington, D.C. 20515

Dear Chair Bilirakis and Ranking Member Schakowsky:

In advance of tomorrow's hearing, "Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership," the undersigned write to oppose the Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution Act of 2026 (SELF DRIVE Act) and the Motor Vehicle Modernization Act, as currently drafted, which would undermine the safety for vehicles equipped with an automated driving system (ADS). Rather, we urge the advancement of solutions proven to improve safety on our Nation's roadways.

Our high-level concerns with these provisions include:

No New Safety Standards for Foundational Safety Technologies or the ADS

- The legislation does not establish safety standards to ensure that the ADS will "see" and safely respond to all road users, vehicles and infrastructure in the roadway environment (aka a "Vision Test"). These basic protections are needed for all road users on America's public roadways.
- Rather, the language focuses on the manufacturers establishing a "safety case" which will neither be required to be submitted (rather, submitted upon request by the U.S. Department of Transportation (U.S. DOT) Secretary), nor are there requirements to independently verify the safety case and operations of the ADS.
- Regulatory directives for the safety case are not required as the legislative language uses "may" rather than "shall."

Mass Exemptions from Federal Motor Vehicle Safety Standards (FMVSS)

- Permits up to 90,000 vehicles (currently 2,500 allowed) to be exempted from FMVSS including for human controls and extends the length of exemptions to five years (currently one year).
- Requires U.S. DOT to rule on exemption application within one year of receipt of application or automatically approved.

State Preemption

- For manufacturers that establish a safety case, states are broadly preempted from taking actions that can be interpreted as hampering operations. These may include state level requirements to report safety and crash data and to limit operations due to safety deficiencies. It also may impact enforcement of traffic safety laws and limit crash investigations.

Restricts Public Access to Safety Data, Weakens Data Collection and Repeals the Standing General Order (SGO)

- The language proposes a new safety data collection which is more limited than the National Highway Traffic Safety Administration's (NHTSA) SGO, needlessly applies confidential business information (CBI) protections to data submitted to NHTSA which have been used previously to keep critical basic crash information out of public view.

- Allows state DOTs to potentially review data from AV manufacturers but restricts them from discussing what they learn about potential safety issues due to CBI restrictions.
- Repeals the SGO once the data repository is established. This will enshrine a system in which NHTSA and the public are not getting sufficient information about the operations of AVs on public roads. The SGO should be strengthened, not repealed.

Expands Allowances for Testing and Demonstration

- Under current law, motor vehicle manufacturers can introduce vehicles into interstate commerce that do not comply with federal safety standards for the sole purposes of testing and evaluation. The bill expands the current law to allow manufacturers of ADS, ADS-equipped vehicles and components of ADS which may result in more vehicles equipped with unproven ADS, absent minimum safeguards on our roadways.
- Expands current law to also allow manufacturers using this provision to engage in commercial operations including the carrying of members of the public as passengers and the transportation of freight.

No Workforce Protections Are Included

- The bill allows for payment for testing operations potentially exacerbating workforce issues for certain working drivers.

No Accessibility Requirements Are Established

- While the AV industry has consistently included accessibility and mobility improvements for people with disabilities as a top priority, the SELF DRIVE Act does not advance such and may hamper states' ability to uphold such protections already established. The Motor Vehicle Modernization Act includes a study on wheelchair securement, but this is insufficient considering the issue has been known and discussed for over a decade and should have been addressed by the AV industry.

No Establishment of Safety Considerations for Remote Operators

- AV operations are using remote operators (ROs) to overcome deficiencies in their ADS and bolster their operations.
- Information on the scope of ROs and the safety deficiencies they are addressing is currently undocumented, yet needs to be, to understand the safety and readiness of related ADS.
- Safety issues related to use of ROs must be addressed including but not limited to restrictions on the number of vehicles each RO is managing, limitations on hours of service (HOS), requirements for a commercial drivers license (CDL) and experience operating related vehicles.

We do not oppose the advancement of vehicles equipped with ADS and urge this Subcommittee to strengthen safety data collection and access and advance safeguards and improvements to ensure that they only operate on roadways and in scenarios for which they are designed to safely do so.

Thank you for your consideration of these issues. We respectfully request this letter be included in the hearing record.

Sincerely,

Advocates for Highway and Auto Safety

League of American Bicyclists

America Walks

Missouri Bicycle & Pedestrian Federation

American Public Health Association

Northern Virginia Families for Safe Streets

Center for Auto Safety

Public Citizen

Consumer Federation of America

Safety Research & Strategies

Consumers for Auto Reliability and Safety

Truck Safety Coalition

Joan Claybrook

Virginia Citizens Consumer Council

Former NHTSA Administrator

Kids and Car Safety

cc: The Honorable Brett Guthrie, Chair, Committee on Energy and Commerce
The Honorable Frank Pallone, Ranking Member, Committee on Energy and Commerce
Members of the Subcommittee on Commerce, Manufacturing, and Trade

January 12, 2026

The Honorable Gus Bilirakis, Chair
The Honorable Jan Schakowsky, Ranking Member
House Energy and Commerce Subcommittee on Commerce, Manufacturing, and Trade
United States House of Representatives
Washington, D.C. 20515

Dear Chair Bilirakis and Ranking Member Schakowsky:

In advance of the upcoming January 13, 2026, hearing, “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership,” the undersigned submit this letter to underscore the human and economic benefits of vehicle safety technologies. Compelling and consistent research demonstrates that these safety systems not only save lives, but they also are cost effective. We respectfully request this letter be included in the hearing record.

We are keenly aware of the impacts from crashes on America’s roads. On average, 112 people were killed every day on roads in the U.S., totaling nearly 41,000 fatalities in 2023.¹ This is a 24 percent increase in deaths in just a decade.² An additional 2.44 million people were injured.³ Early projections for 2024 traffic fatalities remain at a similar historic high level; over 39,000 people are estimated to have been killed that year.⁴

Moreover, the annual economic cost of motor vehicle crashes in 2019 was nearly \$340 billion.⁵ Updated for inflation only, that number rises to \$429 billion in 2025. When loss of life, pain and decreased quality of life are added to economic costs, it is estimated to exceed \$1.75 trillion.⁶ Research from the Network of Employers for Traffic Safety (NETS), finds motor vehicle crashes cost employers \$72.2 billion in direct crash-related expenses in 2019.⁷

According to the National Highway Traffic Safety Administration (NHTSA), vehicle safety technologies and the associated safety standards have prevented more than 860,000 deaths, 49 million nonfatal injuries and damage to 35 million vehicles.⁸ In addition, during that time frame the comprehensive societal benefits amounted to \$17.3 trillion, using 2019 dollars.⁹

The recent regulatory action undertaken by NHTSA to require automatic emergency braking (AEB) on light passenger vehicles is an excellent example of the benefits of requiring effective safety systems on passenger motor vehicles. The agency predicts that AEB will save 362 lives, mitigate over 24,000 injuries annually and result in a yearly cost benefit of between \$5.8-\$7.2 billion.¹⁰ Moreover, research performed by the Insurance Institute for Highway Safety (IIHS) has found that AEB can reduce front-to-rear crashes with injuries by 56 percent.¹¹

Additionally, the IIHS found that impaired driving prevention technology will yield similarly high societal benefits. An updated analysis based on data from 2019 through 2022 indicates that, once the technology is widely deployed, as many as 10,812 lives would have been saved each year.¹²

As property-casualty insurers we are very aware of the rising costs associated with repairing vehicles with more sophisticated technology, but it would be a mistake to focus exclusively on the costs of such technology when we are aware of the tremendous benefits so many safety advances have provided millions of Americans.

We urge this Subcommittee to protect the vehicle safety technology improvements included in the Bipartisan Infrastructure Law (Pub. L. 117-58) and to once again advance a bipartisan safety title in the next surface transportation reauthorization bill to address the deaths and injuries that occur on America's roads. Thank you for your consideration of these issues.

Sincerely,

Allstate Insurance Company

American Property Casualty Insurance Association (APCIA)

Amica Mutual Insurance Company

Farmers Insurance

Independent Insurance Agents & Brokers of America (Big "I")

Liberty Mutual Insurance

National Association of Mutual Insurance Companies (NAMIC)

NJM Insurance Group

Nationwide Mutual Insurance Company

Selective Insurance Company of America

State Farm Mutual Automobile Insurance Company

cc: The Hon. Brett Guthrie, House Energy and Commerce Committee Chair
The Hon. Frank Pallone, House Energy and Commerce Committee Ranking Member
Members of the Subcommittee on Commerce, Manufacturing, and Trade

¹ Traffic Safety Facts Research Note: Overview of Motor Vehicle Traffic Crashes In 2023, NHTSA, Apr. 2025, DOT HS 813 705, (Overview 2023).

² Overview 2023; and Traffic Safety Facts 2022: A Compilation of Motor Vehicle Traffic Crash Data, NHTSA, Dec. 2024, DOT HS 813 656 (Annual Report 2022).; [comparing 2013 to 2023].

³ Overview 2023.

⁴ Traffic Safety Facts: Crash Stats, Early Estimate of Motor Vehicle Traffic Fatalities in 2024, NHTSA, Apr. 2025, DOT HS 813 710 (Early Estimates 2024).

⁵ Economic and Societal Impact 2019.

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- ⁶ CPI Inflation Calculator, BLS, available at https://www.bls.gov/data/inflation_calculator.htm, calculated from Jan. 2021 – Jan. 2025.
- ⁷ Cost of Motor Vehicle Crashes to Employers – 2019, Network of Employers for Traffic Safety, March 2021.
- ⁸ Kahane, C. J., & Simons, J. F. (2024, December). Fatalities, injuries, and crashes prevented by vehicle safety technologies and associated FMVSS, 1968 to 2019 – Passenger cars and LTVs (Report No. DOT HS 813 611). National Highway Traffic Safety Administration.
- ⁹ Simons, J. F., Blincoe, L. J., & Kahane, C. J. (2024, December). Historical analysis of costs and benefits of FMVSS for passenger cars and LTVs on a calendar-year basis (Report No. DOT HS 813 647). National Highway Traffic Safety Administration.
- ¹⁰ 89 FR 39686 (May 9, 2024).
- ¹¹ IIHS, Real-world benefits of crash avoidance technologies: summary of IIHS-HLDI findings.
- ¹² Alcohol and Drugs, IIHS Website, last accessed Aug. 7, 2025, available at <https://www.iihs.org/topics/alcohol-and-drugs#by-the-numbers>.



New Jersey Coalition of Automotive Retailers
856 River Road, Trenton, NJ 08628
Phone: 609.883.5056
Fax: 609.883.1093

Chairman: A. Andrew Shapiro
President: Laura C. Perrotta

January 13, 2026

Ranking Member Frank Pallone
House Committee on Energy and Commerce
2323 Rayburn House Office Building
Washington, DC 20515

Ranking Member Pallone:

On behalf of the 523 franchised auto and truck dealerships in New Jersey, I **urge you to oppose [H.R. 1566](#), the REPAIR Act and urge you to support H.R. 5221, the PART Act during the Commerce, Manufacturing and Trade Subcommittee hearing today.**

The **New Jersey dealers oppose the so-called “right to repair”** legislation due to the fact that the legislation has little to do with repairing a vehicle and instead provides third parties with access to consumer data and enables aftermarket parts manufacturers to reverse-engineer OEM parts. Please see NADA’s issue brief on this legislation attached. The bill is not about consumer choice since any third-party repair shop has access currently to the data it needs to repair vehicles today. In fact, I was just visiting a freightliner truck dealer in New Jersey the other day and they had purchased the software (*at a very low cost*) to fix Kenworth trucks in their service area. It is just as easy for a third-party repair shop to purchase telematics to repair a vehicle from any auto or truck manufacturer.

The bill poses vehicle and driver data security dangers by allowing broad data sharing through unfettered access and is designed to provide third parties the ability to tap into vehicle-generated data. The bill would enable aftermarket parts manufacturers reverse-engineer manufacturer parts. For more information see NADA’s issue brief attached opposing the “REPAIR Act ([H.R. 1566](#)); NADA Letter to [House](#) of Representatives (*attached*); and NADA’s [Section by Section](#) (*attached*) of problems with H.R. 1566.

Additionally, the **New Jersey dealers support the bipartisan PART Act (H.R.5221)**, to help law enforcement trace stolen catalytic converters and make the market more transparent to deter theft. Please see NADA’s issue brief attached. The New Jersey dealers have been dealing with these thefts for years, and this bill could truly help to put an end to this costly and preventable crime.

Thank you for your time and consideration. If you have any questions, feel free to call me at 571-239-0765.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Perrotta'.

Laura Perrotta
President



Written Statement for the Record from MEMA. The Vehicle Suppliers Association
Submitted to the U.S. House of Representatives Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade

“Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership.”

January 13, 2026

Background

MEMA, The Vehicle Suppliers Association, is the leading trade association in the U.S. for vehicle suppliers, parts manufacturers, and remanufacturers. The mobility sector depends on the resiliency and strength of suppliers, and MEMA has been the voice of the supplier industry since 1904. MEMA’s members design and manufacture the technology, components, and services that enable the production of new vehicles, as well as the essential maintenance and repair of the more than 295 million highway vehicles that are currently on the road in the U.S. The vehicle supplier sector shares the Administration’s objectives of strengthening the domestic manufacturing base, growing U.S. manufacturing jobs, and ensuring more opportunities for communities across the U.S. With more than 932,000 individuals employed across the nation, vehicle suppliers represent the largest sector of manufacturing jobs in the U.S.

MEMA and its member companies appreciate the opportunity to provide comments to the Subcommittee on Commerce, Manufacturing, and Trade.

The Supplier Industry’s Central Role in Vehicle Safety

Vehicle suppliers are the designers and innovators at the forefront of motor vehicle safety technology development. They play a foundational role in creating, testing, and manufacturing many of the critical safety systems integrated into modern vehicles. From traditional safety features such as airbags, seat belts, braking systems, and electronic stability control, to the newest generation of advanced driver assistance systems (ADAS), suppliers bring the technical expertise and manufacturing precision essential to saving lives on U.S. roads.

Suppliers invest heavily in research and development, pioneering technologies that are subsequently incorporated into vehicles and provided to consumers. Their deep understanding of component design, integration challenges, and real-world operational dynamics allows suppliers

to innovate solutions that improve crash prevention, reduce the severity of accidents, and enhance occupant protection. Many safety innovations first emerge at the supplier level before being adopted as standard equipment by Original Equipment Manufacturers (OEMs), underscoring the supplier industry's pivotal role in advancing vehicle safety.

Beyond engineering and innovation, suppliers are integral partners throughout the vehicle lifecycle. They collaborate closely with OEMs, regulatory agencies like the National Highway Traffic Safety Administration (NHTSA), and other stakeholders to ensure that new safety technologies meet rigorous performance standards and regulatory requirements. This partnership ensures that components and systems are not only effective, but also reliable and durable under diverse driving conditions.

Suppliers also contribute significantly to safety validation and testing. Through extensive laboratory testing, simulation, and real-world evaluation, they help verify that safety systems perform as intended under a wide range of scenarios. This testing expertise supports regulatory compliance and provides critical data used to refine and enhance safety standards and consumer information programs such as the New Car Assessment Program (NCAP).

Moreover, suppliers are actively engaged in ongoing monitoring and improvement of vehicle safety post-production to identify emerging safety issues quickly and develop corrective measures. This continuous improvement cycle enables faster response to potential defects, supports efficient recall processes, and fosters the ongoing enhancement of vehicle safety technologies.

The complex, interconnected nature of modern vehicle systems requires a collaborative safety framework. No single entity—OEM, supplier, regulator, or infrastructure provider—can fully ensure vehicle safety alone. MEMA believes that a modern, effective motor vehicle safety framework must recognize and support the shared responsibility among all stakeholders, with suppliers playing a critical and proactive role in every stage from design to deployment and beyond.

As the industry embraces transformative technologies such as greater levels of automation, vehicle connectivity and advanced human machine interfaces, the role of suppliers becomes even more crucial. Suppliers develop cameras, sensors, software, cybersecurity protections, and advanced electronic systems that enable these innovations to function safely and reliably. MEMA and its members are committed to working closely with Congress, federal agencies, and industry partners to ensure that these cutting-edge safety technologies are rigorously tested, properly regulated, and widely deployed to protect all road users.

MEMA appreciates the legislation noticed for this hearing and looks forward to continuing to work with the sponsors as this process moves forward. MEMA would also like to highlight and convey its support for several bills and provisions that will be discussed at the hearing.

Motor Vehicle Modernization Act (Discussion Draft/Chairman Brett Guthrie)

Federal Motor Vehicle Safety Standards (FMVSS) have been central to reducing roadway fatalities and injuries for decades, but many standards have not kept pace with rapid advances in technology or the evolution of modern driver-assistance systems. Several FMVSS still rest on design assumptions that no longer reflect how today's software-defined, sensor-intensive, electrified vehicles function. As global markets modernize their regulatory frameworks more quickly, the United States risks lagging behind, creating uncertainty for manufacturers and slowing deployment of safety technologies validated elsewhere.

New Car Assessment Program (NCAP) Reform

The U.S. New Car Assessment Program once set the global benchmark for vehicle safety information but now trails programs in Europe, Japan, and Korea, which have progressed to incorporate evaluations of advanced driver-assistance systems, pedestrian protection, and emerging crash-avoidance technologies. As the U.S. NCAP does not reflect modern safety technologies in its rating system, consumers are left without clear, comparable information about the features that can help to prevent crashes and save lives. Global misalignment also increases complexity for companies, which are subsequently required to navigate multiple safety rating regimes.

MEMA supports the NCAP provisions in the legislation which would:

- Establish a dedicated NCAP Office within NHTSA led by an Associate Administrator.
 - Responsibilities include:
 - Creating roadmaps for expanding NCAP testing.
 - Administering voluntary performance testing.
 - Conducting consumer education about vehicle safety technologies.
 - Creation of a new NCAP Advisory Committee with stakeholders, including dedicated seats for vehicle supplier representatives.
- Require NHTSA to submit to the relevant congressional committees a report that assesses the feasibility of establishing a public-private partnership, a private entity, or any other similar entity to NCAP, including by assessing the various factors, including motor vehicle safety ratings used internationally that are similar to NCAP as well as Monroney label considerations.

In its official priorities for the surface transportation reauthorization, MEMA called for Congress to direct NHTSA to publish a transparent, forward-looking roadmap for NCAP modernization that fully incorporates supplier technical expertise. Suppliers design and manufacture the majority of the technologies addressed by the NCAP program and roadmap. The supplier industry's participation in this process is essential to ensuring that performance metrics reflect real-world capabilities. MEMA also called for the NCAP program to actively incorporate ADAS technologies into the vehicle star rating and the Monroney labels so that consumers can easily understand a vehicle's safety technologies and ratings at the point of sale. MEMA further indicated that supplier representation should be included in any advisory committee to ensure a comprehensive and technically sound modernization effort.

MEMA is pleased that the reforms included in Chairman Guthrie's bill will move us towards these goals and we thank the Chairman for his leadership on these critical issues.

Vehicle Safety Rulemaking and Research Priority Plan

The U.S. Congress has called upon NHTSA to update its standards and ensure that the U.S. keeps pace with other key nations and regions around the world. However, numerous rulemakings required by Congress remain incomplete—some years overdue—including updates to headlamp performance, alignment requirements, and implementation of Adaptive Driving Beam headlights; minimum performance requirements for lane-keeping and lane-departure warning systems; heavy-vehicle automatic emergency braking standards; battery safety requirements for electrified vehicles; and standards enabling camera-based mirror systems. Additional updates are needed to ensure compatibility with automated vehicle designs that diverge from legacy assumptions about controls, interiors, and system architecture.

Regulatory stagnation discourages investment, impedes innovation and slows progress toward next-generation safety performance.

Chairman Guthrie's legislation will require NHTSA to create a rulemaking and research priority plan that:

- Lists all planned safety rulemakings over the next 36 months, including:
 - Statutory authority.
 - Research status and links to supporting data.
 - Whether related technologies are assessed in NCAP.
 - Whether industry performance criteria exist.
 - Expected rulemaking milestones (advanced notice, proposed rule, final rule).
 - Lists research priorities with objectives and timelines.
 - Compares current vs. previous priority plans (except the first one).

- Public posting and submission to congressional committees are required.
- If the plans fail to be delivered on time, then NHTSA must report the reason and a revised timeline.

MEMA's surface transportation priority document urged Congress to direct NHTSA to address the challenges of unfinished congressionally mandated rules and guidance. MEMA is pleased that Chairman Guthrie's bill emphasizes the importance of this work, which will provide much needed stability and certainty for companies.

Testing and Evaluation of Motor Vehicle Equipment: Parity for Vehicle Suppliers

The 2015 FAST Act granted automakers—but not suppliers—the authority to test and evaluate certain vehicles on public roads under defined conditions. Although intended to accelerate innovation, this statutory framework inadvertently excluded the companies responsible for designing and creating important safety systems as well as relevant hardware and software. As a result, under current federal law, suppliers are limited in what they can test—such as braking systems, advanced sensors, powertrain components, and by-wire steering and braking—without partnering with a vehicle manufacturer. This limitation slows safety validation, impedes innovation timelines, restricts competition, and creates unnecessary dependency within the development process.

MEMA members develop and seek to test a wide range of technologies on public roads, including but not limited to, highway navigation systems that manage lane keeping, lane changes, overtaking, and routing with minimal driver input; urban navigation systems that manage traffic lights, stop signs, and complex intersections while still requiring the driver to remain ready to intervene; lane keep assist systems; sensor fusion for automatic emergency braking, including pedestrian and cyclist protection; road departure mitigation; high beam switch assist; traffic jam assist; and highway assist systems.

Public roads expose technologies to unpredictable driver behavior and everyday operating scenarios that cannot be fully replicated on closed test tracks. While test tracks remain essential for controlled, repeatable, and safety-focused testing, real-world data gathered on public roads is critical for identifying comfort- and safety-related issues before products reach consumers.

MEMA's surface transportation priority document requested that Congress amend current law to provide parity to suppliers concerning the ability to conduct public-road testing and evaluation of advanced vehicle technologies. We are pleased to be joined in this effort by the National Consumers League (NCL), and MEMA strongly supports the provision included in the Motor Vehicle Modernization Act of 2025.

SELF Drive Act (Discussion Draft/Rep. Bob Latta and Rep. Debbie Dingell)

Suppliers develop the majority of technologies that are fundamental for automated driving, including cameras, radar, lidar, ultrasonic sensors, by-wire steering and braking systems, control software, computing platforms, and sensor fusion algorithms. Despite this central role, existing federal frameworks do not consistently recognize suppliers' essential contributions. Suppliers are often excluded from direct testing authority and performance assessment processes, even though they design, manufacture, and refine the systems at the core of automated vehicle functionality.

The discussion draft of the SELF Drive Act noticed for this hearing would establish a comprehensive national framework for the regulation of vehicles equipped with automated driving systems (ADS), including vehicles capable of partial or fully automated operation. The bill sets uniform federal safety requirements for ADS and ADS-equipped vehicles. It is intended to facilitate the safe testing, evaluation, and deployment of automated vehicles while avoiding a patchwork of conflicting state regulations by preempting certain state laws in favor of consistent federal standards.

To accomplish these goals, the Act amends Title 49 of the U.S. Code to grant the Department of Transportation and the National Highway Traffic Safety Administration clear authority over ADS oversight. This includes establishing requirements for manufacturer safety cases, defining conditions for testing and limited commercial operation, permitting ADS-dedicated vehicles without traditional manual controls under specified safety conditions, and creating a national automated vehicle safety data repository for crash and mileage reporting. Together, these provisions are intended to enable data-driven federal safety oversight of automated vehicles throughout their development and deployment lifecycle.

MEMA's surface transportation priority document urged Congress to create a modernized AV framework that would enable suppliers to independently test and evaluate ADS technologies on public roads with appropriate requirements. MEMA is supportive of this discussion draft and looks forward to continuing to engage with Representatives Latta and Dingell as the process moves forward to ensure that vehicle suppliers' priorities are reflected.



MEMA Aftermarket Support for the REPAIR Act (H.R. 1566/Rep. Neal Dunn and Rep. Marie Gluesenkamp Perez)

MEMA Aftermarket represents the manufacturers that produce the parts, tools, diagnostic equipment, and service technologies required to maintain vehicles throughout their complete lifespan. As vehicles rely increasingly on software and embedded electronics, safety-critical maintenance depends on timely access to diagnostic and repair information. Without such access, many vehicles may become difficult or impossible to service, reducing consumer choice and increasing the risk that vehicles remain on the road in unsafe conditions.

As vehicles become increasingly complex and software-driven, access to diagnostic and repair data is critical for consumers and independent repair shops alike. Without clear standards and protections, there is a risk of enabling monopolistic control over repair information, which drives up costs for consumers, limits choice, and stifles innovation. The REPAIR Act prevents this anti-consumer scenario by ensuring that vehicle owners maintain the right to access and control their own vehicle data and choose where and how their vehicle is repaired.

By curbing potential anti-competitive behavior and safeguarding access to essential repair tools and information, the REPAIR Act creates a level playing field for the entire aftermarket industry—including thousands of small businesses and repair shops across the country. These provisions are not only vital for affordability and convenience, but also for ensuring that the free market determines decisions in the repair sector.

The bipartisan REPAIR Act (H.R. 1566), sponsored by Representatives Neal Dunn and Marie Gluesenkamp Perez, establishes a secure, standardized framework to ensure that suppliers, independent repairers, and authorized service providers can access the information necessary to diagnose and repair vehicles safely and effectively.

MEMA Aftermarket strongly supports inclusion of the REPAIR Act in the surface transportation reauthorization. Preserving access to critical repair and diagnostic data promotes competition, reduces repair costs for consumers, and, most importantly, keeps vehicles in safe operating condition across their full lifespan.

Conclusion

Vehicle suppliers are the foundation of automotive safety innovation and a critical pillar of the U.S. manufacturing economy. The policies outlined in this testimony are essential to maintaining U.S. leadership in safety technology and accelerating the deployment of innovations that save lives and prevent injuries on the nation's roads.

MEMA and its members stand ready to work with Congress, NHTSA, and all stakeholders to advance these priorities, support a strong domestic manufacturing base, and ensure that American roads remain among the safest in the world.

Thank you for the opportunity to provide this testimony for the record.

POWERSPORTS INDUSTRY



2025 ECONOMIC IMPACT IN U.S. TOTAL

\$50.9 Billion

THE VALUE OF THE POWERSPORTS
RETAIL MARKETPLACE

1,261,300

ESTIMATED NEW POWERSPORTS
RETAIL SALES

DIRECT ECONOMIC CONTRIBUTIONS OF POWERSPORTS RETAILERS

10,690

NUMBER OF POWERSPORTS
RETAILERS

116,000

PEOPLE EMPLOYED AT
DEALERSHIPS

\$5.0 B

TOTAL PAYROLL

2023 U.S. ON-ROAD MOTORCYCLE PURCHASERS 35 YEARS & YOUNGER



46% were first-time buyers



\$70K was their median income



9% were interested in
electric motorcycles



41% primarily used their motorcycle for
commuting to work/school

For more information about the motorcycle and powersports industry in your district, please contact the MIC's Government Relations Office at (703) 416-0444. To receive our weekly Ride Report, please visit mic.org.



MOTORCYCLE
INDUSTRY
COUNCIL®

Source: 2023 MIC Retail Outlet Audit
2022 MIC Retail Outlet Profile Study
2023 Motorcycle Consumer
Experience Study

2023 MIC Motorcycle Statistical Annual
2023 Estimated New Powersports Retail Sales, Motorcycle Industry Council, Inc., Irvine, CA
U.S. Department of Transportation, Federal Highway Administration, November 2024

Motorcycle Riders Foundation

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*"The only national motorcyclists' rights organization
dedicated to on-street riders"*



January 12, 2026

The Honorable Gus Bilirakis
Chairman Subcommittee on Commerce, Manufacturing and Trade
United States House of Representatives
Washington, DC 20515

Dear Chairman Bilirakis:

On behalf of the Motorcycle Riders Foundation (MRF) and the millions of motorcyclists we represent nationwide, I write to express our strong support for H.R. 3385, legislation to update the federal definition of a motorcycle.

The current federal definition of a motorcycle has not kept pace with modern vehicle design and technology. Over time, outdated language has created confusion for regulators, manufacturers, state agencies, and most importantly riders. H.R. 3385 provides a necessary update to this definition, ensuring that motorcycles are clearly distinguished from other vehicle categories and regulated appropriately.

In recent years, a new type of vehicle has entered our roadways, commonly referred to as an *autocycle*. These autocycles are currently classified as motorcycles under federal law, yet they bear little resemblance to a traditional motorcycle and possess vastly different operational characteristics.

The Motorcycle Riders Foundation believes this ambiguity surrounding autocycles has created an unnecessary patchwork of rules and regulations from state to state regarding licensing, insurance, safety statistics, registration, and training requirements. This inconsistent approach undermines both rider safety and sound policymaking and further demonstrates why a modernized federal definition is long overdue.

This clarity is especially important as federal agencies continue to develop and implement safety, environmental, and transportation rules. When motorcycles are inaccurately grouped with passenger vehicles or emerging vehicle classes, riders can face unintended regulatory burdens, and standards that do not reflect the unique performance, design, and use of motorcycles. H.R. 3385 helps prevent these unintended consequences by establishing a commonsense definition rooted in how motorcycles are actually built and operated.

The MRF has long advocated for fair and accurate treatment of motorcycles in federal policy. Riders deserve regulations that enhance safety and mobility without imposing one-size-fits-all

Motorcycle Riders Foundation

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*"The only national motorcyclists' rights organization
dedicated to on-street riders"*



rules designed for cars and trucks. Updating the federal definition of a motorcycle is a foundational step toward that goal.

We respectfully urge you to support and advance H.R. 3385. The Motorcycle Riders Foundation stands ready to work with you and your colleagues to ensure that federal transportation policy reflects the realities of motorcycling in the 21st century.

Thank you for your continued commitment to America's riders.

Sincerely,

Kirk "Hardtail" Willard
President
Motorcycle Riders Foundation

NADA Further Comments on the “REPAIR Act” (H.R. 1566)

Nov. 13, 2025

Section-by-Section Analysis

Section 1. Short Title (Page 2, Lines 1-4)

The Committee should consider changing the title of the bill as the legislation overall has little to do with repairing a vehicle. The bill would provide third party access to consumer vehicle data and could enable aftermarket parts manufacturers to reverse engineer OEM parts and tools. Moreover, the underlying premise of the bill is fundamentally flawed, as access to the information independent repair shops need to repair a vehicle is readily available from auto and truck manufacturers as well as the private market.

Section 2. Maintaining Competition and Data Privacy after Consumers Purchase Motor Vehicles (Page 2, Lines 5-25) (Pages 3-10)

Section 2(a)(1)(D) Access to Data to Produce or Offer Compatible Aftermarket Parts (Page 3, Lines 5-10)

- This subparagraph requires that no manufacturer may impair the ability of an aftermarket parts manufacturer among others to **produce** or offer compatible aftermarket parts.
- This section is unnecessary since the bill’s stated purpose is to ensure access to vehicle repair data and tools. There is no public need to grant aftermarket parts manufacturers **the right** to potentially reverse engineer original, genuine OEM auto and truck parts, including safety critical parts to accomplish the bill’s purpose. Additionally, the language in Sec. 2(a)(6), which states that nothing in the bill may be construed to “limit or expand any law or right relating to intellectual property,” may conflict with Sec. 2(a)(1)(D).
 - The bill should explicitly state that OEMs are not required to disclose information that would enable aftermarket parts makers to produce imitation parts if such information involves the OEMs’ intellectual property or trade secrets, while ensuring that an OEM’s research and development activities are appropriately safeguarded.
- This provision could confer an unfair advantage to enable aftermarket parts manufacturers to reverse-engineer OEM parts to create and market potentially inferior parts and even counterfeit auto parts.
- Counterfeit auto parts have become a problem in the U.S. and can be a safety risk. (<https://www.usatoday.com/story/money/cars/2025/05/30/counterfeit-auto-parts-in-us/83921051007/>). Note a recent Transportation Department [safety advisory notice](#) about the rise in counterfeit and substandard safety devices.

We strongly recommend subparagraph (D) be struck or at least be made clear that automakers will not be forced to share information with aftermarket parts makers so they can manufacture imitation auto parts. This section is unnecessary for a bill whose purpose is to ensure safe and secure access to vehicle repair and maintenance data. There is not a public need for allowing aftermarket parts manufacturers the right to reverse-engineer original, genuine OEM auto and truck parts, including safety critical parts.

Section 2(a)(1)(E) (Page 3, lines 12-16)

- This subparagraph would bar an OEM from employing any technological barrier or specified legal barrier that impairs the ability of an independent repairer to diagnose, repair and maintain a motor vehicle in the same manner as an OEM or dealer.
- Dealers, not independent repairers, are authorized by their manufacturer sales and service agreements to perform recall and warranty work. Under these agreements, dealers must invest a significant amount of their own capital in first-rate technician training and state-of-the-art diagnostic and repair tools to keep up with the latest technology to repair vehicles safely and securely.
- Under this provision, independent repairers will have a legal right to recall and warranty information without any of the cost or training dealers must currently bear.
 - Is it the intent of this legislation to grant independent repairers the legal right to perform recall and warranty work?
 - In a separate paragraph of the bill, Sec. 2(a)(3), the bill explicitly includes an exception for “recall and warranty repairs.” If it is not the bill’s intent to give independent repairers the right to perform recall and warranty work, why is this exception absent from Sec. 2(a)(1)(E)?

Section 2(a)(3)(A) Prohibition on Certain Mandates Related to Repairs (Page 5, Lines 13-15)

- This provision states that a motor vehicle manufacturer may not mandate or imply a mandate to use a particular brand or manufacturer of parts, tools, or motor vehicle equipment.
- Proponents of H.R. 1566 have not provided any evidence of OEMs mandating, or implying to mandate, a particular brand of parts. Apart from a 1-800 number, franchised OEMs do not interact with customers. Except for direct sellers, OEMs do not retail or fix the vehicles they manufacture.
- The Committee should first ascertain that this is a problem before imposing undue government interference in the form of a commercial speech prohibition that comes with a significant fine (see Sec. 5(a)).

Section 2(a)(3)(B) Prohibition on Certain Mandates Related to Repairs (Page 5, Lines 16-25)

- OEMs design and perform rigorous testing of parts and tools for quality, fit, reliability and safety. Under this subparagraph, manufacturers would be prohibited from recommending the use of any particular brand or manufacturer of parts, tools, or motor vehicle equipment without a notice stating that customers can use other parts, tools, or motor vehicle equipment.
- Apart from advertisements, OEMs do not recommend parts to customers; their dealers sometimes do.
 - Under this provision, is the intent to impute liability to an OEM if one of their dealers recommends an OEM part without the congressionally mandated caveat? If “no,” there is no purpose to this provision, unless it is Congress’ intent to regulate the print ads of OEMs touting their own auto parts.
 - If an OEM recommended in a print ad that consumers use “genuine GM parts” for their GM car, would that ad also have to include the sentence on page 5, lines 22-25, to comply with this provision, and in the same font size?

- Have proponents of H.R. 1566 provided the Committee with any evidence that service customers are generally unaware that they are already free to choose any brand of part they want?
- For fair application, should insurance companies be required to state that *“Vehicle owners should consider their options when repairing their insured vehicle, as non-genuine OEM parts may not offer the same quality, fit, reliability and safety”* when processing an auto claim?
- For fair application, should aftermarket parts distributors also be prohibited from recommending their own products without a caveat?
 - While this provision only confers liability for non-compliance on the OEMs, is the intent of this provision to transfer liability to dealers, who routinely interact with consumers, on behalf of the OEM?
- The Committee should be aware that dealers already offer aftermarket or remanufactured parts options to their customers if circumstances warrant. Dealers regularly offer this to their customers despite the absence of a federal government mandate.
- **We strongly recommend paragraph (3) be struck.**

Section 2(a)(4) Prohibition on Certain Limitations (Page 6, Lines 1-5)

- OEMs “may not limit the number or types of persons who a motor vehicle owner may designate as simultaneous designees under this subsection.”
 - Besides the following subparagraph limitation, shouldn’t there be a limit on who can share and receive this data as a designee?
 - Could a foreign aftermarket manufacturer that is known to be an auto parts counterfeiter be a designee?
 - Couldn’t having unlimited designees create unforeseen privacy and cybersecurity risks for vehicle systems?

Section 2(a)(5) Limitation (Page 6, Lines 6-13)

- This paragraph prohibits a motor vehicle manufacturer, any affiliate of a manufacturer or any person working on behalf of a manufacturer from being considered or treated the same way as a motor vehicle owner or their designee.
- The bill does not include, or is at best ambiguous, regarding dealer protections when servicing brands not associated with their franchise.
- Dealers could be construed as a “person working on behalf of [a] manufacturer.” Dealers also routinely service out-of-franchise models. Under this provision, dealers may be barred from accessing the tools and information in the same manner as independent repairers for trade-ins that are out of their franchise.
- We strongly recommend either striking subparagraph (5) or amending it to prevent interference by OEMs in a dealer’s non-OEM repair services by explicitly stating that a new car dealer when working on vehicles outside its franchise line-make has the same rights under the law as the non-dealer repairers.

Section 2(a)(7) Requirements for Persons Receiving Vehicle Generated Data – (Pages 7-10)

- Sec. 2(a)(7)(C) would allow vehicle owner consent to grant broad access to sell, license or transfer vehicle-generated data further demonstrates that the bill is not about vehicle repair but access to vehicle data.
- The definition for vehicle generated data is extremely broad and is not limited to diagnostic and repair data.
- The bill provides that “direct, real-time in-vehicle data” can be **sold** “to any other person” [Sec. 2(a)(7)(C)(ii)] with the consent of the motor vehicle owner.
 - What qualifies as consumer consent? Could the consent process be structured so that it effectively leads consumers to grant third-party access without fully understanding the terms or with a real opportunity to choose? For example, could signing a repair authorization, accepting fine print terms by checking a box, or requiring an opt-out instead of an opt-in be considered consumer permission to share or sell their data?
 - What public policy rationale has independent repairers given Congress which warrants granting them the legal right to sell customer data?
 - Apart from gaining the ability to sell customer data, does this provision bar independent repairers from using the data to market to customers?
- Sec. 2(a)(7)(D) gives aftermarket parts manufacturers the ability to glean vehicle data “for purposes...related to the manufacture or service of such...parts.” [Sec. 2(a)(7)(D)(i)] This data cannot be deleted even if requested by the motor vehicle owner. [Sec. (2)(a)(7)(B)]
- Proponents of H.R. 1566 have failed to articulate a compelling reason why these provisions are necessary to address what proponents purport to be a lack of information or tools to fix a vehicle.

Section 3. Fair Competition After Vehicles are Sold Advisory Committee (Pages 11-14) (Page 15, Lines 1-7)

- This section establishes an advisory committee made up of 11 individuals from various industry stakeholders, including but not limited to automobile insurers, aftermarket tools and parts manufacturers, motor vehicle parts retailers, and motor vehicle parts distributors, to provide recommendations on issues facing the repair industry.
- Under the 2014 Memorandum of Understanding that is still in effect, independent repair facilities have access to the same diagnostic and repair information that auto manufacturers make available to authorized dealer networks. This agreement was reaffirmed by the OEMs with a 2023 industry commitment.
- Automakers and independent repairers already have a longstanding formal mechanism through the [National Automotive Service Task Force](#) (NASTF) to ensure service information, tool information and training data is made available from every truck and auto manufacturer. NASTF also includes a dispute resolution mechanism. In addition, multiple private entities such as [OEM1Stop.com](#) have been created by automakers for repair technicians to find repair and diagnostic information on most vehicles.
- Among the participants of this new advisory committee would be a representative of a “motor vehicle dealership service center.”
 - Why is this new and undefined term used, since the term “motor vehicle dealer” is already defined in this bill and in law?

- Proponents of H.R. 1566 have yet to articulate why creation of an advisory committee, whose composition is biased in favor of the aftermarket industry, and which could exist indefinitely, is necessary.
- **We recommend striking Sec. 3 to reduce unnecessary government spending and bureaucracy.**

Section 4. Rulemaking (Page 15, Lines 8-16)

- This section requires the National Highway Traffic Safety Administration in consultation with the Federal Trade Commission (FTC) to promulgate regulations to require motor vehicle manufacturers and motor vehicle dealers to inform motor vehicle owners about their rights under this Act at the time of vehicle purchase.
- This rulemaking adds more paperwork to an already paperwork-intensive process when buying a car.
- According to NADA's chief economist, this new regulatory burden **will cost over \$100 million annually**. Additionally, the provision is overbroad, as new car purchasers already need not worry about repairing their new vehicle at the point of sale, as new vehicles typically come with a manufacturer's warranty for the first few years or designated miles of ownership.
- This new regulatory paperwork burden would also be duplicative when retailing a new vehicle, as both dealer and OEM would have to give the purchaser the same information.
- This new regulatory burden and potential significant fines by the FTC for non-compliance would only apply to franchised dealers and OEMs; independent dealers (who support H.R. 1566) are exempt.

In Sec. (6)(12), "motor vehicle dealer" means a dealer as defined in Sec. 30102(a) of title 49. That definition is: "dealer means a person selling and distributing new motor vehicles or motor vehicle equipment primarily to purchasers that in good faith purchase the vehicles or equipment other than for resale." Independent dealers are exempt from this legislation because they do not sell or distribute "new" motor vehicles.

- Because this section unnecessarily expands federal regulation and will cost over \$100 million annually, **we strongly recommend striking Sec. 4.**

Section 5. Enforcement by Federal Trade Commission (Page 15, Lines 17-25) (Pages 16-17) (Page 18, Lines 1-5)

- This section treats violations "of this Act or a regulation promulgated under this Act" as an unfair or deceptive act or practice. This section sets out an enforcement structure under the FTC just for violations of this law.
- The FTC has been enforcing unfair or deceptive acts or practices (UDAP) violations since 1938; why special rules (i.e., Sec. 5(c)) must be created for an issue that has not been justified is unclear.

Section 6. Definitions

Section 6(11) Motor Vehicle (Page 21, Lines 10-21)

- The definition of a motor vehicle should be limited to vehicles with a gross vehicle weight rating of 10,000 pounds or less. The bill treats medium- and heavy-duty trucks the same as light-duty vehicles, although heavy-duty trucks, such as school buses and cement mixers, are sold to

businesses and governments, not consumers. Furthermore, the bill ignores the significant differences between light-duty vehicles, which are mass produced for the general public, and medium- and heavy-duty trucks, which are custom-built for specific purposes.

- No data or evidence has been produced by the bill's proponents showing that truck manufacturers are withholding information to prevent independent repairers from fixing heavy-duty trucks.
- Independent heavy-duty truck repair shops have access to the same diagnostic tools and information as dealerships per a 2015 MOU agreed to by the Commercial Vehicle Solutions Network, the Truck and Engine Manufacturers Association, the Equipment and Tool Institute, and the Auto Care Association, which is the main proponent of "right to repair."
- Proponents also fail to mention the millions of dollars in new, completely unnecessary regulatory costs this legislation would impose on heavy-duty truck dealers and OEMs.
- **We strongly recommend that this language be added after Sec. (6)(11)(A)(ii):**
 - **(iii) does not include a motor vehicle with a gross vehicle weight rating of 10,000 pounds or more."**

Section 6(12) Motor Vehicle Dealer (Page 21, Lines 22-25) (Page 22, Lines 1-2)

- The definition of "motor vehicle dealer" should only be cross-referenced back to the federal definition under 49 USC 30102(a)(2). Every franchised motor vehicle dealer, by definition, already has "an agreement with a motor vehicle manufacturer related to diagnostics, repair, or service of a motor vehicle."

Section 6(21) Technological Barrier (Page 24, Lines 14-18)

- The definition for technological barrier is overly broad due to the inclusion of the phrase, "tends to make more difficult the ability of a person to exercise rights under this Act."

Section 7. Report to Congress (Page 25, Lines 20-24) (Page 26, Lines 1-19)

- This section is unnecessary as there is no need for mandated agency reports to be written and submitted to Congress every two years in perpetuity.
- **We recommend striking Sec. 7.**

Section 8. Relationship to State Laws (Page 26, Lines 20-25) (Page 27, Lines 1-2)

- This section preempts any State, or political subdivision of a State's right to maintain, enforce, prescribe, or continue in effect any law, rule, regulation, requirement, standard, or other provision having the force and effect of a law of the State, or political subdivision of the State, that is covered by any provision of this Act or any regulation promulgated pursuant to this Act.
- It is unclear why state law needs to be preempted in the first place as only Massachusetts and Maine have "right to repair" laws
- NADA is consulting with outside counsel to ascertain the scope of this provision to determine whether it will void essential state dealer franchise, data privacy or consumer protection laws.



Oppose So-Called “Right to Repair” Legislation (H.R. 1566/S. 1379)

ISSUE

The REPAIR Act is not about repair; it is about allowing third-party access to customer data. Advocates for “right to repair” legislation claim that independent automotive repair shops do not have access to the parts or data necessary to repair vehicles. However, the REPAIR Act is unnecessary as this concern was addressed by a 2014 Memorandum of Understanding between “right to repair” proponents and auto manufacturers, and reaffirmed by a [2023 industry commitment](#). Today, the information independent shops need to repair vehicles is readily [available](#) for every auto and truck manufacturer. **Members of Congress should not cosponsor H.R. 1566/S. 1379 since independent repair shops have what they need to fairly compete in today’s marketplace, and the legislation creates a significant new federal regulatory structure.**

BACKGROUND

The “REPAIR Act” has little to do with repairing a vehicle. For example, H.R. 1566 provides that “direct, real-time in-vehicle data” can be sold “to any other person” with the consent of the vehicle owner. Such consent could consist of the owner merely checking a box on a form authorizing service of their vehicle. The House bill also gives aftermarket parts manufacturers the ability to glean vehicle data “for purposes...related to the manufacture or service of such...parts.” This data cannot be deleted even if requested by the vehicle owner. In addition, both House and Senate bills mandate that no manufacturer “impairs the ability” or “employ[s] any barrier” for an aftermarket parts manufacturer “to produce” aftermarket parts. Proponents have failed to articulate a compelling reason for these provisions, which are unrelated to their claim that they lack information or tools to fix a vehicle.

The information necessary to repair vehicles is already widely available. In addition to the 2014 MOU, automakers and independent repairers have a longstanding formal mechanism through the [National Automotive Service Task Force](#) to ensure information for service, tools and training is available from every truck and auto manufacturer. Additionally, multiple private entities such as [oem1stop.com](#) provide this information, and the MOU created a resolution panel to remedy situations where an independent repair facility believes a manufacturer has failed to provide the necessary information to repair a vehicle. Even though the MOU is working as intended, “right to repair” proponents now want a new federal regulatory structure that does much more than address so-called “right to repair.”

The bills are so proscriptive that they forbid a manufacturer from even recommending their own auto parts unless the automaker also provides “in the same font” and “font size” what is obvious—that consumers are already free to choose their own auto repair parts. This legislation also includes a new paperwork burden which will unnecessarily lengthen the car-buying process for over 28 million purchasers annually and could cost in excess of \$100 million.

KEY POINTS

- **The “REPAIR Act” is unnecessary because the information necessary to repair vehicles is already available.** Aftermarket parts manufacturers and independent repair shops already have what they need to fairly compete in today’s marketplace. Currently 73% of post-warranty repairs are done outside of the dealer network.
- **The bills are not about repair but rather are designed to provide third parties access to consumer data and enable aftermarket parts manufacturers to reverse engineer OEM parts.** The requirement that no auto manufacturer may impair the ability of an aftermarket parts manufacturer to produce “knock-off” auto parts is unnecessary if the purpose of the bills is to ensure the “right to repair.”
- **H.R. 1566/S. 1379 would create an entirely new regulatory framework** — with a mandated rulemaking, new advisory panel, and reports to Congress every two years — all for a nonexistent problem. This new regulatory paperwork burden could cost over \$100 million annually, affecting 28 million transactions, and expose small business dealers to significant fines.

STATUS

Rep. Neal Dunn (R-Fla.) reintroduced H.R. 1566, the REPAIR Act and Sens. Ben Ray Lujan (D-N.M.) and Josh Hawley (R-Mo.) introduced S. 1379. NADA sent an opposition [letter](#) to all House members and an opposition [letter](#) to all Senators. **Members of Congress are urged not to cosponsor H.R. 1566/S. 1379.**

October 17, 2025



Protect Consumers and Small Businesses from Catalytic Converter Theft *Cosponsor the Bipartisan PART Act (H.R. 5221/S. 2238)*

ISSUE

Catalytic converters are attractive targets for thieves due to their precious metals, such as rhodium, platinum and palladium. Criminals can easily steal catalytic converters from unattended vehicles, and since catalytic converters are not readily traceable, there is a lucrative market for these stolen parts. These thefts are costing millions of dollars to businesses and individual vehicle owners alike and continue to be a significant problem. **Members of Congress should cosponsor the “Preventing Auto Recycling Theft Act” ([H.R. 5221/S. 2238](#)), which would help law enforcement combat catalytic converter theft by marking catalytic converters and creating a more transparent market that deters their theft.**

BACKGROUND

As required by the Clean Air Act, catalytic converters reduce toxic emissions from internal combustion engine vehicles using precious metals to remove toxic elements from the exhaust gases. The price of these precious metals rose sharply during the pandemic, contributing to a sharp increase in theft. Stolen catalytic converters can garner anywhere from \$20 to \$350 on the black market, with the replacement cost to vehicle owners averaging over \$2,500. Stolen catalytic converters are difficult to trace since they lack identification numbers tied to the vehicle, which hampers law enforcement from proving ownership and prosecuting theft.

Thefts have also turned [violent](#), with high-profile [tragedies](#) underscoring the urgency of addressing this issue. While several states, such as Minnesota and North Carolina, have enacted laws to address the issue, this crime frequently involves trafficking stolen parts across state lines and a federal framework is needed to aid the efforts of local law enforcement.

The PART Act addresses this crime by: 1) requiring new vehicles to have unique identifying numbers, a VIN or other traceable number, stamped on catalytic converters at the time of assembly; 2) establishing a \$7 million grant program to mark catalytic converters of vehicles already on the road at no cost to vehicle owners; 3) increasing record keeping requirements for purchasers; and 4) establishing a federal criminal penalty for the theft, sale, trafficking or known purchase of stolen catalytic converters of up to five years.

KEY POINTS

- **Catalytic converter theft skyrocketed after the pandemic** due to the precious metals contained in each device.
- **The PART Act would provide law enforcement the tools to trace stolen catalytic converters back to their source.** Catalytic converters are not one of the 18 vehicle parts required to be marked with a VIN or number traceable to a VIN. Law enforcement has stated that including such tracing in the legislation is critical to help deter the theft and trafficking of stolen catalytic converters since it would make it easier to prosecute criminals.
- **The PART Act provides a national framework to help law enforcement combat catalytic converter theft.** Since this crime frequently involves trafficking stolen parts across state lines, a federal standard is needed to help law enforcement.

STATUS

The PART Act was reintroduced by Sens. Amy Klobuchar (D-Minn.) and Bernie Moreno (R-Ohio) in the Senate and Reps. Jim Baird (R-Ind.) and Betty McCollum (D-Minn.) introduced companion legislation in the House. NADA and 119 other organizations sent a [letter](#) to Congress supporting passage of the PART Act last year. This Congress, the bill includes some non-controversial [revisions](#) to improve clarity and enhance enforcement. **Members are urged to cosponsor the PART Act to help curb the growing national problem of catalytic converter theft protect consumers, and free up valuable time for law enforcement organizations across the country.**

September 10, 2025



September 8, 2025

Dear Representative:

The National Automobile Dealers Association (NADA), which represents over 16,000 franchised new car dealers who employ 1.1 million Americans, and the American Truck Dealers (ATD), a division of NADA representing over 3,200 franchised medium- and heavy-duty truck dealers nationwide, strongly oppose H.R. 1566, the “Right to Equitable and Professional Auto Industry Repair Act” Act (REPAIR Act). We oppose this legislation as it has little to do with repairing a vehicle and raises serious vehicle privacy, intellectual property, and safety issues.

H.R. 1566 is built on the faulty premise that independent repair shops are unable to obtain parts or data necessary to repair a car. However, this matter was addressed in 2008 with the establishment of the National Automotive Service Task Force¹, which makes available service information, tool information and training data from auto manufacturers. In 2014, a Memorandum of Understanding² was signed by independent repairers and auto manufacturers which ensured repair information dealers received would also be made available to independent repair shops. This agreement was updated in 2023 to include telematics. Today, the information independent repair shops need to repair a vehicle is readily available from auto and truck manufacturers.

H.R. 1566 is overbroad and creates data privacy and intellectual property concerns. Sec. 2 of the bill would allow vehicle owners to give all vehicle data, including technical and compatibility information, software, and technology to any third party they designate “without restriction or limitation.” This provision raises serious privacy, data security and vehicle safety concerns. Section 2(a)(1)(D) would also compel auto and heavy-duty manufacturers to provide any “aftermarket parts manufacturer” the information necessary to “produce or offer compatible aftermarket parts,” meaning the information necessary to reverse engineer original, genuine OEM auto and truck parts, including safety critical parts. This provision, which has little to do with the ability to repair a vehicle, raises serious intellectual property concerns.

H.R. 1566 is also overbroad as it treats medium-and heavy-duty trucks the same as light-duty vehicles. No evidence has been produced by the bill’s proponents showing that truck manufacturers withhold information to prevent independent repairers from fixing heavy-duty trucks.

H.R. 1566 could reduce competition and consumer choice. Dealerships routinely service brands outside their franchise. However, this legislation may exclude franchised dealers from receiving vehicle-generated data needed to repair the vehicle that is outside their franchise. For example, in Section

¹ The National Automotive Service Task Force (NASTF) is a not-for-profit organization established to facilitate the identification and correction of gaps in the availability and accessibility of automotive service information, service training, diagnostic tools and equipment, and communications.

² Both light duty and heavy-duty vehicle manufacturers have entered into nationwide [agreements](#) to provide repair information.

2(a)(5) of the bill, a franchised dealer may be barred from receiving the repair information necessary from another automaker to repair vehicles outside of their franchise. This legislation could put dealers at a competitive disadvantage and limit where customers can take their vehicle for repairs.

H.R. 1566 would place a new unnecessary and unfair regulatory burden on franchised dealers. Sec. 4 of the bill requires the National Highway Traffic Safety Administration to “promulgate regulations” requiring more government paperwork “at the point of purchase of a motor vehicle.” Failure to comply with this new regulation could result in a fine up to \$51,744 per violation. Additionally, this new regulatory burden and fine would only apply to franchised dealers; independent dealers are exempt.

Finally, a 2024 Government Accountability Office [report](#) confirmed the information and tools necessary to repair vehicles are already available to independent repair shops. The report found that of the eight automakers GAO interviewed, all confirmed that “they provide to independent repair shops, on fair and reasonable conditions, equal access to the information, data, and tools needed for repairs, and will continue to do so.” In fact, independent repair shops currently perform more than 70% of all non-warranty repairs, and according to the Auto Care Association, which supports this legislation, their total revenue grew 43% from 2014-2022.

H.R. 1566 is touted by its proponents as a “Right to Repair” bill, but the legislation has little to do with repairing a vehicle. Instead, the bill creates unlimited open access to third parties which raises new vehicle privacy, intellectual property, and safety concerns, while mandating a new, untested regulatory burden. **NADA urges you to not cosponsor or vote for H.R. 1566.** Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Stanton", with a stylized flourish at the end.

Mike Stanton
President and CEO



Creating Efficient, Sustainable, Safe Fleets

GENERAL CORRESPONDENCE

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January 12, 2026,

Chairman Bilirakis and Ranking Member Schakowsky:

As the leading national association representing public and private fleet managers, NAFA appreciates your attention to critical fleet issues in your upcoming hearing, Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership. We respectfully request that this letter be included in the hearing record.

NAFA is the national association of private and public fleet managers. Fleets purchase approximately 20 percent of all vehicles sold in the United States, move more than \$10 trillion in goods annually, and contribute roughly \$800 billion to the U.S. economy. Fleets provide critical public services, including fire and police response, school transportation, public transit, and road and utility maintenance and repair. Fleets also ensure that manufacturers receive the raw materials they need, grocery and retail stores remain stocked, and packages are delivered to homes and businesses. Because of this scale, policies affecting fleet operations have direct implications for economic stability, public safety, and consumer affordability nationwide.

With respect to the issues before the Committee, catalytic converter theft and unfettered fleet access to the data their vehicles generate are both operationally and economically consequential for fleet operators.

Thieves steal catalytic converters from vehicles and sell them to scrap dealers for the value of metals such as platinum. This leaves vehicles unusable, and replacement can cost thousands of dollars per incident. The Preventing Auto Recycling Theft (PART) Act, by requiring converters to bear clearly marked identification numbers, permitting them to be associated with individual vehicles, and requiring entities purchasing converters in the secondary (scrap) market to keep transaction records, would meaningfully deter this criminal activity. The legislation also establishes criminal penalties for theft or resale of converters, creating consequences for what is currently a low-risk activity for thieves. NAFA supports these provisions as a practical, enforcement-focused approach to disrupting illicit resale channels and reducing catalytic converter theft nationwide.

Another critical issue for fleets is access to the extensive data that modern vehicles generate. This data includes vehicle component performance, such as battery health, as well as vehicle usage information, including acceleration, braking, and speed. Fleets rely on this data to ensure safe operation, timely maintenance, cost control, and efficient deployment of vehicles. This

information is increasingly transmitted via telematics—over-the-air, cellular-based systems that allow remote access to vehicle data.

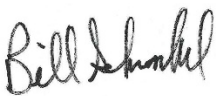
Vehicle manufacturers are increasingly using telematics systems to control and monetize access to data generated by vehicles that fleets own or lease. While manufacturers design the hardware and software systems, fleets operate the vehicles, bear the operational risk, and depend on continuous access to this data to meet safety, service, and compliance obligations. Restricting or paywalling access to essential vehicle data raises fleet operating costs and can negatively affect maintenance, uptime, and safety outcomes.

Both the Data Rights for Information and Vehicle Electronics in Real-Time (DRIVER) Act and the Auto Data Privacy and Autonomy Act would ensure that fleets have appropriate access to critical data generated by the vehicles they own or lease without being forced to repurchase their own operational data. NAFA supports these approaches as balanced, pro-competition policies that protect safety and consumer affordability.

The REPAIR Act, by contrast, would explicitly authorize manufacturers to charge for vehicle data access, effectively granting manufacturers exclusive control over customer vehicle data. This approach would undermine fleets' ability to manage their vehicles efficiently and safely while increasing costs across both public and private fleets. NAFA has consistently opposed this framework.

We appreciate your attention to these important policy matters and stand ready to serve as a technical and operational resource to the Committee as it considers legislative options affecting fleet safety, consumer affordability, and U.S. automotive leadership.

Respectfully,



Bill Schankel
CEO
NAFA Fleet Management Association



The Honorable Gus Bilirakis
Chairman
Subcommittee on Commerce, Manufacturing,
and Trade
House Committee on Energy and Commerce
2306 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Jan Schakowsky
Ranking Member
Subcommittee on Commerce, Manufacturing,
and Trade
House Committee on Energy and Commerce
2408 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Bilirakis and Ranking Member Schakowsky,

On behalf of the **National Automotive Service Task Force (NASTF)**, we appreciate the committee's commitment to ensuring that Americans have the tools and data needed to fix their vehicles. That is a commitment we share and, in fact, is NASTF's purpose.

As you consider legislation affecting automotive right to repair, we wanted to provide background on the role NASTF plays in ensuring an equal playing field for all automotive service professionals.

Background on NASTF

The National Automotive Service Task Force (NASTF) is a not-for-profit, 501(c)(6), established in 2000 to facilitate the identification and correction of gaps in the availability and accessibility of automotive service information, service training, diagnostic tools and equipment, and communications.

NASTF is the largest automotive repair trade association with 53,892 members and over 8,000 vehicle security professionals who perform over 300,000 secure transactions per year.

NASTF is a cooperative effort among the automotive service industry, the equipment and tool industry and automobile manufacturers (OEMs). There is no cost to participate in NASTF, which is open to professional auto service technicians, shop owners, service writers, OEM service employees or any other automotive industry professional.

NASTF helps to ensure an equal playing field for all automotive service professionals and serves as an intermediary between the technician and OEMs.

NASTF's Role in Ensuring Automotive Right to Repair

NASTF operates under the Automotive Service Information Standards (ASIS) agreement signed by nearly all automakers in 2008. The agreement requires automakers to offer all information and tools available to their franchise dealer to independent repairers. It also establishes NASTF as the resource for delivery of vehicle security information related to repair and producing keys for the aftermarket.

Further, the 2013 Massachusetts Right to Repair law and the 2014 industry wide Memorandum of Understanding (the “MOU”) require automobile manufacturers (OEMs) to make available for purchase to owners and independent repair facilities, at a fair and reasonable cost, the tools and data necessary to diagnosis and repair vehicles. This must be the same diagnostic and repair information provided to dealers.

NASTF is named in the 2013 Massachusetts Repair law and the 2014 MOU as the mediator for aftermarket technicians and automakers when the above information is unavailable. When a technician encounters an issue where information is missing or a support system is broken, they can submit a request for assistance¹ and NASTF will contact the correct individual at the automaker for assistance. **NASTF receives an average of 140 requests per year and has a 90% resolution rate.**

The majority of automakers have very good systems in place to support repairers. NASTF assists with the occasional issue that affects everyone using the system, oftentimes independent and dealer alike. Technicians facing the same or similar problems are encouraged to add their experience to the original request. This helps automakers understand the scope of the issue, most of which are related to information technology (IT). NASTF also employs a number of specialist members who inform us of issues so that we can take them to the appropriate brand before they cause significant downtime for the impacted technicians.

NASTF is aware of additional efforts² in the industry to gather technician concerns with repair information, specifically from the Auto Care Association. We have proactively reached out to provide support and ensure the concerns collected are addressed by manufacturers through the established “service information request” process. We are disappointed that the Auto Care Association has recently declined our request to support resolving these technicians’ concerns as we are confident that we could resolve the majority of these issues with the help of our OEM partners.

¹ https://wp.nastf.org/?page_id=842

² <https://www.autocare.org/government-relations/resources/toolkit/right-to-repair-media-kit-for-drivers-and-shops>

Secure Data Release Model

NASTF also operates the Secure Data Release Model (SDRM).³ This system allows automakers to share security related information and tool functions with independent repairers and locksmiths

Background checked, credentialed Vehicle Security Professionals (VSPs) using the SDRM process can purchase key and immobilizer codes, PIN numbers and special tool access from automaker websites. Each transaction is monitored and validated by NASTF.

As always, NASTF will continue to work to ensure that the tools and data needed for owners and independent repair facilities to repair vehicles is available and to solve industry-wide concerns.

Please reach out with any further questions about NASTF's work and our role in ensuring automotive right to repair.

Sincerely,

Donny Seyfer
Executive Officer
National Automotive Service Task Force
dseyfer@nastf.org
303-994-8643

³ https://wp.nastf.org/?page_id=367



**National Safety Council Statement for the Record
House Committee on Energy and Commerce
Commerce, Manufacturing, and Trade Subcommittee
“Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice
and Affordability, And Cement U.S. Automotive Leadership”**

Chairs Guthrie and Bilirakis and Ranking Members Pallone and Schakowsky:

Thank you so much for hosting this timely legislative hearing on solutions the United States government can implement to eliminate fatalities and serious injuries stemming from motor vehicle crashes. In 2023, 44,762 people died in motor vehicle crashes in the United States.¹ Given numerous advancements in motor vehicle design and advanced driver assistance systems (ADAS), the time is now for an all-of-government approach to substantively reduce the dangers people face every day while using the transportation system.

The National Safety Council

The National Safety Council (NSC) is America’s leading nonprofit safety advocate — and has been for over 110 years. As a mission-based organization, we work to eliminate the leading causes of preventable death and injury, focusing our efforts on the workplace and roadway. We create a culture of safety to protect people from hazard and injury in the workplace and beyond so they can live their fullest lives. Our more than 13,000 member companies and federal agency partners represent employees at nearly 41,000 U.S. worksites.

Motor Vehicle Modernization Act

NSC greatly appreciates the efforts of Members of Congress to ensure the continued commitment of the National Highway Traffic Safety Administration (NHTSA) to the New Car Assessment Program (NCAP). As it stands today, NCAP has not kept pace with motor vehicle technology advancements and motor vehicle original equipment manufacturers (OEMs) look to other sources for validators of vehicle safety and technology.² The solution is not to eliminate NCAP; however, NHTSA must invest in updating its list of preferred technologies and testing procedures to keep pace with third-party validators and versions of NCAP in other countries.³

NSC also supports the transparency sought after by the Motor Vehicle Modernization Act regarding rulemaking efforts at NHTSA. As it stands today, NHTSA is behind on several key

¹ <https://injuryfacts.nsc.org/motor-vehicle/overview/introduction/>

² <https://www.iihs.org/ratings/top-safety-picks#criteria>

³ <https://www.euroncap.com/en/car-safety/the-ratings-explained/>

safety proceedings which when complete, can positively affect numerous risky driving behaviors, including distracted driving and impaired driving.

NSC does not support language in the current version of the Motor Vehicle Modernization Act that aims to replace NHTSA crash testing procedures with voluntary performance testing by motor vehicle OEMs. While self-certification may be appropriate for Federal Motor Vehicle Safety Standards (FMVSS) compliance, NHTSA must not cede any involvement in the performance testing of vehicle safety systems that are part of NCAP. United States consumers rely on NHTSA to provide unbiased safety ratings on new vehicles entering the market. Motor vehicle OEMs should not be expected to do the work of a regulator. Given the numerous safety challenges that exist in the United States, Americans are looking for an active motor vehicle regulator to ensure vehicle safety and compliance.

Finally, NSC believes the NCAP Advisory Committee as proposed within the legislative text of the Motor Vehicle Modernization Act should be updated to include equal participation by safety organizations and vehicle manufacturers. OEMs have a diversity of thought based on the economic bottom line of each individual company and their perspectives will be shaped by the vehicles they are trying to sell. Similarly, safety organizations have different perspectives on how best to shape NCAP so it is successful moving forward. Ensuring these opinions are heard at the Advisory Committee is key to a strong NCAP.

Safety is Not for Sale Act

NSC supports the aims and goals of the Safety is Not for Sale Act. Too often, consumers are asked to pay higher prices for technology on new vehicles which will keep them safe while driving.⁴ NSC believes safety technologies available for any model of motor vehicle should be standard and not part of an added 'safety package.'

Additionally, NSC supports the limited aspects of technology that are included in this legislation. Automatic Emergency Braking (AEB), lane keeping assist, driver support systems and digital crash notification are all technologies that have a positive impact on safety. While more technologies may be recognized by the appointed Commission, this is a positive starting point where NHTSA has published research on the importance of these safety technologies.

Safely Ensuring Lives Future Deployment and Research in Vehicle Evolution Act (SELF DRIVE Act)

NSC recognizes that automated driving systems (ADS) are being tested and deployed across the United States at a record pace. While ADS technology may have a recognized safety benefit in the future, today that benefit is not fully realized. Strong federal oversight, including a national

⁴ <https://www.euroncap.com/en/car-safety/the-ratings-explained/>

framework for safe ADS deployment, will be critical to ensuring the development and deployment of new technology that does not put current road users in novel and dangerous predicaments. Furthermore, continued staffing and research by NHTSA will be key to ensuring ADS technology performs in a predictable way that is compliant with rules of the road in every jurisdiction within the United States.

NSC does not support a distinction between an “ADS-dedicated vehicle” and an “ADS-equipped vehicle.” Using the SAE J3016 Levels of Automation Guide, industry distinguishes between “driver support features” and “automated driving features.”⁵ This nomenclature has become standard regulatory language. Level 3 systems, which will be first to market for personally owned vehicles, are ADS technology and should be regulated in the same way Levels 4 and 5 systems are regulated.⁶

NSC is concerned that the SELF DRIVE Act purports to reclassify a driver of Level 3 ADS equipped motor vehicles as an “in-vehicle fallback-ready user.” Level 3 systems require operators of vehicles to remain capable of reengaging in the driving task should the system notify the driver to take control. To maintain a high level of behavioral safety, Congress and NHTSA should continue using the term “driver” with regards to operators of Level 3 systems. This ensure the operator continues to follow the rules of the road before getting in the driver’s seat including being free from impairment.

States and NHTSA must collaborate on enforcement protocols for driver distraction with respect to operating Level 3 vehicles. For Level 3 vehicles, law enforcement will need to know when the vehicle is operating in this mode so as to prevent unnecessary stops for inattentiveness during the driving task by the driver.

NSC appreciates the delineation in the legislative text of what is required of safety cases by ADS manufacturers. Safety cases are critical to the operations of ADS technology as it certifies that a vehicle is safe to operate within its Operational Design Domain (ODD). NSC believes the aspects of a safety case that are listed as optional within the legislative text should be required. Regulators should know the safety management system of manufacturers, change process procedures to ensure timely software and hardware updates, and safety monitoring practices. Additionally, NSC suggests changing the legislative text to require safety cases for ADS-equipped vehicles be made available to NHTSA and not subject to a request. Finally, NSC believes the requirements listed in the legislative text should match what is current in voluntary industry standards and NHTSA requirements to ensure the highest level of safety.

Crash reporting is critical to understanding how an ADS-equipped motor vehicle failed to comply with relevant safety procedures. However, the SELF DRIVE Act could likely make access to information near impossible. By suggesting that all shared crash information is confidential

⁵ <https://www.sae.org/news/blog/sae-levels-driving-automation-clarity-refinements>

⁶ <https://www.sae.org/articles/2025/11/gm-forward-event-nyc>

business information, there could be little information to vet vehicles available to third-party safety advocates and research organizations. While there is text to establish “a system to publicly share the data collected for the repository,” that text is not compatible with Section A which deems “any information shared with a relevant State transportation regulatory agency is protected by the confidential business information protections and procedures.”⁷ Finally, NSC does not support weakening the reporting requirements from the current Standard General Order.⁸

NSC cannot support a broad preemption statute that risks safety in individual states. States have the best information related to digital infrastructure, road design, licensing regimes, insurance requirements and traffic law needed for successful ADS operations. Federal preemption makes sense for safety requirements related to the design of ADS-equipped vehicles. However, States should be able to require more than the base threshold in the legislative text for safety cases and crash reporting.

NSC supports innovation and thorough testing of ADS technologies before deployment in various ODD environments. With needed changes, this legislation could set the foundation for a national framework for autonomous vehicle deployment within the United States.

AV Safety Data Act

NSC supports the requirements for autonomous vehicle crash reporting in this legislation as it complies with the Third Amended Standing General Order (SGO). These requirements for ADS data and Advanced Driver Assistance Systems (ADAS) data should be included in the SELF DRIVE Act to aid in a national framework for autonomous vehicle testing and deployment.

Driver Technology and Pedestrian Safety Act

NSC supports research to determine the safety of new vehicle technologies entering the market. Given the announcements of Level 3 systems soon available for purchase and the vast amount of motor vehicles with touchscreens and other technological advancements, it's important to know if innovation is having an adverse effect on safety.

While NSC would like NHTSA to independently conduct this research, the staffing challenges of NHTSA are well documented.⁹ The National Academies of Sciences, Engineering, and Medicine has the relevant expertise to conduct this research, evidenced by the longstanding contributions of the Transportation Research Board (TRB) to vehicle and vulnerable road user safety.

⁷ https://d1dth6e84htgma.cloudfront.net/03_H_R_SELF_DRIVE_Act_c6810113bc.pdf

⁸ <https://www.nhtsa.gov/laws-regulations/standing-general-order-crash-reporting>

⁹ <https://www.reuters.com/business/world-at-work/us-auto-safety-agency-shedding-more-than-25-employees-2025-07-17/>

Deployment of Required Impairment Prevention Vehicle Equipment to Honor the Abbas Family Legacy to Terminate Drunk Driving Act (DRIVE to HALT Drunk Driving Act)

Alcohol-impaired driving is the leading risky driving behavior in the United States, responsible for 12,429 fatalities in 2023.¹⁰ To end this scourge, Congress passed the HALT Act through IIJA requiring NHTSA to implement a final rule for advanced impaired drunk driving prevention technology. While NHTSA has published and received comments on their Advanced Notice of Proposed Rulemaking (ANPRM), NHTSA has not moved forward with an updated proposal citing the agency will be reviewing comments until May 2026.¹¹

In the time since the ANPRM, numerous organizations have announced having the technology ready to implement this final rule.¹² NSC supports the DRIVE to HALT Drunk Driving Act because it rightfully requires a threshold of vehicles in the United States to have drunk driving prevention technology that meets either Driver Alcohol Detection System for Safety (DADSS) or European NCAP specifications. The problems of alcohol-impaired driving and distracted driving, which the ANPRM requires the technology to recognize, are too great to wait years to solve.

No Kill Switches in Cars Act

Alcohol-impaired driving is a serious problem that needs serious solutions. Repealing the requirement for NHTSA to advance a final rule on impairment recognition technology will not lead to advancements in alcohol-impaired driving prevention. NSC cannot support this bill.

Know Before You Drive Act

Naming conventions of vehicle technology systems should be accurate and instill confidence in the public that technology will accomplish what the name suggests. Too often, the American public has over relied on technology that has not achieved its goal. Terms such as “Full Self Driving” have been rightly criticized as inaccurate and have possibly even led to motor vehicle crashes.¹³

Additionally, NSC supports the right of consumers to know what technologies, including partial automation and safety technologies, are included in their vehicles. With the support of OEMs, NHTSA and the National Transportation Safety Board (NTSB), NSC launched MyCarDoesWhat in 2015.¹⁴ This consumer education campaign details which safety and convenience technologies

¹⁰ <https://www.nhtsa.gov/risky-driving/drunk-driving>

¹¹ <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=2127-AM50>

¹² <https://seeingmachines.com/wp-content/uploads/2025/10/SEE-PR-Seeing-Machines-unveils-impairment-detection-FINAL-05-09-25.pdf>

¹³ <https://www.cnn.com/2021/10/26/ntsb-head-criticizes-teslas-self-driving-features-calls-them-misleading.html>

¹⁴ <https://www.safetyandhealthmagazine.com/articles/13133-nsc-launches-mycardoeswhat-vehicle-safety-campaign#:~:text=Home%20%C2%BB%20NSC%20launches%20'MyCarDoesWhat',said%20in%20a%20press%20release.>

are available in vehicles being sold in the United States.¹⁵ This information should be known to every consumer at the time of vehicle purchase.

NSC supports the Know Before You Drive Act.

Safe Streets for Everyone Act

According to the Insurance Institute of Highway Safety (IIHS), AEB systems would reduce rear-end crashes by 40%. This technology would prevent 28,000 crashes and 12,000 injuries.¹⁶ To continue to support lifesaving technology, the Safe Streets for Everyone requires that the AEB FMVSS requires functionality in daylight and low light conditions, meets speed thresholds for pedestrian protection, and detects and responds to cyclists.

It is imperative that automatic braking systems respond to vulnerable road users including pedestrians and cyclists. In 2023, 7,318 pedestrians died and this technology may be useful in stemming these types of fatalities.¹⁷ NSC supports the Safe Streets for Everyone Act and requests OEMs to implement these enhancements to AEB systems today.

Conclusion

Eliminating serious injuries and fatalities from motor vehicle crashes should be the commitment of everyone involved in motor vehicle sales and traffic safety. Together, we must work quickly through rulemaking and consumer education to ensure that vehicles on the nation's roads are as safe as possible. Safe vehicles and positive driver behavior are critical in our efforts to reach vision zero in the United States.

NSC looks forward to continuing to partner with this Committee and all interested stakeholders to ensure safety is not ceded to innovation.

¹⁵ <https://www.mycardoeswhat.org/>

¹⁶ https://www.nhtsa.gov/sites/nhtsa.gov/files/aeb_factsheet_031616.pdf

¹⁷ <https://www.ghsa.org/sites/default/files/2024-11/2023%20Pedestrian%20Traffic%20Fatalities%20by%20State.pdf>



NATIONAL CONSUMERS LEAGUE

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January 13, 2026

The Honorable Brett Guthrie
Chair
Energy & Commerce Committee
United States House of Representatives
Washington, D.C. 20515

The Honorable Frank Pallone, Jr.
Ranking Member
Energy & Commerce Committee
United States House of Representatives
Washington, D.C. 20515

The Honorable Gus M. Bilirakis
Chair
Commerce, Manufacturing, and Trade
Subcommittee
United States House of Representatives
Washington, D.C. 20515

The Honorable Jan Schakowsky
Ranking Member
Commerce, Manufacturing, and Trade
Subcommittee
United States House of Representatives
Washington, D.C. 20515

Dear Chairs Guthrie and Bilirakis, and Ranking Members Pallone and Schakowsky,

The National Consumers League (NCL) respectfully submits this letter for the hearing titled “*Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership.*” We applaud you for seeking to reduce the unacceptable loss of life, physical injuries, and economic costs attributable to motor vehicle crashes.

Each year, approximately 40,000 lives are lost and 2.6 million people are injured in [traffic crashes](#). That’s enough fatalities to fill the average Major League Baseball stadium—enough injuries to affect nearly every resident of the state of Alabama. Traffic crashes [cost society](#) nearly a trillion dollars in medical bills, emergency services, lost productivity, insurance costs, workplace loss, legal expenses, and property damage. That’s enough money to purchase more than 26 million mid-size SUVs, ten million more than the total number of cars sold in 2024.

The death and destruction on our nation’s roads does not have to be the price we pay for commuting to work, dropping the kids off at school, or picking up groceries. In the remainder of the letter, we detail several NCL policy proposals to address the unacceptable number of deaths and injuries from traffic crashes and provide feedback on bills and discussion drafts slated for consideration at the hearing.

Legislative Proposals

Safety is Not for Sale

NCL has [found](#) that some advanced driving assistance systems (ADAS) are sold as luxury items that must be purchased for an extra fee or as part of expensive add-on packages. These additional costs may put these life-saving technologies out of reach for many Americans.

- *Policy Recommendation:* Make it unlawful for sellers of optional ADAS systems to bundle those systems with non-safety-related equipment.
- *Draft Text:* NCL applauds Ranking Member Pallone for releasing a discussion draft to address this pressing issue.

Rideshare Recalls

Nearly one in six Uber and Lyft vehicles are operating under an active recall, according to an investigation by the [Government Accountability Office](#). These rideshare vehicles pose serious threats not only to passengers and drivers but also to the general public.

- *Policy Recommendation:* Mandate that rideshare platforms notify their drivers of any outstanding safety recalls affecting the driver's vehicle. Prohibit such vehicles from operating on the platform if a recall has not been addressed within 5 days, or if a "do not drive" warning has been issued. If a stop driving warning has not been issued, prohibit such vehicles from operating on the platform if the recall has not been addressed within 60 days of notification, provided a remedy is available.
- *Draft Text:* Please see page 6.

Combating Vehicle Theft

Engine immobilizers, which are anti-theft devices that prevent vehicles from being hot-wired, are standard equipment on nearly all vehicles. But between 2011 and 2021, only 26 percent of Kias and Hyundais deployed in the United States were [equipped](#) with immobilizers. In comparison, nearly 96 percent of model year 2015 vehicles deployed by other manufacturers were equipped with immobilizers. In 2021, this gap led to a surge in thefts after viral TikTok videos showed that these vehicles could easily be stolen using just a screwdriver and a USB cable. While Canada mandates immobilizers by law, the United States does not. The National Highway Traffic Safety Administration (NHTSA) currently permits manufacturers meeting Canada's immobilizer standards to be [exempt](#) from NHTSA's vehicle theft standards.

- *Policy Recommendation:* By statute, harmonize America's immobilizer standards with Canada's. Permit NHTSA to modify such standard as necessary to mitigate the risk of theft.
- *Draft Text:* Please see page 9.

Closing the Pipeline of Safety Defects

Noncompliant and defective motor vehicle equipment is readily available for purchase on prominent online marketplaces, including eBay, Walmart.com, and Amazon. Such equipment endangers public safety and harms domestic manufacturers, who lose market share to noncompliant producers. Concerning product listings include **car and booster seats** (i.e., fabric car and booster seats that may lack the structural integrity, anchorage, and harnessing to adequately secure an infant or toddler), **motorcycle helmets** (i.e., plastic motorcycle helmets that are unlikely to meet federal requirements for impact absorption, penetration resistance, and strap retention), and **LED headlamps** (i.e., ultra-bright headlamps not permitted by NHTSA for installation). While NHTSA has the authority to compel manufacturers of motor vehicle equipment to conduct recalls and remedies, it does not have the power to compel online marketplaces to remove listings of defective equipment and address the danger. NHTSA has found it difficult to locate many international fly-by-night sellers who flood online marketplaces with defective products.

- *Policy Recommendation:* Grant NHTSA the authority to compel online marketplaces to take down postings of defective motor vehicle equipment. If defective motor vehicle equipment is sold on the platform, online marketplaces must notify purchasers and facilitate the replacement of the equipment or issuance of a refund.
- *Draft Text:* Please see page 12.

Feedback on Legislation and Discussion Draft Under Consideration

In the following section, the NCL provides preliminary feedback on some of the bills and discussion drafts slated for consideration at the legislative hearing. NCL intends to provide more fulsome comments and redlines on the various legislation and discussion drafts as the Committee continues through the legislative process.

Motor Vehicle Modernization Act

The Motor Vehicle Modernization Act seeks to enact several reforms to improve NHTSA's effectiveness and efficiency.

- **Sec. 8. Project Management Practices** – This section requires NHTSA to update procedures for rulemakings and reports to require the use of leading project schedule management practices. The Government Accountability Office (GAO) [found](#) that NHTSA has not consistently followed leading project schedule management practices when developing mandated rulemakings and reports. These practices, which include establishing milestones and sequencing activities, can help manage project timeframes and reduce delays. GAO recommended that NHTSA update procedures for rulemakings and reports to require the use of leading project schedule management practices. NCL believes that enshrining these GAO recommendations into law is an important tool for oversight and accountability, thereby helping to ensure a more responsive and effective NHTSA.

- Sec. 9. General Exemptions – This section expands NHTSA’s authority to permit noncompliant vehicles on the nation’s roads. Current law permits manufacturers of motor vehicles to deploy non-compliant vehicles for testing or evaluation, provided that those vehicles are not sold. A provision in the Motor Vehicle Modernization Act seeks to expand that authority to apply to suppliers. Further, the SELF DRIVE Act discussion draft seeks to create a federal framework for the introduction of noncompliant autonomous vehicles (AVs). It is unclear why manufacturers would need to deploy noncompliant vehicles at the levels contemplated in Sec. 9 and without meaningful limitations on commercial use. Such a high number of noncompliant vehicles on the nation’s roads presents safety risks.
- Sec. 10. Testing and Evaluation of Motor Vehicle Equipment – This section permits suppliers manufacturing motor vehicle equipment prior to 2016 to deploy noncompliant motor vehicle equipment for the purposes of testing or demonstration, provided such motor vehicle or motor vehicle equipment is not sold at the conclusion of testing. Suppliers should have the authority to test innovative safety devices with reasonable commercial limitations. NCL supports this provision.

Safety is Not for Sale

NCL strongly supports the Safety is Not for Sale discussion draft. Such legislation is vital to ensuring consumers have more accessible and affordable access to lifesaving automobile safety features.

SELF DRIVE Act

The SELF DRIVE Act seeks to “ensure continued United States leadership in the global automotive and autonomous driving sector, improve road safety, mobility, and accessibility, and create American jobs” by supporting the deployment of AVs, which are vehicles capable of performing the entire driving task without human intervention. We applaud Representative Latta (R-OH) and Dingell (D-MI) for embarking on this legislative effort to support the safe and responsible deployment of AVs. NCL believes that it is important for the United States to establish such a framework for AV deployment.

In its current form, the legislation presents concerns related to safety, accessibility, justice, and economic opportunity. We are optimistic that these concerns can be resolved and stand ready to work closely with the authors of the discussion draft and committee staff to refine the text.

DRIVER Act

The DRIVER Act provides owners the right to access, control, and delete data collected by their vehicle. Any state or local law related to this provision is preempted. Further, the legislation prohibits manufacturers from selling vehicle data unless they grant consumers the right to opt out of such sales

Consumers should have the right to access, control, and delete data collected by their vehicle. We look forward to working with the bill sponsors to ensure that the legislation, including the preemption provision, strengthens consumer protections.

DRIVE to HALT Drunk Driving Act

The DRIVE to HALT Drunk Driving Act requires larger manufacturers to deploy passive drunk and impaired driving technologies that meet minimum performance requirements. Based on NHTSA data, more than 12,000 deaths and nearly 400,000 serious injuries occurred in 2023 due to impaired driving. This proactive measure will undoubtedly save lives and begin to address the tragic and preventable crisis of drunk driving.

No Kill Switches in Cars Act

The No Kill Switches in Cars Act strikes a mandate directing NHTSA to establish performance standards requiring vehicles to be equipped with drunk and impaired driving technology. Drunk drivers are the true kill switch, not revolutionary safety technologies designed to stop them. This misguided bill would result in more unnecessary deaths and injuries on our nation's roads.

PART Act

The PART Act requires NHTSA to mandate that catalytic converters be affixed with antitheft markings, establishes a grant program to facilitate the marking of catalytic converters currently deployed in interstate commerce, and increases criminal penalties for catalytic converter theft. We are encouraged that the Committee is taking action to prevent catalytic converter theft, which has become a major consumer and environmental protection issue.

Know Before You Drive Act

The Know Before You Drive Act prohibits manufacturers from making misleading representations about the capabilities and limitations of AVs and partially automated vehicles. This discussion draft establishes vital protections preventing consumer confusion and misuse of partial driving automation.

We thank you for considering our perspective on improving roadway safety, automobile innovation, and American competitiveness, and stand ready to work with you on these various legislative proposals.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally Greenberg", with a stylized, cursive script.

Sally Greenberg
President and CEO
The National Consumers League

Section 1. Short Title.

This Act may be cited as “[TBD]”.

Section 2. Transportation Network Company Recall Notification.

(a) IN GENERAL.—Chapter 301 of title 49, United States Code, is amended by inserting after section 30129 the following:

“§ 30130. Transportation Network Company Recall Obligations.

"(a) Transportation Network Company Recall Notifications and Remedies

“(1) IN GENERAL.— A transportation network company shall provide a notification to a TNC driver of an open recall affecting their TNC vehicle as soon as practicable, but not later than 5 days, after publication of the motor vehicle safety recall information in a recall database.

“(2) REMEDIES.— A transportation network company may not connect a passenger to a TNC vehicle with an open recall on the later of the date that is 60 days after—

“(A) a notification described in paragraph (1) is provided to a TNC driver;
or

“(B) the earliest remedy date for such vehicle published in a recall database.

“(3) DO NOT DRIVE WARNINGS.— A transportation network company may not connect a passenger to a TNC vehicle with an open recall not later than 5 days after—

“(A) a notification described in paragraph (1) is provided to a TNC driver;
and

“(B) a do not drive warning for such vehicle is published in a recall database.

“(4) CONTENT OF NOTIFICATIONS.— Notification of a recall by a transportation network company required under paragraph (2) or paragraph (3) shall contain motor vehicle safety recall information available to the public in a recall database.

“(5) METHOD OF NOTIFICATIONS.— A transportation network company shall notify a TNC driver of an open recall affecting their TNC vehicle by electronic means, including electronic mail and alerts transmitted through the digital network.

“(6) EFFECTIVE DATE.— This subsection shall take effect 180 days after the date of the enactment of this [TBD] Act.

“(b) REMEDY REPORT.—

(1) IN GENERAL.— Not later than 1 year after the date of enactment of this Act and every year thereafter, a transportation network company shall submit a report to the Secretary detailing—

(A) the practices and process adopted by the transportation network company to comply with subsection (a);

(B) the annual recall completion rate of all TNC vehicles by manufacturer, model year, component (such as brakes, fuel systems, and air bags), and vehicle type (such as passenger car, sports utility vehicle, and pick-up truck) for the year before the report is submitted.

“(2) PUBLIC AVAILABILITY.— The Secretary shall make any report submitted by a transportation network company under paragraph (5) publicly available not later than 30 days after receipt.

“(c) DEFINITIONS.— In this subsection—

“(1) COVERED VEHICLE.— The term “covered vehicle” means a motor vehicle with a gross vehicle weight rating of 10,000 pounds or less except that, for vehicles powered primarily by means of electric battery power, the weight of the electric battery or batteries shall not count towards the gross vehicle weight rating.

“(2) OPEN RECALL.— The term “open recall” means a defect or noncompliance that has not been remedied.

“(3) PASSENGER.— The term “passenger” means an individual who is matched with a TNC driver by using a TNC platform.

“(4) RECALL DATABASE.— The term “recall database” means a database of motor vehicle safety recall information that—

(A) is made available to the public on the Internet;

(B) is searchable by vehicle identification number;

(C) is in a format that preserves consumer privacy; and

(D) includes information about open recalls.

“(5) SECRETARY.—The term “Secretary” means the Secretary of Transportation.

“(6) TNC DRIVER.— The term “TNC driver” means an individual who contracts with a transportation network company and provides transportation services to passengers.

“(7) TNC PLATFORM.— The term “TNC platform” means an online-enabled application or digital network made available by a transportation network company to connect riders to TNC drivers for the purpose of providing pre-arranged transportation services.

“(8) TNC VEHICLE.— The term “TNC vehicle” means a covered vehicle owned, leased, or otherwise authorized for use by a TNC driver that the TNC driver uses to provide pre-arranged transportation services.

“(9) TRANSPORTATION NETWORK COMPANY. — The term “transportation network company”—

“(A) means a corporation, partnership, sole proprietorship, or other entity, that makes available an online-enabled application or digital network to connect passengers to TNC drivers for the driver to transport the passenger using a motor vehicle owned, leased, or otherwise authorized for use by the driver to a point chosen by the passenger; and

“(B) does not include a shared-expense carpool or vanpool arrangement that is not intended to generate profit for the driver.”

(b) ENFORCEMENT AUTHORITY.—Section 30165(a)(1) of title 49, United States Code, is amended by inserting “30130,” after “30127,”.

(c) CLERICAL AMENDMENT.—The analysis for chapter 301 of title 49, United States Code, is amended by inserting after the item relating to section 30129 the following:

“30130. Transportation Network Company Recall Obligations.”.

Section 1. Short Title.

This Act may be cited as “[TBD]”.

Section 2. Immobilizers

(a) IN GENERAL.—Chapter 331 of title 49, United States Code, is amended by inserting after section 33118 the following:

“§ 33119. Immobilizers

“(a) In general.— Not later than 2 years after the date of enactment of this Act, each new covered passenger motor vehicle shall be equipped with an immobilizer as standard equipment that meets—

“(1) the minimum performance standards of subsections 8 through 21 of C.R.C, c. 1038.114, *Theft Protection and Rollaway Prevention* (as in effect on the date of enactment of this Act);

“(2) the National Standard of Canada ANSI/CAN/UL/ULC 338, *Standard for Vehicle Theft Deterrent Equipment and Systems: Electronic Immobilization System and Aftermarket Installation Requirements* (as in effect on the date of enactment of this Act);

“(3) the United Nations Economic Commission for Europe (UN/ECE) Regulation No. 97 (ECE R97), *Uniform Provisions Concerning Approval of Vehicle Alarm System (VAS) and Motor Vehicles with Regard to Their Alarm System (AS)* (as in effect on the date of enactment of this Act); or

“(4) the UN/ECE Regulation No. 116 (ECE R116), *Uniform Technical Prescriptions Concerning the Protection of Motor Vehicles Against Unauthorized Use* (as in effect on the date of enactment of this Act).

“(b) Amendments.— Notwithstanding any other provision of this chapter, the Secretary may amend the minimum performance standards for immobilizers established in subsection (a) if the amended standard —

“(1) mitigates unreasonable risk of the theft of covered passenger motor vehicles;

“(2) is practicable; and

“(3) provides relevant objective criteria.”

(b) Definitions.—

(1) IN GENERAL.—Section 33101 of title 49, United States Code, is amended—

(A) in the matter preceding paragraph (1), by striking “chapter—” and inserting “chapter:”;

(B) in each of paragraphs (1) through (13)—

(i) by inserting “The term” after the paragraph designation; and

(ii) by inserting a paragraph heading, the text of which is comprised of the term defined in that paragraph;

(C) by redesignating paragraphs (3), (4), (5), (6), (7), (8), (9), (10), and (11) as paragraphs (4), (5), (7), (8), (9), (10), (11), (12), and (13);

(D) by inserting before paragraph (4) the following:

“(3) Covered Passenger Motor Vehicle.— The term “covered passenger motor vehicle” means a motor vehicle that has a gross vehicle weight rating of not more than 10,000 pounds except that, for vehicles powered primarily by means of electric battery power, the weight of the electric battery or batteries shall not count towards the gross vehicle weight rating;

(E) by inserting before paragraph (7) (as so redesignated) the following:

“(6) Immobilizer.— The term “immobilizer” means motor vehicle equipment that, when activated, is designed to prevent a covered passenger motor vehicle from being powered by its own propulsion system.”

(c) Prohibited acts.—

(1) IN GENERAL.— Section 33114 of title 49, United States Code, is amended—

(A) in paragraph (1) of subsection (a), striking “33102 or 33103” and inserting “33102, 33103, or 33119”; and

(B) in subsection (b) inserting “ prescribed under section 33102 or 33103” after “conformity with the standard”.

(d) Civil penalties and enforcement.—

(1) IN GENERAL.— Section 33115 of title 49, United States Code, is amended in in subsection (a) by—

(A) redesignating paragraphs (2), (3), (4), and (5) as paragraphs (3), (4), (5), and (6);

(B) by inserting before paragraph (2) the following:

“(2) Immobilizer penalties.— A person that violates section 33119 of this title, or a regulation prescribed thereunder, is liable to the United States Government for a civil penalty of not more than \$21,000 for each violation. A separate violation occurs for each covered passenger motor vehicle or immobilizer and for each failure to meet a the minimum performance standard established in that section. The maximum penalty under this paragraph for a related series of violations is \$105,000,000.”

(e) Preemption of State and local law.— Section 33118 of title 49, United States Code, is amended by striking “33102 or 33103” and inserting “33102, 33103, or 33119”.

SECTION 1. SHORT TITLE; TABLE OF CONTENTS.

(a) SHORT TITLE.—This Act may be cited as the “[TBD]”.

(b) TABLE OF CONTENTS.—

Sec. 1. Short title; table of contents.

Sec. 2. Notifications and remedies for covered online marketplaces.

Sec. 3. Effective date.

SECTION 2. NOTIFICATIONS AND REMEDIES FOR COVERED ONLINE MARKETPLACES.

(a) DEFINITIONS.—Section 30102(a) of title 49, United States Code, is amended—

(1) by redesignating paragraphs (1), (2), (3), (4), (5), (6), (7), (8), (9), (10), (11), (12) and (13) as paragraphs (2), (3), (4), (5), (6), (7), (8), (9), (10), (11), (12), (13), and (14), respectively;

(2) by inserting before paragraph (2) (as so redesignated) the following—

“(1) COVERED ONLINE MARKETPLACE.-

“(A) IN GENERAL.— The term "covered online marketplace" means any person that operates a consumer-directed electronically based or accessed platform that-

“(I) includes features that allow for, facilitate, or enable third-party sellers to sell, offer for sale, or introduce in interstate commerce motor vehicle equipment;

“(II) is used by one or more third-party sellers for such purposes; and

“(III) has a contractual or similar relationship with consumers governing their use of the platform to purchase motor vehicle equipment.”

“(B) EXCLUSION.— The term “covered online marketplace” does not include a dealer that—

“(I) is licensed by a State to engage in the sale of motor vehicles;

“(II) takes title to, holds an ownership interest in, or takes physical custody of a motor vehicle; and

“(III) is predominantly engaged in the sale and servicing of motor vehicles or the leasing and servicing of motor vehicles.

“(C) THIRD-PARTY SELLER.— For the purposes of subparagraph (A), the term "third-party seller" means any person that sells, offers for sale, or introduces in interstate commerce motor vehicle equipment through a consumer-directed electronically based or accessed platform that such person does not own or operate.”

(b) NOTIFICATIONS OF DEFECTS AND NONCOMPLIANCE.—Section 30118 of title 49, United States Code, is amended in subsection (a) by inserting “and each covered online marketplace allowing for, facilitating, or enabling the sale, offering for sale, or introduction in interstate commerce of the motor vehicle equipment” after “manufacturer of a motor vehicle or replacement equipment.”

(c) IN GENERAL.—Chapter 301 of title 49, United States Code, is amended by inserting after section 30120A the following:

“§ 30120B. Notification and remedy obligations of covered online marketplaces

“(a) IN GENERAL.—No covered online marketplace may allow for, facilitate, or enable the sale, offering for sale, or introduction in interstate commerce of motor vehicle equipment that is subject to a decision under section 30118(b) or a notice required under section 30118(c) in a condition that it may be reasonably used for its original purpose unless—

“(1) the defect or noncompliance is remedied as required by this title before the sale, offering for sale, or introduction in interstate commerce of the equipment; or

“(2) notification of the defect or noncompliance is required under section 30118(b) but enforcement of the order is set aside in a civil action to which section 30121(e) applies.

“(b) RECALL ORDERS.— The Secretary of Transportation shall order a covered online marketplace to give notification of and remedy defective or noncompliant motor vehicle equipment that was sold, offered for sale, or introduced in interstate commerce through the covered online marketplace if the Secretary—

“(1) makes a final decision under section 30118(b) that the motor vehicle equipment—

“(A) contains a defect related to motor vehicle safety; or

“(B) does not comply with an applicable motor vehicle safety standard prescribed under this chapter; or

“(2) receives a notification under subsection 30118(c) from the manufacturer of the motor vehicle equipment.

“(c) EXEMPTIONS.— A covered online marketplace shall not be required to comply with the requirement in subsection (a) or an order issued under subsection (b) with respect to a defective or noncompliant motor vehicle equipment if the Secretary decides under subsection 30118(d) that the defect or noncompliance is inconsequential to motor vehicle safety.

“(d) REMEDIES.—

“(1) IN GENERAL.— A covered online marketplace issued an order under subsection (b) shall remedy the defect or noncompliance by providing or facilitating, including through third-party sellers—

“(A) any of the following remedies the covered online marketplace chooses—

“(i) the replacement of the motor vehicle equipment without charge to the first purchaser; or

“(ii) a refund of the total purchase price, including the cost of shipping and handling, to the first purchaser; and

“(B) reimbursement for the reasonable and necessary expenses of repairing or replacing the equipment to a first purchaser who incurred such expenses within a reasonable time in advance of the notification under subsection (e).

“(2) TIMELINE.— The covered online marketplace shall remedy the defect or noncompliance as soon as practicable, but not later than 15 days after giving a notification required under subsection (e) of such defect or noncompliance.

“(3) NONAPPLICATION.—

“(A) PURCHASE PERIOD.— The requirement that a remedy be provided without charge does not apply if the motor vehicle equipment was bought by the first purchaser more than 15 calendar years before the Secretary issues the covered online marketplace an order under subsection (b).

“(B) APPEALS.— This subsection does not apply during any period in which enforcement of an order under subsection (b) is restrained or the order is set aside in a civil action to which section 30121(e) of this title applies.

“(e) NOTIFICATION.—

“(1) NOTIFICATION.—

“(A) IN GENERAL.— A covered online marketplace issued an order under subsection (b) shall give notification of the defect or noncompliance—

“(i) to the first purchaser, if such purchaser’s contact information is reasonably ascertainable, by—

“(I) electronic means, including electronic mail and alerts transmitted through a covered online marketplace; or

“(II) first-class or certified mail; or

“(ii) by public notice in the way required by the Secretary if the Secretary determines that such public notice is required for motor vehicle safety; or

“(iii) in a manner otherwise prescribed by the Secretary by regulation.

“(B) DETERMINATION.— In making a determination under clause (A)(ii), the Secretary shall consider—

“(i) the magnitude of the risk to motor vehicle safety caused by the defect or noncompliance; and

“(ii) the cost of public notice compared to the additional number of first purchasers the notice may reach.

“(2) CONTENT.—The notification shall contain—

“(A) a clear description of the defect or noncompliance;

“(B) the measures to be taken to obtain a remedy of the defect or noncompliance;

“(C) a statement that the covered online marketplace giving notice will provide or facilitate the remedy of the defect or noncompliance without charge to the first purchaser, as required by subsection (d);

“(D) the earliest date on which the defect or noncompliance will be remedied without charge to the first purchaser under subsection (d);

“(E) the procedure the recipient of a notice is to follow to inform the Secretary when a covered online marketplace does not remedy the defect or noncompliance under subsection (d);

“(F) a statement that it is unlawful to sell or lease the defective or noncompliant motor vehicle equipment under subsection 30120(j);

“(G) instructions on disposing of the equipment, rendering the equipment to a condition that it cannot be reasonably used for its original purpose, or otherwise preventing the equipment from being sold, offered for sale, or introduced into interstate commerce; and

“(H) any other information the Secretary prescribes by regulation.”

“(3) TIMING FOR NOTIFICATION.— Notification required under this subsection shall be given within 15 days, or within a reasonable time prescribed by the Secretary, after the covered online marketplace is issued the order described in subsection (b).

“(4) ADDITIONAL NOTIFICATIONS.— If the Secretary decides that a notification sent by a covered online marketplace under this section has not resulted in an adequate number of motor vehicle equipment being remedied, the Secretary may order the covered online marketplace to send additional notifications.

“(f) RECALL REPORT.—

“(1) IN GENERAL.— Not later than 5 working days after receiving an order under subsection (b), the covered online marketplace shall submit to the Secretary a recall report including—

“(A) the third-party seller of the motor vehicle equipment subject to the order;

“(B) a description of the items of motor vehicle equipment subject to the order;

“(C) the total number of defective or noncompliant motor vehicle equipment subject to the order that have been sold, offered for sale, or introduced into interstate commerce through the covered online marketplace.

“(D) a description of the program of the covered online marketplace for remedying the defective or noncompliant motor vehicle equipment subject to the order;

“(E) the estimated dates upon which the covered online marketplace will give the notifications under subsection (e) and perform or facilitate a remedy under subsection (d);

“(F) a description of how, to the extent practicable, the covered online marketplace will prevent the sale, offer for sale, and introduction in interstate commerce of the defective or noncompliant motor vehicle equipment subject to the order; and

“(G) any other information the Secretary prescribes by regulation.

“(2) ADDENDUM.— If any of the information described in subparagraphs (1)(C) through (G) is not known to the covered online marketplace 5 working days after the issuance of an order under subsection (b), the covered online marketplace shall submit to the Secretary such information not later than 5 working days after the information becomes known to the covered online marketplace.

“(3) MATERIAL CHANGES.—The covered online marketplace shall submit to the Secretary amendments to the report not later than 5 days after the covered online marketplace knows that the information contained in the report is inaccurate or has materially changed.

“(g) RECALL STATUS REPORT.—

“(1) IN GENERAL.— With respect to an order issued under subsection (b), each covered online marketplace that is giving notification under subsection (e) and performing or facilitating a remedy under subsection (d) shall submit to the Secretary a recall status report including—

“(A) the date notification began and the date completed, if applicable;

“(B) the number of motor vehicle equipment involved in the notification campaign;

“(C) the cumulative number of motor vehicle equipment that has been remedied;

“(D) the cumulative number of offerings for sale of the motor vehicle equipment removed from the covered online marketplace; and

“(E) any other information the Secretary prescribes by regulation.”

“(2) NUMBER OF SUBMISSIONS.—Each covered online marketplace is required to submit a recall status report—

“(A) by the applicable date described in section 573.7(d) of title 49, Code of Federal Regulations (or a successor regulation) for each of 8 consecutive quarters, beginning with the quarter in which the campaign was initiated; and

“(B) for each of the 3 years beginning after the date of completion of the last quarter for which a report was submitted under subparagraph (A).

“(h) PUBLIC AVAILABILITY.—The Secretary shall publish each report or amendment to a report described in subsections (f) and (g) in the Federal Register not later than 30 days after receipt of the report or amendment.

“(i) HEARINGS ABOUT MEETING NOTIFICATION AND REMEDY REQUIREMENTS.—

“(1) IN GENERAL.— On the motion of the Secretary or on petition of any interested person, the Secretary may conduct a hearing to decide whether the covered online marketplace has reasonably met the notification and remedy requirements required under this section.

“(2) PRESENTATIONS.— Any interested person may make written and oral presentations of information, views, and arguments on whether the covered online marketplace has not reasonably met the notification or remedy requirements.

“(3) RESOLUTION.—If the Secretary decides that the covered online marketplace has not reasonably met the notification or remedy requirements, the Secretary shall order the covered online marketplace to take specified action to meet those requirements and may take any other action authorized under this chapter.

(d) PROVISIONAL NOTIFICATION AND CIVIL ACTIONS TO ENFORCE.—Section 30121 of title 49, United States Code, is amended—

(1) in paragraph (a)(1)—

(A) by inserting “or covered online marketplace” after “manufacturer”;

(B) by inserting “or under section 30120B(b) of this title” after “section 30118(b) of this title”;

(C) in subsection (A) by inserting “or covered online marketplace” after “manufacturer”;

(D) in subsection (E)—

(i) by inserting “or covered online marketplace” after “manufacturer”; and

(ii) by inserting “or under section 30120B(d) of this title” after “section 30120 of this title”;

(2) in paragraph (a)(2)—

(A) by inserting “or covered online marketplace” after “manufacturer”; and

(B) by inserting “or under section 30120B(e) of this title” after “section 30118(b) of this title”;

(3) in paragraph (b)(1)—

(A) by inserting “or covered online marketplace” after “manufacturer” each place it appears; and

(B) by inserting “or under section 30120B(e) of this title” after “section 30119(c) and (d) of this title”.

(4) in paragraph (b)(2)—

(A) by inserting “or covered online marketplace” after “manufacturer” each place it appears; and

(B) by inserting “or under section 30120B(b) of this title” after “section 30118(b) of this title”;

(5) in subsection (c), by inserting “with respect to a manufacturer” after “subsection (a) of this section”;

(6) by redesignating subsection (d) as subsection (e);

(7) by inserting before subsection (e) (as so redesignated) the following—

“(d) ORDERS TO COVERED ONLINE MARKETPLACES.—If the Secretary prevails in a civil action referred to in subsection (a) of this section with respect to a covered online marketplace, the Secretary shall order the covered online marketplace—

“(1) to notify each first purchaser described in section 30120B(e) of this title of the outcome of the action and other information the Secretary requires, and notification under this subsection may be combined with notification required under section 30120B(e) of this title;

“(2) to specify the earliest date on which the defect or noncompliance will be remedied without charge to the first purchaser under section 30120B(d); and

“(3) if notification was required under subsection (a) of this section, to reimburse a first purchaser for reasonable and necessary expenses (in an amount that is not more than the amount specified in the order of the Secretary under subsection (a)) incurred for repairing or replacing the defective or noncompliance during the period beginning on the date that notification was required to be issued and ending on the date the first purchaser receives the notification under this subsection.”;

(8) in subsection (e) (as so redesignated)—

(A) by inserting “or under section 30120B(b) of this title” after “section 30118(b) of this title”;

(B) by inserting “or covered online marketplace” after “manufacturer”; and

(C) by striking “under section 30118(b) shall be consolidated” and inserting “under section 30118(b) or under section 30120B(b) shall be consolidated”.

(e) ACTIONS BY THE ATTORNEY GENERAL.—Section 30163 of title 49, United States Code, is amended—

(1) in subsection (a);

(1) by striking “and” in paragraph (1);

(2) by striking “.” and inserting “; and” in subparagraph (2)(B) ;

(3) by adding at the end the following—

“(3) the allowance, facilitation, or enabling of the sale, offering for sale, or introduction in interstate commerce of motor vehicle equipment through a covered online marketplace if the equipment is subject to a decision under section 30118(b) or a notice required under section 30118(c).”

SECTION 3. EFFECTIVE DATE.

This Act shall take effect on the date that is 1 year after the date of enactment of this Act.



NEW JERSEY STATE **AFL-CIO**

10/30/25

Dear

Representative:

Please Oppose HR-1566: Right to Repair Act

On behalf of our affiliated union, the International Association of Machinists and Aerospace Workers (IAMAW), we respectfully ask you to vote “no” on this bill if it comes before you for consideration.

In September 2025, the New Jersey State Legislature unanimously passed S-3309, and it was subsequently signed into law by Governor Murphy. This law ensures proper wages for auto mechanics. HR-1566, commonly known as the REPAIR Act, would significantly hinder the effectiveness of this new law.

Before the enactment of this state law, auto manufacturers paid mechanics a significantly lower rate – approximately 40% less – for warranty work as compared to what customers paid for the same exact repair for an out-of-warranty vehicle at auto dealerships.

The REPAIR Act (sponsored by Rep. Neil Dunn: R-FL) would undermine this state law because it would allow independent repair shops to perform work and repairs on customers’ vehicles and be compensated by the manufacturer at a lesser rate.

The existing pay structure should remain intact and not be negatively impacted by the REPAIR Act.

We appreciate your consideration of our position on this important legislation and respectfully ask you to vote “no” if it comes before the House of Representatives for a vote.

In Unity,



Charles Wowkanech
President



Laurel Brennan
Secretary-Treasurer

“The Voice for Working Families in New Jersey”

This email was sent to lward@njafcio.org

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NJ State AFL-CIO · 106 West State St. · Trenton, NJ 08608-1102 · USA

January 12, 2026

The Honorable Brett Guthrie
Chair
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Frank Pallone, Jr.
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

Dear Chair Guthrie and Ranking Member Pallone,

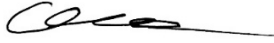
The National League of Cities remains committed to providing substantial feedback to the Energy and Commerce Committee to improve the Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution (SELF DRIVE) Act of 2026. With thousands of autonomous cars driving on city streets and passenger rides increasing every day, America's cities have gained extensive practical understanding of how autonomous vehicles can integrate into roads today and where regulatory blind spots are causing clear risks to public safety without appropriate accountability. We appreciated the opportunity to provide the Committee input directly from first responders and local authorities who have significant experience with AV operations, yet further work is needed.

As state and local government associations have shared with this Committee during previous Congressional sessions where SELF DRIVE was discussed and set aside, overly broad preemption will not advance autonomous vehicles safely. While the regulation of motor vehicle safety standards should remain a federal obligation, state and local governments are the primary authorities concerning operational safety, including regulating the operation of motor vehicles after such vehicles have been constructed, the operators of those motor vehicles, as well as the rules of the road governing how motor vehicles are required to be safely operated on public roadways.

As incubators of innovation and the level of government closest to the people, local governments must retain the authority to initiate the necessary choices that best serve constituents and protect local public safety, privacy, and efficiency of the road network as new technologies like autonomous vehicles develop over time. The SELF DRIVE Act as currently written will not ensure that autonomous vehicles consistently and reliably follow the rules of the road and are held accountable for safe operations in our communities.

We support a competitive American economy that embraces technology improvements including autonomous vehicles, but we must integrate them in a manner that ensures safe operations which is the role of states and local governments.

Sincerely,

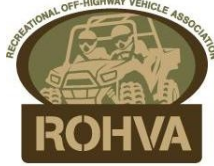
A handwritten signature in black ink, appearing to read 'Clarence E. Anthony', with a long horizontal stroke extending to the right.

Clarence E. Anthony
CEO and Executive Director

cc: Members of the House Energy and Commerce Committee



**MOTORCYCLE
INDUSTRY
COUNCIL®**



January 11, 2026

The Honorable Jan Schakowsky
Ranking Member, House Energy &
Commerce Subcommittee on Commerce,
Manufacturing, and Trade
2323 Rayburn House Office Building
Washington, DC 20515

RE: Exclude Motorcycles from H.R. 1566, the Right to Equitable and Professional Auto Industry Repair (REPAIR) Act

Dear Ranking Member Schakowsky:

The Motorcycle Industry Council (MIC)¹, the Specialty Vehicle Institute of America (SVIA)², and the Recreational Off-Highway Vehicle Association (ROHVA)³ represent several hundred companies in the powersports industry. H.R. 1566 will be considered on January 13 at the House Energy and Commerce Subcommittee on Commerce, Manufacturing, and Trade. We urge that H.R. 1566, the REPAIR Act, be **amended to specifically exclude motorcycles and off-highway vehicles from the scope of the provisions**. In the absence of an amendment, our organizations oppose the bill.

Our member companies have several problems and concerns with including motorcycles and off-highway vehicles in motor vehicle right-to-repair legislation:

1. Motorcycles are excluded from the Massachusetts right to repair law, which appears to be the law on which this legislation is based.
2. Non-factory trained technicians working on motorcycles and off-highway vehicles is a serious safety concern, as is the litigation risk of untrained individuals performing work on such vehicles.
3. Franchised dealers, which are largely small businesses, will be economically harmed by H.R. 1566.
4. H.R. 1566 introduces dangerously broad language that threatens the foundation of American manufacturing.
5. National Highway Traffic Safety Administration (NHTSA) believes the Massachusetts right to repair law “poses significant safety concerns.”

Motorcycles are excluded from the Massachusetts right to repair law

It appears to be the intent of motor vehicle right to repair legislation to model such legislation after the Massachusetts right to repair law. Motorcycles were ultimately excluded from the Massachusetts right

¹ The Motorcycle Industry Council (MIC) is a not-for-profit, national trade association representing several hundred manufacturers, distributors, dealers and retailers of motorcycles, scooters, motorcycle parts, accessories and related goods, and allied trades.

² The Specialty Vehicle Institute of America (SVIA) is the national not-for-profit trade association representing manufacturers, dealers, and distributors of all-terrain vehicles (ATVs) in the United States. SVIA’s primary goal is to promote safe and responsible use of ATVs.

³ The Recreational Off-Highway Vehicle Association (ROHVA) is a national, not-for-profit trade association formed to promote the safe and responsible use of recreational off-highway vehicles (ROVs – sometimes referred to as side-by-sides or UTVs) manufactured or distributed in North America. ROHVA is also accredited by the American National Standards Institute (ANSI) to serve as the Standards Developing Organization for ROVs. More information on the standard can be found at <https://rohva.org/ansi-standard/>.

to repair law (and automobile MOU) because they are different than automobiles in terms of the diagnostic connector standard mandated by motor vehicle right to repair laws. Motorcycles, ATVs and ROVs often cannot comply with provisions typically included in motor vehicle right to repair legislation due to factors such as different (or non-existing) data ports. Automobiles, on the other hand, have uniform ports on their vehicles. Other state legislators recognize this difference and specifically excluded motorcycles from the definition of motor vehicle for purposes of the right to repair law ([Chapter 93K](#)). Off-highway vehicles are also excluded from the Massachusetts law because it applies only to on-highway motor vehicles.

New York and Minnesota also recently passed right to repair legislation which specifically excluded motorcycles, ATVs and off-highway vehicles. We urge Congress to follow the lead of those states by excluding motorcycles and off-highway vehicles from H.R. 1566 as follows:

(8) Motor Vehicle. – The term “motor vehicle” has the meaning given such term in section 30102(a) of title 49, United States Code, but excludes motorcycle, motorized bicycle, all-terrain vehicle, and off-highway recreational vehicle, and of the term “motor vehicle trailer” in section 390 of title 49, Code of Federal Regulations.

Safety and Litigation Concerns

Serious safety concerns exist relating to the inherent danger of allowing non-factory trained technicians, untrained mechanics, and owners to perform certain work on motorcycles and off-highway vehicles if they are captured under any right to repair legislation. This is particularly of concern during the warranty period where dealers and manufacturers need to know exactly what repairs were done or attempted in order to ensure compliance with warranties. Today’s vehicles are highly computerized with systems that control emissions, stability control, antilock brakes, and a host of other activities. Many of these systems are government-mandated in order to ensure proper protection of the vehicle users and to protect against Clean Air Act violations. Untrained individuals or illegal tampering with coding could cause vehicle failure, endanger drivers/riders, and increase emissions in violation of government standards.

Litigation risk is another concern associated with allowing non-factory trained technicians to perform certain work on motorcycles and off-highway vehicles. If environmental or safety override attempts result in clean air violations, destruction of property, injury, or death, and manufacturers are likely to be swept up in lawsuits, regardless of who may be liable for such damage and injuries due to unqualified individuals tampering or attempting repairs.

Small Business Franchised Dealers

H.R. 1566 would harm economically small business franchised dealers. Dealers have invested heavily in training, special tooling, and equipment to service vehicles. Franchised dealers sign a dealer agreement giving them access to service information, technical expertise, and special tools required to diagnose and repair original equipment products. This is a substantial monetary investment. If tools and technical information are provided to customers and unauthorized independent repair shops, the franchised dealer’s investment is compromised.

In 2025, the value of the powersports retail marketplace in the United States was \$51 billion, with an estimated 1.2 million new powersports retail sales and 10,690 powersports retailers. With thousands of powersports retailers across the country, it is certainly difficult to make the case that users of our products do not have access to service and parts when necessary.

Threat to the Foundation of American Manufacturing

Under the guise of right to repair, H.R. 1566 introduces dangerously broad language that threatens the foundation of American manufacturing. We are deeply concerned by provisions prohibiting any design

choice that 'tends to make it more difficult' for aftermarket providers to compete—a standard so vague it invites endless, predatory litigation. This mandate constitutes an unprecedented infringement on property rights, deviating from free-market principles by forcing companies to 'open-source' their intellectual property. By requiring OEMs to share sensitive ECU coding and diagnostic data, H.R. 1566 forces manufacturers to design vehicles to a 'least common denominator' rather than innovating and introducing technologies that set their products apart from the competition. Ultimately, H.R. 1566 places American innovation at risk, stripping away the protections our companies need to maintain a competitive edge against global adversaries like China."

NHTSA Right to Repair Concerns

Although Massachusetts has set the standard on motor vehicle right to repair, in a recent letter to the Counsel for Vehicle Manufacturers⁴, the National Highway Traffic Safety Administration believes the Massachusetts right to repair law "poses significant safety concerns." NHTSA also states in the letter, dated June 13, 2023, that "open access to vehicle manufacturers' telematics offerings with the ability to remotely send commands allows for manipulation of systems on a vehicle, including safety-critical functions such as steering, acceleration, or braking, as well as equipment required by Federal Motor Vehicle Safety Standards (FMVSS)...A malicious actor here or abroad could utilize such open access to remotely command vehicles to operate dangerously, including attacking multiple vehicles concurrently." These points should be considered before proceeding with any right to repair legislation. Imagine if you will a bad actor shutting off a motorcycle that is traveling at highway speed which could cause loss of control of the vehicle resulting in injuries or death. Unlike automobiles with four wheels and plenty of protection around them, a motorcycle the is suddenly shut off – losing stability control, antilock brakes, etc. – would be extremely dangerous.

We support preserving consumer access to high-quality and affordable vehicle repair but not at the expense of placing American innovation at risk, stripping away the protections of U.S. companies, having non-factory-trained technicians, untrained mechanics, and owners perform certain work on motorcycles and off-highway vehicles, which could ultimately lead to product failure, injury, or death. Therefore, we urge you to specifically exclude motorcycles and off-highway vehicles from the provisions of H.R. 1566.

Thank you for considering our comments. Should you have any questions, please contact me at 571-684-6144.

Sincerely,



Scott P. Schloegel
Senior Vice President, Government Relations

⁴ NHTSA letter to the Counsel for Vehicle Manufacturers dated 6-13-23:
<https://www.documentcloud.org/documents/23846414-nhtsa-letter>

Testing & Evaluation Parity for Vehicle Suppliers

A Safety-Focused, Innovation-Enabling Update for the Highway Bill Reauthorization

Vehicle suppliers—auto parts manufacturers—design and build many of the systems that directly determine a vehicle’s safety, efficiency, and performance, including braking systems, emissions controls, sensors, and powertrain components. These technologies must be validated in real-world driving conditions before reaching consumers.

The 2015 FAST Act granted automakers authority to conduct independent testing and evaluation on public roads under controlled and responsible conditions. That authority did not extend to suppliers, even though they develop critical technologies that also require on-road evaluation. As a result, suppliers may only conduct such testing at the national level when partnered with an automaker, slowing safety verification and delaying improvements that benefit consumers.

A federal framework would allow suppliers to do this at their facility locations around the country, which is particularly important as vehicle supplier presence has expanded throughout the United States in recent years.

Expanding federal authority is a narrow, practical update that strengthens safety and supports innovation without altering any existing automaker obligations or exemptions.

Why This Matters for Safety and Consumers

Strengthening Real-World Safety Validation

Many safety-critical systems cannot be fully validated through laboratory or closed-track testing. Controlled access to public roads allows suppliers to evaluate components in the same conditions Americans drive every day—different weather, terrain, road surfaces, and traffic environments. This leads to more complete safety data, faster identification of issues, and technologies that are better prepared to meet federal safety requirements and consumer expectations.

Advancing Innovation

Suppliers are responsible for a significant share of the innovation that improves vehicle safety and performance. Without the ability to independently test on public roads, development slows and consumers wait longer for safety-enhancing technologies. Testing parity would allow suppliers to validate innovations more efficiently while remaining fully accountable under the same controlled framework Congress established for automakers in 2015.

MEMA. The Vehicle Suppliers Association and the National Consumers League support extending this authority to suppliers to ensure that technologies are tested as thoroughly and safely as possible before reaching the public.



INTERNATIONAL UNION OF POLICE ASSOCIATIONS

THE ONLY UNION FOR LAW ENFORCEMENT OFFICERS

SAM A. CABRAL
International President

MICHAEL V. CRIVELLO
International Secretary-Treasurer

January 9, 2026

The Honorable Robert Latta
United States House of Representatives
2470 Rayburn House Office Building
Washington, DC 20515

Dear Congressman Latta,

The International Union of Police Associations, AFL-CIO, represents rank and file, active-duty law enforcement professionals across this great nation, including the U.S. territories of Puerto Rico and the Virgin Islands. I write to express our opposition to the **SELF-DRIVE Act** as currently drafted.

While we support responsible innovation, the SELF-DRIVE Act advances large-scale deployment of automated vehicles while weakening accountability, limiting state and local public safety authority, and exposing first responders to unproven operational risks.

The Act designates the automated driving system as the “driver” when engaged, yet fails to provide a practical framework for roadside enforcement, immediate fault determination, or criminal accountability. Officers responding to crashes will face vehicles with no human operator and delayed manufacturer responsibility, undermining established enforcement and judicial processes.

Equally concerning, the Act broadly preempts state and local authority to regulate automated vehicle operations, even when such regulation is necessary to address unique roadway conditions or emergency response realities. Communities should not be stripped of their ability to protect the public and the responders who serve them. Laws that work in Montana will not work in New York City.

The bill relies heavily on manufacturer self-certification to address emergency interaction, despite the absence of standardized responder overrides, guaranteed compliance with

lawful commands, or mandatory real-world testing with police, fire, and EMS personnel. Emergency scenes are unpredictable, and software assumptions are not a substitute for proven operational performance.

Additionally, delayed crash reporting timelines and restricted access to vehicle data hinder timely investigations and accountability. Cybersecurity vulnerabilities further expose responders to vehicles that may be remotely compromised and beyond their control. Finally, the Act permits commercial passenger and freight operations during so-called testing phases, effectively turning public roads into live laboratories without full safety validation or responder sign-off.

For these reasons, we respectfully urge Congress to withhold support for the SELF-DRIVE Act unless it is amended to:

- Establish clear, immediate accountability
- Preserve state and local public safety authority
- Require standardized responder overrides and real-world validation
- Provide immediate access to crash and system data
- Prohibit commercial operations until independent safety validation is complete

Innovation must enhance public safety, not undermine it. We stand ready to work with Congress to develop a framework that supports technological progress while protecting the men and women who respond when technology fails.

Respectfully,



Sam A. Cabral
International President
International Union of Police Associations



January 12, 2026

The Honorable Brett Guthrie
Chair, House Energy & Commerce
Committee
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Frank Pallone
Ranking Member, House Energy & Commerce Committee
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Gus Bilirakis
Chairman, Subcommittee on Commerce,
Manufacturing and Trade
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Jan Schakowsky
Ranking Member, Subcommittee on Commerce,
Manufacturing and Trade
2125 Rayburn House Office Building
Washington, D.C. 20515

Re: Statement for the Record by the Recycled Materials Association – House Energy & Commerce Subcommittee on Commerce, Manufacturing and Trade Hearing, “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership”

Dear Chairman Guthrie, Ranking Member Pallone, Chairman Bilirakis, and Ranking Member Schakowsky,

The Recycled Materials Association (ReMA), the leading organization dedicated to promoting safe, economically sustainable, and environmentally responsible recycling, writes to express concerns with H.R. 5221, the Preventing Auto Recycling Theft (PART) Act. ReMA represents 1,700 companies that play a critical role in supplying recycled materials to U.S. manufacturers, generating \$169 billion in economic impact and supporting nearly 600,000 jobs nationwide in 2024.¹

ReMA is the only national trade association representing the full end-of-life chain of custody for catalytic converters, including auto dismantlers, metal recyclers, downstream processors and smelters. It is estimated that more than 30 million catalytic converters are legally recycled every year – mainly through the recycling of end-of-life automobiles - returning those precious metals back to the manufacturing supply chain. These platinum group metals are critical inputs for a wide range of products, from biomedical supplies to capacitors needed for data center growth, and more.

The recycled materials industry recognizes the significant financial burden and distress that catalytic converter thefts impose on American families and has long worked with state and local governments and law enforcement to prevent these stolen materials from entering the marketplace. While ReMA supports strong, enforceable measures to deter catalytic converter theft, the PART Act as introduced does not fully account for the practical realities of the end-of-life vehicle supply chain or established chain of custody practices. As a result, certain provisions risk unintentionally disrupting legitimate recycling operations and the supply of critical materials without meaningfully strengthening theft prevention or improving enforcement outcomes.

¹ [Economic Impact Study - U.S. Based Recycled Materials Industry, 2024 Executive Summary](#)

While catalytic converter theft imposes real hardship on victims, theft-related material represents a small fraction of the catalytic converters recycled annually, underscoring the importance of targeted enforcement that disrupts criminal activity without impeding legitimate commerce. ReMA members believe that limiting purchase points and clearly defining who may lawfully possess detached catalytic converters are among the most effective ways to eliminate the black market that fuels this crime. Consistent with this approach, and to support these efforts, the industry developed ScrapTheftAlert.com, a voluntary tool that enables law enforcement to quickly notify recyclers of major thefts, share identifying information, and prevent stolen materials from reentering the legitimate supply chain.

Accordingly, ReMA respectfully requests the Committee consider the following targeted changes to ensure the legislation is workable, effective, and advances the shared goal of eliminating catalytic converter theft while reflecting the realities of, and without risking the disruption of, the end-of-life catalytic converter supply chain:

- **Tailor recordkeeping requirements to reflect the practical differences between business-to-business transactions and transactions involving individuals.** This section in particular must be clarified to indicate what information should be transferred at point of sale across the supply chain. Currently, there are 19 states² that have established separate recordkeeping requirements for individual vs. business sellers. Uniform recordkeeping requirements that fail to distinguish between individuals and business-to-businesses transactions would impose unnecessary burdens on lawful commerce without improving theft detection.

1) PURCHASES FROM INDIVIDUALS. — For transactions in which the seller is an individual, the purchaser must maintain a record of the following:

- (A) The name, address, telephone number and a photocopy of a government issued identification of the seller;*
- (B) the make, model, and vehicle identification number (VIN) of the vehicle from which the catalytic converter was removed, if available;*
- (C) a statement signed by the seller attesting that the catalytic converter is not stolen and is free of any liens or encumbrances and the seller has the right to sell it;*

2) PURCHASES FROM BUSINESSES. —For transactions between businesses that lawfully possess a catalytic converter or converter substrate the purchaser must maintain a record of the following:

- (A) a record of the transaction date, location of the transaction, and volume in accordance with the custom of the trade for the type of transaction*

- **Remove the reference to “motor vehicle parts that contain precious metals,”** to ensure the provision remains tailored to catalytic converters. ReMA supports strong, enforceable measures to deter and address catalytic converter theft, however, inclusion of this broader language risks

² AL, AZ, CA, CT, GA, IA, IN, KY, MN, MS, NC, NJ, NV, OK, OR, SC, TN, TX, WI. To note, ME does not set different recordkeeping requirements, but instead requires that catalytic converters be marked when they are removed from a vehicle, with different marking requirements for vehicle recyclers (VIN or the recycler’s license and stock number) vs from other persons (VIN). Additionally, 4 states only allow business sellers: DE, ID, MD, PA.

sweeping in lawful recycling of non-targeted vehicle components and imposing unnecessary compliance burdens on lawful automobile dismantlers and recyclers.

- **Preserve the recycling of catalytic converters, including those that may lack a VIN or Unique Identifying Number.** As drafted, the bill's recordkeeping requirements require the purchaser to obtain "the vehicle identification number or a unique part identification number marked, etched, or engraved on the converter that can be tied directly to the vehicle identification number of the vehicle," "while also including prohibition on the sale of catalytic converters that have had identifying markings "removed or otherwise tampered with." Together, these provisions fail to account for catalytic converters that were manufactured and placed into use prior to the enactment of the bill and its related regulatory requirements.

As a result, lawful catalytic converters that were never marked may be excluded from the legitimate recycling system through no fault of the recycler. While the legislation would require new catalytic converters to be marked with a VIN or Unique Identifying Number at the point of sale, and establishes a grant program to support marking, neither the marking requirements nor the grant program can take effect immediately. Given that vehicles typically take 12-15 years to reach a recycler – and that the average light vehicle on the road today is approximately 12.8 years old³ – there will be a lengthy transition period during which many catalytic converters would remain without marking and could be unintentionally excluded from the recycling system.

- **Reconsider classifying catalytic converters as "major parts" under federal law as it could conflict with – and potentially undermine – existing state frameworks.** Our laboratories of democracy have repeatedly demonstrated both the capacity and willingness to enact, strengthen, and revise catalytic converter laws to deter theft, target bad actors in the supply chain, equip law enforcement with the appropriate tools to investigate and prosecute these crimes, and ensure victims have access to meaningful recourse.

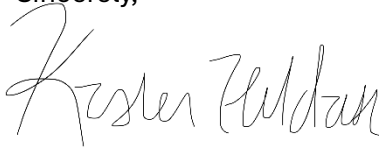
Every state except Wyoming regulates catalytic converter purchases through metals purchase requirements or related statutes, and in each case imposes additional or heightened restrictions beyond those applied to other recycled (or scrap) metal such as unique documentation, proof of ownership, and reporting requirements. The majority of these laws treat catalytic converters as restricted metal property, rather than as automobile parts governed under vehicle dismantling statutes. This very important distinction is a necessary tool for limiting legitimate purchase points that helps limit the black marketplace in which this crime thrives. In direct response to stakeholder concerns, 45 states have updated catalytic converter laws in the last five years. This provision would layer a duplicative federal recordkeeping and enforcement framework on top of an already robust and evolving state system. Even though well-intentioned, an additional federal overlay may complicate investigations and create unnecessary confusion, duplication, and potential loopholes without improving on-the-ground enforcement outcomes for crimes traditionally handled at the state and local level.

³ U.S. Department of Transportation, Bureau of Transportation Statistics, Average Age of Automobiles and Trucks in Operation in the United States (data table, including average age of passenger cars and light trucks), available at <https://www.bts.gov/content/average-age-automobiles-and-trucks-operation-united-states>

A more effective federal approach would support state enforcement efforts, improve information-sharing within law enforcement, and avoid imposing a one-size-fits-all federal transaction regime on a system already regulated at the state level.

ReMA stands ready to work with the Committee to strengthen the PART Act in a manner that effectively deters criminal activity without disrupting legitimate recycling operations or existing state enforcement frameworks. With targeted, practical adjustments, Congress can advance meaningful theft prevention while preserving lawful catalytic converter recycling infrastructure. Should you have any questions or wish to discuss these concerns further, please contact me at khildreth@recycledmaterials.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristen Hildreth". The signature is fluid and cursive, with the first name "Kristen" written in a larger, more prominent script than the last name "Hildreth".

Kristen Hildreth
VP of Government Relations & Public Policy

January 12, 2026

The Honorable Gus Bilirakis, Chair
The Honorable Jan Schakowsky, Ranking Member
Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
U.S. House of Representatives
Washington, D.C. 20515

Dear Chair Bilirakis and Ranking Member Schakowsky:

In advance of the upcoming hearing, “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership,” the undersigned urge this Committee to advance proven solutions to improve safety on our Nation’s roadways. We respectfully request this letter be included in the hearing record.

Motor Vehicle Deaths Remain Historically High

America’s roads are moving an ever-increasing number of people and goods.¹ This activity comes with a significant yet preventable human toll as well as infrastructure challenges and a robust price tag. On average, 112 people were killed every day on roads in the U.S., totaling nearly 41,000 fatalities in 2023.² This is a 24 percent increase in deaths in just a decade.³ An additional 2.44 million people were injured.⁴ Early projections for 2024 traffic fatalities remain at a similar historic high level; over 39,000 people are estimated to have been killed that year.⁵

In addition to the physical and emotional repercussions and infrastructure damage due to motor vehicle crashes, the annual economic cost is approximately \$340 billion (2019 dollars).⁶ This figure equates to every person living in the U.S. essentially paying an annual “crash tax” of over \$1,000. Moreover, the total value of societal harm from motor vehicle crashes in 2019, which includes loss of life, pain and decreased quality of life, was nearly \$1.4 trillion.⁷ When adjusted solely for inflation, this figure amounts to over \$1.79 trillion.⁸ Research from the Network of Employers for Traffic Safety (NETS) finds motor vehicle crashes cost employers \$72.2 billion in direct crash-related expenses in 2019.⁹

These devastating crashes impact millions of Americans each year including the families of U.S. Department of Transportation (U.S. DOT) Secretary Duffy and Members of Congress. These tragedies result in long-lasting effects which often are not accounted for in statistics alone. For every single death and serious injury, there is a horrific ripple effect forever changing the lives of children, parents, friends and communities. We know the solutions to meaningfully reduce its impact which includes vehicle safety improvements.

Federal Safety Standards Prevent Motor Vehicle Crashes, Save Lives, Avert Injuries and Reduce Associated Costs

Consumer, public health and safety groups have always enthusiastically championed proven vehicle safety technology and for good reason -- it is one of the most effective strategies for preventing deaths and injuries. According to the National Highway Traffic Safety Administration (NHTSA), “[t]he FMVSS [Federal Motor Vehicle Safety Standards] remain NHTSA’s core way of ensuring that all motor vehicles provide the requisite level of safety performance and provide it within a technical timeframe.”¹⁰ In fact, the agency has estimated that from 1968 through 2019, NHTSA’s safety standards have prevented more than 860,000 deaths, 49 million nonfatal injuries and damage to 65 million vehicles.¹¹ In addition, during that time frame the comprehensive societal benefits amounted to \$17.3 trillion, using 2019 dollars.¹²

In 1991, the bipartisan Intermodal Surface Transportation Efficiency Act (ISTEA)¹³ included a mandate for front seat airbags as standard equipment. As a result, by 1997, every new car sold in the United States was equipped with this technology and the lives saved have been significant. Airbags have saved an estimated 50,457 lives from 1987 to 2017, according to NHTSA.¹⁴ Additional proven lifesaving technologies have been required as standard equipment in all vehicles in other federal legislation and regulatory proposals. They include: tire pressure monitoring systems;¹⁵ rear outboard 3-point safety belts;¹⁶ electronic stability control;¹⁷ rear safety belt reminder systems;¹⁸ brake transmission interlocks;¹⁹ safety belts on motorcoaches;²⁰ rear-view cameras;²¹ safer power window switches;²² advanced driver assistance systems (ADAS);²³ advanced impaired driving prevention technology;²⁴ rear designated seating position alert (hot cars);²⁵ enhanced vehicle hood and bumpers to better protect vulnerable road users;²⁶ and, advanced head lamps.²⁷

The recent regulatory action undertaken by NHTSA to require pedestrian automatic emergency braking (PAEB) on light passenger vehicles is an excellent example of the benefits of requiring effective safety systems on passenger motor vehicles. The agency predicts that PAEB will save 362 lives, mitigate over 24,000 injuries annually and result in a yearly cost benefit of between \$5.8-\$7.2 billion. The Final Rule for PAEB issued in 2024 also noted that the end user price for the safety technology for a popular make and model vehicle, a Toyota Camry, is \$240.24.²⁸ This cost is modest, particularly given the returns on the investment. Moreover, research performed by the Insurance Institute for Highway Safety (IIHS) has found that AEB can reduce front-to-rear crashes with injuries by 56 percent.

Research also demonstrates that lifesaving vehicle safety technologies are not resulting in increased prices for new cars. A 2023 study by Consumer Reports (CR) found that “[c]ommonly reported changes in average transaction prices appear to be primarily driven by shifts toward larger, more expensive SUVs and away from smaller and cheaper cars, rather than from the cost of technology improvements in individual models.”²⁹ As a result, CR concluded that “[t]hese findings prove that regulators can and should be aggressive in ensuring that automakers continue to deliver cost-effective technology improvements that save dollars and lives.”³⁰

Major Contributors of Crashes Must be Addressed with Effective Solutions

We urge this Committee to continue to seek to address the leading contributing factors to motor vehicle crashes. In 2023, alcohol impaired driving resulted in 12,429 people killed;³¹ speeding resulted in 11,775 people killed;³² 10,484 vehicle occupants killed in crashes were unrestrained;³³ and, crashes in which at least one driver was distracted resulted in 3,275 fatalities.³⁴ Additionally, in 2021, the most recent year for which data is available according to the Non-Traffic Surveillance (NTS) system, an estimated 3,990 people were killed in non-traffic motor vehicle crashes, an increase of 26 percent from 2020.³⁵ These issues are persistent, and the solutions are known and available, yet remain underused, underfunded or are not required as standard equipment in vehicles.

Advanced driver assistance systems (ADAS) can mitigate the issues of impairment, speeding, distraction and fatigue

Crashes, including those resultant from some of the leading contributors to fatalities, can be prevented or mitigated by automatic emergency braking (AEB) and other ADAS systems. Research by the Insurance Institute for Highway Safety (IIHS) has demonstrated crash reductions:³⁶

Automatic emergency braking

- ↓ 50% Front-to-rear crashes
- ↓ 56% Front-to-rear crashes with injuries
- ↓ 14% Claim rates for damage to other vehicles
- ↓ 24% Claim rates for injuries to people in other vehicles
- ↓ 41% Large truck front-to-rear crashes

Automatic emergency braking with pedestrian detection

- ↓ 27% Pedestrian crashes
- ↓ 30% Pedestrian injury crashes

Lane departure warning

- ↓ 11% Single-vehicle, sideswipe and head-on crashes
- ↓ 21% Injury crashes of the same types

Blind spot detection

- ↓ 14% Lane-change crashes
- ↓ 23% Lane-change crashes with injuries
- ↓ 7% Claim rates for damage to other vehicles
- ↓ 8% Claim rates for injuries to people in other vehicles

Rear automatic braking

- ↓ 78% Backing crashes (when combined with rearview camera and parking sensors)
- ↓ 9% Claim rates for damage to the insured vehicle
- ↓ 29% Claim rates for damage to other vehicles

Rearview cameras

- ↓ 17% Backing crashes

Rear cross-traffic alert

- ↓ 22% Backing crashes

We urge this Committee to conduct oversight to ensure the U.S. DOT issues the Final Rule for AEB in heavy vehicles and lane departure warning (LDW) and lane keeping assist (LKA) in passenger vehicles, as Congressionally mandated. Additionally, we urge Congress to direct NHTSA to enhance the AEB rule by including bicycle and motorcycle rider detection and response in all lighting conditions. Research conducted by IIHS earlier this year found that clothing which makes pedestrians stand out to human drivers may make them invisible to automated crash prevention systems, so ensuring AEB operates properly in all lighting conditions is essential.³⁷ The Final Rule for AEB in passenger vehicles must be swiftly complied with, absent added delay. We also urge Congress to direct U.S. DOT to issue standards and requirements for other vehicle safety technologies shown by research to reduce crashes and impacts, including as noted by IIHS research, blind spot detection, rear AEB and rear cross traffic alert.

Impaired Driving

In 2019, the total comprehensive cost of drunk driving over the .08 percent blood alcohol concentration (BAC) limit was estimated at nearly \$296 billion.³⁸ Adjusted for inflation only, that amounts to \$373 billion in 2025 dollars.³⁹ The total cost to employers of motor vehicle crashes with an alcohol-impaired employee or dependent driving (both on-the-job and off-the-job) was \$8 billion in 2018 (expressed in 2019 dollars).⁴⁰ Accounting for inflation only, that amounts to over \$10 billion in 2025 dollars.⁴¹

According to NHTSA, between 2011-2020, an average of almost 10,500 people were killed each year due to alcohol impaired driving crashes.⁴² The IIJA directed NHTSA to issue a FMVSS requiring passenger motor vehicles to be equipped with impaired driving prevention technology by 2024.⁴³ IIHS research estimates that passive impaired driving prevention technology will save more than 10,000 lives each year, once widely deployed.⁴⁴ The agency issued an Advanced Notice of Proposed Rulemaking (ANPRM) in January 2024 but has taken no further regulatory action.⁴⁵ Until NHTSA completes this overdue rulemaking, lives will continue to be needlessly lost, injuries suffered and associated costs expended. We urge this Committee to conduct oversight in furtherance of advancing this Congressional mandate.

Speeding

Speeding-related crashes cause \$46.4 billion in economic costs and \$225 billion in comprehensive costs (2019).⁴⁶ These costs account for 14 percent of all economic costs and 16 percent of all societal harm (measured as comprehensive costs) from motor vehicle crashes.⁴⁷ If these costs were updated for inflation alone, in 2025 they would equate to \$58.6 billion in economic costs and \$284 billion in comprehensive costs.⁴⁸ Speeding-related crashes cost employers nearly \$10 billion in 2018 (expressed in 2019 dollars); the majority are a result of off-the-job crashes.⁴⁹ If this cost were updated for inflation alone, in 2025 it would equate to \$12.6 billion.⁵⁰

Excess speed can contribute to both the frequency and severity of motor vehicle crashes. At higher speeds, additional time is required to stop a vehicle, and more distance is traveled before corrective maneuvers can be implemented. Speeding reduces a driver's ability to react to emergencies created by driver inattention, unsafe maneuvers of other vehicles, roadway hazards, vehicle issues (such as tire blowouts) or perilous weather conditions. Increases in speed also can mean life or death for vulnerable road users (VRUs) who lack the protective structure of a vehicle. While many drivers have a proclivity to exceed posted speed limits or may approve of higher speed limits, AAA has found that raising speed limits leads to a very minimal reduction in time on the road noting, "Raising speed limits is often thought of as a way to improve traffic flow and to allow drivers to get to their destinations more quickly. However, AAA research shows that driving at higher speeds increases risk which can outweigh the potential benefits of saving a few minutes of time."⁵¹

Intelligent speed assistance (ISA) can provide information to drivers about present speed limits, warn drivers when a vehicle speed is above the limit, prevent a vehicle from exceeding the speed limit, or maintain a set speed.⁵² The U.S. DOT Volpe Center released research, “New York City Intelligent Speed Assistance Pilot Evaluation,” in 2024 which showed “ISA produced a 64 percent reduction in overall speeding and an 82 percent decrease on high-speed roads.”⁵³ The IIHS found that more than “60% of drivers would find it acceptable if their vehicle provided an audible and visual warning when they exceeded the posted speed limit.”⁵⁴ The National Transportation Safety Board (NTSB) has recommended that NHTSA require ISA in all new vehicles that, at a minimum, warns drivers when they exceed the speed limit. States have already started acting on this technology; Washington State, Virginia and the District of Columbia have enacted laws for ISA use for repeat and/or extreme speeding offenders. All states should be incentivized to follow suit in the next surface transportation reauthorization bill.

Occupant Protection

Seat belt use is a proven lifesaver. From 1975 to 2019, seat belts prevented over 403,000 fatalities and saved society approximately \$2.5 trillion in economic costs.⁵⁵ Seat belts serve as the first line of defense against injury or death for vehicle occupants when crashes occur. According to NHTSA, the combination of an airbag plus a lap and shoulder belt reduces the risk of death in frontal crashes by 61 percent.⁵⁶ Sadly, for passenger vehicle occupant fatalities in 2023, it is estimated that nearly half (49 percent) were unrestrained.⁵⁷

Seat belt reminder systems have been proven to improve seat belt use and save lives.⁵⁸ Congress as part of the Moving Ahead for Progress in the 21st Century Act (MAP-21) directed NHTSA to amend federal safety standards to require these systems in the rear seats of passenger vehicles (previously these systems were only required for the front driver’s seat although most automakers also equipped the front passenger seat).⁵⁹ NHTSA recently issued a Final Rule requiring a seat belt use warning system for rear seats by September 1, 2027. The rule also updates and enhances the current seat belt warning requirements for the driver’s seatbelt and extends these requirements to the front outboard passenger seat by September 1, 2026.⁶⁰ We urge the Committee to conduct oversight to ensure it is implemented without delay to improve vehicle occupant safety.

Distracted Driving

Crashes in which at least one driver was identified as being distracted imposed an economic cost of \$98.2 billion in 2019.⁶¹ Adjusted for inflation only, that amounts to \$123.9 billion in 2025 dollars.⁶² In 2018, distracted driving crashes cost employers nearly \$19 billion.⁶³

Driver distraction is known to be a major contributor to motor vehicle crashes.⁶⁴ However, the true impact of distracted driving remains unclear due to issues with the underreporting of crashes involving distraction, including differences in police crash report coding and database limitations.⁶⁵

In 2023, over two trillion text and multimedia messages were sent or received in the U.S. Mobile wireless data traffic has risen dramatically over the last decade, from 3 trillion megabytes in 2010 to 100.1 trillion in 2023.⁶⁶ Research has shown that because of the degree of cognitive distraction these devices cause, the behavior of drivers using mobile phones (whether handheld or hands-free) is equivalent to the behavior of drivers at the threshold of the legal limit for alcohol in most states (0.08 percent BAC).⁶⁷ Crash risk increases dramatically – as much as four times higher – when a driver is using a mobile phone, with no significant safety difference between handheld and hands-free phones observed in many studies.⁶⁸ A study by the Virginia Tech Transportation Institute found that text messaging increased the risk of a safety-critical driving event (i.e., crashes, near-crashes, crash-relevant conflicts and unintentional lane deviations) by 23.2 times.⁶⁹ Sending or receiving a text message causes the driver's eyes to be off the road for an average of 4.6 seconds. When driving 55 miles per hour (mph), this is the equivalent of driving the entire length of a football field with one's eyes closed.⁷⁰

The IIJA directed U.S. DOT to conduct research regarding the installation and use of driver support systems, also known as driver monitoring systems, to minimize or eliminate driver distraction and automation complacency within three years and report to Congress within six months of the completion of the research.⁷¹ The Euro NCAP is already evaluating these systems including for non-fatigue impairment detection.⁷² In addition, several major automakers include some type of driver monitoring/ driver support technologies in their vehicles sold in the U.S. We urge the Committee to use its oversight authority to ensure the U.S. DOT releases the study and commences and completes rulemaking.

Vulnerable Road User (VRU) Safety

Crashes involving pedestrians resulted in \$17.6 billion in economic costs and \$112.5 billion in comprehensive costs in 2019.⁷³ Accounting for inflation alone, this would equate to \$22.2 billion in economic costs and \$142 billion in comprehensive costs in 2025.⁷⁴ Crashes involving bicyclists resulted in \$5.6 billion in economic costs and \$32.2 billion in comprehensive costs in 2019.⁷⁵ Accounting for inflation alone, this would equate to \$7 billion in economic costs and \$40.6 billion in comprehensive costs in 2025.⁷⁶

Lack of conspicuity is a roadway safety issue, especially for VRUs. Of the 7,522 pedestrians killed in traffic crashes in 2022, 78 percent occurred in dark conditions.⁷⁷ Also in 2022, there were 1,105 pedalcyclists fatalities, and 51 percent occurred in dark conditions.⁷⁸ Improvements to vehicle lighting would afford drivers additional time to identify and respond accordingly to pedestrians, bicycle riders and other VRUs in the roadway. The IIJA directed U.S. DOT to issue a Final Rule updating the headlamp standard (FMVSS 108) and permitting adaptive driving beam (ADB) headlamps within two years. ADB headlights are a lighting technology which uses headlight beam modification to increase illumination of the road while avoiding glare to other traffic. While the U.S. DOT has taken action to allow use of ADB, it should improve the standard and require them.⁷⁹ This action has been recommended by the NTSB and others.⁸⁰ According to IIHS, 44 percent of headlight systems tested on model year 2024 vehicles earned a good rating.⁸¹ About 23

percent of the systems tested were rated marginal or poor because of inadequate visibility, excessive glare from low beams for oncoming drivers, or both.⁸² Ensuring that the U.S. DOT takes action to improve the headlamp standard and advance a requirement should be pursued by the Committee.

Additionally, the IIJA included a provision directing NHTSA to issue a Notice for Public Comment on updating hood and bumper standards for passenger vehicles to “to reduce the number of injuries and fatalities suffered by pedestrians, bicyclists, or other vulnerable road users.”⁸³ In September 2024, NHTSA issued a Notice of Proposed Rulemaking (NPRM) to establish a new FMVSS to ensure passenger vehicles are designed to mitigate the risks of serious injuries and fatalities in crashes involving pedestrians including children.⁸⁴ The standard proposed in the NPRM would save 67 lives annually with the benefits far outpacing the costs by establishing test procedures simulating a head-to-hood impact and performance requirements to minimize the risk of head injury.⁸⁵ While this is a step in the right direction, we urge the Committee to ensure that the U.S. DOT pursues a comprehensive upgrade.

Annually, motorcycle crashes cost nearly \$17 billion in economic impacts and \$107 billion in societal harm as measured by comprehensive costs based on 2019 data.⁸⁶ Accounting for inflation alone, in 2025, this would equate to over \$21 billion in economic impacts and over \$135 billion in societal harm.⁸⁷ Serious injuries and fatalities accounted for 83 percent of total comprehensive costs of motorcycle crashes, compared to 60 percent of the total comprehensive costs of all motor vehicle crashes.⁸⁸

Motorcycle riders continue to be overrepresented in fatal traffic crashes.⁸⁹ IIHS evaluated on-road data and found motorcycle anti-lock braking systems (ABS) were associated with a 22 percent reduction in the rate of fatal crash involvements.⁹⁰ Requiring ABS as standard equipment via a FMVSS on new motorcycles will prevent and mitigate crashes. European Union General Safety Regulation (EU GSR) has required ABS fitment on motorcycles since 2016. IIHS most recently filed a Petition for Rulemaking to require ABS on motorcycles with NHTSA in 2023.⁹¹ We urge the Committee to pursue a standard for this safety improvement in the next surface transportation reauthorization.

Child Passenger Safety

Since 1990, over 1,100 unattended children have been killed in “hot cars,” and 7,500 more have been injured.⁹² Cost effective technology exists to prevent these tragedies now. The IIJA directed U.S. DOT to issue a Final Rule within two years requiring all new passenger motor vehicles weighing less than 10,000 pounds to be equipped with a system to alert the operator to check rear-designated seating positions after the vehicle engine or motor is deactivated by the operator. The U.S. DOT has not taken regulatory action and should issue a Final Rule which requires the system to detect occupants in the entire passenger compartment rather than rely on reminder systems which are less effective. Of note, Euro New Car Assessment Program (NCAP) added testing of child detection systems in 2023 (protocol), and from 2025 onwards will only be assigning points for direct sensing

systems.⁹³ We urge the Committee to direct U.S. DOT to comprehensively elevate NCAP and minimally adopt protocols from global NCAPs which have advanced beyond the U.S. program.

Automated Driving System (ADS) Safety

In addition to having the potential to save lives now, crash avoidance technologies may be foundational building blocks for a potentially automated driving future. An ADS equipped vehicle which includes autonomous vehicles (AV), will, depending upon its level, need to detect and respond to all road users, vehicles and infrastructure in the roadway environment in all lighting conditions and speeds (AEB), to monitor blind spots and take appropriate action (blind spot detection with intervention), to stay within its lane of traffic (LKA), to obey speed limits (ISA), and to know if the vehicle is occupied (occupant detection), especially if deployed as a shared system, among other responsibilities. We urge this Committee to advance safeguards for vehicles equipped with an ADS to ensure that they only operate on roadways and in scenarios for which they are designed to safety do so.

Thank you for your consideration of these issues. We look forward to working with you to address the public health crisis of motor vehicle crashes.

Sincerely,

Advocates for Highway and Auto Safety

America Walks

American Public Health Association

Center for Auto Safety

Christopher King Foundation

Citizens for Reliable and Safe Highways

Consumers for Auto Reliability and Safety

Consumer Federation of America

DRIVE SMART

Emergency Nurses Association

Families for Safe Streets

Families for Safe Streets Greater
Philadelphia

Families for Safe Streets San Diego

GreenLatinos

Joan Claybrook, Former NHTSA
Administrator

Kids and Car Safety

League of American Bicyclists

Missouri Bicycle & Pedestrian Federation

National Campaign for Transit Justice

National Coalition for Safer Roads

Northern Virginia Families for Safe Streets

Parents Against Tired Truckers

The White Line

Public Citizen

Transport Workers Union of America

Rails to Trails Conservancy

Trauma Foundation

Ride Illinois

Truck Safety Coalition

Safe Routes Partnership

Vision Zero Network

StopDistractions.org

cc: The Honorable Brett Guthrie, Chair, Committee on Energy and Commerce
The Honorable Frank Pallone, Ranking Member, Committee on Energy and Commerce
Members of the Subcommittee on Commerce, Manufacturing, and Trade

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The SELF DRIVE Act

The SELF DRIVE Act from Representatives Bob Latta and Debbie Dingell is bipartisan, groundbreaking legislation that enhances safety, strengthens U.S. technological competitiveness, expands mobility, and grows American jobs.

Need to Know

- Establishes appropriate federal and state authority to regulate autonomous vehicles. More than half of U.S. states have autonomous vehicle deployment statutes and these laws will remain in force going forward, providing states an important role in AV regulation as the federal government moves forward on vehicle design and performance policy.
- Raises the bar on safety of autonomous vehicles by requiring that the National Highway Traffic Safety Administration (NHTSA) enact federal rules requiring a safety case and establishing driving competency requirements.
- Promotes vehicle accessibility for people with disabilities by modernizing AV design regulations on manual controls, which will facilitate the development of next-generation vehicle platforms that better serve Americans.
- Strengthens autonomous vehicle incident reporting by enshrining requirements in statute, requiring NHTSA to codify particular requirements, and establishing information sharing with state transportation authorities.

Key Provisions in the SELF DRIVE Act

Section 3 requires manufacturers of automated driving systems (ADS) and ADS-equipped vehicles to develop and document a formal “safety case” before selling or importing those systems or vehicles in the U.S. It creates a mandatory, enforceable framework for automated driving systems, shifting ADS oversight toward documented, reviewable safety justifications before these systems can be sold or deployed in the U.S. Section 3 also defines what a required “safety case” for an automated driving system (ADS) must contain and sets minimum competencies an ADS must demonstrate.

Section 3 establishes a new National AV Safety Data Repository to formalize and standardize ADS incident and mileage reporting, improves federal and state access to safety data, and replaces the current crash reporting requirements with a permanent regulatory system.



The SELF DRIVE Act

Section 3 establishes cybersecurity protections by requiring a written cybersecurity plan describing how the manufacturer detects, prevents, and responds to cyberattacks, unauthorized intrusions, and malicious vehicle control commands. It also requires oversight and congressional reporting on the implementation of federal rules protecting the cybersecurity and supply chain security of connected vehicles.

Section 3 ensures that ADS-dedicated vehicles carrying human occupants include a way for occupants to command a safe stop and exit, while preventing regulators from forcing traditional human-driver controls onto ADS-dedicated vehicles.

Section 4 modernizes federal law around testing and evaluation to accommodate automated driving systems, allows carefully controlled commercial activity as part of testing, and gives the U.S. Department of Transportation tools to prevent testing exemptions from being used as a substitute for full regulatory compliance at scale.

Section 5 allows ADS-equipped vehicles to temporarily deactivate human-driver controls during automated operation, without violating “make inoperative” rules, while preserving the requirement that human control can be promptly restored and that overall ADS safety requirements are met.

Section 6 protects the security of connected vehicles by requiring that the Secretary of Commerce review the implementation of the final rule, Securing the Information and Communications Technology and Services Supply Chain, and briefing congressional committees following that review.

The SELF DRIVE Act is a massive step forward for American autonomous vehicle leadership. AVIA encourages strong support of the legislation.

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January 12, 2026

Congressman Gus Bilirakis
Chairman
Subcommittee on Commerce,
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2125 Rayburn House Office
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Congresswoman Jan Schakowsky
Ranking Member
Subcommittee on Commerce,
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RE: H.R. 6688, the "ADAS Functionality and Integrity Act"

Dear Chairman Bilirakis, Ranking Member Schakowsky, and Members of the Subcommittee:

Thank you for holding this important hearing on "Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership." I write on behalf of the Specialty Equipment Market Association (SEMA) and its 7,000 members in support of H.R. 6688, the "ADAS Functionality and Integrity Act," an important, bipartisan bill to ensure that vehicle owners and automotive businesses can properly and safely customize, modify, and calibrate motor vehicles with advanced driver assistance systems (ADAS).

ADAS is increasingly available throughout our nation's fleet of vehicles, with most new cars, trucks, and SUVs now featuring some advanced safety systems, such as forward collision warning (FCW), lane departure warning (LDW), and automatic emergency braking (AEB). Each automaker has their own way of implementing this new technology, whether through cameras, radar, LiDAR, or ultrasonic sensors. What remains consistent across the various ways of incorporating ADAS into a vehicle is the crucial step of calibrating and testing these systems to ensure they remain fully functional, thereby keeping drivers, passengers, other drivers, and pedestrians safe.

H.R. 6688 is integral to ensuring that ADAS is properly calibrated and tested for the full lifecycle of the vehicle, including when owners modify or customize their vehicles. The sensors and cameras that support ADAS can be taken out of calibration from everyday driving (such as hitting a pothole); post collision repair; and when common modifications are made, including the addition of bike racks, wraps to advertise a business, adjusting a vehicle's ride height to navigate difficult terrain on a farm or ranch, or other changes to the external profile to upgrade bumpers, lights, or add a snowplow.

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Website: www.sema.org

Millions of Americans modify and customize their vehicles to enhance their vehicles' safety, performance, and comfort. Their reasons for modifying vary. For some, it's a means for doing business and earning a livelihood; for others, it's how they recreate or express themselves. **Regardless of their needs and preferences, it is imperative that evidence-based calibration and testing procedures are in place to ensure that ADAS is properly functioning for the protection of people both inside and outside the vehicle.**

Currently, ADAS calibration and testing procedures are only available for stock vehicles, which haven't been altered since coming off the assembly line. Now is the time to address the information gap in ADAS functionality to ensure that modified and customized vehicles can be properly calibrated and tested, which H.R. 6688 will help accomplish.

It cannot be overstated how our nation's ability to support existing ADAS in our national fleet is a crucial step toward the safety of autonomous vehicles (AVs) and the public's future, wide adoption of these next-generation vehicles.

SEMA thanks Representative Diana Harshbarger and original sponsors Representatives Jay Obernolte, Gabe Vasquez, and Norma Torres for introducing the ADAS Functionality and Integrity Act. Their bill requires the National Highway Traffic Safety Administration (NHTSA) to create guidelines for model year 2028 and future vehicles that outline modification ranges and tolerances that maintain ADAS functionality. It also requires NHTSA to create test procedures to ensure vehicle service providers can properly calibrate ADAS.

SEMA strongly supports H.R. 6688, which is a critical step toward ensuring the safety of Americans on our nation's roads and highways.

Background on SEMA

SEMA is a non-profit trade association representing over **7,000 businesses that form the backbone of the specialty automotive aftermarket industry in the U.S.** Our members, many of whom are small businesses, drive innovation through the manufacturing, distribution, sale, and installation of specialty automotive aftermarket parts and components. SEMA is proud to represent an industry that supports over **1.3 million American jobs across every congressional district, while annually contributing \$337 billion to the American economy.** Our industry's scope is seen each year in Las Vegas, when SEMA holds its most well-known for putting on the world-famous Las Vegas SEMA Show, North America's largest trade show, with over 2,500 exhibitors and more than 160,000 industry attendees for a B2B-only showcase of our nation's engineering prowess.

SEMA members produce, sell, and install parts and equipment that enable the American people to modify and customize their vehicles for work and play, improving the safety, performance, and aesthetics of the cars and trucks they rely on each day. From simple

modifications like adding a tow hitch to haul a bike, boat, or camper, to attaching a snowplow to the front of a truck, to wrapping a work van as a way to advertise a small business, aftermarket modifications help the American people to put food on their table and to live their best lives.

I am proud of SEMA's work in helping the automotive aftermarket industry better understand how their products interact with ADAS and the steps needed to ensure the full functionality of these safety systems.

SEMA is the only organization that has dedicated the time, money, and resources to study the impact of modifications on the performance of ADAS. Our commitment to maintaining ADAS performance has been supported by significant financial investment of association funds. This includes the expansion of our SEMA Garage program in 2022, marked by our largest capital expenditure to date, which features a 45,000-square-foot, state-of-the-art engineering facility located outside of Detroit. The SEMA Garage Detroit houses SEMA's ADAS R&D Technology Center, with two dedicated ADAS labs designed to perform OEM-level and independent aftermarket calibrations, along with system diagnostics for both stock and modified vehicles. The SEMA Garage Detroit is the only aftermarket facility of its kind.

Last year, at the Detroit SEMA Garage, we hosted more than 70 professionals from the customization, collision, and repair industries for a robust gathering where stakeholders sought to address the most growing and pressing challenges associated with ADAS calibrations. What resulted was a clear, industry-wide roadmap to ensure ADAS functions safely and reliably in every vehicle, which we've shared with industry leaders, federal regulators, and lawmakers throughout Congress.

The SEMA Garage continues to advance our understanding of how aftermarket modifications impact ADAS performance across popular vehicles, including a series of white papers that look at the performance of ADAS in modified vehicles like the Chevrolet Silverado 1500, Ford F-150, Ford Bronco, Toyota Tacoma, and the Ram 1500. SEMA's research provides clear, data-driven insights into how sensor reliability is influenced by modifications such as lift kits, wheels, and suspension components. These findings help manufacturers, installers, and enthusiasts understand when recalibration is needed to preserve full ADAS functionality and have led to our conclusion that more needs to be done to ensure the proper functionality of these safety systems for the full lifecycle of a vehicle.

ADAS Guidelines for Modified Vehicles Must be Established

ADAS features are standard in most model year (MY) 2026 vehicles, providing peace of mind to safety-conscious consumers and offering the potential to significantly reduce crashes and road fatalities. **According to SEMA's [trend research](#), more than 90% of MY 2023 and newer vehicles are equipped with ADAS features.**

ADAS is a crucial tool for preventing vehicle crashes. However, **there are currently no**

standard procedures for automotive businesses to follow to properly test ADAS in modified vehicles, ensure calibration is complete and successful, or even determine when and whether calibration is necessary. Without reasonable pathways to calibrate, test, and validate ADAS functionality in modified vehicles, owners will not fully benefit from this technology.

ADAS sensors and cameras are subject to degradation and misalignment over time and can be impacted by even the most common modifications, such as adding bike racks, wrapping a vehicle, adding a winch to the front bumper, or lifting a vehicle to navigate rocky terrain, which is especially important for driving on farms, ranches, and other off-road environments. Given that common modifications, which have been relied upon for decades by millions of Americans, can impact ADAS features, such as FCW, LDW, and AEB, **now is the time for NHTSA to create guidelines that ensure vehicle owners and their automotive professionals have the information needed to maintain the safety and performance integrity of ADAS.** This includes having clear information to determine ADAS tolerances as well as establish proper testing and validation to confirm that the calibration was performed properly and successfully.

We commend automakers for their considerable investments in ADAS technology, which has the potential to save thousands of lives. However, it's no secret that the cost of new vehicles has rapidly increased over the last decade, and the inclusion of ADAS features are a significant factor in those costs. Given the reality that vehicle owners are paying for these safety features in their vehicles, **those who choose to modify or customize their vehicles are no less deserving of enjoying the safety benefits of ADAS than vehicle owners who choose to keep their vehicles in their stock condition.**

Additionally, as ADAS functions combine to form higher levels of self-driving capabilities, it is critical that these safety systems can be properly calibrated and tested. Transparency and guidelines to fill ADAS gaps will only increase trust in existing and future safety systems, including those found in AVs, which are increasingly present in our major cities.

H.R. 6688, the “ADAS Functionality and Integrity Act”

The ADAS Functionality and Integrity Act, if enacted into law, would ensure that vehicle owners and automotive businesses have the information needed to properly calibrate and test ADAS. This legislation is crucial for safely making common modifications, such as installing bike racks, wrapping a vehicle, replacing larger wheels and tires, or installing a winch or aftermarket bumpers, without compromising the functionality of ADAS.

The bill would require NHTSA to work with automakers, parts manufacturers, the aftermarket, and dealers to create guidelines that provide modification ranges and tolerances in terms of changes to ride height, wheel and tire sizes, overall static

geometry, physical displacement parameters, and sensor and camera function that maintain proper calibration for new vehicles starting in model year 2028.

H.R. 6688 requires NHTSA to create guidelines that establish ADAS test procedures, allowing the automotive businesses that owners choose to engage to properly test and validate that vehicle systems have been properly calibrated. The bill would also create a process for manufacturers to provide vehicle tolerance and system sensitivity information relevant to modification and calibration to vehicle owners and NHTSA within 30 days after the release of a passenger motor vehicle.

In addition to providing NHTSA with up to two years to develop guidelines, the bill would also require the agency to publish a study within one year of enactment on the resources needed to create and maintain guidelines annually for new vehicles.

Closing

Thank you again to the Subcommittee for holding this important hearing on motor vehicle safety, consumer choice, and affordability.

Americans deserve confidence that ADAS works as intended for the entire life of their vehicle. Currently, the industry lacks clear standards governing ADAS calibration and testing, and aftermarket businesses and vehicle owners need access to the necessary information and procedures needed to keep modern safety features functioning. This bill marks a critical step forward in the name of vehicle safety and in protecting the American people's ability to continue modifying and customizing the vehicles they own.

The ability to calibrate and test is deeply intertwined with ensuring that Americans can modify their vehicles to meet their needs, as it is key to maintaining vehicle quality and keeping owners and other road users safe. When vehicle owners and service professionals are not able to access the vehicle information needed to properly service, calibrate, and validate ADAS performance, those barriers impede vehicle owners' rights.

I appreciate your consideration of these comments and thank the Subcommittee for its consideration of H.R. 6688 for potential inclusion in the vehicle safety title of the surface transportation reauthorization bill.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Spagnola", with a horizontal line underneath.

Mike Spagnola
President and CEO



January 12, 2026

The Honorable Brett Guthrie
Chairman
Committee on Energy and Commerce
U.S. House of Representatives

The Honorable Frank Pallone
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives

The Honorable Gus M. Bilirakis
Chairman
Subcommittee on Commerce,
Manufacturing, and Trade
U.S. House of Representatives

The Honorable Janice D. Schakowsky
Ranking Member
Subcommittee on Commerce,
Manufacturing, and Trade
U.S. House of Representatives

Dear Chairmen Guthrie and Bilirakis and Ranking Members Pallone and Schakowsky:

The Society of Collision Repair Specialists (SCRS) appreciates the opportunity to submit comments for the record regarding proposed federal legislation impacting vehicle repair, consumer safety, and access to automotive repair information.

SCRS serves as the national voice for thousands of collision repair professionals across this country, The vast majority of whom operate small, family-owned independent businesses serving their local communities. Our members are responsible for repairing increasingly complex vehicles that integrate advanced materials, electronics, supplemental restraint systems (SRS), and advanced driver-assistance systems (ADAS).

These repairs are safety-critical, and to restore that safety and functionality the repairs must be performed in accordance with documented manufacturer repair procedures, utilizing appropriate tools and equipment, and with the skill demonstrated by properly trained technicians.

SCRS opposes the legislation currently introduced as the "REPAIR Act."

Our membership has clearly communicated with SCRS and with members of this committee that the proponents of this Act do not represent an understanding of the actual challenges facing independent repair businesses in our space.

While the stated intent of that proposal is to expand access to repair information, SCRS agrees with our members that the REPAIR Act does not accurately reflect or resolve the real-world challenges facing consumers or repair professionals who work to restore safety to America's roadways.

Independent collision repairers already have access to original equipment manufacturer (OEM) repair information and instructions, diagnostic tools, and training resources. The primary obstacles to safe and proper repairs are not access-related, but rather economic and systemic pressures that incentivize cost-cutting at the expense of OEM-required repair procedures.

The REPAIR Act increases accessibility to vehicle data, not to repair information, but provides no added accountability that the already-available repair information will be utilized to effectuate a proper repair for the consumer.

Small repair businesses are not interested in being responsible or liable for protecting large amounts of sensitive information such as location, biometrics, in-cabin and surround view observance, driving behavior, personal contacts, and more. Our industry's small businesses are already under pressure from technology companies who have interest in accessing and monetizing repair and claim-related data for commercial exploitation. Greater access to more information that isn't necessary for repair does not help repair businesses.

This is why SCRS instead **supports the SAFE Repair Act** proposal, a collaborative legislative framework developed jointly between repairers and the Alliance for Automotive Innovation. This proposal reflects extensive industry engagement and is narrowly focused on protecting consumer safety while preserving competition and consumer choice.

The SAFE Repair Act recognizes that vehicle repair today is fundamentally different from vehicle repair of the past. Modern vehicles require precise repair procedures, system initializations and calibrations, and specialized environments and equipment all ensure that safety systems function as designed.

The SAFE Repair Act proposal safeguards continued access to necessary information and tools while reinforcing the importance of performing repairs in a manner consistent with manufacturer requirements.

SCRS members regularly report pressure to deviate from OEM repair instructions, omit required procedures, or substitute parts for cheaper alternatives that do not provide the same fit, finish, meet the same specifications or protection of consumer investments. This is often driven by reimbursement constraints rather than technical necessity. These pressures push back against consumer education and often contend with consumer's preference in how they want their vehicle fixed and as a result place consumers at risk; creating untenable conditions for repair businesses committed to safety-first repairs.

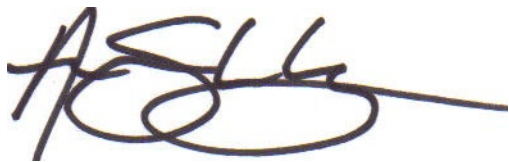
Many SCRS member businesses have made significant investments in advanced repair capabilities, including establishing in-house or separate independent ADAS calibration operations using the same equipment and information available to franchised dealerships. These investments demonstrate that independent repairers can perform complex, technology-driven repairs when allowed to do so without interference from insurance influence.

From a consumer perspective, the issue is straightforward: vehicle owners expect their cars to be repaired safely, correctly, and in accordance with manufacturer standards. The SAFE Repair Act supports that expectation by protecting consumer choice and reinforcing accountability in the repair process.

SCRS respectfully urges the Committee to carefully evaluate the unintended consequences of the REPAIR Act and to give serious consideration to alternatively supporting the SAFE Repair Act as a more effective, balanced, and safety-focused approach. This framework better reflects the realities of today's vehicles, today's repair environment, and the shared goal of ensuring that motorists can trust the safety of their vehicles when they return to the road.

Thank you for the opportunity to submit these comments for the record.

Respectfully submitted,

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Aaron Schulenburg
Executive Director
Society of Collision Repair Specialists

A handwritten signature in dark ink, appearing to read 'KMB' in a stylized, blocky font.

Michael Bradshaw
Chairman
Society of Collision Repair Specialists



Transport Workers Union of America, AFL-CIO

John Samuelson
International President

Alex Garcia
International Executive
Vice President

Jerome Lafragola
International
Secretary-Treasurer

Curtis Tate
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Vice President

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International Administrative
Vice President

"AMERICA'S FIGHTING DEMOCRATIC UNION"

January 8, 2026

The Honorable Gus Bilirakis
Chairman
Subcommittee on Commerce,
Manufacturing, and Trade
House Committee on Energy and
Commerce

The Honorable Jan Schakowsky
Ranking Member
Subcommittee on Commerce,
Manufacturing, and Trade
House Committee on Energy and
Commerce

RE: Statement for the Record: Hearing on Examining Legislative Options to
Strengthen Motor Vehicle Safety, Ensure Consumer Choice, and Cement U.S.
Automotive Leadership

Dear Chairman Bilirakis and Ranking Member Schakowsky,

On behalf of more than 160,000 members of the Transport Workers Union of America (TWU), I offer this statement for the record as part of the above-mentioned hearing. Specifically, the TWU is encouraged by two pieces of legislation on the subcommittee's agenda which attempt to address ongoing issues caused by autonomous vehicles (AVs): the draft legislation offered by Representatives Latta and Dingell (SELF DRIVE Act of 2026) and the AV Safety Data Act offered by Representative Mullin. Actions to regulate AVs are long overdue and these bills both deserve serious consideration as part of the subcommittee's work on the next surface transportation reauthorization.

TWU members operate, maintain, and service more than half of all public transportation trips in the United States. Additionally, our members work alongside and within areas congested with motor vehicles – including ground workers on airport tarmacs and bikeshare workers whose job site is on city streets. Seriously regulating and overseeing AVs is essential to both the safety of these workers and their long-term economic well-being. The AV Safety Data Act, which the TWU has endorsed, and the SELF DRIVE Act would both take critical steps to ensure workers' safety is never at risk due to AVs, both as drivers and as pedestrians on the surrounding streets.

Unregulated AVs are the most significant threat to roadway safety today. The overly permissive atmosphere created by federal inaction over the past decade has allowed thousands of driverless cars to be deployed with next to no enforceable safety standards. Manufacturers have been allowed to market “full self-driving” vehicles while arguing in court that these vehicles are meant solely to assist humans. An entire transportation industry is developing with the philosophy of failing fast and asking questions later – tenets anathema to both safety and job creation. Absent strong federal leadership to set standards and hold innovators accountable for their actions, this wild west atmosphere will continue to expand and undermine the safety of our national infrastructure.

We are encouraged that the SELF DRIVE Act would, for the first time, set enforceable safety standards on AVs. The discussion draft would ensure humans retain oversight and the ability to intervene to keep vehicles safe and preserve the existing division of responsibility between federal and state regulators. It is not comprehensive of all that the federal government should be doing to rein in the excesses of the AV industry and the TWU will continue to seek additional protections for worker safety and economic security with regard to AVs. However, the SELF DRIVE Act, especially in combination with the AV Safety Data Act, would be a start.

Minimum federal safety standards for AVs are urgently needed

Under our current regulatory structure, AV safety standards are in free fall. A patchwork of inadequate and dangerously lenient state laws is encouraging a race to the bottom, and a complacent federal government has allowed far too many risks into the system. Several times a week, new videos become available of AVs driving through police cordons, rolling over firefighting equipment, ignoring school bus stop signals, and engaging in other unsafe activities. As more AVs have been deployed, the situation has not gotten better, rather the dangers they pose have become more widespread. With no realistic minimum safety standard in place and with more AV developers entering the market as time goes on, it would be naïve to expect any safety improvements across the system without federal intervention.

Establishing a federal safety standard, enforced by NHTSA, will ensure that AVs meet our safety expectations *before* they are deployed onto our streets. Many of the AVs currently deployed do not meet the standards envisioned by SELF DRIVE Act and would have to be immediately withdrawn from service were this enacted. It is long past time that the federal government acknowledge its responsibility for these vehicles in the same manner it does for traditional cars, trucks, and buses.

Humans must retain oversight and the ability to intervene to keep vehicles safe

The most essential component of transportation safety is well-trained, qualified workers professionally conducting their duties. AVs, just like every other piece of equipment, will malfunction. The hardware and the software of these vehicles will break down. When this happens, humans must have the ability to intervene to prevent disaster.

These are not theoretical concerns in our transportation systems. In two crashes in 2019 and 2020, automated systems on the Boeing 737-MAX aircraft overrode human commands after failing to correctly respond to the environment, crashing at full speed and killing 346 people. In 2009, 9 people were killed, including the operator, on the Washington, DC Metro's Red Line when the positive train control system ignored the operator's command to brake and accelerated into a parked train just north of the U.S. Capitol. In both instances, had humans been allowed to intervene the crashes would have been avoided.

In addition to the obvious safety benefits of allowing human oversight and intervention in automated systems, AV developers must face a practical matter that many commercial vehicles will continue to require humans onboard even if they are not expected to operate their vehicle. Public transportation systems are obligated to provide services for the disabled community. Tour bus operators and other service companies may continue to want humans present to provide the services they do today for paying customers. In these cases, disallowing workers from accessing the controls to these vehicles would effectively hold them hostage. These workers would be trapped, entirely at the mercy of their employer and the competency of the automated system. It seems obvious that such situations should be prohibited.

The TWU does not believe that all vehicles must forever utilize the same methods of control present on our current fleets. We believe that equipment will change as safety improvements are developed. Certified operators will be able to work with any system to safely navigate our roads, provided the technology enables them to oversee and intervene as the workers deem necessary.

States and localities should continue to make operational decisions for AVs

NHTSA is poorly equipped to regulate car use at the street level. The agency's expertise has, since its inception, centered around the safety of the manufacturer and the products available in the market. It would be impossible for the NHTSA to review or assess the millions of corners, intersections, school zones, taxi stands, bus stops, and other commonplace traffic realities across the U.S.

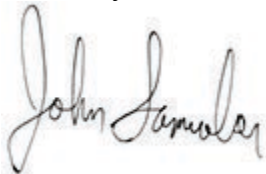
The current division of labor between NHTSA and state/local regulators works and should be applied to AVs. The safety of the vehicle itself should be solely a federal responsibility. However, where and how these vehicles are allowed to operate, what certifications are necessary for the operators, minimum amounts of insurance coverage, where it is safe for a vehicle to stop, and many (*many*) other decisions must be left up to state and local authorities who already have these rules in place. None of these issues should be interpreted to be part of an AVs “performance” and covered under NHTSA’s preemption powers.

More legislation is needed to fully regulate AVs

Unregulated AVs are the most significant threat to roadway safety today. Bad actors have been enabled by a patchwork of inadequate and dangerously lenient state laws which encourage a race to the bottom on standards and a complacent federal government that has allowed far too many risks into the system. Our institutions, including Congress, must do much more to ensure that AV profiteers, including Big Tech companies and their billionaire investors, actually live up to their own marketing claims on safety and job creation.

While the SELF DRIVE Act presented to the committee would take a long-overdue first step towards addressing the threats inherent in AV deployment, it leaves many issues left to be addressed. Mandating commercial motor vehicles continue to be overseen by qualified, certified human operators, ensuring that new jobs being created by this industry are good, union jobs, and requiring AVs to demonstrate an increased level of safety in our public transportation systems are some of the outstanding issues that must be tackled to truly regulate the industry. Many of these issues are outside of the Energy and Commerce committee’s jurisdiction and will need to be handled in other forums. The TWU will fight to ensure that every arm of our government ensures workers are the primary beneficiaries of AV deployment and that safety is never at risk from unproven technologies.

Sincerely,

A handwritten signature in black ink, appearing to read "John Samuelson". The signature is fluid and cursive, with the first name "John" being more prominent and the last name "Samuelson" written in a more compact, flowing style.

John Samuelson
International President



January 12, 2026

The Honorable Brett Guthrie, Chair and the Honorable Frank Pallone, Ranking Member
Committee on Energy and Commerce

The Honorable Gus Bilirakis, Chair and the Honorable Jan Schakowsky, Ranking Member
Subcommittee on Commerce, Manufacturing and Trade

U.S. House of Representatives

Washington, DC 20515

Dear Chairman Guthrie, Ranking Member Pallone, Chairman Bilirakis and Ranking Member Schakowsky:

The undersigned organizations write to voice our support for the progress made on the bipartisan SELF DRIVE Act discussion draft, which was recently announced by Representatives Bob Latta and Debbie Dingell. The SELF DRIVE Act would help ensure that millions of Americans are able to access the benefits of autonomous vehicles (“AVs”), which provide safer roads, greater supply chain resilience, create new economic and enhanced accessibility opportunities.

Autonomous vehicles have [driven](#) more than 145 million autonomous miles on U.S. public roads, a distance roughly equivalent to the distance between Earth and Mars. These vehicles undertake diverse operations, carrying passengers across major cities like Phoenix, Austin, Los Angeles, and San Francisco,

assisting with transit access in rural communities in the Midwest, filling in middle mile cargo roles in Arkansas, and hauling freight across Texas and beyond.

The SELF DRIVE Act makes strides toward enabling the safe and timely deployment of AV technology and solidifying the U.S. as the global leader in this transformative field. While AVs have been deployed in recent years, the United States lacks a federal policy framework to set uniform rules of the road for these vehicles. The SELF DRIVE Act would advance this objective in key ways.

First, the legislation authorizes key rulemakings related to AV safety. Second, it establishes cybersecurity requirements to make sure that AVs are secure from outside threats. Third, the proposal modernizes federal motor vehicle safety standards for the modern era by addressing standards for vehicles that operate without a human driver.

The SELF DRIVE Act will help the United States remain the global leader on AVs amidst fierce competition with the People's Republic of China. China is the United States's closest strategic competitor on autonomous vehicles and determined to replace the U.S. as the global leader. A strong federal policy framework will allow U.S. companies to compete and win in the global race on AVs.

Finally, autonomous vehicles are an opportunity to re-imagine how Americans move, but the federal government's rules must keep pace with the opportunity before us to build vehicles that are accessible for people with disabilities, including wheelchair users and nonvisual accessibility, and address new use cases. Legislation like the SELF DRIVE Act will lay the foundation for years of growth of AV technology and allow U.S. companies to lead the pack in developing standards and practices worldwide.

The undersigned organizations appreciate the Committee's consideration of this important bill to transform transportation as we know it. We look forward to working with Representatives Latta and Dingell, the Committee, and Congress on appropriate revisions throughout the process and more broadly to ensure the safe and timely deployment of AVs and American leadership in this game-changing technology.

Sincerely,

United for Autonomy

ITS America

U.S. Chamber of Commerce

American Council for the
Blind

MEMA. The Vehicle
Suppliers Association

United Spinal Association

American Trucking
Associations

National Association of
Manufacturers

Zero Emission Transportation
Association

Autonomous Vehicle Industry
Association

National Federation of the
Blind

Association for Uncrewed
Vehicle Systems International
(AUVSI)

National Venture Capital
Association

Reason Foundation

Bay Area Council

TechNet

Chamber of Progress

Truck & Engine

Dallas Regional Chamber

Manufacturers Association

January 12, 2026

The Honorable Gus Bilirakis, Chair
The Honorable Jan Schakowsky, Ranking Member
Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
U.S. House of Representatives
Washington, D.C. 20515

Dear Chair Bilirakis and Ranking Member Schakowsky:

As you prepare for the upcoming hearing, “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership” we urge you to prioritize advancing requirements for safety technologies in vehicles. We respectfully request this letter be submitted to the hearing record.

Across our nation, families like ours are devastated by the loss of a loved one or the suffering of a serious injury due to motor vehicle crashes and incidents. A staggering 40,000 deaths and 2.44 million injuries occurred on America’s roads in 2023, amounting to a public health and safety crisis.

Traffic crashes, fatalities and injuries affect not only victims, survivors and their families, they also come with a hefty price tag for consumers. The annual economic cost of motor vehicle crashes was \$429 billion in 2025.ⁱ This equates to each person living in the U.S. essentially paying an annual “crash tax” of more than \$1,200.ⁱⁱ

Vehicle safety technologies are ready now to save lives, prevent injuries and reduce the financial impact of the crisis on America’s roads. Please prioritize getting them into new vehicles to ensure no other family experiences the grief and trauma that we confront every day. Research for this approach is clear, and additional information is provided below.

Solutions exist, and we urge you to conduct oversight on uncompleted Congressional directives and to advance additional solutions in the next surface transportation reauthorization bill, including:

- Rulemakings to ensure new cars and medium and large trucks will be equipped with comprehensive automatic emergency braking (AEB)
- Passenger vehicles equipped with impaired driving prevention technology
- Lane departure warning (LDW), lane keeping assistance (LKA) and driver support systems
- Systems to prevent unattended children from dying or suffering serious injuries in hot cars
- Intelligent speed assistance

We thank the Committee for its past leadership to protect families, communities and road users and ask that you continue to do so in the next surface transportation reauthorization bill. Our families want the safest vehicles on the roads. Whether you are a driver, a passenger, or outside a vehicle standing, walking, biking or rolling, everyone deserves safe public roadways.

Automatic emergency braking

Over the last two decades, deaths of vulnerable road users (VRU), which include bicycle riders, pedestrians, motorcycle riders and other road users outside the vehicle, have surpassed increases in traffic fatalities. Therefore, we urge you to advance a requirement for automatic emergency braking (AEB) to detect and respond to bicycle riders and motorcycle riders.

Alcohol-impaired driving

Alcohol impaired driving resulted in 12,429 people killed in 2023ⁱⁱⁱ and remains the largest single contributor to road fatalities. Over the last 10 years, on average, drunk drivers have been responsible for approximately 30 percent of all traffic fatalities annually.^{iv} Yet the advanced impaired driving prevention technology required in the IIJA is more than a year overdue. Lack of swift action defies understanding as the potential benefits are exceedingly high. According to research from IIHS released in July 2020, *Potential lives saved by in-vehicle alcohol detection systems*, alcohol-detection systems, once widely deployed, could save more than 9,000 lives a year in the U.S., accounting for more than 25% of road fatalities.^v A recent update of that analysis based on data from 2019 through 2022 indicates that as many as 10,812 lives would have been saved.^{vi} We urge the Committee to conduct oversight on the inaction of the law.

Driver distraction - Lane departure warning / Lane keeping assistance and Driver support systems

Driver distraction is a well-known and documented issue that is expanding due, at least in part, to reliance on smart phones, ubiquity of the technology and its ever-expanding uses. Crash risk increases dramatically – as much as four times higher – when a driver is using a mobile phone, with no significant safety difference between handheld and hands-free phones observed in many studies.^{vii}

The IIJA directed the U.S. Department of Transportation (DOT) to issue Final Rules for LDW and LKA as well as conduct research regarding the installation and use of driver support systems, also known as driver monitoring systems, to minimize or eliminate driver distraction and automation complacency within three years and report to Congress within six months of the completion of the research.^{viii} The DOT Secretary then must determine if one or more rulemakings are required. The DOT should issue the LDW and LKA Final Rules and should release the study and advance a Final Rule with a compliance date for driver support systems to prevent driver distraction, disengagement and automation complacency including for vehicles equipped with partial automated driving system (ADS) and to ensure driver capability. We urge you to conduct oversight to advance action on this vital technology.

Unattended children in hot cars

Children dying unattended in hot cars is a tragedy that can be prevented by the integration of available and inexpensive systems to detect and alert to an unattended child in the passenger compartment. More than 1,100 children have died in hot cars since 1990 and at least another 7,500 survived with varying types and severities of injuries.^{ix} Parents, caregivers and our youngest, most vulnerable passengers deserve this protection. The IIJA requirement to address this problem is more than two years overdue. We urge you to also conduct oversight on this lapse.

Intelligent speed assistance

In 2023, 11,775 people were killed in speeding-related crashes, accounting for 29 percent of total crash fatalities. Intelligent speed assistance (ISA) is a vehicle safety technology that helps drivers comply with speed limits by using global positioning system (GPS) data, cameras, digital maps or some combination of these to detect the legal speed limit. It can then warn the driver when they are speeding or prevent speeding. Laws have been passed in Washington State, Virginia and the District of Columbia for ISA use for repeat and/or extreme speeding offenders. We urge the Committee to incentivize all states to follow suit in the next surface transportation reauthorization bill.

Automated driving system safeguards

While one day vehicles equipped with automated driving systems (ADS) and autonomous vehicles (AV) may improve safety on our roadways, they are not a near term solution. Conversely, the identified vehicle safety technologies are ready now to save lives and curb costs. Getting them into new vehicles backed by performance standards must be our present focus to reach the goal of ending deaths on our roadways.

Sincerely,

Marissa Rodriguez, New City, NY

I lost my sweet, adorable 1 year old girl and boy twins, Luna & Phoenix, in July 2019 due to my loving husband accidentally leaving our babies in his car when he went to work. My family is devastated and broken.

Gunnar Naughton, Riley, KS

I lost my niece Brooklyn to a frontover accident in 2021. Life has never been the same for our family after such a loss.

Mitchell Millsap, Elkins, AR

Uncle of Brooklyn Cline killed due to a front over.

Angela and Scott Jones, Gilbert, AZ

Parents of Charlotte Jones, who was passed away on 9/3/19, due to a hot car tragedy.

Michelle Ramsey, Houston, TX

In 2016, two drunk and impaired drivers changed my family forever. I lost two sons, Khaiden(6) and Samuel (4), while my daughter, myself and a Good Samaritan were severely injured.

Rose Kehoe, Arlington, VA

We lost our dear son, Braylon Meade, to an impaired driver over three years ago.

Marc Benardout, Los Angeles, CA

My son Noah was a pedestrian killed by a drunk driver going at double the speed limit through a city street intersection. His killer served just 6 weeks in prison before being released.

Cheryl Bransom, Portland, OR

Our son, Douglas Bransom, was killed in 2006 at age 7 in a front over incident by our neighbor.

Phil Bransom, Portland, OR

Our son, Douglas Bransom, was killed in 2006 at age 7 in a front over incident by our neighbor.

Jon Naser, Canonsburg, PA

18 years ago my dad, Jim, was taking my 8 year old sister, Liz, and 2 of her friends to basketball practice when they were hit by a drunk driver. Jim was killed instantly while Liz was severely injured.

Clara Shelton, Denver, CO

My brother, Sam, was an 18-year-old college freshman when he was killed by a drunk and drugged driver who was going well over the speed limit.

George Murphy, Jacksonville, IL

On a beautiful July 4th Wednesday in 1984, my 24-year-old daughter, Kellie Murphy Wheatley, was struck and killed instantly. The impaired driver was a local 68 individual with three previous DUI arrests, and no convictions.

Eileen Zadrozny, Westfield, NJ

My beautiful 23 year-old son Ryan was killed by a drunk driver on 12/1/24. The drunk driver was going 105 mph on an urban street when he killed my son who was crossing in a crosswalk. This driver had also killed another person in a similar way in 2011.

Scott Lockard, Tacoma, WA

My 18-year-old daughter was killed by an underage drunk driver. He was traveling the wrong way on interstate five and hit my head on.

Catherine Koessl, Kenosha, WI

My parents, Dr. Vincent and Mary Rizzo, and uncle, Dr. Michael Rizzo, were killed on April 5, 2019 by a drunk driver with a BAC of .316.

Emily Stein, Medford, MA

My dad was killed by a driver programming her GPS. He was 61 about to become a grandpa with my first child.

Brenda Johnson, Highland, IL

My son Joshua Melton, age 18, was killed by a drunk driver doing over 130 mph. The accused had a DUI when he was 20, and 3 months later killed my son.

Cindy Ortega, Albuquerque, NM

My son was killed by a drugged and drunk driver in Santa Fe, NM in July of 2016. He was only 36 years young and had a whole life ahead of him until this tragedy.

Tyler Cestia, New Iberia, LA

James Lee, Carbondale, KS

In February 2023, my oldest child, Alyssa, was killed by a drunk driver. She was 16. Alyssa's killer was nearly 3 times the legal limit to drive.

Kathryn Prescott, Brooklyn, NY

On September 7th 2021, I was struck and then run over by a 33 cement truck. All four left-side wheels of the vehicle rolled over my legs and pelvis, crushing bone, severing arteries and leaving me to undergo 14 surgeries and complete over four years of physical therapy. On top of the physical ramifications, my crash effectively ended a career I'd spent 20 years trying to build and completely upended multiple other aspects of my life. The driver didn't stop – never hit the brakes.

Lisa Alleman, Lakewood, OH

My husband was killed in a highway accident and that brought the importance of safety measures to my mind.

Linda Wilburn. Ardmore, OK

Orbie's Mom

Kim Telep, St. Ignace, MI

My husband was pulled over on the New Jersey turnpike checking his work vehicle when a trucker veered off the road and hit my husband and his vehicle. My husband died as a result of his injuries nine days later.

Aparna Mulchandani, Hackensack, NJ

We lost our 22 year-old son, Elan, when he was rear ended by a truck going at 65 miles per hour while he was stopped in traffic on his way to work.

Jaideep Mulchandani, Hackensack, NJ

Our 22 year-old son, Elan ""Izi"" Mulchandani would not have been killed by a truck that didn't stop and rear ended him if the truck had AEB. This happened on December 2024.

David Gross, Dufur, OR

I lost my son over eight years ago when an out-of-control semi crashed into him as he sat astride his cycle, stopped in a work zone.

Barbara Galgiani, Stockton, CA

My nephew Paul Katuszonek was killed by a driver that had been driving for too many hours and did not see that Paul was stopped for a flagman.

Anna Guardipee, Salem, VA

In October of 2019 while stopped in traffic in a construction zone, my friend and I were crashed into by a tractor trailer driven by a driver who was texting. He never hit his brakes and crashed us at almost 60 miles an hour the impact left me paralyzed from the chest down and killed Jenny.

Mrs. Rosalind Reddick, Zebulon, NC

Our son, Elijah Jayden Hawkins-Maynor, transitioned to Paradise on October 5, 2023 due to an impaired drug and drunk driver. He was a passenger in a vehicle with three other people that collided with a tree. While the others survived, Elijah tragically succumbed to his injuries.

Franklin Wood, Falls Church, VA

My daughter, Dana Wood, and her friend Jessica were both killed on October 15, 2002, on I-95 in Virginia. Dana and her friend were driving to East Carolina University when a truck driver, who neither slowed nor attempted to change lanes, struck Dana's disabled car pushing it 1,500 feet down the highway.

Angela Suter, Hagerstown, MD

My daughter 27 was killed in a tractor trailer crash Oct 3 2024 when the driver never hit the brakes. She was killed instantly.

Dawn King, Davisburg, MI

My father was killed December 23, 2004 when his car, slowed in traffic, was struck from behind by a semi driven by a sleepy driver who didn't see all stopped traffic ahead.

Melanie De Leon, Katy, TX

My sister, Melissa De Leon (48yrs old), was killed in under-ride truck crash on February 24, 2023 in South Texas. Six weeks later, when traveling home from Katy, TX to visit my family for the Easter Holiday on Highway 77 South, a speeding semi-truck traveling Northbound lost control in the rain and flew into the median coming within feet of hitting/killing my pregnant wife and I as we were in a standstill due to southbound traffic.

Paul L. Huffman, Roanoke, VA

Laura Fredricks, Becket, MA

My daughter, Emily Claire Fredricks, was killed on November 28, 2017, in Philadelphia, Pennsylvania. She was a cyclist and was killed by the driver of a private sanitation truck.

Gage Evans, Arvada, CO

My husband would likely be alive today if the truck that killed him had been equipped with and employed Automatic Emergency Braking (AEB) and Intelligent Speed Assistance (ISA). It was traveling at upwards of 80 m/p/h on the ramp off highway I 70 into a line of stopped traffic on Colfax Avenue in Lakewood, Colorado in 2019.

Lori Johnson, San Diego, CA

AEB would not have saved my family in particular but other families associated with Truck Safety Coalition may not have lost their loved ones had AEB been in big trucks.

Angela Sims-Fuelling, Myrtle Beach, SC

If AEB were on trucks my husband would be alive. The truck driver hit him at 55 miles hour. AEB would have slowed the truck and he would have had a chance to survive.

Ronnie Hamby Jr, Ellsworth, KS

If my truck had the AEB system, my truck wreck might not have been as bad let alone happened as it would have started my reaction time sooner.

Michael White, Boulder, CO

Until July 29th, 2023, we were living one story. The story of a mom and dad watching their 17-year-old son chase his dreams as a US national cycling champion and member of the US National Cycling Team across multiple cycling disciplines. That story ended instantly, when Magnus was killed by a driver on his last training ride before departing to Scotland to represent the US at the Mountain Bike World Championships. A driver had passed out after an all-night bender, consuming whiskey, prescription drugs and cocaine. The driver never braked, drifted 18 feet to the right, and hit and killed our son.

Brian Goggin, Washington, DC

In July 2021, a distracted truck driver struck and killed my mother without stopping.

Gina Cancelliere, Las Vegas, NV

A drunk driver driving a pickup truck without operating its headlights at 9PM on 12/1/1999 hit me as a pedestrian. I was thrown 40 feet down the road. Suffered 2 collapsed lungs, lacerated liver, subdural hematoma, fractured ribs-pelvis-tailbone-pubic bone, optic nerve damage, countless bruises and stitches on the top of my head. I missed the last semester of college and 2 solid weeks of my life. I have chest tube scars, my left eye swells when I'm tired, my left hip is often sore.

Mike Doyle, Alexandria, VA

I am a crash survivor who started a pedestrian street safety advocacy group a year after I recovered from my injuries. I know that technology such as ASE helps to slow drivers down and saves lives. If the driver that crashed into me had today's sensor technology installed in his 5,000-pound SUV, my crash could have been avoided and the months of neurology rehab made moot.

Melissa Wandall, Bradenton, FL

My husband, Mark, was killed by a repeat red light runner. Mark was the passenger in a vehicle driven by my brother, Philip, who was doing all the right things. He was stopped at a red light and proceeded left when his green arrow allowed him to proceed. When he proceeded on green his vehicle was T-boned by the driver that ran the red light. My brother is physically and emotionally debilitated from this crash that took my young husband's life and left a newborn without her father.

Daniel Langenkamp, Bethesda, Maryland

My wife, Sarah Debbink Langenkamp, was killed in 2022 by the driver of a large truck while she was riding her bike home in an (unprotected) bike lane from our children's elementary school.

Jason Waldron Warren Michigan

I lost my entire family to a drunk and drugged driver. It took my Father Dean Waldron, my Stepmother Sherry Waldron My 4 y/o Brother Shane Waldron and my 12 y/o Brother Adrian Waldron I was the only survivor at 10 y/o. The Drunk driver also died.

Heather Geronemus, Fort Lauderdale, FL

My father, Dr. Robert Geronemus, a renowned nephrologist, was killed in car on pedestrian DUI hit and run on January 24, 2009.

Steven Benvenisti, Upper Saddle River, NJ

When I was a senior in college, a drunk driver crashed his vehicle into me while I was walking. My injuries were catastrophic, including a severe TBI, crushed legs, requiring 15 surgeries and more than 6 months of hospitalization.

Jody Miller, Triadelphia, WV

A drunk driver robbed me of my daughter, Heather, at the age of 21, just weeks prior to her graduation from the WVU School of Nursing....no graduation, no weddings, no more Christmas's, no more tomorrow's!

Sandy Melville, Rochester, MN

My 23 year-old son was crossing the street in Rochester Mn. On Black Friday Nov. 27th, 2010 and was hit and killed on impact one step from the curb by a repeat impaired driver with a BAC of .21.

Larry Coggins, Lakeland, FL

I spent 25 years in law enforcement, all in traffic, where I witnessed firsthand on a weekly basis in the busiest region in FL, what an impaired driver can do to themselves, their families, and more often than not, innocent people.

Kristine Villatoro, Front Royal, VA

My daughter, Anna Marie Dalton, was killed by an impaired driver on 2/19/19. She was only 23 years old and the prime of her life. Unfortunately the driver was stopped by police after they were observed driving on a multi use walking path. The driver did not have a license and had been on probation for a previous drug offense. My daughter was killed less than 8 minutes after the officer cleared the traffic stop.

Ava Fontenot, Gulfport, MS

Our 25 year-old son, Lindsey, was killed July 2, 2010 along with his friend. The drunk driver was killed also. Lindsey left behind a fiancé, his sister and his parents.

Ronald Thomas, Mosinee, WI

Our daughter, Kaytlyn Madison Thomas, graduated in May of 2021, turned 18 in June, and 14 days later was killed by an impaired wrong way driver on I39. She was only a month away from starting her college dream in fashion creation. The impaired driver was on the road for an hour. 45 minutes after the first 911 call, her drive ended when our daughter met her head on.

Ashley Evans, Knoxville, TN

My life was permanently changed by a preventable crash involving an impaired driver. On Wednesday morning of July 8th, 2020, in Sevierville, TN my 3-year-old identical twin daughters (Ella & Emma Lett) were going to a petting zoo with their grandparents (Mike & Judy Lett) when an impaired driver that was speeding rear-ended another vehicle causing it to cross the center line and collide head-on with the car my twins were riding in. Emma Grace Lett survived but her sister Ella Mae fought 5 days before she passed on July 13, 2020. The grandparents also suffered a number of injuries.

Juan Rodriguez, New City, NY

My family and I suffered the greatest loss of our twin babies, Luna and Phoenix, to a hot car death.

Roberta Thomas, Urbana, OH

My son, Robert Thomas, and his friend, Megan Branam, were killed by a drunk driver in April 2025. My son's girlfriend, Nevaeh Brown, was also in the car and suffered catastrophic injuries that left her in the hospital for almost two months and still healing through therapy. The driver had been to prison prior to this for an OVI and this was his fifth one. He was three times the legal limit.

Beatriz Viera, Somerset, NJ

My daughter passed away in a hot car accident.

Michelle Stuyvesant, Garland, TX**Marta Magellan, Miami, Florida**

My one-year-old grandson died due to an expectation that my husband, as usual, had brought him in from the car as he always did. But on that day, he was involved with workers fixing something in the back, and he simply assumed I had brought him and closed the baby's bedroom door, where we both thought he slept. Our darling Sammy died in a hot car accident, and our lives spiraled into a grief that will never end.

Jennifer Levi, Palisades, CA

Our 18 year-old son Braun Levi was it and killed by a repeat drunk driver with a suspended license.

Killian Cline, Liberty, MO

My daughter Brooklyn was killed in 2021 due to a frontover.

Justin Cline, Liberty, MO

My daughter Brooklyn was killed in 2021 due to a frontover.

Doretta McHugh, Summerville, SC

If these safety measures had been in the vehicle of the drunk driver that killed my son, Daniel Everett Coy, he may still be here. That man ran a red light, turning left in the path of my son who had the green light, right of way on very busy road when he was on his motorcycle. If alcohol detection systems were on board that vehicle, a Mercedes-Benz, he wouldn't have been able to drive away from 2 separate bars where he imbibed 8-90% proof drinks in a matter of 4 hours. Four hours after the crash, he still had a BAC of 0.156, glassy eyes and slurred speech.

James Gersing, Miami, FL

My wife and I were watching our grandchild when several workmen met me at the house when we returned from the store. My wife told me to deal with them while she opened the house. The baby was asleep in the back seat and by the time we realized it, he was gone.

Kristi Hosea, Springfield, IL

My only cousin Jimmy was killed by an impaired driver in the state of Georgia. His loss changed the course of history in our family.

Tammy Duffy Chesapeake, VA

On May 19, 2017 my 18 yr old daughter Kaitlyn was a month away from graduating HS with plans to attend Virginia Tech premed/bio. A drunk and drugged furniture delivery truck driver hit and killed my beautiful daughter and our puppy with a 10,000 lb box truck. Her friend survived with a TBI and other life altering injuries.

Jamie Dill Evansville, Indiana

Parent of Oliver Dill who passed away in a hot car.

Stephanie Coggins Lakeland, FL

Being married to a state law enforcement officer for 25 years, I have seen and heard the horror stories about crashes where innocent lives were lost, families wiped out, and children orphaned at the hands of a drunk driver. It boggles my mind that the USA is behind European countries when it comes to adding lifesaving DUI prevention technology to all vehicles.

Tatiana Coriano Bayamon, Puerto Rico

I've been working directly with young people for four years, talking to them about the dangers of drinking and driving. Every day we wake up to tragic accidents that could have been prevented if we had used technology to our advantage.

Lynn Ivey Tallahassee, Florida

I'm a Victim Services Specialist for MADD North Florida for 19 years. I have seen firsthand the harm that comes to victims of impaired driving.

Tannan Millsap Elkins, Arkansas

Brooklyn Cline, killed due to frontover accident.

Kayla Naughton Riley, KS

Aunt of Brooklyn Cline, killed due to a frontover.

Jeannine South Lutz, Florida

As an impaired driving prevention advocate, I see firsthand every day how impaired driving ends and destroys innocent lives. The technology exists to save lives.

Josh Wright, Attorney from Birmingham, Alabama

Legal advocate and champion for stopping DUI injuries and deaths as a lawyer for over 25 years.

Karen Murphy Bristow, VA

My son could have been saved if safety measures were in place.

Cindy Ortega, Albuquerque, NM

My son was killed by a drunk driver 9 years ago and our lives were adversely changed forever.

Erynn Sendrick Daytona Beach, Florida

I've seen first-hand the devastation caused by drunk driving. I also understand that even good people make catastrophic decisions in moments of impaired judgment. This technology doesn't remove personal responsibility - it supports it, creating a safeguard that prevents one bad decision from destroying multiple lives.

Jill Duerstock Batesville, IN

My daughter was killed by a drunk driver in September 2023. She was a 3rd year nursing student who had so much left to give to the world. The driver barreled down the highway on the wrong side of the road and hit Riley and her boyfriend head on. He survived but has injuries that derailed his career as a police man and along with the emotional trauma will affect him forever.

Arlene Rosenbusch, Rockville, MD

My sister and her husband were killed by a drunk driver 10 years ago in Maryland.

Cynthia C. Hagain Lilburn, Georgia

My mother, Maria E. Hagain, age 58, my sister and only sibling, Jennifer M. Hagain, age 24, and my sister's fiancée, who lived with us, Eric M. Geiger, age 22, all of Lilburn, Georgia, were killed by an underage drunk driver on a trip to visit my dad, who was working in North Carolina. It will be 30 years on March 1st since all three were killed along with the 20-year-old drunk driver and his 23-year-old passenger (both Marines). It will be 30 years since three people were injured in a third car, which included a 5-year-old girl and her parents. Eight lives impacted. Five lives lost forever

Erin Holley Charleston, SC.

My precious 5-week-old son was left by myself and my husband in a parked car accidentally midday in June in SC. (We both believed the other had moved him to my vehicle when we parked our other car). We returned within 20 minutes (just ahead of EMS whom we had called for help), and he was fine, thank G*d! But 10 months later a boy in his same daycare class died in a parking lot outside his dad's workplace (the dad drove to work accidentally without stopping at daycare).

Deona Bien-Olathe KS

Mother of Aslyn Ryan who died at 1 year of age in 2004 from a hot car tragedy after her sitter inadvertently left her in a hot car.

Penelope Roa Murnane**Larry Liberatore Odenton, MD**

My son was killed by a truck driver who fell asleep at the wheel.

Megan Aurelius League City, TX

Mother of Lillian Guerra (5mo) who died in a hot car in Texas in 2013.

Kristi McElroy Orlando, FL

Over 12,000 people are killed annually due to Impaired Driving - please help save lives!

Anne Callery Redwood City, CA

In 2017, my husband was killed by an impaired driver.

Annette Barrera Las Vegas, NV

September 14, 2012, Annette Barrera was struck by a drunk driver at 55 mph. The drunk driver left the scene, but was picked up just down the street. Annette Barrera was taken to an emergency room for extensive medical attention. Attention that would include a brain surgery, a filter placed in her leg, years of therapy to get minimal functioning back and a lifetime of hardship.

Russ Swift Port St Lucie, FL

Had AEB been available in the vehicle our son was riding in, the vehicle would never have driven under the side of a tractor-trailer stall across both lanes of the highway.

Penelope Murnane Santa Rosa Beach, FL

On April 19, 1981 our car was hit by a drunk driver around 10:00 am. My mom, dad, and brother all perished because of that action by the drunk driver. I survived because a hero following us stopped and pulled me out of our car. I was 12, my Mom was 40 and my Dad was 35, my brother was 14.

Kelly Kalinowski Scottsdale, AZ

Daughter a survivor of a truck crash with 5 deaths. No evidence of braking for stopped traffic on I-40.

Olivia Kalinowski Scottsdale, Arizona

I am a survivor of a truck crash with 5 deaths and no evidence of breaking.

Cynthia Hernandez Santa Maria, CA

While AEB likely would not have prevented my daughter's crash, it has the potential to prevent thousands of truck crash deaths and injuries and must be standard on all classes of commercial motor vehicles.

Denise McCalister Tampa, Florida

I've worked with both DUI offenders and victims and have seen the devastating effects of impaired driving.

Robyn Morton Pinellas Park, Florida

I've worked with both DUI offenders and victims and have seen the lasting effects it brings. Being the mother of a retired Law Enforcement DUI Officer, I have seen the effects it has on not only families/victims, but those who are boots on the ground to remove impaired drivers from our roadways. My son lost his best friend to an impaired driver 11 years ago and he still struggles with it today.

Jodie Edwards Liberty Township, OH

Parent of a child who died due to being inadvertently left in a hot car.

Sonia Burgess Lake City, SC

My 24 year old daughter was rear ended by an 18 wheeler. She and her 3 friends died on the scene.

Catherine Shapiro Hypoluxo, Florida

As a cyclist I have had 3 friends hit by impaired drivers while riding their bikes. Tragically 2 of them were killed, 1 survived and thankfully is healthy today. As the Program Manager for MADD South Florida, it's critical to implement DUI technology to save innocent lives.

Jan Taylor Weeks North Bethesda, Maryland

Automatic Emergency Braking could have saved our children's lives, our family and all of our futures. In July, 2009, our beautiful and amazing sons Stone Weeks, 24, and Holt Weeks, 20, were happily on their way home to Washington DC from Rice University in Houston. Driving on Interstate 81 in Virginia with only an hour left to go, Stone and Holt were in the right-hand lane preparing to exit onto Interstate 66 -- when traffic stopped because

of a jack- knifed tractor trailer ahead. The brothers stopped at the end of the miles-long line, and were then slammed from behind by a 40-ton Peterbilt tractor trailer rig traveling full-speed. The severity of the impact shot Stone's and Holt's car under the tractor trailer ahead of them. Catastrophic fire obliterated their car and both tractor trailers. This carnage and devastation melted and seared the road to the extent it had to be remilled and repaved.

Tamecha Buck Lawrenceville, Georgia

On August 2, 2021, myself and my 2 sons Javarius (19) & Chase (8) were all traveling back from a trip to the Grand Canyon when a drunk driver driving the wrong way hit us head on.

Fay Swenson Rapid City, SD

Our son Brad was killed by a speeding drunk/drugged driver who got herself and her dog out and never even tried to get Brad out and he burnt up in his car.

Amy Froehlich Appleton, Wisconsin

Our innocent and amazing son who was driving safely to go hiking, was killed instantly by a 5th time Drunk Offender going at a rate of over 80 mph in a 35 mph zone.

Susan Salhaney Grosse Pointe, Michigan

My brother was killed in 2022 during a charity bike ride for Make A Wish in Michigan. An impaired driver hit his team of five riders. The crash resulted in two fatalities, one of which was my brother.

Shirelle Green Clinton, MD

My 23-year-old son, Matéo died from injuries he sustained in a crash with a friend who had been drinking.

Taylor Greeson Lansing, Michigan

Helen Disney-Greeson, Martin Stott, and Jason Betcher deserve to still be here today. Three individuals taken by three different impaired drivers in three different years.

Cynthia Naughton Manhattan, KS

Grandmother of Brooklyn Cline, killed in a front over.

Eileen and Stan Zadrozny Westfield, New Jersey

On December 1, 2024, our beautiful 23 year-old son Ryan was crossing the street when he was killed by a drunk driver who was going 105 mph on an urban street. This driver had also killed another person in a similar way in 2011.

Linda Wickett Travelers Rest, SC

I am a friend and former colleague of Marta Magellan. She lost her grandson, Sammy Joe Schnall, son of Monique and Jeremy Schnall, because he was left in a hot car, not purposely but because everyone thought someone else had brought him into his room.

Roy Crawford Whitesburg, Kentucky

My 16 year old son was killed by an illegal trucker.

Jennifer Mooney Tierney Kernersville, NC

I lost my father in a horrific truck crash. While AEB may not have saved him, there is no denying that it could and has saved many.

Westin & Dawn Peabody Phoenix, AZ

Parents of Maya Peabody who died in a hot car 2008.

Judy Cotton Fleming Island, FL

I have been involved with Mothers Against Drunk Driving (MADD) for over 26 years, first as a volunteer and the last 13 years as a Victim Services Specialist.

Timothy Moorman, Sr. Fleming Island, FL

I tragically took the life of a 19-year-old young woman in Jacksonville, FL, on 9/25/2003 while driving under the influence of alcohol. It was not only life ending for my victim, but life altering for me. I have since dedicated my life to helping end drunk and drugged driving and have been volunteering for MADD since my release from prison in 2010

Ellen Snelling Temple Terrace, Florida

My Aunt Martha was critically injured by a drunk driver in 1997 in Sarasota. She was airlifted to a trauma hospital and admitted to the ICU. She remained in the hospital for several weeks, followed by months of rehab.

Michelle Grubbs La Center, Kentucky

I lost my 26 yr old son, his fiancé & 3 of her family members in a preventable truck crash in 2021.

Colin Campbell Los Angeles, California

My two teenage children were murdered by a drunk and high driver, and repeat DUI offender, on June 12, 2019. Their names are Ruby and Hart Campbell and they were beautiful, brilliant and talented.

Sarah Sheets Kerrville, Texas

I experienced a near miss 10 years ago when a myriad of circumstances allowed me to forget the most important person in my life, my then 9 month old daughter. I went into the bank and realized what I'd done 20 minutes later and rushed to her. She was ok. It can happen to anyone. Technology exists that would prevent unthinkable tragedy. It needs to be utilized.

Jatnaely Vega Puerto Rico

I am writing out of concern for human safety. Impaired driving continues to harm innocent lives, and preventable tragedies occur every day. Proven technology exists to help stop impaired driving before it happens. I urge you to support the immediate implementation of DUI prevention technology to help save lives.

Limaris Ortiz San Juan, P.R.

I see a lot of news report deaths because a drunk driving crashes. Like society we have the responsibility to take action to stop that fatal decision to drive while the person is drunk.

Julie Huntington Queens, NY

My Dad was senselessly killed by a reckless truck driver while driving on the Ohio Turnpike in 2019. Automated safety features like Automatic Emergency Braking could have saved his life.

Carol Leister El Dorado Hills, California

My 21-year-old son Scott Leister was killed by a drunk driver on the San Francisco-Oakland Bay Bridge on August 17, 2008. Scott was killed and the other passengers were injured when a speeding drunk driver hit their car from behind. Scott planned to get a medical degree to provide international humanitarian aid to those in need. .

Ida Crosby Orangeburg, South Carolina

My 19 year old son, Dominic Grenier, was killed on May 1, 2021 by a drunk driver. The drunk driver was a repeat offender with a suspended license. This technology could've saved my son's life. I will never fully recover from losing him. It is past time for the law to be implemented. Thank you.

Sherrill Futrell, Davis, CA

Friend hit by drunk driver.

Esmi Rosales-Cruz Kenosha, WI

Parent of Zac Shipley who passed away due to a frontover accident.

Jacy Good White Plains, NY

Lost my parents and was left paralyzed at the hands of a cell phone distracted driver.

Nereda Pugh Philadelphia, PA

I lost my son to a hit and run driver, while riding his bike in July of 2022. I've been advocating with FSS since then. I have also been working with Vision Zero as an Ambassador since 2025.

Martha Warmuth, Murfreesboro, TN

Our 28 year old daughter was hit and killed by a negligent, distracted driver in Boston in 2016. She was a beautiful, smart caring person who was successful in her career. This technology would have saved her.

Shane O'Neal Lowell, MA

I lost my youngest brother, Will O'Neal, in September of 2024 to a fatal crash. Will was biking home in Brooklyn, NY when a driver struck him in an intersection, ending his life at 26 years old. We need to do more to protect our most vulnerable road users and ensure everyone gets home safely. "

Kristin Whitaker Tampa, FL

My son passed away and it would have been preventable with the aid of increased vehicle safety measures to detect and prevent it.

Ian Shipley Kenosha, WI

Lost son from a frontal accident.

Angela Sims-Fuelling Myrtle Beach, SC

My husband Jim was killed January 4, 2022 by a truck driver you failed to stop or use his breaks. If his truck was equipped with Automatic Emergency Breaking (AEB) it would've decreased or stopped the impact and my husband would still be alive.

Deidre Hankins Tampa, Florida

In 2016 my son and his girlfriend were hit by a drunk driver. She was killed and he was in the hospital for three weeks. It is a devastating tragedy and totally preventable. We need this technology to prevent others from experiencing this kind of pain and loss. Please pass whatever bills are needed in order to advance the life-saving technology in vehicles. Thank you!

John Moore Tampa, Florida

Speeding quite likely was a contributing factor in the vehicle that struck my passenger side while executing my left turn. I had looked to my right before proceeding, but to no avail.

Stephanie Ronan, Rocky Mount, North Carolina

It has been seven years since an impaired driver crashed into me. On September 29, 2018 my life and my family's life was changed forever. Today, my body is held together by hardware in my neck, ribs, leg, and femur. I live every single day with chronic pain, limited range of motion in my neck and shoulder, and the constant reminders that my body will never be the same. The impaired driver didn't just crash into me — he crashed into my children's lives, too. He took away the mother they once knew. No one else should ever have to endure the pain, trauma, and loss that my family and I live with every single day because there is technology available to end impaired driving with the Halt Act.

Jeff & Val Shipley Kenosha, WI

Lost our grandson Zac Shipley age=3 from a front rollover accident due to the driver not knowing he was in front of the car.

Susan Becker Indianapolis, IN

Our son and our daughter's twin brother, Emery Becker was killed by a drunk driver the early morning hours of 18 Mar 2018 in LA where was living and working. He was pronounced dead at the scene. I am sharing Emery's story to have it be different for other families. The HALT act will allow it to be different. Please think about your family, your children, your children's children. . Thank you for your support in the effort to end drunk and impaired driving. Susan, Vic and Clara #emeryforever25

Rev, Martha Ann Matter Tampa, FL

As a pastor I have conducted funerals for people killed by drunk drivers, as well as helping families work through their grief. People killed by drunk drivers have died needlessly and their families experienced senseless grief. We have to stop all this.

Amy Cohen, NY, NY

My 12-year-old son was killed in front of our home. He was an athlete, musician, and a scholar. He deserved to grow up. Getting from 8th grade to soccer practice should not be a deadly act.

Jessica Hart, Washington, DC

My 5-year-old daughter Allie was killed while riding her bike in a crosswalk (at an all-way stop, in a school zone, in a residential neighborhood). Vehicle safety like automatic emergency braking could have stopped the driver from killing her.

Judith Kottick Jersey City, NJ

My daughter was killed by a reckless bus driver in Queens, NY. We should use all means available to protect our citizens from harm and death. Living without your child is a nightmare no parent should have to endure, especially when the loss is preventable.

Christy King Williamsburg, VA

On July 4, 2020, my son Christopher was killed in a car crash. He was a teenager full of life, deeply loved, and with his whole future ahead of him. He was not wearing a seat belt. I can't bring Christopher back, but I can fight to make sure other families don't receive the same devastating call. If sharing Christopher's story helps save even one life, then his life continues to make a difference. Thank you.

Britney Lee Sherman, TX

Older sister of Kaysen Neyland who passed away due to injuries sustained from being left in a hot vehicle.

Raelyn Balfour, San Antonio, TX

I am a decorated army veteran with almost 30 years of service. I lost my son in a car in 2008. No mother wants to feel what that feels like every day please I urge you to pass this legislation for bipartisanship to make sure that no mother feels the way I do every day thank you for your time."

Taylor Zaglia Holliston, MA

I am the mother of Fiona who passed away due to a hot car death.

Kate McGee New Canaan, CT

Lost 2-year old Luke in a front roll-over in 2019.

Whitney Rodden Spring Hill, KS

My 14mo old daughter Harper was killed in a front over accident at her daycare in 2016. Ever since then we have become child safety advocates to prevent this from happening to others.

Jamie Dill Evansville, Indiana

Parent of Oliver Dill that died in a hot car on July 9, 2019.

Simone Zaglia Holliston, MA

Our daughter Fiona's death was an accident that could have been prevented by the technology that alerts a driver of the presence of children/passengers in the back seat. She was, and for us will always represent, pure joy. Please ensure this technology is required in all passenger vehicles, thus bringing us in line with other developed countries. Thank you.

Pamela Cestia New Iberia, LA

My 2.5 year old son, Thomas, passed away due to a hot car accident. Having safer vehicles is key to eliminating hot car deaths.

Erica Boyer, mother of Noah Dreblow Chandler, Indiana

Noah was a front over in the driveway of his grandparents house. His grandfather was unable to see him due to his large vehicle."

Nan Potetz Phoenix City

My husband hit and killed my daughter, Erica Boyer, 15 mo old son Noah in our driveway, 2007. My husband Joe passed away Dec 1, 2024.

Dikeisha Whitlock-Pryer Houston, Texas

Our son Raymond Pryer loss his life tragically of a heat stroke after being left behind in a Daycare bus on July 19,2018 here in Houston, Texas. His death was senseless and preventable. We need your help please to stop such preventable deaths.

Erin Holley Charleston, SC

My son, Finn, was accidentally left in a parked car in Charleston midday in June when only 5 weeks old. We were moving into a new house, had a 4 year old daughter as well and hadn't slept in 5 weeks. These deaths of our most innocent, precious and beloved children (and pets) are easily preventable with the requirement of technology (affordable, already-in-existence!) in new vehicles. How regrettable it will be to lose even one defenseless life because we decided to go backwards and stop protecting them.

cc: The Honorable Brett Guthrie, Chair, Committee on Energy and Commerce
The Honorable Frank Pallone, Ranking Member, Committee on Energy and Commerce
Members of the Subcommittee on Commerce, Manufacturing, and Trade

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- i The Economic and Societal Impact of Motor Vehicle Crashes, 2019 (Revised), NHTSA, Feb 2023, DOT HS 813 403, available at <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813403>. [Economic Impact 2019], and CPI Inflation Calculator, US Bureau of Labor Statistics, https://www.bls.gov/data/inflation_calculator.htm, inflation values from Jan. 2019 to Jan. 2025
- ii The Economic and Societal Impact of Motor Vehicle Crashes, 2019 (Revised), NHTSA, Feb 2023, DOT HS 813 403, available at <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813403>. [Economic Impact 2019], and CPI Inflation Calculator, US Bureau of Labor Statistics, https://www.bls.gov/data/inflation_calculator.htm, inflation values from Jan. 2019 to Jan. 2025
- iii Traffic Safety Facts Research Note, Overview of Motor Vehicle Traffic Crashes in 2023. DOT HS 813 705, April 2025.
- iv Traffic Safety Facts 2022: A Compilation of Motor Vehicle Traffic Crash Data, NHTSA, DOT HS 813 656, Apr. 2025 (Revised), available at <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813656>.
- v Potential Lives Saved By In-Vehicle Alcohol Detection Systems, IIHS, available at <https://www.iihs.org/topics/bibliography/ref/2209>.
- vi Alcohol and Drugs, IIHS Website, last accessed Aug. 7, 2025, available at <https://www.iihs.org/topics/alcohol-and-drugs#by-the-numbers>.
- vii McEvoy, S.P.; Stevenson, M.R.; McCartt A.T.; Woodward, M.; Haworth, C; Palamara, P.; and Cercarelli, R. 2005. Role of mobile phones in motor vehicle crashes resulting in hospital attendance: a case-crossover study. *British Medical Journal* 331(7514):428; available at <http://www.bmj.com/content/331/7514/428>; and Redelmeier, D.A. and Tibshirani, R.J. 1997. Association between cellular-telephone call and motor vehicle collisions. *The New England Journal of Medicine* 336:453-58, available at <http://www.stat.wmich.edu/naranjo/articles/nejmcellphone.pdf>.
- viii Pub. L. 117-58, § 24209 (2021).
- ix Kids and Car Safety: Hot Car Deaths, available at: <https://www.kidsandcars.org/hot-cars/2024-deaths>.

Statement for the Record
International Brotherhood of Teamsters
House Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer
Choice and Affordability, and Cement U.S. Automotive Leadership
January 12, 2026



International Brotherhood of Teamsters
25 Louisiana Avenue
Washington, DC 20015

On behalf of 1.3 million members of the International Brotherhood of Teamsters, including hundreds of thousands of professional drivers, we appreciate the effort of Representatives Dingell and Latta to finally move forward legislation on autonomous vehicles.

As the Teamsters have long stated, for both our members and the public, the federal government cannot continue to permit a Wild West for autonomous vehicles, wherein they are subjected to no rules, no standards, and operate free from any oversight. Congress must consider threats posed by autonomous vehicles to the livelihoods of millions of Americans, and to the safety of other road users and pedestrians across the country.

This Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution (SELF DRIVE) Act of 2026 represents a first step in developing a comprehensive national framework, by creating safety requirements for autonomous vehicle manufacturers before those vehicles may be sold and operated. By entrusting the Department of Transportation to evaluate the safety of these vehicles, it begins to put an end to the unfortunate era of allowing companies to deploy AVs at will while demanding public trust with no verification. Critically, the legislation also considers the rights of states and preserves necessary authorities for local governments to make their own decisions concerning how autonomous vehicles may operate on their own roads, and what conditions they may be subject to.

The Teamsters would also like to use the consideration of this legislation to remind the Committee and Congress that the increasing deployment of autonomous vehicles unequivocally require further Congressional action. Essential issues, including the regulation of commercial operations and safety, the critical role of certified human operators, and workforce impacts must be addressed in additional legislation – a federal framework which fails to address these issues is fundamentally incomplete and inadequate.

Finally, we appreciate the consideration by Representatives Dingell and Latta of Teamsters priorities, and welcome the opportunity to work with any member of the Committee on issues concerning autonomous vehicles moving forward



January 12, 2026

The Honorable Gus Bilirakis, Chair
The Honorable Jan Schakowsky, Ranking Member
Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
U.S. House of Representatives
Washington, D.C. 20515

Dear Chair Bilirakis and Ranking Member Schakowsky:

Thank you for convening tomorrow's hearing, "Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership." Advocates for Highway and Auto Safety (Advocates) urges this Subcommittee to advance proven solutions to improve safety on our Nation's roads. Advocates respectfully requests this letter be included in the hearing record.

Motor Vehicle Deaths Remain Historically High

America's roads are moving an ever-increasing number of people and goods.¹ This activity comes with a significant yet preventable human toll as well as infrastructure challenges and a robust price tag. On average, 112 people were killed every day on roads in the U.S., totaling nearly 41,000 fatalities in 2023.² This is a 24 percent increase in deaths in just a decade.³ An additional 2.44 million people were injured.⁴ Early projections for 2024 traffic fatalities remain at a similar historic high level; over 39,000 people are estimated to have been killed that year.⁵

In addition to the physical and emotional repercussions and infrastructure damage due to motor vehicle crashes, the annual economic cost is approximately \$340 billion (2019 dollars).⁶ This figure equates to every person living in the U.S. essentially paying an annual "crash tax" of over \$1,000. Moreover, the total value of societal harm from motor vehicle crashes in 2019, which includes loss of life, pain and decreased quality of life, was nearly \$1.4 trillion.⁷ When adjusted solely for inflation, this figure amounts to over \$1.79 trillion.⁸ Research from the Network of Employers for Traffic Safety (NETS) finds motor vehicle crashes cost employers \$72.2 billion in direct crash-related expenses in 2019.⁹

These devastating crashes impact millions of Americans each year including the families of U.S. Department of Transportation (U.S. DOT) Secretary Duffy and Members of Congress. These tragedies result in long-lasting effects which often are not accounted for in statistics alone. For every single death and serious injury, there is a horrific ripple effect forever changing the lives of children, parents, friends and communities. We know the solutions to meaningfully reduce its impact which includes vehicle safety improvements.

Federal Safety Standards Prevent Motor Vehicle Crashes, Save Lives, Avert Injuries and Reduce Associated Costs

Advocates always has enthusiastically championed proven vehicle safety technology and for good reason -- it is one of the most effective strategies for preventing deaths and injuries. According to the National Highway Traffic Safety Administration (NHTSA), “[t]he FMVSS [Federal Motor Vehicle Safety Standards] remain NHTSA’s core way of ensuring that all motor vehicles provide the requisite level of safety performance and provide it within a technical timeframe.”¹⁰ In fact, the agency has estimated that from 1968 through 2019, NHTSA’s safety standards have prevented more than 860,000 deaths, 49 million nonfatal injuries and damage to 65 million vehicles.¹¹ In addition, during that time frame the comprehensive societal benefits amounted to \$17.3 trillion, using 2019 dollars.¹²

In 1991, Advocates led the coalition that supported enactment of the bipartisan Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991¹³ which included a mandate for front seat airbags as standard equipment. As a result, by 1997, every new car sold in the United States was equipped with this technology and the lives saved have been significant. Airbags have saved an estimated 50,457 lives from 1987 to 2017, according to NHTSA.¹⁴

Advocates built on this success by supporting additional proven lifesaving technologies as standard equipment in all vehicles in other federal legislation and regulatory proposals. These efforts include: tire pressure monitoring systems;¹⁵ rear outboard 3-point safety belts;¹⁶ electronic stability control;¹⁷ rear safety belt reminder systems;¹⁸ brake transmission interlocks;¹⁹ safety belts on motorcoaches;²⁰ rear-view cameras;²¹ safer power window switches;²² advanced driver assistance systems (ADAS);²³ advanced impaired driving prevention technology;²⁴ rear designated seating position alert (hot cars);²⁵ enhanced vehicle hood and bumpers to better protect vulnerable road users;²⁶ and, advanced head lamps.²⁷

The recent regulatory action undertaken by NHTSA to require pedestrian automatic emergency braking (PAEB) on light passenger vehicles is an excellent example of the benefits of requiring effective safety systems as standard equipment. The agency predicts that PAEB will save 362 lives, mitigate over 24,000 injuries annually and result in a yearly cost benefit of between \$5.8-\$7.2 billion. The Final Rule for PAEB issued in 2024 also noted that the end user price for the safety technology for a popular make and model vehicle, a Toyota Camry, is \$240.24.²⁸ This cost is modest, particularly given the returns on the investment. Moreover, research performed by the Insurance Institute for Highway Safety (IIHS) has found that AEB can reduce front-to-rear crashes with injuries by 56 percent. Any delay in implementing the Final Rule is an unnecessary safety setback.

Legislation on Hearing Agenda: Advocates supports the Safety Is Not for Sale Act of 2026 which helps to ensure vehicle safety technologies are available to more consumers purchasing a new car by limiting the ability of manufacturers to package

these lifesaving systems with non-safety and costly items such as heated steering wheels and panoramic roofs.

Major Contributors of Crashes Must be Addressed with Effective Solutions

We urge this Subcommittee to continue to address the leading contributing factors to motor vehicle crashes. In 2023, alcohol impaired driving resulted in 12,429 people killed;²⁹ speeding resulted in 11,775 people killed;³⁰ 10,484 vehicle occupants killed in crashes were unrestrained;³¹ and, crashes in which at least one driver was distracted resulted in 3,275 fatalities.³² In 2023, 7,314 pedestrians and 1,166 pedalcyclists were killed in traffic crashes.³³ Motorcycles continue to be the most hazardous form of motor vehicle transportation;³⁴ 6,335 riders were killed in 2023.³⁵ From 2013-2023, fatalities involving pedestrian increased 53 percent, pedalcyclists increased 55 percent and motorcycles increased 35 percent.³⁶ Additionally, in 2021, the most recent year for which data is available according to the Non-Traffic Surveillance (NTS) system, an estimated 3,990 people were killed in non-traffic motor vehicle crashes, an increase of 26 percent from 2020.³⁷ These issues are persistent, and the solutions are known and available, yet remain underused, underfunded or are not required as standard equipment in vehicles.

Advanced driver assistance systems (ADAS) can mitigate the issues of impairment, speeding, distraction and fatigue

Crashes, including those that result from some of the leading contributors to fatalities, can be prevented or mitigated by AEB and other ADAS systems. Research by IIHS has demonstrated crash reductions.³⁸

We urge this Subcommittee to conduct oversight to ensure the U.S. DOT issues the Final Rule for AEB in heavy vehicles and lane departure warning (LDW) and lane keeping assist (LKA) in passenger vehicles, as Congressionally mandated. Additionally, we urge Congress to direct NHTSA to enhance the AEB rule by including bicycle and motorcycle rider detection and response in all lighting conditions. Research conducted by IIHS earlier this year found that clothing which makes pedestrians stand out to human drivers may make them invisible to automated crash prevention systems, so ensuring AEB operates properly in all lighting conditions is essential.³⁹ As noted, the Final Rule for AEB in passenger vehicles must be swiftly complied with, absent added delay.

We also urge Congress to direct U.S. DOT to issue standards and requirements for other vehicle safety technologies shown by research to reduce crashes and impacts, including as noted by IIHS research, blind spot detection, rear AEB and rear cross traffic alert.

Impaired Driving

In 2019, the total comprehensive cost of drunk driving over the .08 percent blood alcohol concentration (BAC) limit was estimated at nearly \$296 billion.⁴⁰ Adjusted for inflation only, that amounts to \$373 billion in 2025 dollars.⁴¹ The total cost to employers of motor vehicle crashes with an alcohol-impaired employee or dependent driving (both on-the-job and off-

the-job) was \$8 billion in 2018 (expressed in 2019 dollars).⁴² Accounting for inflation only, that amounts to over \$10 billion in 2025 dollars.⁴³

According to NHTSA, between 2011-2020, an average of almost 10,500 people were killed each year due to alcohol impaired driving crashes.⁴⁴ The IJA directed NHTSA to issue a FMVSS requiring passenger motor vehicles to be equipped with impaired driving prevention technology by 2024.⁴⁵ IIHS research estimates that passive impaired driving prevention technology will save more than 10,000 lives each year, once widely deployed.⁴⁶ The agency issued an Advanced Notice of Proposed Rulemaking (ANPRM) in January 2024 but has taken no further regulatory action.⁴⁷ Until NHTSA completes this overdue rulemaking, lives will continue to be needlessly lost, injuries suffered and associated costs expended. As such, we urge this Subcommittee to employ its oversight authority to ensure NHTSA swiftly issues a Final Rule.

Legislation on Hearing Agenda: Advocates supports the DRIVE to HALT Drunk Driving Act (H.R. 6850) and opposes the No Kill Switches in Cars Act (H.R. 1137).

Speeding

Speeding-related crashes cause \$46.4 billion in economic costs and \$225 billion in comprehensive costs (2019).⁴⁸ These costs account for 14 percent of all economic costs and 16 percent of all societal harm (measured as comprehensive costs) from motor vehicle crashes.⁴⁹ If these costs were updated for inflation alone, in 2025 they would equate to \$58.6 billion in economic costs and \$284 billion in comprehensive costs.⁵⁰ Speeding-related crashes cost employers nearly \$10 billion in 2018 (expressed in 2019 dollars); the majority are a result of off-the-job crashes.⁵¹ If this cost were updated for inflation alone, in 2025 it would equate to \$12.6 billion.⁵²

Excess speed can contribute to both the frequency and severity of motor vehicle crashes. At higher speeds, additional time is required to stop a vehicle, and more distance is traveled before corrective maneuvers can be implemented. Speeding reduces a driver's ability to react to emergencies created by driver inattention, unsafe maneuvers of other vehicles, roadway hazards, vehicle issues (such as tire blowouts) or perilous weather conditions. Increases in speed also can mean life or death for vulnerable road users (VRUs) who lack the protective structure of a vehicle. While many drivers have a proclivity to exceed posted speed limits or may approve of higher speed limits, AAA has found that raising speed limits leads to a very minimal reduction in time on the road noting, "Raising speed limits is often thought of as a way to improve traffic flow and to allow drivers to get to their destinations more quickly. However, AAA research shows that driving at higher speeds increases risk which can outweigh the potential benefits of saving a few minutes of time."⁵³

Intelligent speed assistance (ISA) can provide information to drivers about present speed limits, warn drivers when a vehicle speed is above the limit, prevent a vehicle from exceeding the speed limit, or maintain a set speed.⁵⁴ The U.S. DOT Volpe Center released

research, “New York City Intelligent Speed Assistance Pilot Evaluation,” in 2024 which showed “ISA produced a 64 percent reduction in overall speeding and an 82 percent decrease on high-speed roads.”⁵⁵ The IIHS found that more than “60% of drivers would find it acceptable if their vehicle provided an audible and visual warning when they exceeded the posted speed limit.”⁵⁶ The National Transportation Safety Board (NTSB) has recommended that NHTSA require ISA in all new vehicles that, at a minimum, warns drivers when they exceed the speed limit. States have already started acting on this technology; Washington State, Virginia and the District of Columbia have enacted laws for ISA use for repeat and/or extreme speeding offenders. All states should be incentivized to follow suit, and ISA should be required on all new vehicles in the next surface transportation reauthorization bill.

Occupant Protection

Seat belt use is a proven lifesaver. From 1975 to 2019, seat belts prevented over 403,000 fatalities and saved society approximately \$2.5 trillion in economic costs.⁵⁷ Seat belts serve as the first line of defense against injury or death for vehicle occupants when crashes occur. According to NHTSA, the combination of an airbag plus a lap and shoulder belt reduces the risk of death in frontal crashes by 61 percent.⁵⁸ Sadly, for passenger vehicle occupant fatalities in 2023, it is estimated that nearly half (49 percent) were unrestrained.⁵⁹

Seat belt reminder systems have been proven to improve seat belt use and save lives.⁶⁰ Congress as part of the Moving Ahead for Progress in the 21st Century Act (MAP-21) directed NHTSA to amend federal safety standards to require these systems in the rear seats of passenger vehicles (previously these systems were only required for the front driver’s seat although most automakers also equipped the front passenger seat).⁶¹ NHTSA recently issued a Final Rule requiring a seat belt use warning system for rear seats by September 1, 2027. The rule also updates and enhances the current seat belt warning requirements for the driver’s seatbelt and extends these requirements to the front outboard passenger seat by September 1, 2026.⁶² We urge the Subcommittee to conduct oversight to ensure it is implemented without delay to improve vehicle occupant safety.

Legislation on Hearing Agenda: Advocates supports the Securing Accessible Functional Emergency (SAFE) Exit Act which would require new motor vehicles to be equipped with a manual door release allowing timely exit regardless of failure of any electrical system. This important legislation will help to ensure that electric door hatches that can fail to properly function in a crash will not trap occupants inside a vehicle and inhibit first responders.

Distracted Driving

Crashes in which at least one driver was identified as being distracted imposed an economic cost of \$98.2 billion in 2019.⁶³ Adjusted for inflation only, that amounts to \$123.9 billion in 2025 dollars.⁶⁴ In 2018, distracted driving crashes cost employers nearly \$19 billion.⁶⁵

Driver distraction is known to be a major contributor to motor vehicle crashes.⁶⁶ However, the true impact of distracted driving remains unclear due to issues with the underreporting of crashes involving distraction, including differences in police crash report coding and database limitations.⁶⁷

In 2023, over two trillion text and multimedia messages were sent or received in the U.S. Mobile wireless data traffic has risen dramatically over the last decade, from 3 trillion megabytes in 2010 to 100.1 trillion in 2023.⁶⁸ Research has shown that because of the degree of cognitive distraction these devices cause, the behavior of drivers using mobile phones (whether handheld or hands-free) is equivalent to the behavior of drivers at the threshold of the legal limit for alcohol in most states (0.08 percent BAC).⁶⁹ Crash risk increases dramatically – as much as four times higher – when a driver is using a mobile phone, with no significant safety difference between handheld and hands-free phones observed in many studies.⁷⁰ A study by the Virginia Tech Transportation Institute found that text messaging increased the risk of a safety-critical driving event (i.e., crashes, near-crashes, crash-relevant conflicts and unintentional lane deviations) by 23.2 times.⁷¹ Sending or receiving a text message causes the driver's eyes to be off the road for an average of 4.6 seconds. When driving 55 miles per hour (mph), this is the equivalent of driving the entire length of a football field with one's eyes closed.⁷²

The IIJA directed U.S. DOT to conduct research regarding the installation and use of driver support systems, also known as driver monitoring systems, to minimize or eliminate driver distraction and automation complacency within three years and report to Congress within six months of the completion of the research.⁷³ The Euro NCAP is already evaluating these systems including for non-fatigue impairment detection.⁷⁴ In addition, several major automakers include some type of driver monitoring/ driver support technologies in their vehicles sold in the U.S.⁷⁵

Legislation on Hearing Agenda: Advocates supports the Driver Technology and Pedestrian Safety Act of 2025 (H.R. 3360) which directs U.S. DOT to study the distraction that can result from driver controlled technology including touch screen-based systems.

Vulnerable Road User (VRU) Safety

Crashes involving pedestrians resulted in \$17.6 billion in economic costs and \$112.5 billion in comprehensive costs in 2019.⁷⁶ Accounting for inflation alone, this would equate to \$22.2 billion in economic costs and \$142 billion in comprehensive costs in 2025.⁷⁷ Crashes involving bicyclists resulted in \$5.6 billion in economic costs and \$32.2 billion in comprehensive costs in 2019.⁷⁸ Accounting for inflation alone, this would equate to \$7 billion in economic costs and \$40.6 billion in comprehensive costs in 2025.⁷⁹

Lack of conspicuity is a roadway safety issue, especially for VRUs. Of the 7,314 pedestrians killed in traffic crashes in 2023, 77 percent occurred in dark conditions.⁸⁰ Also in 2023, there were 1,166 pedalcyclists fatalities, and 53 percent occurred in dark

conditions.⁸¹ Improvements to vehicle lighting would afford drivers additional time to identify and respond accordingly to pedestrians, bicycle riders and other VRUs in the roadway. The IIJA directed U.S. DOT to issue a Final Rule updating the headlamp standard (FMVSS 108) and permitting adaptive driving beam (ADB) headlamps within two years. ADB headlights are a lighting technology which uses headlight beam modification to increase illumination of the road while avoiding glare to other traffic. While the U.S. DOT has taken action to allow use of ADB, it should improve the standard and require them.⁸² This action has been recommended by the NTSB and others.⁸³ According to IIHS, 44 percent of headlight systems tested on model year 2024 vehicles earned a good rating.⁸⁴ About 23 percent of the systems tested were rated marginal or poor because of inadequate visibility, excessive glare from low beams for oncoming drivers, or both.⁸⁵ Ensuring that the U.S. DOT takes action to improve the headlamp standard and advance a requirement should be pursued by the Subcommittee.

Additionally, the IIJA included a provision directing NHTSA to issue a Notice for Public Comment on updating hood and bumper standards for passenger vehicles to “to reduce the number of injuries and fatalities suffered by pedestrians, bicyclists, or other vulnerable road users.”⁸⁶ In September 2024, NHTSA issued a Notice of Proposed Rulemaking (NPRM) to establish a new FMVSS to ensure passenger vehicles are designed to mitigate the risks of serious injuries and fatalities in crashes involving pedestrians including children.⁸⁷ The standard proposed in the NPRM would save 67 lives annually with the benefits far outpacing the costs by establishing test procedures simulating a head-to-hood impact and performance requirements to minimize the risk of head injury.⁸⁸ While this is a step in the right direction, we urge the Subcommittee to ensure that the U.S. DOT pursues a comprehensive upgrade.

Annually, motorcycle crashes cost nearly \$17 billion in economic impacts and \$107 billion in societal harm as measured by comprehensive costs based on 2019 data.⁸⁹ Accounting for inflation alone, in 2025, this would equate to over \$21 billion in economic impacts and over \$135 billion in societal harm.⁹⁰ Serious injuries and fatalities accounted for 83 percent of total comprehensive costs of motorcycle crashes, compared to 60 percent of the total comprehensive costs of all motor vehicle crashes.⁹¹

Motorcycle riders continue to be overrepresented in fatal traffic crashes.⁹² IIHS evaluated on-road data and found motorcycle anti-lock braking systems (ABS) were associated with a 22 percent reduction in the rate of fatal crash involvements.⁹³ Requiring ABS as standard equipment via a FMVSS on new motorcycles will prevent and mitigate crashes. European Union General Safety Regulation (EU GSR) has required ABS fitment on motorcycles since 2016. IIHS most recently filed a Petition for Rulemaking to require ABS on motorcycles with NHTSA in 2023.⁹⁴ We urge the Subcommittee to pursue a standard for this safety improvement in the next surface transportation reauthorization.

Legislation on Hearing Agenda: Advocates supports the Magnus White Cyclist Safety Act (H.R. 3649) and the Safe Streets for Everyone Act of 2026 to strengthen the performance requirements of AEB and enhance VRU safety.

Child Passenger Safety

Since 1990, over 1,100 unattended children have been killed in “hot cars,” and 7,500 more have been injured.⁹⁵ Cost effective technology exists to prevent these tragedies now. The IIJA directed U.S. DOT to issue a Final Rule within two years requiring all new passenger motor vehicles weighing less than 10,000 pounds to be equipped with a system to alert the operator to check rear-designated seating positions after the vehicle engine or motor is deactivated by the operator. The U.S. DOT has not taken regulatory action and should issue a Final Rule which requires the system to detect occupants in the entire passenger compartment rather than rely on reminder systems which are less effective. Of note, Euro New Car Assessment Program (NCAP) added testing of child detection systems in 2023 (protocol), and from 2025 onwards will only be assigning points for direct sensing systems.⁹⁶ We urge the Subcommittee to direct U.S. DOT to comprehensively elevate NCAP and minimally adopt protocols from global NCAPs which have advanced beyond the U.S. program.

Legislation on Hearing Agenda: Advocates opposes the Motor Vehicle Modernization Act which fails to address many of NCAP’s most serious shortcomings.

Experimental Autonomous Driving Technology Remains Unproven, and the U.S. is Not Lagging Behind Other Countries in Deployment

In stark contrast to the effectiveness of federal standards and proven safety technology, cars equipped with various levels of automated driving systems (ADS), for which there are no FMVSS, already have been involved in numerous serious and deadly crashes, many of which have been subject to investigation by the NTSB and NHTSA.⁹⁷ As NHTSA noted in the 2025 Notice of Proposed Rulemaking (NPRM) on the ADS-Equipped Vehicle Safety, Transparency, and Evaluation Program (AV STEP), vehicles equipped with automated driving systems (ADS) “...often struggle with driving tasks that humans consider relatively simple.”⁹⁸ Furthermore, according to data collected by NHTSA’s Standing General Order (SGO) 2021-1 requiring manufacturers to report certain crashes involving vehicles equipped with ADS or SAE Level 2 ADAS, there have been approximately 1,874 crashes involving ADS and 3,003 with ADAS. These include 51 crashes resulting in a fatality.⁹⁹

In addition, several San Francisco transportation agencies submitted comments to the California Public Utilities Commission in 2023 detailing numerous dangerous incidents involving AVs operating in the city.¹⁰⁰ These events include:

- Interfering with emergency response operations including 18 incidents documented by the San Francisco Fire Department in which AVs put firefighters and the public at risk.

- Making planned and unplanned stops in travel lanes that have interfered with transit service and blocked traffic.
- Intrusions into construction zones where City employees were working.
- Obstructions caused by AVs having to interpret and respond to human traffic control officers.
- Erratic driving.¹⁰¹

According to recent media reports, similar issues continue to occur including failing to stop for school buses,¹⁰² ceasing operating in the middle of city streets during a power outage¹⁰³ and traveling on light rail tracks causing the robotaxi's passenger to flee.¹⁰⁴

Many promises have been touted about AVs bringing reductions in motor vehicle crashes and resultant deaths and injuries, lowering traffic congestion and vehicle emissions, expanding mobility and accessibility, improving efficiency, and creating more equitable transportation options and opportunities.¹⁰⁵ However, as auto industry leaders have acknowledged, these outcomes are far from certain.¹⁰⁶

Additionally, supporters of AVs often assert that these vehicles will improve roadway safety by inaccurately stating that 94 percent of crashes are due to human error pointing to a report from NHTSA as support for this misleading claim. However, the agency stated in the same document with this statistic that “[a]lthough the critical reason is an important part of the description of events leading up to the crash, **it is not intended to be interpreted as the cause of the crash nor as the assignment of the fault to the driver, vehicle, or environment.**”¹⁰⁷ [*Emphasis added.*] In addition, NTSB Chair Jennifer Homendy has declared that using the statistic in such a manner is “dangerous” and “[a]t the same time it relieves everybody else of responsibility they have for improving safety, including DOT.”¹⁰⁸ Proponents of AVs also have made the claim that these vehicles will prevent 90 percent of crash fatalities.¹⁰⁹ Yet, as NHTSA states in the AV STEP NPRM, “[t]his proposal recognizes that the potential of ADS is still largely unproven.”¹¹⁰

In sharp contrast to what is happening in the U.S., other countries are taking a more calculated, careful and cautious approach to the development of AVs.¹¹¹ Often-repeated claims about the U.S. “falling behind” other countries in the “race” for AVs are simply not true nor supported by research. For example:

- China continues to require permits or restricts operations of AVs on its roads to only those areas approved by the authorities.¹¹² In fact, the nation recently delayed plans for production of AVs after a deadly crash.¹¹³
- Germany continues to require permits, approvals, and limits areas of operation for AVs.¹¹⁴
- In Japan, the introduction of Level 4 vehicles will be controlled and limited to specific, lightly populated areas.¹¹⁵

- The latest United Nations Economic Commission for Europe (UNECE) regulations will limit operations to restrict risks and oversee approval through testing and other requirements.¹¹⁶

In sum, no country is selling fully automated vehicles for unfettered use to the public and by many accounts, none will be for a significant amount of time.¹¹⁷ According to the most recent KPMG analysis, the U.S. ranks fourth in the world for AV readiness, while China stands at number twenty.¹¹⁸ The U.S. is not lagging behind other countries in allowing AVs to go to market, but we are behind in establishing comprehensive regulations to ensure public safety will not be jeopardized or diminished.

Legislation on Hearing Agenda: Advocates opposes the Discussion Draft of the Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution (SELF DRIVE) Act of 2026 because it fails to address the known safety issues with AVs and recklessly preempts states from enacting commonsense protections for their citizens. It also includes a new data collection program which is less comprehensive than NHTSA's Standing General Order. Advocates supports the AV Safety Data Act, H.R. 4376, which will help to ensure U.S DOT is getting important data on the operations of AVs. In addition, Advocates supports the Know Before You Drive Act which will ensure consumers have accurate information on the capabilities of partially automated driving systems and AVs.

The AV Tenets Offer a Sound and Sensible People-and-Safety-First Approach to AV Deployment

To identify a people-and-safety-first path forward on AVs, Advocates and numerous stakeholders developed the “AV Tenets.”¹¹⁹ These sound and sensible policy positions should be a foundational part of any national AV policy. The AV Tenets are based on expert analysis, real-world experience, and public opinion. They have four main categories including: 1) prioritizing safety of all road users; 2) guaranteeing accessibility and equity; 3) preserving consumer and worker rights; and, 4) ensuring local control and sustainable transportation. They are supported by a coalition of more than 65 organizations representing consumers, public health and safety experts, pedestrians, bicyclists, disability rights activists, emergency responders, law enforcement, labor and others. Requiring that AVs meet minimum performance standards, including for cyber security and a “vision test” to ensure the vehicle can respond to all people, vehicles and objects in the roadway environment, is essential. In addition, AV operations must be subject to adequate oversight, including a comprehensive database accessible by vehicle identification number (VIN) with basic safety information. These are fundamental prerequisites to prevent crashes caused by AVs and boost consumer confidence in this burgeoning technology.

Thank you for your consideration of these issues. We look forward to working with you to address the public health crisis of motor vehicle crashes.

Sincerely,



Catherine Chase
President

cc: The Honorable Brett Guthrie, Chair, Committee on Energy and Commerce
The Honorable Frank Pallone, Ranking Member, Committee on Energy and Commerce
Members of the Subcommittee on Commerce, Manufacturing, and Trade

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- ¹¹³ Keith Bradsher, China Delays Plans for Mass Production of Self-Driving Cars After Accident, NY Times (Dec. 23, 2025).
- ¹¹⁴ Germany completes legal framework for autonomous driving | Federal Cabinet approves new ordinance, Apr. 2022, Malterer, M.
- ¹¹⁵ Japan to open roads to autonomous vehicles in 2023, Nov. 28, 2022, Wessling, B., The RobotReport.
- ¹¹⁶ New rules to improve road safety and enable fully driverless vehicles in the EU, Jul. 6, 2022, UNECE.
- ¹¹⁷ Lawrence Ulrich, Driverless Still a Long Way From Humanless, N.Y. Times (Jun. 20, 2019); Level 5 possible but "way in the future", says VW-Ford AV boss, Motoring (Jun. 29, 2019).
- ¹¹⁸ Autonomous Vehicle Readiness Index, KPMG, 2020, <https://assets.kpmg.com/content/dam/kpmg/xx/pdf/2020/07/2020-autonomous-vehicles-readiness-index.pdf>.
- ¹¹⁹ See: <https://saferoads.org/autonomous-vehicle-tenets/>.



Safety Concerns with the SELF DRIVE Act and Motor Vehicle Safety Act January 2026 Draft Legislation

Advocates for Highway and Auto Safety (Advocates) does not oppose the advancement of vehicles equipped with an automated driving system (ADS). We are opposed to actions, including the identified below, which fail to proactively address the developing technology to ensure the safety of road users. According to data collected by the National Highway Traffic Safety Administration's (NHTSA) Standing General Order (SGO) 2021-1 requiring manufacturers to report certain crashes involving vehicles equipped with ADS or SAE Level 2 advanced driver assistance systems (ADAS), there have been approximately 1,874 crashes involving ADS and 3,003 with ADAS. These include 51 crashes resulting in a fatality.ⁱ The SGO safety data collection and access must be strengthened, and safeguards and improvements to ensure that vehicles equipped with an ADS only operate on roadways and in scenarios for which they are designed to safely do so must be advanced.

No New Safety Standards for Foundational Safety Technologies or the ADS (SELF DRIVE Act)

- The legislation does not establish safety standards to ensure that the ADS will “see” and safely respond to all road users, vehicles and infrastructure in the roadway environment (aka a “Vision Test”). These basic protections are needed for all road users on America’s public roadways.
- The language focuses on the manufacturers establishing a “safety case” which will neither be required to be submitted (rather, submitted upon request by the U.S. Department of Transportation (U.S. DOT) Secretary), nor are there requirements to independently verify the safety case and operations of the ADS.
- Regulatory directives for the safety case are not required as the legislative language uses “may” rather than “shall.”

Mass Exemptions from Federal Motor Vehicle Safety Standards (FMVSS) (Motor Vehicle Modernization Act)

- Permits up to 90,000 vehicles (currently 2,500 allowed) to be exempted from FMVSS including for human controls and extends the length of exemptions to five years (currently one year).
- Requires U.S. DOT to rule on exemption application within one year of receipt of application or automatically approved.

State Preemption (SELF DRIVE Act)

- For manufacturers that establish a safety case, states are broadly preempted from taking actions that can be interpreted as hampering operations. These may include state level requirements to report safety and crash data and to limit operations due to safety deficiencies. It also may impact enforcement of traffic safety laws and limit crash investigations.
- This unprecedented provision would result in a state being preempted from taking action to protect its citizens on its roads in the absence of federal action or conflict and would be predicated on the development of a “safety case” that is not required to be submitted to any regulatory body.

Restricts Public Access to Safety Data, Weakens Data Collection and Repeals the Standing General Order (SGO) (SELF DRIVE Act)

- The language proposes a new safety data collection which is more limited than the National Highway Traffic Safety Administration's (NHTSA) SGO and needlessly applies confidential business information (CBI) protections to data submitted to NHTSA which have been used previously to keep critical basic crash information out of public view.
- Allows state DOTs to potentially review data from AV manufacturers but restricts them from discussing what they learn about potential safety issues due to CBI restrictions.

- Repeals the SGO once the data repository is established. This will enshrine a system in which NHTSA and the public are not getting sufficient information about the operations of AVs on public roads. The SGO should be strengthened, not repealed.

Expands Allowances for Testing and Demonstration (SELF DRIVE Act)

- Under current law, motor vehicle manufacturers can introduce vehicles that do not comply with federal safety standards into interstate commerce for the sole purposes of testing and evaluation. The bill expands the current law to allow manufacturers of ADS, ADS-equipped vehicles and components of ADS which may result in more vehicles equipped with unproven ADS, absent minimum safeguards on our roadways.
- Expands current law to also allow manufacturers using this provision to engage in commercial operations including the carrying of members of the public as passengers and the transportation of freight.

No Workforce Protections Are Included (SELF DRIVE Act)

- The bill allows for payment for testing operations potentially exacerbating workforce issues for certain working drivers.

No Accessibility Requirements Are Established (SELF DRIVE Act and Motor Vehicle Modernization Act)

- While the AV industry has consistently included accessibility and mobility improvements for people with disabilities as a top priority, the SELF DRIVE Act does not advance such and may hamper states' ability to uphold such protections already established.
- The Motor Vehicle Modernization Act includes a study on wheelchair securement, but this is insufficient considering the issue has been known and discussed for over a decade and should have been addressed by the AV industry.

No Establishment of Safety Considerations for Remote Operators (SELF DRIVE Act)

- AV operations are using remote operators (ROs) to overcome deficiencies in their ADS and bolster their operations.
- Information on the scope of ROs and the safety deficiencies they are addressing is currently undocumented, yet needs to be, to understand the safety and readiness of related ADS.
- Safety issues related to use of ROs must be addressed including but not limited to restrictions on the number of vehicles each RO is managing, limitations on hours of service (HOS), requirements for a commercial drivers license (CDL) and experience operating related vehicles.

Fails to ensure that the U.S. New Car Assessment Program (NCAP) is upgraded to meet its international counterparts (Motor Vehicle Modernization Act)

- By any measure NCAP has been exceedingly successful. The program has been copied the world over and has provided necessary safety information to consumers for decades. While NHTSA did implement some important updates to NCAP in recent years, the program remains woefully outdated, particularly its five-star rating program and is in need of substantial upgrades to ensure that the program is both keeping pace with the current state of technology and maximizing its benefits to safety.

ⁱ Standing General Order on Crash Reporting: For Incidents Involving ADS and Level 2 ADAS, NHTSA, available at <https://www.nhtsa.gov/laws-regulations/standing-general-order-crash-reporting>, last accessed Dec. 17, 2025.



January 12, 2026

The Honorable Brett Guthrie
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone, Jr.
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Guthrie and Ranking Member Pallone,

On behalf of the Autonomous Vehicle Industry Association (“AVIA”), I am writing to express our strong support for Representatives Bob Latta’s and Debbie Dingell’s *Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution* (“SELF DRIVE”) Act of 2026. AVIA commends Representatives Latta and Dingell for their leadership on this issue and we strongly encourage the Committee to move forward with this important piece of legislation.

As an organization, AVIA is committed to bringing the tremendous safety and mobility benefits of autonomous vehicles (“AVs”) to consumers in a safe, responsible, and expeditious manner. AVIA’s membership is comprised of the world’s leading technology, automotive, ridesharing, trucking, and transportation companies.¹ Vehicles operated by AVIA members have driven more than 145 million autonomous miles on U.S. public roads, a distance roughly equivalent to the average distance between Earth and Mars or driving around the Earth 5,600 times.² This figure is growing every day. AVs will play a pivotal role in addressing critical challenges facing our nation, including by reducing the persistent and unacceptable level of traffic fatalities in our country, increasing transportation access, enhancing supply chain efficiency, reviving our industrial capacity, creating jobs, and expanding economic output. To fully realize these benefits, however, a supportive federal policy framework that helps accelerate the safe deployment of the technology across the country is essential.

The SELF DRIVE Act of 2026 would further this goal by enabling the safe and timely deployment of AV technology nationwide and solidifying the United States as the global leader in this transformative field. American leadership on AVs is being challenged by strategic competitors,

¹ Our members include Amazon, Aurora, AVRS, Avride, Bot Auto, Cavue, Discount Tire, DoorDash, Ford, Gatik, GM, Honda; International, J.D. Power, Kodiak, Lyft, Motional, NGV, Nuro, Plus, Stack, Tier IV, Torc Robotics, TaskUs, Terawatt Infrastructure; Uber, UPS, Volkswagen Group of America, Volvo Cars, Volvo Autonomous Solutions, Waabi, Waymo, and Zoox. See *Our Mission and Members*, AUTONOMOUS VEHICLE INDUS. ASS’N, <https://www.theavindustry.org/about> (last visited January 12, 2026).

² AUTONOMOUS VEHICLE INDUS. ASS’N, STATE OF AV 2025, (May 2025), https://cdn.prod.website-files.com/67ee2ad971d86c70d02ed03f/683802d318db2c77d4ce3d43_2025_StateOfAV_AnnualReport_Web.pdf.

including the People's Republic of China. China is determined to supplant U.S. leadership on AVs and set global technological standards in the future. Congress can support U.S. ingenuity and innovation by passing the SELF DRIVE Act.

The Act would update key regulations and establish statutory programs to support the ongoing development and deployment of AVs by:

- Requiring manufacturers of automated driving systems (“ADS”) and ADS-equipped vehicles to produce an ADS “Safety Case” that provides documented, reviewable safety justifications for their ADS, including set minimum operational competencies, before their systems or vehicles can be sold or deployed in the United States.
- Ensuring the security of AVs by requiring manufacturers to produce a written cybersecurity plan describing how the manufacturer detects, prevents, and responds to cyberattacks, unauthorized intrusions, and malicious vehicle control commands.
- Allowing ADS-dedicated vehicles—which are designed to be operated exclusively by an ADS within specific operational parameters—to be manufactured without traditional human driver controls, while requiring that, when designed to carry an occupant, such vehicles include a means for an occupant to command a vehicle to safely stop and allow them to exit the vehicle. This provision would greatly advance the ability of autonomous vehicle companies to develop accessible vehicles for people with disabilities.
- Establishing a National AV Safety Data Repository to formalize and standardize ADS crash reporting, which would improve access to safety data for federal and state agencies and increase public transparency. The National AV Safety Data Repository would also provide state transportation regulators with a greater understanding of incidents involving autonomous vehicles.
- Modernizing federal law related to vehicle testing and evaluation to accommodate AVs and allow for carefully controlled commercial activity as part of AV testing, while protecting testing exemptions from being misused as a substitute for regulatory compliance at scale.
- Allowing AVs to temporarily deactivate human driver controls during automated operation, without violating existing “make inoperative” restrictions under federal regulations, while preserving the requirement that human controls can be restored if needed. This provision is important to ensure that innovative safety and technical developments can be adopted into vehicles in autonomous operation.

AVIA appreciates in advance the Committee's consideration of this transformative bill. AVIA looks forward to working with Representatives Latta and Dingell, the Committee, and Congress more broadly to ensure the safe and timely deployment of AVs and American leadership in this critical technology.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Jeff Farrah', with a stylized, cursive flourish at the end.

Jeff Farrah, CEO
Autonomous Vehicle Industry Association

January 12, 2026

The Honorable Gus Bilirakis, Chair
The Honorable Jan Schakowsky, Ranking Member
Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
United States House of Representatives
Washington, D.C. 20510

RE: Disregard for consumer safety, state and local law, and civil justice in the SELF DRIVE Act

Dear Chair Bilirakis and Ranking Member Schakowsky:

We the undersigned, on behalf of the members of each of our groups individually, and all drivers, passengers, pedestrians and other road users nationwide, write today with grave concerns about the broad and unnecessary assertion of federal authority and omission of vital consumer protections by the proposed SELF DRIVE Act.

Amongst a host of provisions that would degrade consumer safety, the vague and incredibly broad preemption clause in the proposed language would have wide ranging consequences on state and local laws crafted to ensure the responsible introduction of novel autonomous vehicles (AVs) into the varying transportation ecosystems of US cities. Additionally, at a time when so much is unknown about the safety performance of these vehicles in the real world, there is no provision which prohibits the inclusion of a mandatory arbitration clause into contracts with consumers using AVs, which would sequester consumer claims in secretive courts of arbitration that are ultimately designed to protect companies from legal scrutiny and accountability.

States and their political subdivisions are already preempted from exercising their powers in the area of motor vehicle performance to ensure that Federal Motor Vehicle Safety Standards and other safety rules administered by the National Highway Traffic Safety Administration (NHTSA) are the law of the land. However, the broad reach of the preemption clause in the proposed SELF DRIVE Act extends far beyond the federal government's traditional authority to regulate vehicle performance and ensure consistent national performance standards to help ensure vehicle safety.

The proposed act's preemption language would infringe on traditional state and local authorities to regulate traffic law, auto dealers, insurance, registration, licensing, crash investigation, safety and emissions inspections, congestion management, environmental laws, and various consumer protections. Not only does the preemption provision prevent state law enforcement from enforcing the rules of the road, it prevents them from even *investigating* a crash. The bill prohibits states from requiring manufacturers to provide video crash data for any serious crash. Critically, the proposed preemption language would also threaten state negligence and product liability laws as they would apply to AVs, given the extremely ambiguous language in the savings clause.

Ultimately, the preemption scheme envisioned by the proposed SELF DRIVE Act would act to ensure that local authorities are powerless to protect citizens while weakening those citizens' ability to pursue effective claims against irresponsible AV companies. Federal preemption is traditionally used as a tool for ensuring that federal statutes or regulations, once enacted, are able to operate without conflict across the country. But the proposed SELF DRIVE Act's preemption scheme turns this model on its head, ensuring that even in the absence of federal safety regulations governing AV performance or safety, consumers will have nowhere to turn when the inevitable problems raise their head.

The coup de gras is that the proposed SELF DRIVE Act neither proposes nor mandates ANY federal safety regulations that would ensure autonomous vehicle safety. The only thing the proposed language requires is that AV companies produce a "safety case" in order to trigger this massive preemptive effect. Safety cases would be retained internally by manufacturers with no submission to DOT required, hidden from the public, and unavailable to federal regulators unless subpoenaed by NHTSA pursuant to an investigation. The safety case is essentially a quiz that the manufacturers write themselves, grade themselves, and never have to turn in—and if they say they did it, then states and individuals can't hold them accountable when AVs break the rules of the road and hurt someone.

In the absence of any federal safety regulations geared to ensure that AVs don't kill and injure road users, and a preemption scheme that prevents state authorities from stepping up to the plate to protect residents, injured parties would typically be able to turn to the civil justice system as a last resort. But the proposed SELF DRIVE Act contains no language that would stop the proliferation of mandatory arbitration clauses across the AV landscape.

Whether they are in the terms of service of autonomous vehicle rideshare companies or those that will surely reside in future potential ownership or leasing agreements absent a legislative prohibition, mandatory arbitration clauses should not be allowed as a means to shield irresponsible AV companies from civil claims.

As you know, forced arbitration contract terms require consumers to adjudicate claims in forums that do not have the protections of the legal system—the rules of evidence and discovery do not apply, there is no requirement that arbitrators follow the law, there are no juries, and there is little to no opportunity for witness depositions. Moreover, arbitration proceedings are secretive, and the findings of arbitrators are seldom appealable. Additionally, because arbitration firms rely on repeat customers for their profits, it is unlikely that arbitrators will find for a consumer over the corporation likely to provide additional business in the future.

The potential for inserting forced arbitration clauses into a contract between an AV operator or manufacturer and an individual consumer is ever present and creates an alternate system of justice when the inevitable defects in new technology occur. Such a result would create yet another incentive for unscrupulous manufacturers to put shareholders' interests ahead of safety concerns.

For years now the auto industry has been emboldened by the intrusion of forced arbitration in other fields. As a result, it is all too common for consumers to be deprived of their federal and state rights by contracts conditioned on acceptance of forced arbitration as a means to resolve disputes. We have long believed that when a company makes a defective vehicle, they should

use their engineers to build a better vehicle, and not their lawyers to find a legal loophole to avoid responsibility. To be clear, forced arbitration has no place in rideshare agreements or in the sale or lease of automobiles, be they used or new, human driven or autonomous.

Arbitration, when voluntarily consented to by both parties post-dispute is a fine dispute resolution mechanism. Yet, the use of binding arbitration clauses continues to proliferate. Waymo's partnership with Uber to provide autonomous rideshare raises significant questions in this area, since Uber has zealously defended binding arbitration clauses at the expense of consumers for many years now, and Waymo currently uses forced arbitration as well. Future self-driving vehicles may be purchased or leased directly by consumers from multi-national manufacturers, creating an even greater power imbalance than when buying from a local dealership, enabling foreign manufacturers to insert forced arbitration provisions directly into consumer sales contracts.

This moment presents an opportunity to ensure that a practice designed to deprive consumers of their constitutional rights not be allowed to continue into the next generation of vehicles. Importantly, there is precedent in the area of forced arbitration and cars: 15 U.S.C. § 1226, the Motor Vehicle Franchise Contract Dispute Resolution Process Act. Passed into law in 2002, this law prevents auto manufacturers from forcing arbitration clauses on their franchisees, without consent. Consumers deserve the same rights when it comes to driverless vehicles.

In another blow to accountability and safety, the legislation itself defines the automated driving system itself—hardware and software—as the "driver." This provision alone would effectively exempt automated vehicle manufacturers from thousands of state laws regulating the driver of a motor vehicle. The ADS can't be ticketed, can't have its license suspended, and can't be held responsible when it runs a red light or ignores a school crossing guard or interferes with emergency vehicles. Similarly, the ADS can't be held responsible in court or in arbitration for negligence that causes injury or death. Only a person or a company can be held accountable for safe driving and following the rules of the road – not a hardware and software system. The bill must be changed to provide that the driver of the AV is the *manufacturer* of the ADS, not the ADS itself.

Together the preemption language and lack of a prohibition on mandatory arbitration in the proposed SELF DRIVE Act would leave consumers without access to the civil justice system, unable to turn to state and local authorities to address the many negative consequences that AVs have and will continue to bring to our cities, and ultimately relying on a federal authority that has no plans to issue comprehensive AV safety regulations.

Under the proposed bill, consumers and localities would ultimately be forced to rely on the DOT's limited and oftentimes incredibly slow and ineffective defect enforcement authority to address safety issues after they occur, while local authorities would be prohibited from regulating AV safety. These local authorities would also be prohibited from current or future regulation of AVs in the large range of other concern areas where states and cities have long used their authorities to minimize the negative impact of automobiles. This arrangement is unacceptable, and this moment presents an opportunity to ensure that consumers remain the highest priority as autonomous travel continues to develop.

Thank you for your attention to this important matter,

Salena Zellers Schmidtke, Biomechanical Engineer
BioInjury, LLC

Michael Brooks, Executive Director
Center for Auto Safety

Joanne Doroshow, Executive Director
Center for Justice & Democracy

Carmen Balber, Executive Director
Consumer Watchdog

Rosemary Shahan, President
Consumers for Auto Reliability and Safety

Janette E Fennell, President
Kids and Car Safety

Caron Whitaker, Deputy Executive Director
League of American Bicyclists

Christine Hines, Senior Policy Director
National Association of Consumer Advocates

Laurie Woodward Garcia, Leader
People Power United

Joan Claybrook, President Emeritus
Public Citizen

Robert Weissman, Co-President
Public Citizen

Ware Wendell, Executive Director
Texas Watch

Zach Cahalan, Executive Director
Truck Safety Coalition, Citizens for Reliable and Safe Highways (CRASH), and Parents Against
Tired Truckers (P.A.T.T.)

Melissa Millar, Policy Director
Tzedek DC



January 13, 2026

The Honorable Gus Bilirakis
Chair
House Subcommittee on Commerce,
Manufacturing, and Trade
2306 Rayburn HOB
Washington, DC 20515

The Honorable Jan Schakowsky
Ranking Member
House Subcommittee on Commerce,
Manufacturing, and Trade
2408 Rayburn HOB
Washington, DC 20515

RE: Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership and SELF DRIVE Act

Dear Chair Bilirakis and Ranking Member Schakowsky,

On behalf of Chamber of Progress, a tech industry association supporting public policies to build a society in which all people benefit from technological advances, I write to thank you for convening this hearing on motor vehicle safety, consumer choice, and affordability. We are particularly pleased to see the Subcommittee's consideration of the Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution (SELF DRIVE) Act of 2026.

We appreciate the Subcommittee's attention to this issue and thank Representatives Latta and Dingell for their bipartisan leadership on this legislation. As the autonomous vehicle industry reaches a critical inflection point, the need for clear federal policy has never been greater. This hearing represents an important step in establishing the regulatory clarity needed to support innovation and unlock the safety, accessibility, and economic benefits of autonomous vehicles.

Autonomous vehicles are increasingly being deployed across the country, logging millions of autonomous miles and demonstrating measurable, real-world safety improvements. This growing track record underscores the technology's potential to reduce crashes and injuries and the need for timely federal policy to ensure those benefits are realized safely, equitably, and affordably. Without clear federal policy, the United States risks ceding leadership in this transformative technology and delaying the safety and economic benefits it promises.

Thank you again for bringing this important issue before the Subcommittee. We believe the SELF DRIVE Act offers a thoughtful approach to federal autonomous vehicle policy.

We appreciate the opportunity to contribute to this discussion and look forward to supporting the Subcommittee's work as you evaluate the best path forward for federal AV legislation.

Sincerely,

A handwritten signature in black ink that reads "Hope Ledford". The signature is written in a cursive, flowing style.

Hope Ledford
Director of Civic Innovation Policy



January 12, 2026

The Honorable Brett Guthrie
Chairman
Committee on Energy and Commerce
U.S. House of Representatives

The Honorable Frank Pallone
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives

The Honorable Gus M. Bilirakis
Chairman
Subcommittee on Commerce,
Manufacturing, and Trade
U.S. House of Representatives

The Honorable Janice D. Schakowsky
Ranking Member
Subcommittee on Commerce,
Manufacturing, and Trade
U.S. House of Representatives

Dear Chairmen Guthrie and Bilirakis and Ranking Members Pallone and Schakowsky:

Our organizations represent manufacturers, suppliers, dealers, collision and mechanical repair professionals, and technology innovators working together to serve America's drivers. We support

a competitive repair marketplace and share a common goal of ensuring consumers can keep their vehicles safely and affordably maintained. That is exactly why we are united today in strong opposition to H.R. 1566, the “Right to Equitable and Professional Auto Industry Repair” (REPAIR) Act.

The United States already has one of the most open and competitive repair ecosystems in the world. For passenger cars, independent repairers perform 74% of out-of-warranty repairs, and every piece of information needed to diagnose and repair today’s vehicles is available through existing service information tools, scan solutions, and established industry data-sharing programs.

For commercial vehicles, the unique business-to-business relationship between manufacturers and their customers relies on exceptional service repair performance – which may be the most highly competitive aspect of the commercial vehicle industry. As noted in previous federal analyses, the motor vehicle sector has long been recognized as the model for self-regulation to expand repair access and consumer choice.

Unfortunately, the REPAIR Act would not strengthen that system. Instead, it would disrupt it in ways that increase consumer risk, weaken safety protections, expand commercial access to sensitive driver data and expose vehicle systems to cyber vulnerabilities.

Below are our most serious concerns:

1. The bill mandates broad access to full streams of vehicle telematics data, far beyond what is necessary for repair.

Modern vehicles generate vast amounts of sensitive information: location, driving behavior, cabin interactions, biometric indicators, personal contacts, and more. The REPAIR Act would force automakers to make that data remotely accessible to any designated third party, without limiting access to information actually needed to repair a vehicle. The bill also lacks meaningful restrictions on how third parties may use, resell, store or monetize that data, creating major privacy and commercial exploitation risks for millions of drivers.

2. The bill gives insurers and large commercial enterprises new avenues to harvest vehicle data for non-repair purposes.

Despite claims that the legislation is about small repair shops, the entities that stand to gain the most are insurance carriers and big-box retailers whose business models increasingly depend on access to telematics data. Nothing in the bill prevents entities with no role in hands-on repair from using the data to steer consumers, influence claims decisions, adjust premiums, or build profit-driven data products. This is an enormous step beyond “repair,” and it happens with no consumer transparency or meaningful consent expectations.

3. The technical framework contemplated by the REPAIR Act creates significant safety and cybersecurity vulnerabilities.

Federal safety regulators have consistently warned about the dangers of remote interfaces capable of sending commands into critical vehicle systems. The proponents of the REPAIR Act have long advocated for a universal access channel into millions of vehicles, which would generate new attack surfaces for malicious actors, create the possibility of large-scale cyber events, and weaken decades of investment in vehicle safety architecture. The bill opens the door to the government mandating technology that independent experts have said is fundamentally unsafe.

4. The bill attempts to federalize issues far outside right-to-repair and would give the FTC authority to expand access to even more categories of data.

The bill empowers federal regulators to require access to additional data “for additional purposes” even when unrelated to repair. This is not a repair-market policy; it is a sweeping federal mandate for data access without consumer safeguards, guardrails or clarity on downstream use. It also undermines ongoing bipartisan work in Congress on broader national data privacy legislation.

5. The legislation jeopardizes consumer trust in the rapidly evolving connected vehicle ecosystem.

The widespread adoption of advanced safety systems, electrification, connectivity and over-the-air updates depends on the public trusting that their information is secure, and their vehicles cannot be manipulated remotely. Policies that facilitate open access to vehicle operating environments threaten that trust and risk chilling the deployment of life-saving technologies. This puts drivers, technicians and the entire transportation system in a more vulnerable position.

6. The REPAIR Act’s harmful provisions are not limited to passenger vehicles or individual consumers, but would also disrupt the heavy-duty industry.

As drafted, the bill would apply equally to heavy-duty and commercial vehicles, where vehicles are operated by fleets, data is integral to logistics and safety systems, and “automobile” and “consumer” assumptions simply do not apply. These vehicles operate in fundamentally different environments with distinct safety, cybersecurity, and operational considerations

7. The bill ignores existing voluntary solutions that are already working and that respect safety, privacy and security.

The most effective path forward is continued collaboration among manufacturers, dealers, technicians and independent repairers. Today’s vehicles can be repaired safely without granting commercial parties unrestricted access to sensitive driver information.

We all want consumers to have access to safe, fair and high-quality vehicle repair options. But the REPAIR Act does not advance that goal. It introduces major risks to safety and cybersecurity, gives insurers and retailers access to sensitive data they do not need for repair, and undermines consumer privacy at a time when trust in connected technologies has never mattered more.

On behalf of the millions of American workers, consumers and businesses we represent, we respectfully urge the Committee to reject the REPAIR Act and focus instead on policies that strengthen vehicle repair access without compromising privacy, security or safety.

Sincerely,

Alliance for Automotive Innovation
American Truck Dealers
American Automotive Policy Council
American International Automobile Dealers Association
Association of Equipment Manufacturers
Associated Equipment Distributors
Autos Drive America
Equipment Leasing and Finance Association
International Association of Machinists (IAM Union)
National Automobile Dealers Association
National Association of Manufacturers
National Association of Minority Automobile Dealers
Outdoor Power Equipment Institute
Society of Collision Repair Specialists
Truck and Engine Manufacturers Association (EMA)

January 9, 2026

The Honorable
U.S. House of Representatives
Washington, DC 20515

Dear Representatives,

My name is Cory Donenfeld and I am the owner of Northwest Auto Body, a family-owned independent repair facility founded by my father in 1976 in Sandpoint, Ponderay and Bonner Ferry Idaho. Today, I have the privilege of running this small business alongside my Co- owner, serving customers throughout the Northwest, Bonner County, and surrounding communities.”

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family’s safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn’t provide independent auto repair shops like mine with anything we don’t already have to properly fix your vehicle. Frankly, I’m tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being “locked out” by automakers is not true. It’s a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), and

the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,

Cory Donenfeld





The Honorable Brett Guthrie
US House of Representatives
Rayburn Building, Room 2161
Washington, D.C 20515
Dear Representative Guthrie,

My name is Robert McSherry, and I own North Haven Auto Body, Sabo Auto Body, and Woodbridge Auto Body — independent repair facilities that have served Connecticut continuously since 1938, 1947, and 1960. For generations, our businesses have focused on one principle: performing safe, manufacturer-correct repairs using the proper equipment, procedures, and trained professionals.

We invest heavily in OEM tools, training, and repair procedures, all of which are already available directly from vehicle manufacturers. Independent repairers are not “locked out” of the information needed to properly and safely repair vehicles. That claim is simply not true.

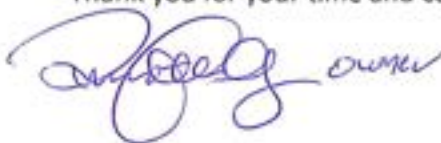
The REPAIR Act does not give shops like mine access to anything we do not already have. Instead, it risks weakening accountability and repair standards while benefiting large insurance interests that profit when consumers are pressured toward lower-cost parts and shortcuts — often at the expense of required repair procedures and vehicle safety.

What small businesses and consumers need is protection from legislation that lowers safety standards, not laws that blur responsibility in the name of convenience or corporate profit.

I urge you to oppose the REPAIR Act and instead support the SAFE Repair Act, developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation. This proposal preserves consumer choice while protecting proper repair standards and public safety.

I would welcome the opportunity to host you at our North Haven facility to demonstrate the investments we have made and the realities our customers face when seeking quality repairs in today's increasingly complex vehicles.

Thank you for your time and consideration.

 1/9/2024



"We meet by Accident"

January 9, 2026

The Honorable Brett Guthrie
U.S. House of Representatives
Rayburn House Office Building, Room 2161
Washington, DC 20515

Dear Representative Guthrie,

Our names are Tony Cavallaro Jr. and Joe Cavallaro, and our family owns and operates Airport Auto Body, a family-owned independent repair facility in Hartford, CT founded by our parents in 1983.

Our mission has always been to perform safe, high-quality repairs using the proper tools, training, and OEM repair procedures. We have invested heavily to ensure we can repair today's complex vehicles correctly, and our customers trust us with their family's safety every time they hand over their keys.

As you familiarize yourself with issues affecting the automotive repair industry, we want to clearly state our position. We strongly oppose the REPAIR Act as currently written and urge you to oppose it as well.

Independent repair shops like ours already have access to the data and tools needed to properly repair vehicles. The claim that we are being "locked out" by automakers is simply not true. That narrative benefits large insurers and corporations that profit by steering repairs toward cheaper alternatives, often at the expense of safety and consumer choice. The truth is that independent repair businesses like ours already have access to all the data and tools we need to safely repair a vehicle.

What small businesses like ours need is protection from policies that blur accountability, erode repair standards, and jeopardize vehicle safety.

We encourage you to support the SAFE Repair Act, developed by the Society of Collision Repair Specialists and the Alliance for Automotive Innovation. This proposal meaningfully addresses real consumer and repairer challenges while preserving safety, accountability, and proper repair standards.

We would welcome the opportunity to host you at our facility to show you firsthand how independent shops have invested in the same equipment and systems used by dealerships. Our customers want their vehicles restored to pre-accident condition using proper procedures, tools, and parts, which is already available to our industry.

Thank you for your time and consideration. We hope we can count on your opposition to the REPAIR Act and your support of the SAFE Repair Act.

Sincerely,

Airport Auto Body
Tony Cavallaro Jr.
Joe Cavallaro

75 Locust Street, Hartford, CT 06114

From: [REDACTED]
Sent: Saturday, January 10, 2026 10:58 AM
To: Falconer, Susan <[REDACTED]>; Stein, Peter
<[REDACTED]>
Cc: 'Bristol Dealership' <[REDACTED]>, 'TC Baker'
<[REDACTED]>
Subject: ****Upcoming Bills in Energy and Commerce Committee - Tri-Cities Business Owners Concerns About Right to Repair, DRIVES Act Legislation****
Importance: High

Susan and Peter -

We are reaching out as constituents of Congresswoman Harshbarger regarding bills that will be considered in the coming weeks in Washington. My name is John Baker and have included my father, Tim Baker, and my brother, TC Baker, - we own and operate the Wallace Auto Group in Tri-Cities, Tennessee.

We appreciate the Congresswoman's leadership for our region, but we did want to share concerns about 2 bills that may come before the Energy and Commerce Committee.

As background, we are a fourth-generation business and have multiple new car dealerships in Bristol/Kingsport/Johnson City (Wallace Auto Group – representing, Volkswagen, Subaru, Kia, Ford, Nissan, and Mitsubishi) and also have our own independent collision center, which is certified by 25+ OEM's (many of these OEM's we are certified in at our collision center, we do not own a corresponding dealership; for example: Tesla, Porsche, BMW, Jaguar Land Rover, Rivian, and Lucid – which has broadened our scope of business as an independent repairer as well as a dealer). Between our various businesses, we employ over 280 hardworking people in the area. Our experience is unique in that we have both sides of the business. We think our experience makes us experts on specific concerns about two bills that might come before the House Energy and Commerce Committee in the next few weeks.

REPAIR Act:

We are committed to safety for our customers and believe the so-called Right to Repair bill does not actually serve the purpose of helping consumers. We strongly oppose the REPAIR Act as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like our collision center with anything we don't already have to properly fix a car, the issue is that many independent repair facilities are choosing to not purchase access to OEM information such as repair procedures, diagnostic tooling, and other OEM special

tools, and instead are crying wolf by stating they do not have access to the information/tooling equipment as dealers. The idea that independent repairers are being “locked out” by automakers is simply not true and a complete fallacy. We desire to better explain the current independent repairer landscape and set the record straight on what we believe the proposed bill is completely missing the mark in regard to the bill’s proponents of a competitive market. We aim to better educate our lawmakers on this issue before the bill is voted on as if it were to pass as it is currently written, would be a major step in the wrong direction for our business and many others within Tennessee and across the country. Our businesses have continually invested in training, tooling/equipment, and our facilities to perform proper and safe repairs. The passing of this bill as currently written would be a severe detriment to our business, both our dealerships and our independent collision repair facility. The truth is that independent repair businesses like our collision center, already have access to all the data and tools we need to repair today’s complex vehicles safely and properly. The difference is, our independent repair facility has chosen to invest in the tooling, diagnostic equipment, and access to OEM repair information versus the independent repair facilities/companies that are supporting this bill that either have not made a similar investment and/or have spread a false narrative about the marketplace not being competitive due to a complete lie of lack of access to the resources needed to fix complex vehicles.

The REPAIR Act doesn’t provide independent auto repair shops like mine with anything we don’t already have to properly fix your vehicle. Frankly, I’m tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being “locked out” by automakers is not true. It’s a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today’s complex vehicles.

I would welcome the opportunity to host you at our facility, Wallace Collision Center. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we’ve made in our capability and also

examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

DRIVES Act:

Secondly, we appreciate Congressman Harshbarger's effort to stop China from getting our customer data. You are right when you say China is one of the biggest threats to America. However, we have significant concerns that the DRIVES Act goes beyond the China problem - it includes problematic language on how customer data is handled. We believe that the bill would provide data to third parties who will not serve the best interest of the US car owner and instead serve their interests at the expense of the vehicle owner. Specifically, the bill would enable insurance carriers to monopolize consumer choice at the detriment of the consumer and also drastically increase the cost of vehicle ownership, which is already increasing at a historic rate.

We would welcome the opportunity to visit Congresswoman Harshbarger in the district and/or talk on the phone about our concerns. My cell phone is [REDACTED]. We are happy to have you visit our dealerships as well as our collision center to see first-hand some of the issues.

Sincerely,

John Russell Baker
Owner/Manager

Wallace Auto Group:

- Wallace Subaru of Bristol
- Wallace Volkswagen of Bristol
- Wallace Kia of Bristol
- Wallace Subaru of Johnson City
- Wallace Volkswagen of Johnson City
- Wallace Mitsubishi of Johnson City
- Wallace Ford of Kingsport
- Wallace Nissan of Kingsport
- Wallace Mitsubishi of Kingsport
- Wallace Volkswagen of Kingsport
- Wallace Collision Center

Work Phone: [REDACTED]
Mobile Phone: [REDACTED]
Email: [REDACTED]

January 9, 2026

The Honorable Erin Houchin
U.S. House of Representatives
Room 342, Cannon House Office Building
25 Independence Ave SE
Washington, DC 20515

Dear Representative Houchin,

My name is Abbie Ziegler, and I am one of the owners of Enneking Auto Body, Inc, a family-owned independent repair facility in southeastern Indiana. My grandfather started the business in Oldenburg, IN in 1954, my father, uncle, and mother took it over from him, added a second location in Greensburg, IN in 2003, and now my sisters, brother, and I are the third generation to run the company.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facilities have invested in all the tools and training to perform repairs properly, and we utilize the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourself with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where I stand. I strongly **oppose the REPAIR Act** as currently introduced, and I urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like my family's with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – our customers to purchase alternative vehicle parts, rather than the parts our customers want.

The truth is that independent repair businesses like my family's already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which we are a member of, and the Alliance for Automotive Innovation (Auto Innovators). I believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our shop in either Batesville or Greensburg, IN. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs, and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit one of our facilities soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Abbie Ziegler". The signature is written in a cursive, flowing style.

Abbie Ziegler

From: Jerry McNee [REDACTED]
Sent: Thursday, January 8, 2026 4:31 PM
To: [REDACTED]@mail.house.gov
Cc: Mike Anderson [REDACTED], Aaron Schulenburg [REDACTED]
Subject: Oppose the REPAIR Act

January 8, 2026

The Honorable Dan Scharfenberger
U.S. House of Representatives
Room 251, Cannon House
Office Building 25
Independence Ave, SE, Washington, DC 20515-3307

Dear Representative Tom Kean,

My name is Gerald McNee, and I am the owner of Ultimate Collision Repair, a family-owned independent repair facility 1115 US HWY 1, Edison, NJ 08837 founded 1988. Today, I have the privilege of running this small business alongside my children, serving customers throughout Edison NJ, Middlesex County, and surrounding communities.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility anytime in 2026. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a safe, quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act and support the SAFE Repair Act proposal.**

Thank you for your time and consideration.

Sincerely,
Jerry McNee

Sent from Jerry's iPad

January 9th, 2026



The Honorable Kelly Robin
U.S. House of Representatives
2329 Rayburn House Office Building
Washington, DC 20515

Dear Representative Robin,

My name is Beth Seberger, and I am a third-generation repairer in my family's business. I currently serve my second term as President of our state automotive service association here in Illinois, AASPI.

I grew up in this industry. I've watched it evolve from steel and welders to advanced materials, electronics, sensors, and software. Through all of that change, one thing has never changed for my family or my shop: our responsibility to protect the people who trust us with their vehicles and their safety.

Our facility has invested heavily in the training, equipment, and OEM-provided repair information required to properly repair today's complex vehicles. We follow manufacturer procedures because modern vehicles demand it — and because our customers expect their cars to be returned to pre-accident condition, not "close enough." These are the vehicles that carry families, teens, and first responders, and we take that responsibility seriously.

In Illinois, I am actively engaged in legislative work focused on consumer protection — specifically, ensuring that vehicle owners are entitled to a fair, transparent evaluation of their vehicles and their insurance claims. This work is not about increasing costs or creating barriers; it is about fairness, accountability, and making sure consumers are not disadvantaged during one of the most stressful events they experience as vehicle owners. This perspective directly informs how I view federal policy proposals impacting this industry.

I understand that you are working to familiarize yourself with key issues affecting the automotive service and repair industry. As someone who is directly impacted by these policies every day, I want to be clear about where we stand. On behalf of our association and the independent repairers we represent, we strongly oppose the REPAIR Act as it is currently introduced, and we respectfully urge you to oppose it as well.

Despite what has been suggested by its supporters, the REPAIR Act does not provide independent repair shops like mine with access to information or tools we do not already have. The narrative that independent repairers are “locked out” by automakers does not reflect the reality of how professional collision repair facilities operate today.

What the REPAIR Act *does* is blur accountability, weaken repair standards, and create pathways that benefit large corporate interests, particularly insurance companies at the expense of consumers. In practice, these pressures often result in consumers being steered toward alternative or lower-quality parts and repairs that do not meet manufacturer requirements, all in the name of cost savings.

Independent repair businesses like mine do not need shortcuts. What we need is protection. Protection for consumers, safety, and repair standards that reflect the complexity of modern vehicles.

That is why we ask that you instead review and support the SAFE Repair Act, an alternative framework developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation (Auto Innovators). We believe this proposal more accurately addresses the real challenges facing consumers and small businesses, while preserving access to the information, tools, training, and equipment necessary to perform repairs safely and correctly.

I would welcome the opportunity to host you at our facility in New Lenox, IL. I would be proud to show you firsthand how an independent shop invests in the same systems, equipment, and repair information available to dealerships — and to share real-world examples of the pressures consumers face when trying to choose safe, proper repairs.

At the end of the day, our customers want one thing: their vehicles to be restored properly and safely, using correct repair procedures, proper tools, and the parts they choose. The SAFE Repair Act supports that goal. It protects consumer choice and supports repairers who refuse to cut corners, even when doing the right thing is harder.

Thank you for your time and consideration. I hope we can count on your support for policies that truly protect consumers and roadway safety, and I look forward to continuing this conversation.

Sincerely,

Beth Seberger

Proud President

AASPI

Probst Collision, LLC.

Opposition to the REPAIR Act and Support for the SAFE Repair Act

January 9, 2026

The Honorable Kevin Mullin
U.S. House of Representatives
Room 1404 Longworth House Office Building
Washington, DC 20515

Dear Representative Mullin,

My name is Todd Hesford, and I am the owner of MVAC Inc, a family-owned pair of collision centers in South Orange County. You may not know us as you do not represent our district but you are in our state. My mother, who passed away in 2025, founded our business back in 1983. Our team has taken over and grown it over the years into two trust worthy, and quality minded, family oriented collision centers. We are a well known reliable name in our communities.

Our focus has remained the same for over 40 years. Provide safe and proper repairs that are in accordance with and follow OEM guidance. Basically that means, fix the car the way we would for our own family. I think we can all agree that modern vehicle technology is not slowing down. Likewise, our resolve to continually invest in proper training, equipment and tooling to repair these vehicles does not slow down. Our clients are expecting us to deliver on this commitment to safe and proper repairs. We deliver on this promise regularly by accessing and utilizing the repair information that is provided to us from the OEM.

I give the House of Representatives a lot of credit, you are asked to review a lot of issues and legislation. Some of which may be completely foreign to you, and then, you make what you think is a good decision for the country. As a small business owner, I do not have a major voice when it comes to these things. But I felt compelled to speak up on the REPAIR Act, as I strongly oppose it. It will have major negative impacts throughout our collision industry. I urge you to oppose it also.

The REPAIR Act in its current form, does absolutely nothing for collision repair centers such as ours, that we do not already have access to. Honestly, I am beyond disappointed with the individuals and organizations who are claiming to “Speak up” on behalf of businesses such as ours.

The claim that the authors of the REPAIR Act are making is that we, the collective service and collision industry do not have access to or are being locked out of

- The correct tools
- The correct education
- Or the correct parts

All of this is an absolute fraud, made up in lies and misdirection. This is promoted by insurance companies, and large corporations who will profit from the same insurance companies that will direct where and how a car is repaired. Often times pressuring the consumer to accept it or they will be left on their own to pay for the repair.

The truth is that for decades now, businesses like mine have had access to all of these things. We as upstanding businesses have to make a choice to actively train and purchase the correct tools or parts. We do not need more legislation on this, we need better policy protection from the bad actors and the likes of the authors of the REPAIR Act. Something that instills consistent accountability and does not leave the safety of our customer in jeopardy in exchange for a better financial bottom line.

I would offer as an alternative that you review and support SAFE Repair Act as opposing legislation. This has been developed by the Alliance for Automotive Innovation, along with the Society of Collision Repair Specialists (SCRS), of which I am a board member. Their proposal addresses the real challenges facing consumers and small repair businesses while preserving safety, accountability, and access to the information, tools, equipment, and training required to repair modern vehicles properly.

If you or your counterparts have the time, we would proudly welcome you here in Orange County to show you how we have and continue to invest in all of the things laid out in this letter. Repair centers like ours are proof that the independent repairer already possesses the ability to access everything needed to perform the safe and proper repair. We do have challenges in this industry, but they rarely ever come from a vehicle manufacturer. They come from downward pressure for cost cutting measures.

In closing, our customers and our team want the same thing, restore their vehicle back to pre-accident condition following OEM repair procedures and utilizing proper tools and parts. We cannot get this with the REPAIR Act. I implore you to familiarize yourself with SAFE Repair Act, take the time to visit local service and collision center so you can understand this matter better. We can offer you references anywhere in the country to facilities who will make the time so you can make an educated decision.

Thank you for your time and consideration.

Sincerely,

Todd M Hesford

Mission Viejo Auto Collision

Opposition to the REPAIR Act and Support for the SAFE Repair Act

January 9, 2026

The Honorable Jay Obernolte
U.S. House of Representatives
Room 2433 Rayburn House Office Building
Washington, DC 20515

Dear Representative Mullin,

My name is Todd Hesford, and I am the owner of MVAC Inc, a family-owned pair of collision centers in South Orange County. You may not know us as you do not represent our district but you are in our state. My mother, who passed away in 2025, founded our business back in 1983. Our team has taken over and grown it over the years into two trust worthy, and quality minded, family oriented collision centers. We are a well known reliable name in our communities.

Our focus has remained the same for over 40 years. Provide safe and proper repairs that are in accordance with and follow OEM guidance. Basically that means, fix the car the way we would for our own family. I think we can all agree that modern vehicle technology is not slowing down. Likewise, our resolve to continually invest in proper training, equipment and tooling to repair these vehicles does not slow down. Our clients are expecting us to deliver on this commitment to safe and proper repairs. We deliver on this promise regularly by accessing and utilizing the repair information that is provided to us from the OEM.

I give the House of Representatives a lot of credit, you are asked to review a lot of issues and legislation. Some of which may be completely foreign to you, and then, you make what you think is a good decision for the country. As a small business owner, I do not have a major voice when it comes to these things. But I felt compelled to speak up on the REPAIR Act, as I strongly oppose it. It will have major negative impacts throughout our collision industry. I urge you to oppose it also.

The REPAIR Act in its current form, does absolutely nothing for collision repair centers such as ours, that we do not already have access to. Honestly, I am beyond disappointed with the individuals and organizations who are claiming to “Speak up” on behalf of businesses such as ours.

The claim that the authors of the REPAIR Act are making is that we, the collective service and collision industry do not have access to or are being locked out of

- The correct tools
- The correct education
- Or the correct parts

All of this is an absolute fraud, made up in lies and misdirection. This is promoted by insurance companies, and large corporations who will profit from the same insurance companies that will direct where and how a car is repaired. Often times pressuring the consumer to accept it or they will be left on their own to pay for the repair.

The truth is that for decades now, businesses like mine have had access to all of these things. We as upstanding businesses have to make a choice to actively train and purchase the correct tools or parts. We do not need more legislation on this, we need better policy protection from the bad actors and the likes of the authors of the REPAIR Act. Something that instills consistent accountability and does not leave the safety of our customer in jeopardy in exchange for a better financial bottom line.

I would offer as an alternative that you review and support SAFE Repair Act as opposing legislation. This has been developed by the Alliance for Automotive Innovation, along with the Society of Collision Repair Specialists (SCRS), of which I am a board member. Their proposal addresses the real challenges facing consumers and small repair businesses while preserving safety, accountability, and access to the information, tools, equipment, and training required to repair modern vehicles properly.

If you or your counterparts have the time, we would proudly welcome you here in Orange County to show you how we have and continue to invest in all of the things laid out in this letter. Repair centers like ours are proof that the independent repairer already possesses the ability to access everything needed to perform the safe and proper repair. We do have challenges in this industry, but they rarely ever come from a vehicle manufacturer. They come from downward pressure for cost cutting measures.

In closing, our customers and our team want the same thing, restore their vehicle back to pre-accident condition following OEM repair procedures and utilizing proper tools and parts. We cannot get this with the REPAIR Act. I implore you to familiarize yourself with SAFE Repair Act, take the time to visit local service and collision center so you can understand this matter better. We can offer you references anywhere in the country to facilities who will make the time so you can make an educated decision.

Thank you for your time and consideration.

Sincerely,

Todd M Hesford

Mission Viejo Auto Collision

January 7, 2026

The Honorable Rep. Jay Obernolte (R-CA-23)
U.S. House of Representatives
2186 Rayburn House Office Building
Washington, DC 20515-0523

Dear Representative Obernolte,

My name is Andrew Batenhorst, and I am the operator of Pacific Collision Center, a family-owned independent repair facility founded in 2014, which serves the greater Glendale, CA community. We specialize in certified collision repairs of the latest, advanced technology EV and ICE vehicles on the market today.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which

I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility Glendale. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Andrew Batenhorst

January 8, 2026

The Honorable Frank Pallone
U.S. House of Representatives
Room 2107 Rayburn House Office Building
Washington, DC 20515

Dear Representative Pallone,

My name is Paul Sgro, and I am the owner of Lee's Garage Inc., a family-owned independent repair facility located in West Long Branch. As you know, we are a local business with deep roots in the community. I had the privilege of taking over this company from my father in 1981, and over the past four decades, I have grown it into a trusted leader in our area—focused on protecting lives by ensuring safe and proper vehicle repairs.

Our mission has always been the same: to provide safe, high-quality repairs performed according to the standards required by modern vehicle technology. Our facility has invested heavily in the tools, equipment, and ongoing training necessary to repair today's complex vehicles properly. We utilize the same repair information provided by automakers and follow OEM procedures as intended. Our customers trust us with their families' safety, and we take that responsibility very seriously.

I understand that you are working to familiarize yourself with key issues in the automotive service and repair industry. As a local small business owner directly impacted by these policies, I want to be clear about where we stand. We strongly oppose the REPAIR Act as it is currently introduced, and we respectfully urge you to oppose it as well.

The REPAIR Act does not provide independent repair facilities like mine with access to anything we do not already have to properly and safely repair vehicles. Frankly, I am frustrated by individuals and

organizations that represent businesses nothing like mine claiming to speak on behalf of independent repairers.

The narrative that independent repair shops are being "locked out" by automakers is simply not true. This claim is a myth promoted by interests that stand to benefit the most from the REPAIR Act—namely large insurance companies and corporate entities that profit when insurers pressure, and in reality often require, consumers to accept alternative or non-OEM parts instead of the parts they prefer or that are required for proper repairs.

The truth is that independent repair businesses like mine already have access to the data, tools, and information needed to repair vehicles safely and correctly. What we need from policymakers is protection—not from automakers, but from legislation that blurs accountability, erodes repair standards, and jeopardizes vehicle safety in the name of convenience and corporate profit.

Instead, I urge you to closely review and support the SAFE Repair Act, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, and the Alliance for Automotive Innovation. This framework addresses the real challenges facing consumers and small repair businesses while preserving safety, accountability, and access to the information, tools, equipment, and training required to repair modern vehicles properly.

I would welcome the opportunity to host you at our facility in West Long Branch. I would be proud to show you how we have invested in the same equipment, systems, and capabilities available to franchised dealerships. We are proof that independent repairers already have access to what is needed to perform safe, proper repairs. We would also welcome the opportunity to demonstrate the real pressures our customers face when trying to choose quality repairs over cost-cutting alternatives.

At the end of the day, our customers want one thing: their vehicles restored to pre-accident condition using proper repair procedures, proper tools, and proper parts. The SAFE Repair Act protects and preserves consumer repair choice and supports repairers like us who refuse to cut corners—despite constant pressure from insurance companies to do so.

I hope you will consider visiting our facility, and I respectfully ask that you oppose the REPAIR Act and support the SAFE Repair Act.

Thank you for your time and consideration.

Sincerely,

Paul Sgro
President
Lee's Garage Inc.

Paul R Sgro

Driven to win in 25 !!

Lee's Garage Inc.
853 Broadway
West Long Branch NJ 07764


January 9th, 2026



The Honorable Jan Schakowsky
U.S. House of Representatives
2408 Rayburn House Office Building
Washington, DC 20515

Dear Representative Schakowsky,

My name is Beth Seberger, and I am a third-generation repairer in my family's business. I currently serve my second term as President of our state automotive service association here in Illinois, AASPI.

I grew up in this industry. I've watched it evolve from steel and welders to advanced materials, electronics, sensors, and software. Through all of that change, one thing has never changed for my family or my shop: our responsibility to protect the people who trust us with their vehicles and their safety.

Our facility has invested heavily in the training, equipment, and OEM-provided repair information required to properly repair today's complex vehicles. We follow manufacturer procedures because modern vehicles demand it — and because our customers expect their cars to be returned to pre-accident condition, not "close enough." These are the vehicles that carry families, teens, and first responders, and we take that responsibility seriously.

In Illinois, I am actively engaged in legislative work focused on consumer protection — specifically, ensuring that vehicle owners are entitled to a fair, transparent evaluation of their vehicles and their insurance claims. This work is not about increasing costs or creating barriers; it is about fairness, accountability, and making sure consumers are not disadvantaged during one of the most stressful events they experience as vehicle owners. This perspective directly informs how I view federal policy proposals impacting this industry.

I understand that you are working to familiarize yourself with key issues affecting the automotive service and repair industry. As someone who is directly impacted by these policies every day, I want to be clear about where we stand. On behalf of our association and the independent repairers we represent, we strongly oppose the REPAIR Act as it is currently introduced, and we respectfully urge you to oppose it as well.

Despite what has been suggested by its supporters, the REPAIR Act does not provide independent repair shops like mine with access to information or tools we do not already have. The narrative that independent repairers are “locked out” by automakers does not reflect the reality of how professional collision repair facilities operate today.

What the REPAIR Act *does* is blur accountability, weaken repair standards, and create pathways that benefit large corporate interests, particularly insurance companies at the expense of consumers. In practice, these pressures often result in consumers being steered toward alternative or lower-quality parts and repairs that do not meet manufacturer requirements, all in the name of cost savings.

Independent repair businesses like mine do not need shortcuts. What we need is protection. Protection for consumers, safety, and repair standards that reflect the complexity of modern vehicles.

That is why we ask that you instead review and support the SAFE Repair Act, an alternative framework developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation (Auto Innovators). We believe this proposal more accurately addresses the real challenges facing consumers and small businesses, while preserving access to the information, tools, training, and equipment necessary to perform repairs safely and correctly.

I would welcome the opportunity to host you at our facility in New Lenox, IL. I would be proud to show you firsthand how an independent shop invests in the same systems, equipment, and repair information available to dealerships — and to share real-world examples of the pressures consumers face when trying to choose safe, proper repairs.

At the end of the day, our customers want one thing: their vehicles to be restored properly and safely, using correct repair procedures, proper tools, and the parts they choose. The SAFE Repair Act supports that goal. It protects consumer choice and supports repairers who refuse to cut corners, even when doing the right thing is harder.

Thank you for your time and consideration. I hope we can count on your support for policies that truly protect consumers and roadway safety, and I look forward to continuing this conversation.

Sincerely,

Beth Seberger

Proud President

AASPI

Probst Collision, LLC.



Haury's Collision & Vintage
11514 Lake City Way NE
Seattle, WA 98125
Phone: (206) 365-1565
Website: www.hauryscollision.com

January 9, 2026

The Honorable Representative Kim Schrier
U.S. House of Representatives
Room 1110, Longworth House Office Building
Washington, DC 20515

Dear Representative Schrier,

I am the owner of Haury's Collision and Vintage in Seattle. We are an OEM factory certified collision repair shop and pride ourselves in OEM specification repairs. Our repair facility serves consumers at one of the most stressful moments they face, after a vehicle collision. Our customers families depend on for safety, mobility, and peace of mind, and we believe public policy must prioritize those same values.

Haury's is writing to formally express our **opposition to the REPAIR Act** as currently introduced.

Our independent collision repair facility is committed to quality and safety are not facing a lack of access to repair information or tools. We already obtain manufacturer repair procedures, diagnostic capabilities, and specialized training necessary to safely repair today's increasingly complex vehicles. The infrastructure for safe and proper repair already exists in the current marketplace.

Our concern lies in the downstream consequences the REPAIR Act would create for consumers.

By reducing clarity around responsibility and weakening established repair standards, the REPAIR Act risks shifting the burden of safety away from accountable parties and onto vehicle owners. Consumers are already required to navigate insurance processes, technical repair decisions, and cost disputes they are not equipped to fully evaluate. This legislation would further complicate that landscape rather than improve it.

In real-world application, our repair facility is pressured to accept repair decisions driven by cost containment rather than vehicle safety or manufacturer requirements. **Policies that lower guardrails or broaden discretion in repair practices make it more difficult for consumers to ensure their vehicle is restored to pre-loss condition.**

Safe and proper repairs are not theoretical. They are being performed every day by independent repairers who invest in training, tooling, and compliance with OEM standards. Any legislation that weakens the expectation of those standards undermines consumer safety and confidence in the repair process.

For these reasons, Haury's Collision & Vintage encourages a more measured approach. We ask that you review the SAFE Repair Act framework developed by the Society of Collision Repair Specialists (SCRS) in collaboration with the Alliance for Automotive Innovation. This proposal better aligns with the realities of modern vehicle repair by preserving accountability, safety standards, and consumer protections without sacrificing access or choice.

Consumers want certainty that their vehicle has been repaired correctly, safely, and according to established standards. Any legislative action should reinforce and not erode that expectation.

Thank you for your consideration and for your continued work on issues affecting Washington consumers. Haury's Collision & Vintage respectfully urges you to oppose the REPAIR Act and support policies that place safety, accountability, and consumer protection first.

Respectfully,

Jeff Butler, AIC
Insurance Claims Expert
Vehicle repair expert, ASE Master Technician
Haury's Collision & Vintage
11514 Lake City Way NE | Seattle, WA
P: (206)365-1565 | www.hauryscollision.com



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January 8, 2026

The Honorable Representative Kim Schrier
U.S. House of Representatives
Room 1110, Longworth House Office Building
Washington, DC 20515

Dear Representative Schrier,

My name is Justin Lewis. I own Accurate Auto Body, a family-owned independent collision repair facility in Redmond, Washington, founded by my parents in 1994. Today, I have the privilege of running the business alongside my wife, serving families throughout Redmond, Bellevue, King County, and the surrounding communities.

For more than six years, I have been actively involved in advocating for stronger consumer protections here in Washington State. This work finally resulted in meaningful legislation passing this last session as SB 5721 was signed into law. That effort was driven by one simple goal: making sure consumers can receive safe, proper repairs on increasingly complex vehicles.

Every day, families trust my business with one of their most important assets, their vehicle and, ultimately, their safety. We take that responsibility seriously. Our shop has made significant investments in equipment, training, certifications, and OEM repair information so that we can repair vehicles according to manufacturer requirements, not shortcuts or outdated practices.

Those resources already exist in today's market, and independent repairers like us are using them successfully.

I understand you are working to become familiar with key issues affecting the automotive repair industry, and I appreciate your willingness to engage. As someone directly impacted by these policies and who works face-to-face with consumers navigating claims, costs, and safety concerns, I want to clearly share why we **strongly oppose the REPAIR Act** as currently written.

The REPAIR Act does not solve a problem that consumers or independent repairers are experiencing today. Independent shops already have access to the tools, data, and information necessary to repair modern vehicles correctly.

The notion that we are "locked out" by automakers simply does not reflect reality in my shop or many others like it.

What does concern me deeply is how the REPAIR Act would impact consumers. By lowering guardrails and blurring accountability, the bill risks increasing pressure to prioritize convenience and cost over safety and proper repair standards. In practice, this would make it harder—not easier—for consumers to receive repairs that restore their vehicle to pre-accident condition.

My customers already face enough challenges: navigating insurance claims, understanding technical repair requirements, and advocating for what is truly necessary to keep their families safe. The REPAIR Act would further distance consumers from that goal by empowering large

corporate interests—particularly insurers—who benefit financially when repair standards are diluted and cheaper alternatives are pushed, often against a customer's wishes.

What consumers actually need is protection, not from automakers, but from policies that unintentionally undermine repair quality and safety. Safe and proper repairs are obtainable today, and they depend on clear standards, trained professionals, and accountability. Any legislation that weakens those pillars ultimately harms the very people it claims to help.

For these reasons, I encourage you to take a close look at the **SAFE Repair Act** framework developed by the Society of Collision Repair Specialists (SCRS), of which I serve on the board of directors, in collaboration with the Alliance for Automotive Innovation.

The SAFE Repair Act framework proposal more accurately reflects the real-world needs of consumers and repairers alike, while preserving access to repair information, tools, training, and most importantly, safety.

I would welcome the opportunity to host you at our facility in Redmond. We would be proud to show you firsthand how independent repairers like us have invested in the same advanced equipment and systems used by dealerships, and to share real examples of the pressures our customers face when safety and proper repairs are challenged.

At the end of the day, our customers want one thing: their vehicle returned to pre-accident condition using proper procedures, proper tools, and proper parts. That goal should unite all of us.

Thank you for your time and consideration. I hope we can count on your support in **opposing the REPAIR Act** and advancing solutions that truly protect consumers and public safety.

Sincerely,

Justin Lewis

Owner, Accurate Auto Body

8710 Willows Road NE

Redmond, WA 98052

January 9th, 2026

The Honorable Kim Schrier
U.S. House of Representatives
Room 1110, Longworth House Office Building, 15 Independence Ave, SE
Washington, DC 20515

Dear Representative Kim Schrier,

My name is Micah Strom, I am the collision chair for NWACA representing over 35 collision shops and the owner of Modern Collision Rebuild & Service, a family-owned independent repair facility on Bainbridge Island in our great state of Washington. I am a second generation shop owner which was founded by my parents in 1974. Today, I have the privilege of running this small business alongside my brother, serving customers throughout Bainbridge Island and the Olympic Peninsula.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What our customers need from policymakers is consumer protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility on Bainbridge Island. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Micah Strom

January 6, 2026

The Honorable Representative Kim Schrier
U.S. House of Representatives
Room 1110, Longworth House Office Building
Washington, DC 20515

Dear Representative Kim Schrier,

My name is Justin Henderson, and I am the owner of ProStar Collision LLC, a family-owned independent repair facility that I started from ground up in 2014. Today, I have the privilege of running this small business alongside my wife, serving customers throughout Ellensburg, WA and surrounding communities.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where I stand. I strongly **oppose the REPAIR Act** as currently introduced, and I urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility in Ellensburg, WA. I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Justin Henderson



January 8, 2026

The Honorable Darren Soto
U.S. House of Representatives
Room 2353, Rayburn House Office Building
50 Independence Avenue, SW
Washington, DC 20515

Dear Representative Soto,

My name is Nader Akbari, and I am the owner of Central Florida Paint & Body, an independent repair facility in Orlando founded in 2021 specializing in OEM certified, high quality collision repair. We pride ourselves on repairing vehicles properly and safely by investing in training and tooling to ensure our staff and our organization are up to date with the frequently changing landscape of the automotive industry and the technology used in today's vehicles, while also providing the best possible service to our guests during the stressful circumstances vehicle accidents create in their lives. We also partner with local trade schools like Orange Technical College and UTI to recruit and invest in the new generation entering the workforce and help guide these students both professionally and personally.

Our mission has remained consistent since day one: delivering safe, high-quality repairs that meet the requirements of today's advanced vehicle systems. We have made substantial investments in specialized equipment and ongoing training, and we rely on the repair information and procedures already made available by vehicle manufacturers to restore vehicles as they were designed to be repaired. Our customers entrust us with the safety of their families, and we approach that responsibility with the seriousness it deserves.

I recognize that you are in the process of reviewing issues that impact the automotive service and repair sector. As a small business owner who is directly affected by this legislation, I want to clearly state our position. We oppose the REPAIR Act in its current form and respectfully ask that you do the same.

The REPAIR Act does not provide independent repair facilities like mine with any additional access or capability beyond what already exists to properly and safely repair vehicles. I am increasingly frustrated by organizations claiming to represent independent repairers when their business models and realities bear little resemblance to shops like ours.

The claim that independent repair shops are being "locked out" by automakers is inaccurate. That narrative is being driven by parties who stand to benefit most from the REPAIR Act—namely large insurance carriers and corporate entities that profit when

consumers are steered, or effectively forced, toward non-OEM or alternative parts instead of the parts vehicle owners actually prefer.

Independent repair businesses already have access to the data, diagnostic information, and tools required to perform safe and proper vehicle repairs.

What we need from lawmakers is not intervention against automakers, but protection from legislation that weakens accountability, lowers repair standards, and compromises vehicle safety in favor of speed, convenience, or corporate cost-cutting.

Rather than advancing the REPAIR Act, I encourage you to review and support the SAFE Repair Act—an alternative proposal developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation. This approach more accurately addresses the real concerns facing consumers and independent repairers while preserving access to the information, tools, equipment, and training necessary to repair today's increasingly complex vehicles correctly.

I would welcome the opportunity to invite you to our facility at a time that works for your schedule. We would be proud to demonstrate the level of investment we've made in equipment and systems that mirror those used by franchised dealerships.

Our operation demonstrates that independent repairers already possess the access and capability needed to perform safe, manufacturer-compliant repairs. We would be glad to walk you through our processes and also share real-world examples of the pressures and obstacles consumers face when trying to choose a repair that prioritizes quality and safety.

Ultimately, vehicle owners want one outcome: a properly restored vehicle returned to its pre-loss condition using correct repair procedures, appropriate tools, and the right parts.

The SAFE Repair Act upholds consumer choice and supports repairers who are committed to doing the job correctly—even when faced with ongoing pressure from insurance companies to take shortcuts.

I hope you will visit our facility soon, and I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Nader Akbari
Managing Partner, Central Florida Paint & Body

January 12, 2026

The Honorable Lori Trahan
U.S. House of Representatives
Room 2233, Rayburn House Office Building

50 Independence Ave, SW,
Washington, DC 20515-2103

RE: Concerns of Massachusetts Collision Repairers Regarding the REPAIR Act

Dear Representative Trahan,

My name is Evangelos "Lucky" Papageorg, and I serve as the Executive Director of the Alliance of Automotive Service Providers of Massachusetts (AASP-MA), doing business as the Massachusetts Auto Body Association (MABA). Our association represents independent collision repair businesses across the Commonwealth—family-owned small businesses that employ thousands of skilled workers and serve communities throughout Massachusetts.

Our members share a common mission: to restore vehicles safely and correctly, in accordance with manufacturer repair procedures and the realities of modern vehicle technology. Independent collision repairers have made substantial investments in OEM tools, training, equipment, and repair information to ensure that vehicles are repaired properly and safely. Our members take seriously the trust placed in them by consumers, whose safety depends on the quality of these repairs.

We understand that you are familiarizing yourself with key issues affecting the automotive service and repair industry. As the voice of independent collision repairers in Massachusetts, we want to be clear about where our members stand. AASP-MA/MABA strongly opposes the REPAIR Act as currently introduced, and we urge you to oppose it as well.

Contrary to claims made by its proponents, the REPAIR Act does not provide independent collision repair shops with access to information or tools they do not already have. The narrative that independent repairers are being "locked out" by automakers is simply not accurate. That claim is being advanced primarily by entities whose business models and interests differ significantly from those of local, independent repair shops—and who stand to benefit financially from

AASP-MA dba MABA

P O BOX 850210 BRAINTREE, MA. 02185 Tel# 617.574.0741

www.aaspmma.org

(Pg 2)

legislation that weakens repair standards and accountability.

The reality is that independent collision repair businesses already have access to the OEM repair data, tools, and training necessary to safely repair today's vehicles. What our members need from policymakers is protection—not from automakers, but from legislation that blurs responsibility, undermines established repair standards, and places consumer safety at risk in the name of convenience or corporate profit.

For that reason, we encourage you to carefully review and support the SAFE Repair Act, an alternative legislative framework developed collaboratively by the Society of Collision Repair Specialists (SCRS) and the Alliance for Automotive Innovation. This proposal more accurately reflects the realities of today's vehicles and repair environment, while preserving accountability, safety, and consumer choice.

We believe the SAFE Repair Act better addresses the real challenges facing consumers and independent repair businesses, ensuring appropriate access to information, tools, equipment, and training without compromising vehicle safety or repair integrity.

AASP-MA/MABA would welcome the opportunity to arrange a visit for you at one of our member facilities here in Massachusetts. Such a visit would demonstrate firsthand that independent collision repairers have already invested in the same technologies and systems used by dealerships and would also illustrate the pressures our members and their customers face—particularly from insurance-driven cost controls that often conflict with proper repairs.

At the end of the day, consumers want their vehicles returned to pre-accident conditions using proper repair procedures, proper tools, and proper parts. The SAFE Repair Act protects that expectation. It supports responsible repairers who refuse to cut corners, even when facing daily pressure to do so.

We appreciate your time and consideration, and we hope we can count on your support in opposing the REPAIR Act and advancing the SAFE Repair Act. We look forward to continuing this important conversation.

Sincerely,



Evangelos "Lucky" Papageorg
Executive Director

Alliance of Automotive Service Providers of Massachusetts
d/b/a Massachusetts Auto Body Association (AASP-MA / MABA)

AASP-MA dba MABA
P O BOX 850210 BRAINTREE, MA. 02185 Tel# 617.574.0741
www.aaspma.org



The Honorable Gus Bilirakis
US House of Representatives
Rayburn Building, Room 2306
Washington, D.C. 20515
Dear Representative Bilirakis,

My name is Robert McSherry, and I own North Haven Auto Body, Sabo Auto Body, and Woodbridge Auto Body — independent repair facilities that have served Connecticut continuously since 1938, 1947, and 1960. For generations, our businesses have focused on one principle: performing safe, manufacturer-correct repairs using the proper equipment, procedures, and trained professionals.

We invest heavily in OEM tools, training, and repair procedures, all of which are already available directly from vehicle manufacturers. Independent repairers are not “locked out” of the information needed to properly and safely repair vehicles. That claim is simply not true.

The REPAIR Act does not give shops like mine access to anything we do not already have. Instead, it risks weakening accountability and repair standards while benefiting large insurance interests that profit when consumers are pressured toward lower-cost parts and shortcuts — often at the expense of required repair procedures and vehicle safety.

What small businesses and consumers need is protection from legislation that lowers safety standards, not laws that blur responsibility in the name of convenience or corporate profit.

I urge you to oppose the REPAIR Act and instead support the SAFE Repair Act, developed by the Society of Collision Repair Specialists (SCRS), of which I am a member, in collaboration with the Alliance for Automotive Innovation. This proposal preserves consumer choice while protecting proper repair standards and public safety.

I would welcome the opportunity to host you at our North Haven facility to demonstrate the investments we have made and the realities our customers face when seeking quality repairs in today’s increasingly complex vehicles.

Thank you for your time and consideration.



"We meet by Accident"

January 9, 2026

The Honorable Gus Bilirakis
U.S. House of Representatives
Rayburn House Office Building, Room 2306
Washington, DC 20515

Dear Representative Bilirakis,

Our names are Tony Cavallaro Jr. and Joe Cavallaro, and our family owns and operates Airport Auto Body, a family-owned independent repair facility in Hartford, CT founded by our parents in 1983.

Our mission has always been to perform safe, high-quality repairs using the proper tools, training, and OEM repair procedures. We have invested heavily to ensure we can repair today's complex vehicles correctly, and our customers trust us with their family's safety every time they hand over their keys.

As you familiarize yourself with issues affecting the automotive repair industry, we want to clearly state our position. We strongly oppose the REPAIR Act as currently written and urge you to oppose it as well.

Independent repair shops like ours already have access to the data and tools needed to properly repair vehicles. The claim that we are being "locked out" by automakers is simply not true. That narrative benefits large insurers and corporations that profit by steering repairs toward cheaper alternatives, often at the expense of safety and consumer choice. The truth is that independent repair businesses like ours already have access to all the data and tools we need to safely repair a vehicle.

What small businesses like ours need is protection from policies that blur accountability, erode repair standards, and jeopardize vehicle safety.

We encourage you to support the SAFE Repair Act, developed by the Society of Collision Repair Specialists and the Alliance for Automotive Innovation. This proposal meaningfully addresses real consumer and repairer challenges while preserving safety, accountability, and proper repair standards.

We would welcome the opportunity to host you at our facility to show you firsthand how independent shops have invested in the same equipment and systems used by dealerships. Our customers want their vehicles restored to pre-accident condition using proper procedures, tools, and parts, which is already available to our industry.

Thank you for your time and consideration. We hope we can count on your opposition to the REPAIR Act and your support of the SAFE Repair Act.

Sincerely,

Airport Auto Body
Tony Cavallaro Jr.
Joe Cavallaro



75 Locust Street, Hartford, CT 06114

January 7, 2026

The Honorable Members of the CMT Subcommittee, and the Honorable Tim Burchett of Tennessee

U.S. House of Representatives

Washington, DC 20515

Dear CMT Subcommittee,

My name is Jerry Dalton and I am the owner of Dalton Collision a family-owned independent repair facility's in Knoxville Tennessee and serve the greater Knoxville area with quality, SAFE, OEM certified repairs.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly oppose the REPAIR Act as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts

my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and support the SAFE Repair Act, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which I am a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

I would welcome the opportunity to host you at our facility's Dalton Collision in Knoxville or Blaine, I would love to show how we have invested in the same equipment and systems available to auto dealerships.

We are proof that independents already have access to what we need to perform safe, proper repairs and we would be happy to show you our operations and demonstrate firsthand the investments we've made in our capability and also examples of the real pressures and barriers our customers face in choosing a quality repair.

At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to oppose the REPAIR Act and support the SAFE Repair Act proposal.

Thank you for your time and consideration.

Sincerely,

Jerry Dalton

From: LYNSEY MARTIN [REDACTED]
Date: Fri, Jan 9, 2026 at 10:49 AM
Subject: Hello from Finks Unlimited
To: <[REDACTED]@mail.house.gov>, <[REDACTED]@mail.house.gov>, CCA Info
<info@carolinascollisionassociation.com>

January 9, 2026

The Honorable Russell Fry

U.S. House of Representatives

25 Independence Avenue

Cannon House Office Building Room 345

Washington, DC 20515

Dear Representative Russell Fry,

My name is Lynsey Fink Martin, and I am the owner of Finks Unlimited Collision, a family-owned independent repair facility that started in Concord, North Carolina by my father and continues to serve our community today. Today, I have the privilege of running this small business in honor of my family and in hopes to have a continued future in the community.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. Our facility has invested in all the tools and training to perform repairs properly, and utilizes the information already provided by the automakers to conduct those repairs as intended by the OEM. Our customers trust us with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a local business owner directly impacted by these policies, I want to be clear about where we stand. We strongly oppose the REPAIR Act as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like mine with anything we don't already have to properly fix your vehicle. Frankly, I'm tired of people who represent businesses that look nothing like mine claiming to speak for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – my customers to purchase alternative vehicle parts, rather than the parts my customers want.

The truth is that independent repair businesses like mine already have access to all the data and tools we need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and support the SAFE Repair Act, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses like ours, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

We are proof that independents already have access to what we need to perform safe, proper repairs. At the end of the day, our customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers like us who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope you will visit our facility soon, and I hope we can count on you to oppose the REPAIR Act and support the SAFE Repair Act proposal.

Thank you for your time and consideration.

Sincerely,

Lynsey Fink-Martin

Owner/Operator

Finks Unlimited Collision, Inc.

236 Hwy 49 South

Concord, NC 28025

January 9, 2026

The Honorable Russell Fry
U.S. House of Representatives
25 Independence Avenue
Cannon House Office Building Room 345
Washington, DC 20515

Dear Representative Russell Fry,

My name is Kaitlyn George, and I am the Executive Director of the Carolinas Collision Association, a non-profit organization who is dedicated to safe and correct collision repairs in North and South Carolina. We support many shops in the Carolinas through education and resources and encourage our members to share their voice when support is needed.

Our focus has always been the same: safe, high-quality repairs performed to the standards required by modern vehicle technology. We invest in tools and training to help local independent shops perform repairs properly, and utilize the information already provided by the automakers to conduct those repairs as intended by the OEM. Customers trust these businesses with their family's safety, and we take that responsibility seriously.

I understand you are working to familiarize yourselves with key issues in the automotive service and repair industry. As a voice for many local business owners directly impacted by these policies, I want to be clear about where we stand. We strongly **oppose the REPAIR Act** as currently introduced, and we urge you to oppose it as well.

The REPAIR Act doesn't provide independent auto repair shops like these with anything they don't already have to properly fix your vehicle. Frankly, I'm tired of people who have little understanding of the day to day struggles of these shops and customers speaking for our industry.

The idea that independent repairers are being "locked out" by automakers is not true. It's a myth pushed by the interests that stand to be the biggest beneficiaries of the REPAIR Act: large insurance companies and corporations that profit when insurers pressure – and in reality, require – customers to purchase alternative vehicle parts, rather than the parts the customers want to properly restore their vehicle.

The truth is that independent repair businesses already have access to all the data and tools they need to safely repair a vehicle.

What we need from policymakers is protection. Not from automakers, but from a law that blurs accountability, erodes repair standards, and jeopardizes safety in the name of convenience and corporate profit.

Instead, I ask that you closely review and **support the SAFE Repair Act**, an alternative legislative proposal developed by the Society of Collision Repair Specialists (SCRS), which we are a member of, and the Alliance for Automotive Innovation (Auto Innovators). We believe this framework actually addresses the real challenges facing consumers and small repair businesses, while ensuring access to the information, tools, equipment, and training necessary to properly repair today's complex vehicles.

At the end of the day, customers want one thing: their vehicle restored to pre-accident conditions using proper repair procedures, proper tools, and proper parts.

The SAFE Repair Act protects and preserves consumer repair choice. It supports repairers who refuse to cut corners – despite daily pressure from insurance companies to do so.

I hope we can count on you to **oppose the REPAIR Act** and **support the SAFE Repair Act proposal**.

Thank you for your time and consideration.

Sincerely,
Kaitlyn George



January 13, 2026

The Honorable Gus Bilirakis, Chairman
The Honorable Jan Schakowsky, Ranking Member
Subcommittee on Commerce, Manufacturing, and Trade
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Bilirakis and Ranking Member Schakowsky:

Consumer Reports (CR), the independent, nonprofit, and nonpartisan member organization, writes regarding the January 13, 2026, hearing, “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership.” We ask that this letter be included in the hearing record.

For over 85 years, CR has used rigorous research, independent testing, and evidence-based advocacy to advance vehicle safety innovations that protect consumers. We have championed everything from seat belts and crash avoidance technologies to protections for people outside the vehicle. Strong safety standards not only save lives and prevent injuries, but also deliver lasting benefits for consumers and the transportation system as a whole.

As the Subcommittee considers legislative proposals to shape the future of vehicle safety, we offer the following perspectives on key bills and discussion drafts under consideration.

Motor Vehicle Modernization Act (Chairman Guthrie)

Consumer Reports appreciates the intent behind the Motor Vehicle Modernization Act to reform, update, and better equip the National Highway Traffic Safety Administration (NHTSA) to oversee motor vehicle safety into the future. We support provisions that aim to promote transparency and accountability, such as the requirement for a recurring safety rulemaking and research priority plan, which would be a welcome step toward improving the timeliness and coordination of NHTSA’s rulemaking processes. We also urge the Subcommittee to support increased appropriations for NHTSA, which remains significantly underfunded.

Updating the five-star safety ratings program, including through the establishment of a dedicated New Car Assessment Program (NCAP) office, an NCAP advisory committee, and consumer education components, would help to improve public understanding of vehicle safety technologies and address longstanding concerns that the program has not kept pace with rapidly evolving vehicle safety features. The new advisory committee should be transparent, balanced, and accountable, including through full compliance with the Federal Advisory Committee Act.

The bill also directs the advisory committee to study the feasibility of shifting some functions of the program to a public-private partnership or private entity. NCAP plays a vital role in informing and protecting consumers, and its independence, transparency, and public accountability must be preserved. We think the program is best situated within NHTSA, but if its structure were to change, we would emphasize the need for strong safeguards and a meaningful role for public interest advocates and independent safety experts to ensure it continues to serve its consumer information mission.

The bill's provisions around rulemaking transparency and project management reinforce timely, accountable regulatory processes, and we support them. In addition, we conditionally support the bill's provisions requiring a recurring review of existing safety standards, which would help standards keep pace with evolving vehicle designs. These reviews should include consideration of standards that need to be strengthened, and in making a determination about potentially revising a standard, the NHTSA Administrator should be required to consider the benefits to the public related to the standard, not just the costs for manufacturers.

However, we are concerned about provisions that would drastically expand the number of vehicles allowed to receive general exemptions from federal motor vehicle safety standards (FMVSS) under 49 U.S.C. 30113. The bill would dramatically increase the volume of allowable exempt vehicles from 2,500 to 90,000, and shorten review timelines. Perhaps most problematic is the "deemed approved" provision that would automatically grant an exemption if NHTSA fails to decide on an exemption application within one year. This is a departure from current law, which requires NHTSA to make certain findings before granting exemptions.

These changes raise significant safety concerns, as they could allow vehicle deployments without a full safety review or explicit agency finding that the exemption is in the public interest and maintains motor vehicle safety. We especially oppose these changes in relation to clause (iv) of section 30113(b)(3)(B), which is a vague and misguided provision of law. While NHTSA will certainly need to gauge equivalence of an AV's novel safety feature with the level of safety provided by an individual FMVSS, it is unrealistic to expect the agency to be able to establish a well-reasoned, impartial, and widely-agreed-upon meaning of "overall safety level at least equal to the overall safety level of nonexempt vehicles."

The bill also expands the ability of manufacturers to put new vehicle technology on public roads solely for purposes of testing or evaluation, by allowing introduction of "motor vehicle equipment" for these purposes in addition to full motor vehicles. While some clarification around testing and evaluation is reasonable, any such use must be narrowly scoped, rigorously overseen, and not used as a backdoor to avoid necessary safety standards.

With respect to recalls, we are unclear what the intention is behind the proposed revisions to 49 U.S.C. 30118, and we are uncertain what their real-world impact would be if the bill were enacted. We would oppose this provision if it were likely to contribute to manufacturer delays in addressing a safety defect. Regardless, if this bill ultimately were to amend section 30118, the priority should not be tweaking subsection (c), but rather granting NHTSA efficient and effective imminent hazard authority that it could use to protect the public quickly when there are vehicles on the road with a condition that substantially increases the likelihood of injury or death.

Finally, we support the bill's attention to recall completion and notification methods, as well as consumer education around automation. These are key components to building a modern vehicle safety ecosystem, especially as driving automation systems become more common and more complex.

Safety is Not For Sale Act (Ranking Member Pallone)

In 2020, CR issued a report that found automakers routinely bundled core safety technologies with expensive, non-safety features, forcing consumers to pay thousands more for protection that should be standard; for example, access to automatic emergency braking with pedestrian detection often required upgrades costing \$2,000 or more.¹ A separate 2023 analysis of blind spot warning found a similar pattern, with consumers typically paying over \$1,500 to get a vehicle with the feature, particularly on popular SUVs and trucks, which may present greater risks to pedestrians and others outside motor vehicles.²

The Safety is Not For Sale Act addresses this issue by requiring that optional safety features be offered either as standard trim equipment or separately from non-safety features. This would rightly prevent automakers from restricting access to life-saving technologies to those customers who pay for luxury add-on packages.

While the bill would deliver meaningful progress, CR's position continues to be that many of these features—and particularly those with well-established safety benefits—should simply be standard across all new vehicles. In our view, blind spot warning, rear cross traffic warning, advanced drunk and impaired driving prevention technology, and automatic crash notification should come standard on all new vehicles (including all trims), and consumers should not be required to pay extra for them. We also note that, as the bill is currently written, it could still permit manufacturers to bundle safety features with other safety features, resulting in affordability barriers if key protections are locked behind add-on or higher-trim safety packages.

Finally, we note that adaptive cruise control and lane centering technologies (which appear to be described in Sec. 2 (e)(6)(B)(i)) are not proven to deliver safety benefits and should be considered convenience features, not safety features.

SELF DRIVE Act (Reps. Latta and Dingell)

Consumer Reports welcomes the opportunity to work toward a federal safety framework for automated vehicles, but the SELF DRIVE Act as currently written raises serious concerns. While this discussion draft requires manufacturers to submit structured “safety cases” demonstrating how their systems meet core safety competencies, it lacks requirements for independent

¹ Consumer Reports, “A High Price on Safety: How Automakers Require Consumers to Pay a Premium for Proven Vehicle Safety Features.” (June 2020) (online at: advocacy.consumerreports.org/wp-content/uploads/2020/06/CR-A-High-Price-on-Safety-June-2020.pdf).

² Consumer Reports, “A Blind Spot in Safety: An analysis of blind spot warning in popular heavy vehicles in the U.S.” (Aug. 24, 2023) (online at: advocacy.consumerreports.org/wp-content/uploads/2023/08/CR-Blind-Spot-Warning-Analysis-August-2023.pdf).

verification or certification of those safety cases. It appears manufacturers could satisfy the safety elements of the legislation simply by developing and self-certifying their safety case without any requirement for it to be made public or even to be submitted to NHTSA unless requested.

The proposed safety data repository builds on existing NHTSA efforts, but appears to deliver weaker provisions compared to the current Standing General Order, such as by narrowing the scope of reportable crashes, loosening reporting timelines, and expanding the ability of manufacturers to treat safety-critical information as confidential.

Crucially, the bill also broadly preempts state authority without ensuring robust federal oversight, stripping states and localities of their role in protecting road users while providing limited tools for NHTSA to ensure meaningful accountability at the federal level. We strongly oppose the breadth of this state preemption provision and urge the Subcommittee to narrow it substantially or remove it entirely.

As Congress considers autonomous vehicle legislation, it should ensure that any federal AV framework includes enforceable safety standards with independent validation of system performance and robust public transparency. Manufacturers should be required to demonstrate how their vehicles meet clearly defined safety benchmarks before deployment. Safety data and crash reporting should be made publicly accessible, and the data should be specific and detailed enough to allow for meaningful analysis of system performance and safety outcomes. Critically, Congress must also preserve the ability of states and localities to protect their residents. Without these core safeguards, AV legislation risks introducing new hazards on our roads and impunity for developers that fail to put safety first.

Finally, it is worth noting that companies in various industries are increasingly adding forced arbitration clauses into their standard contracts and terms of use, stripping consumers of their right to go to court if they are harmed by a product or service. Instead, legal disputes get shunted off to private forums where many basic legal protections do not apply, and the company often has an unfair advantage. Congress should seize the opportunity presented by the SELF DRIVE Act to prohibit the use of forced arbitration in mobility services and the auto industry broadly.

REPAIR Act (Reps. Dunn and Perez)

Consumer Reports takes no position on the REPAIR Act. CR strongly supports the right to repair and strongly opposes broad preemption of state authority to enact or enforce right to repair laws.

AV Safety Data Act (Rep. Mullin)

Consumer Reports supports the goals of the AV Safety Data Act, which would build on NHTSA's existing Standing General Order (SGO) by codifying safety data reporting requirements for both Level 2 and Level 3–5 systems and, importantly, expand those requirements through enhanced monthly reporting of key metrics. These include miles traveled, unplanned stoppage events, and crashes involving injuries to vulnerable road users or occupants

of other vehicles. These would address gaps in reporting such as the lack of standardized data on operational exposure and non-crash safety risks like road obstructions.

However, by simply codifying the existing reporting requirements, the bill would lock in narrower requirements that were introduced under the Third Amended SGO, which came into effect on June 16, 2025.³ This would be a missed opportunity to establish a stronger statutory baseline for the reporting of AV data.

Driver Technology and Pedestrian Safety Act (Rep. Mullin)

Consumer Reports supports the Driver Technology and Pedestrian Safety Act. Our research has long shown that overly complex or poorly designed touchscreen systems can increase driver distraction.⁴ As digital interfaces replace some physical controls, clearer guidelines are needed to ensure these systems minimize cognitive and visual demand. For example, the updated 2026 protocols for the European New Car Assessment Programme (Euro NCAP) will award higher safety ratings to vehicles that retain physical controls for basic functions like turn signals, hazard lights, and windshield wipers, recognizing that touchscreen-only interfaces take drivers' eyes off the road. Directing NHTSA to study the impact of certain non-safety related controls would be a step toward addressing a growing and underregulated risk to road safety.

DRIVER Act (Rep. Harshbarger)

Consumer Reports takes no position on the DRIVER Act. CR strongly supports data access laws, but the provisions in this legislation are vague and would preempt more detailed and specific state laws that are already in effect.

ADAS Functionality and Integrity Act (Reps. Harshbarger, Obernolte, Vazquez, and Torres)

Consumer Reports supports efforts to improve the safety and reliability of advanced driver assistance systems (ADAS) throughout the vehicle lifecycle, including after collisions and repairs. We have advised consumers that advanced driver assistance systems like automatic emergency braking and lane-keeping assist rely on precisely calibrated sensors and cameras, and that even common repairs, such as windshield replacement, may require recalibration to maintain proper system functionality.⁵ This bill, by establishing calibration standards, enhancing transparency around required procedures, and promoting consistent industry practices, could help ensure that ADAS features perform safely and reliably over time, especially if a consumer decides to make significant modifications to their vehicle.

³ NHTSA, "Third Amended Standing General Order 2021-01" (Apr. 24, 2025) (online at: www.nhtsa.gov/sites/nhtsa.gov/files/2025-04/third-amended-SGO-2021-01_2025.pdf)

⁴ Consumer Reports, "The Most and Least Distracting Infotainment Systems" (Nov. 16, 2017) (online at: www.consumerreports.org/car-safety/most-and-least-distracting-infotainment-systems/)

⁵ Consumer Reports, "The Hidden Cost of Car Safety Features" (Nov. 16, 2020) (online at: www.consumerreports.org/car-repair/the-hidden-cost-of-car-safety-features/)

DRIVE to HALT Drunk Driving Act (Rep. Dingell)

The DRIVE to HALT Drunk Driving Act aims to speed up the use of technology to address impaired driving, which remains one of the most persistent causes of preventable roadway deaths. By requiring automakers to equip a portion of their fleets with passive alcohol detection systems that meet DADSS performance specifications and driver attention systems aligned with Euro NCAP's impairment detection protocols, the bill takes an iterative approach to deployment of these technologies. Importantly, the bill establishes minimum deployment requirements while preserving flexibility to adopt updated safety benchmarks, and includes an appropriate sunset clause that would take effect once NHTSA finalizes its rulemaking required under section 24220 of the Infrastructure Investment and Jobs Act. The bill thus would promote near-term deployment using technologies already in use globally, while also maintaining regulatory momentum and flexibility.

No Kill Switches in Cars (Rep. Perry)

We strongly oppose the No Kill Switches in Cars Act because it baselessly undermines critical efforts to prevent impaired driving. As advocates for both consumer safety and consumer privacy, we at Consumer Reports can say unequivocally that the effect of this bill would be to block the rollout of life-saving technology, putting lives at risk and delaying progress on one of the most preventable causes of road deaths. Contrary to arguments made by proponents, the bill would do nothing to improve consumer privacy.

To require an update to the definition of 'motorcycle' (Rep. Van Orden)

Consumer Reports takes no position on Rep. Van Orden's bill to require an update to the statutory definition of "motorcycle."

PART Act (Reps. Baird and McCollum)

Consumer Reports is still reviewing the PART Act and plans to weigh in with comments at a later date.

Safe Vehicle Access for Survivors Act (Reps. Dingell and Crenshaw)

Consumer Reports is still reviewing the Safe Vehicles for Survivors Act and plans to weigh in with comments at a later date.

Know Before You Drive Act (Rep. Schreier)

Confusion over what partially automated driving features can actually do is a known safety risk. CR has raised concerns about system names like "Autopilot" and "Full Self-Driving,"⁶ which can lead drivers to overestimate a vehicle's capabilities. The Know Before You Drive Act would

⁶ Consumer Reports, "Senators Call for Investigation of Tesla's Marketing Claims of Its Autopilot and 'Full Self-Driving' Features" (Aug. 18, 2021) (online at: www.consumerreports.org/advertising-claims/call-to-investigate-tesla-marketing-claims-autopilot-fsd-a1181594362)

appropriately address this issue by requiring automakers to clarify functionality before consumers use these features, and the bill could help reduce misuse and improve public understanding of driving automation.

SAFE Exit Act (Rep. Kelly)

Consumer Reports strongly supports and has already publicly endorsed the SAFE Exit Act, which would require all vehicles with electronic door latches to include accessible, clearly labeled manual releases that function without vehicle power. Tragically, investigations have linked electronic door failures to at least 15 deaths, including horrifying instances where occupants were trapped in burning vehicles as first responders struggled to gain access.⁷ CR has raised concerns about designs that obscure or complicate emergency egress, especially in those situations where power is lost after a crash or fire,⁸ and over 36,000 consumers have signed a petition calling for safer car door handles.⁹ When poorly designed, electronic door latch systems can hinder escape and delay first responder access. This bill addresses a growing safety risk with a straightforward requirement to ensure occupants can always exit the vehicle safely. We urge all members of the Subcommittee to cosponsor this bill.

Safe Streets for Everyone Act (Rep. Clarke)

CR welcomed NHTSA's final rule establishing FMVSS No. 127 to require all new cars and light-duty trucks to be equipped with effective automatic emergency braking (AEB) that includes pedestrian detection technology. CR considers AEB to be one of the most significant auto safety advances of the past two decades. However, the rule does not require detection of cyclists or motorcyclists, which CR had urged NHTSA to include in the final rule.¹⁰ The Safe Streets for Everyone Act—which is based on H.R. 3649, the Magnus White Cyclist Safety Act—would close critical gaps in the current rule and ensure new AEB systems can detect and respond to both bicycles and motorcycles. We strongly support this bill.

Consumer Reports appreciates the Subcommittee's attention to motor vehicle safety and related policy challenges. We look forward to continuing to work with the Subcommittee and full Committee as these proposals move forward, and we stand ready to provide additional research, technical expertise, and consumer-focused perspectives to help ensure that any final legislation meaningfully advances safety outcomes on U.S. roads.

⁷ Consumer Reports, "How to Escape Your Car If the Electronic Door Handle Fails" (Jan. 7, 2026) (online at: www.consumerreports.org/cars/car-safety/how-to-escape-your-car-if-the-electronic-door-release-fails-a8152892189/).

⁸ Consumer Reports, "Proposed Law Takes Aim at Unsafe Electronic Car Door Handles" (Jan. 7, 2026) (online at: www.consumerreports.org/cars/car-safety/unsafe-electronic-car-door-handles-safe-exit-act-a1099298865/).

⁹ Consumer Reports, "Automakers: Make Electronic Door Handles Safer" (online at: action.consumerreports.org/nb-20251203-doorhandlesafety/).

¹⁰ Consumer Reports, "Consumer Reports Submits Comments on Proposed NHTSA Automatic Emergency Braking Systems Rule." (Aug. 15, 2023) (online at: advocacy.consumerreports.org/research/consumer-reports-submits-comments-on-proposed-nhtsa-automatic-emergency-braking-systems-rule/).

Sincerely,

William Wallace
Director
Safety Advocacy

Cooper Lohr
Senior Policy Analyst
Transportation and Safety

cc: Members of the Subcommittee on Commerce, Manufacturing, and Trade



December 23, 2025

The Honorable Brett Guthrie
House Energy & Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone
House Energy & Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Ted Cruz
Senate Commerce Committee
254 Russell Senate Building
Washington, DC 20510

The Honorable Maria Cantwell
Senate Commerce Committee
254 Russell Senate Building
Washington, DC 20510

RE: Accessibility Considerations to Ensure Access and Safety for Disabled Travelers in Autonomous Vehicle Legislation and Provisions in Surface Transportation Reauthorization

Dear Chairs Guthrie and Cruz and Ranking Members Pallone and Cantwell:

The undersigned members of the Consortium for Constituents with Disabilities (CCD) Transportation Task Force and fellow advocates urge you to consider and prioritize the safety and access needs of disabled passengers and pedestrians in any stand-alone autonomous vehicle (AV) legislation or surface transportation provisions. Recommendations in this letter reference Congressman Latta's 2023 SELF DRIVE Act discussion draft (SELF DRIVE Act Draft) and Congresswoman Dingell's AV framework proposal (AV Framework Proposal).¹ We recognize Representative Dingell and Latta's leadership of the Congressional Autonomous Vehicle Caucus and are grateful for their acknowledgement that disability rights advocates must be at the table as AV frameworks are developed.² We are also providing '*Disability Access in AVs and Motor Vehicles*' draft bill text (Access in AVs Draft) for your consideration.

CCD is the largest coalition of national organizations working together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of people with disabilities. The Americans with Disabilities Act (ADA) sought to "provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities." Through AV policymaking Congress has the opportunity to lead, uphold the ADA's mandate, enhance safety, and improve lives and mobility for all.

Disability AV Advocacy, Engagement and Recommendations

The CCD Transportation Task Force has adopted cross-disability AV Principles and provided feedback on past AV legislative drafts.^{3,4} Signatories to the principles included 20 national organizations. Many of our members also participated in 3 days of AV accessibility workshops in 2019 hosted by the Alliance of Automobile Manufacturers (an organization preceding the Alliance for Automotive Innovation) with government, industry and disability stakeholders, and U.S. Department of Transportation (USDOT) and U.S. Department of Labor (USDOL) listening sessions.^{5,6} AVs can improve mobility and quality of life for the disability community, including for those with physical, sensory, intellectual and developmental disabilities and neurological conditions such as epilepsy. For the full potential of AVs to be realized any AV legislation must:

- explicitly include consideration of accessibility and the needs of disabled travelers of all disability types in each rulemaking, including federal motor vehicle safety standards (FMVSS) updates;
- ensure exemptions granted based on improved access address the biggest challenges to accessibility;
- ensure preemptions do not prohibit state or local requirements or performance metrics that would increase the numbers of fully accessible autonomous vehicles and services accessible to people with disabilities, including wheelchair users;
- ensure AV-related ADA or other civil rights claims can be filed in court;
- ensure AVs complement and improve public transit;
- ensure data collected and safety considerations address the needs for accessible sidewalks, crossings, curb cuts, accessible pedestrian signal and related infrastructure;
- and ensure USDOT and the US Access Board have the resources and staff to adopt and implement necessary research, rulemaking and standard setting.

Background

Nearly 1 in 5 people in the U.S. has a disability (more than 57 million). In addition, the age of people over 65+ is set to double by 2050. Many older adults who acquire short or long-term disabilities or health conditions in both rural and urban settings will need accessible transportation options to access healthcare and remain active in their communities. As a result of the passage of the ADA, 99% of public buses are equipped with ramps, curb ramps benefit the public, and there is improved provision of accessible transit to people with sensory disabilities. Yet, significant barriers to accessible, affordable transportation remain across modes.

Many people with disabilities cannot drive because of their specific disability, are currently unable to obtain a driver's license, are denied service or cannot afford to purchase a wheelchair accessible vehicle (WAV).⁷ It's critical that ride-share and on-demand services provide disability access yet there are not adequate WAVs and trip denials for service animal users and other people with disabilities are rampant. There are no purpose-built wheelchair accessible

passenger vehicles on the market today in the United States. Wheelchair users often pay nearly double the price of the vehicle for necessary aftermarket modifications, including to have a ramp installed or other features that require exemptions from the FMVSS.⁸

Without affordable, accessible transportation people with disabilities are unable to travel to work, to school, to contribute to and participate in their communities, to support and spend time with family and friends, and live their lives to the fullest. A report by the National Disability Institute found that a critical barrier to competitive integrated employment and entrepreneurship is a lack of accessible transportation options. Accessible, affordable, and sustainable AVs could lead to an additional 4.4 million jobs for people with disabilities, an additional \$867 billion in U.S. GDP and \$1.6 trillion in U.S. output.⁹

Manufacturers and transportation providers are developing, testing and deploying autonomous shuttles and passenger vehicles. AVs have the potential to dramatically improve access for people with disabilities. The promise and safety of AVs will only be realized if the vehicles and the surrounding infrastructure are fully accessible, and the safety elements consider the needs of all people with disabilities.

Regarding any AV legislation we urge you to:

Retain the Following Provisions from the SELF DRIVE Act Draft and the AV Framework Proposal

Licensing and Insurance – Legislation should prohibit discrimination on the basis of disability by states and any other governmental authorities in licensing and insurance. We strongly support the provisions that prohibit discriminatory licensing laws nationwide.

Highly Automated Vehicles Advisory Council – An Advisory Council comprised of industry, consumer, safety, labor, civil rights and other stakeholders is necessary to continue discussions and identify barriers, unintended impacts and solutions. Disability representation is critical and should be included within any advisory council and should also be required to consider accessibility needs.

Include Accessibility and Strengthen the Following in the SELF DRIVE Act Draft and the AV Framework Proposal

Safety Framework and Self-Assessment Rulemakings – The SELF DRIVE Act Draft and AV Framework Proposal direct NHTSA to initiate safety rulemakings and safety assessments for entities developing AVs. The timelines in the proposals differ. We support the SELF DRIVE Act draft's inclusion of accessibility including non-visual accessibility, in the safety assessment. **The Access to AVs Draft requires a safety rulemaking for accessible AV HMIs and a rule for automated driving systems (ADS) to assess and validate the performance of sensing, perception and response to disabled people outside the vehicle.**

Any safety framework rulemaking must also include a requirement for USDOT to consider the

needs of all disabled travelers, including people with physical, sensory (those that are blind or low vision or Deaf or hard of hearing) and intellectual and developmental disabilities. A mandate from Congress for all AV-related rulemakings would ensure inclusion. The vehicle's ADS HMI and object detection outside the vehicle are critical in any safety framework. HMI must be accessible to people with sensory and cognitive disabilities for AVs to reach their full potential. A Disability Rights Education & Defense Fund brief on ableism in AV AI and algorithms recommends standards be set to ensure AVs can detect all people with disabilities and other members of marginalized communities outside the vehicle.¹⁰ Research and recent anecdotes suggest that not all AVs are being taught to detect people seated in their wheelchairs, service animal users, or people with darker skin tones, among others.

Proposed manufacturer self-assessments require USDOT to identify risks to motor vehicle safety and steps taken to mitigate such risks during the design, development, and introduction into interstate commerce. Accessibility and how the needs of disabled travelers, including non-visual access and access for wheelchair users, are being met must be included in safety self-assessments provided by manufacturers and in any publicly available database.

Updating Existing FMVSS Standards – The SELF DRIVE Act Draft would require a review of FMVSS and initiating or documenting research to evaluate AV safety. The AV Framework Proposal would require updating FMVSS within 3 years.

Existing FMVSS must be updated to ensure the safety of AVs, including level 4 and 5. We strongly encourage Congress to require USDOT to include a review of how updated FMVSS will ensure the safety of fully accessible AVs, including those that are both electric and autonomous, and are built with wheelchair ramps and will require testing and deployment of automatic securement systems.¹¹ The federal safety framework must assume deployment of, and advance progress toward, fully accessible passenger vehicles (both large and small) as well as accessibility standards. These standards will not only increase public trust of AVs, but also a roadmap for those in the industry seeking to develop and deploy the safest, most accessible vehicle.

Examples of FMVSS related standards that require attention for passenger-related accessible ergonomics are active suspension and kneeling capabilities for level entry, vehicle doorway height and width for entry, rear passenger entry for ambulatory self-or assisted passenger transfers, passenger restraint systems, ramps and mobility equipment securement, and grab assistance throughout vehicles that allow for perpendicular movement. Any updates to the FMVSS must maintain the current exemptions to crashworthiness for modified vehicles to install a ramp until vehicles are fully accessible and such modification is no longer required for physical access. **The Access to AVs Draft requires a standard for automated restraint systems for wheelchair users and ramps and ramp installations.**

Exemptions for Vehicles that Benefit People with Disabilities – The SELF DRIVE Act Draft and AV Framework Proposal would allow NHTSA to exempt up to 100,000 and 80,000 AVs per manufacturer each year respectively. Both proposals would allow exemptions to be granted 'if

the vehicle would provide transportation access for individuals with disabilities, including non-visual access for individuals who are blind or visually impaired.'

We support this provision *if* the existing language is strengthened to incentivize manufacturers to address the more difficult accessibility challenges such as vehicles that can effectively communicate with people who are blind or Deaf, are accessible for wheelchair users who remain in their wheelchair, and provide automatic wheelchair securement. **Vehicles eligible for this exemption must be accessible for all people with disabilities and the exemption should clearly define the requirements.**¹²

Exemption Database – The SELF DRIVE Act Draft and AV Framework Proposal require publishing data of exempted vehicles. We urge you to require publishing whether the vehicle was granted an exemption because it would promote access for individuals with disabilities and how it promotes such access.

Public Transportation – The SELF DRIVE Act Draft includes in the definition of AV vehicles that provide public transportation while the AV Framework Proposal does not and requirements in the proposal would not apply to transit vehicles. We encourage any bill to allow use of and permit exemptions for vehicles used in public transportation. We note the ADA requires transportation provider's personnel to assist with the use of securement systems, lifts, and ramps.¹³ We recommend legislation require research into the value of transit employees on transit vehicles who can serve as ambassadors and focus on customer service including wayfinding and emergency assistance. AV use in public transportation ensures AV rideshare providers are under clear civil rights law obligations, including the ADA. Without transit and paratransit providers adopting accessible AVs, a significant market for AVs is lost. It is worth noting that assisting people with disabilities is a universal value consistently expressed by the AV industry.

In addition, permitting AVs to be used in public transit could create opportunities for AV rideshare and transit to work together to ensure on-demand service is complementing rather than replacing transit. Studies have shown that when a rideshare service enters a market and provides what some view as a more convenient alternative to public transit, transit ridership can decrease.¹⁴ Decreased ridership can lead to cuts in fixed bus routes and service hours which also leads to potential cuts in required paratransit service provided for people with disabilities. Finally, many AVs are likely to be electric vehicles. Prohibitions on the use of certain electric vehicle types by transit agencies may create an additional barrier to electrification of paratransit and transit fleets, leaving people with disabilities behind.

Preemption – There is a provision in the SELF DRIVE Act Draft that preempts state or political subdivisions of a state to maintain, enforce, prescribe, or continue in any effect any law or regulation regarding the design, construction, or performance of AVs. The AV Framework Proposal provision creates an interim period of preemption for 10 years unless an AV framework is established. We are concerned these provisions may unintentionally preempt AV accessibility or equity performance measures or requirements at the state or local level,

including state laws that would mandate vehicle environmental standards to mitigate harm. While we understand the need for federal standards of vehicle design and construction, we also encourage allowing states and local jurisdictions to seek higher performance requirements that also ensure the greatest access and benefits for disabled and other historically underserved travelers. Many cities like New York City, Chicago, and San Francisco have taken the lead in defining accessible parity for mobility solutions that use public roads and streets to operate. Their leadership and innovation for service needs to continue to be allowed and local and state levels. **The Access to AVs Draft bill prohibits discrimination on the basis of disability by AV operators that would protect the rights of disabled passengers and pedestrians should preemption be included.**

Forced Arbitration – The SELF DRIVE Act Draft does not reference or prohibit forced arbitration clauses from AV service providers or sellers. The AV Framework Proposal prohibits pre-dispute arbitration agreements related to the use of AVs but does not include remedies available under civil rights laws.

We strongly encourage inclusion of a prohibition on forced arbitration clauses in any AV framework. AV providers must be held accountable for injuries and property damage, and remedies available under applicable civil rights must be made available.¹⁵ Disabled passengers repeatedly face discrimination from rideshare and micromobility services and disabled pedestrians and cyclists routinely have dangerous interactions with vehicles in public streets and rights of way. The rights of disabled travelers should be protected to ensure a safe and quality experience. In order to fully protect their rights, all disabled people must have the option to take their claims, including those under civil rights laws and the ADA, to court. Should forced arbitration be allowed, we urge upholding disabled travelers' rights. **The Access to AVs Draft bill includes a provision and language limiting forced arbitration when involving death or injury of disabled person, unfair practices affecting a disabled person, harm to wheelchairs or service animals.**

USDOT Personnel and Staffing, Resources for Development – The SELF DRIVE Act Draft does not provide funding or staff to USDOT to implement requirements. The AV Framework Proposal authorizes funds to NHTSA and requires a report on the staffing and resource needs for USDOT, including additional personnel or resources needed in the 10-year period following the bill's passage. The Secretary is to consider the staffing of the Highly Automated Systems Safety Center of Excellence. We strongly encourage including in the report the staffing and resource needs required to ensure accessibility and safety are prioritized in the development of AVs, as well as creating a department within the Center for Excellence, or a separate center focused on accessibility of AVs. We also encourage the hiring of experts with disabilities who bring their own lived experience and informed perspective.

Consider Adding Provisions not included in the SELF DRIVE Act draft or AV Framework Proposal

Infrastructure Data and Considerations – For travelers with disabilities to safely utilize, enter and exit an AV the surrounding infrastructure must be accessible. When data is collected

through mapping or other means, AV service providers and government entities should collect and share infrastructure accessibility information, including areas where pick-ups and drop-offs may be unsafe. This data could then be used to identify necessary improvements.

Privacy: Passengers' health, disability status, and locations visited must not be shared or used for commercial or tracking purposes without permission of the individual.

U.S. Access Board AV Standards Mandate – The US Access Board currently provides accessibility guidelines and standards for policymakers and industry for transportation vehicles including buses and vans, rail cars and automated guideway vehicles and public rights of way.¹⁶ There are currently no federal accessibility standards for fully accessible AV passenger vehicles. USDOT has on their Inclusive Design Challenge webpage a list of existing standards, e.g., wheelchair securement, that may be used as a guide for the time being.¹⁷ There is also a summary report from the Alliance of Automobile Manufacturers-hosted *AVs and Increased Accessibility* workshops that identifies accessibility needs in detail.¹⁸ However, these do not hold the same weight nor are they enforceable.

A mandate for the U.S. Access Board to draft AV standards is critical in any legislative framework. In addition, including a deadline within which the Department of Justice and USDOT must adopt the standards and providing sufficient funding for the Access Board to develop the standards is necessary.

Thank you for your consideration. Please contact CT Tyson at ctyson@dredf.org and Sarah Malaier, smalaier@afb.org, with any questions. We are eager to support your efforts to enhance safety and mobility for all.

Sincerely,

CCD Transportation Task Force Co-Chairs

Danica Gonzalves, Paralyzed Veterans of America, danicag@pva.org
Sarah Malaier, American Foundation for the Blind, smalaier@afb.org
Tyler Beck, Epilepsy Foundation of America, tbeck@efga.org
Sarah Bellish, Cure SMA, sarah.bellish@curesma.org
Olivia Keller, Amputee Coalition, okeller@amputee-coalition.org

Signatory Organizations

Access Ready

American Association of People with Disabilities

American Council of the Blind

American Foundation for the Blind

American Printing House for the Blind
Autistic Women & Nonbinary Network
Christopher & Dana Reeves Foundation
Cure SMA
Deaf Equality
Disability Belongs
Disability Rights California
Disability Rights Education & Defense Fund
Easterseals
Epilepsy Foundation of America
Muscular Dystrophy Association
National Council on Independent Living
Paralyzed Veterans of America
Spark Access
TDIforAccess
United Spinal Association

¹ Congressman Latta's 2023 SELF DRIVE Act discussion draft and Congresswoman Dingell's 2023 AV framework proposal were summarized in a July 24, 2023 Energy & Commerce hearing memo: https://d1dth6e84htgma.cloudfront.net/IDC_Memo_Self_Driving_Vehicles_AV_Hearing_2023_07_26_be020b0868.pdf. The full text of Congresswoman Dingell's 2023 AV framework proposal is available at: https://debbiedingell.house.gov/uploadedfiles/dingell_automated_vehicle_discussion_draft.pdf

² Dingell, Latta Statement on DOT AV Framework (April 2025).
<https://debbiedingell.house.gov/news/documentsingle.aspx?DocumentID=5644>

³ Consortium for Constituents with Disabilities Transportation Task Force Autonomous Vehicle Principles, updated May 2022. Available at <https://www.c-c-d.org/fichiers/CCD-Disability-AV-Framework-Hearing-Letter-072523-FINAL.pdf>.

⁴ CCD Transportation Task Force August 23, 2019 feedback on AV Bill Issues, including disability access, advisory committees, rulemakings, exemptions, privacy, safety evaluation reports and accessibility features, crash data, resources for NHTSA, consumer education, studies examining potential impacts, and infrastructure available at <https://www.c-c-d.org/fichiers/CCD-Transpo-TF-Feedback-on-AV-Bill-Issues-082319.pdf>. November 4, 2019 Feedback on AV Legislation Sections, including on a HAV advisory council, and disability exemptions available at: <https://www.c-c-d.org/fichiers/CCD-Transp-TF-Feedback-on-AV-Sections-110419.pdf>. December 9, 2019 Feedback on AV Legislation Sections, including on new FMVSS and licensing and insurance available at <https://www.c-c-d.org/fichiers/CCD-Transp-TF-Feedback-on-AV-Sections-120919.pdf>. February 21, 2020 Feedback on AV Legislation Sections, including on consumer education, cybersecurity, personnel and staffing, and additional considerations available at: <https://www.c-c-d.org/fichiers/CCD-AV-Sections-Response-02-21-20.pdf>.

⁵ Autonomous Vehicles and Increased Accessibility Workshops (May 3, July 19, September 10, 2019). Hosted by the Alliance of Automobile Manufacturers (an organization preceding the Alliance for Automotive Innovation). Washington, D.C. Summary Report, agendas and presentations available at <https://www.autosinnovate.org/avaccessibility>.

⁶ U.S. Department of Labor (October 2019). Autonomous Vehicles: Driving Employment for People with Disabilities. Available at <https://www.dol.gov/odep/topics/AV-Info-Guide-Revised.doc>.

⁷ A Bureau of Transportation Statistics (BTS) study of adults with disabilities found that roughly half of respondents 18 to 64 reported living in a household with income under \$25,000. Bureau of Transportation Statistics (2018). Travel Patterns of American Adults with Disabilities. Available at <https://www.bts.gov/travel-patterns-with-disabilities>.

⁸ The aftermarket modifications for wheelchair accessibility are vitally important for the ability of wheelchair users to travel outside their homes. However, wheelchair users face an uncomfortable tradeoff between that access and their safety since the modifications may decrease the overall crashworthiness of the vehicle. People with disabilities regularly choose access over safety. This tradeoff exists because neither manufacturers nor NHTSA have obligations to make today's passenger vehicles both safe and accessible to all people with disabilities and fail to do so voluntarily. As long as this tension exists, nothing in the proposed legislation should diminish access to after-market modifications of vehicles to provide vehicle access to people with disabilities.

⁹ National Disability Institute (December 30, 2022). Economic Impacts of Removing Transportation Barriers to Employment for Individuals with Disabilities Through Autonomous Vehicle Adoption. Available at <https://www.nationaldisabilityinstitute.org/reports/autonomous-vehicle-adoption/>.

¹⁰ Ian Moura for the Disability Rights Education and Defense Fund (November 2022). Addressing Disability & Ableist Bias in Autonomous Vehicles: Ensuring Safety, Equity & Accessibility in Detection, Collision Algorithms & Data Collection. Available at <https://dredf.org/addressing-disability-and-ableist-bias-in-avs/>.

¹¹ The industry's safety standards for independent wheelchair securement and passenger restraint should be adopted by NHTSA and integrated into the FMVSS.

¹² The SELF DRIVE Act introduced in 2021 included an exemption for vehicles that would improve access for individuals with disabilities. The draft does not reflect how many vehicles could be exempted under this subsection.

¹³ 49 CFR 37.165(f)

¹⁴ UrbanismNext, University of Oregon (2021). Do Transportation Network Companies Increase or Decrease Transit Ridership - Empirical Evidence from San Francisco. Available at <https://www.urbanismnext.org/resources/do-transportation-network-companies-increase-or-decrease-transit-ridership-empirical-evidence-from-san-francisco-2>.

¹⁵ We support provisions prohibiting some predispute arbitration claims. We also encourage remedies available under applicable civil rights laws be included.

¹⁶ The US Access Board is an independent federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards. Learn more and review the guidelines and standards they have developed at <https://www.access-board.gov/>.

¹⁷ US Department of Transportation Inclusive Design Challenge Resources. Available at <https://www.transportation.gov/inclusive-design-challenge/resources>.

¹⁸ Autonomous Vehicles and Increased Accessibility Workshops (2019). Available at <https://www.autosinnovate.org/avaccessibility>.



January 13, 2025

The Honorable Brett Guthrie
House Energy & Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone
House Energy & Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515

RE: Letter for the Record for the Hearing on “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership”

Dear Chairman Guthrie and Ranking Member Pallone:

The Disability Rights Education & Defense Fund and Consortium for Constituents with Disabilities (CCD) Transportation Task Force co-chairs write to submit a letter for the record for today’s hearing on strengthening motor vehicle safety and cementing U.S. automotive leadership. To ensure American leadership in autonomous vehicles (AVs) and automated driving system (ADS)-equipped vehicles, we urge you to consider and prioritize the safety and access needs of disabled passengers and pedestrians.

Recommendations in this letter reference the SELF DRIVE Act of 2026, Congressman Latta’s 2023 SELF DRIVE Act discussion draft (SELF DRIVE Act Draft) and Congresswoman Dingell’s AV framework proposal (AV Framework Proposal).¹ We recognize Representative Dingell and Latta’s leadership of the Congressional Autonomous Vehicle Caucus and are grateful for their acknowledgement that disability rights advocates must be at the table as AV frameworks are developed.² We are also providing “*Disability Access in AVs and Motor Vehicles*” draft bill text (Access in AVs Draft) for your consideration. In addition, we are providing accessibility considerations in AVs signed by 20 disability advocacy organizations submitted on December 23, 2025.

CCD is the largest coalition of national organizations working together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of people with disabilities. The Americans with Disabilities Act (ADA) sought to “provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” Through AV policymaking, Congress has the opportunity to

lead, uphold the ADA's mandate, enhance safety, and improve lives and mobility for all.

Disability AV Advocacy, Engagement and Recommendations

The CCD Transportation Task Force has adopted cross-disability AV Principles and provided feedback on past AV legislative drafts.^{3,4} Signatories to the principles included 20 national organizations. Many of our members also participated in three days of AV accessibility workshops in 2019 hosted by the Alliance of Automobile Manufacturers (an organization preceding the Alliance for Automotive Innovation) with government, industry and disability stakeholders, and U.S. Department of Transportation (USDOT) and U.S. Department of Labor (USDOL) listening sessions.^{5,6} AVs can improve mobility and quality of life for the disability community, including for those with physical, sensory, intellectual and developmental disabilities and neurological conditions such as epilepsy. For the full potential of AVs to be realized any AV legislation must:

- explicitly include consideration of accessibility and the needs of disabled travelers of all disability types in each rulemaking, including federal motor vehicle safety standards (FMVSS) updates;
- ensure preemptions do not prohibit state or local requirements or performance metrics that would increase the numbers of fully accessible autonomous vehicles and services accessible to people with disabilities, including wheelchair users;
- ensure AV-related ADA or other civil rights claims can be filed in court;
- ensure data collected and safety considerations address injury and harm to disabled pedestrians and wheelchair users and their assistive devices or service animals; the needs for accessible sidewalks, crossings, curb cuts, accessible pedestrian signals and related infrastructure; and
- ensure USDOT and the U.S. Access Board have the resources and staff to adopt and implement necessary research, rulemaking and standard setting.

Background

Nearly 1 in 5 people in the U.S. has a disability (more than 57 million). In addition, the age of people over 65+ is set to double by 2050. Many older adults who acquire short or long-term disabilities or health conditions in both rural and urban settings will need accessible transportation options to access healthcare and remain active in their communities. As a result of the passage of the ADA, 99% of public buses are equipped with ramps, curb ramps benefit the public, and there is improved provision of accessible transit to people with sensory disabilities. Yet, there remain significant barriers to accessible, affordable transportation.

Many people with disabilities cannot drive because of their specific disability, are currently unable to obtain a driver's license, are denied transportation services, or cannot afford to purchase a wheelchair accessible vehicle (WAV).⁷ It's critical that ride-share and on-demand services provide disability access yet there are not adequate WAVs and trip denials for service animal users and other people with disabilities are rampant. There are no purpose-built

wheelchair accessible passenger vehicles on the market today in the United States. Wheelchair users often pay nearly double the price of the vehicle for necessary aftermarket modifications, including to have a ramp installed or other features that require exemptions from the FMVSS.⁸

Without affordable, accessible transportation, people with disabilities are unable to travel to work, to school, to contribute to and participate in their communities, to support and spend time with family and friends, and live their lives to the fullest. A report by the National Disability Institute found that a critical barrier to competitive integrated employment and entrepreneurship is a lack of accessible transportation options. Accessible, affordable, and sustainable AVs could lead to an additional 4.4 million jobs for people with disabilities, an additional \$867 billion in U.S. GDP, and \$1.6 trillion in U.S. output.⁹

Manufacturers and transportation providers are developing, testing and deploying autonomous shuttles and passenger vehicles. AVs have the potential to dramatically improve access for people with disabilities. The promise and safety of AVs will only be realized if the vehicles and the surrounding infrastructure are fully accessible, and the safety elements consider the needs of all people with disabilities.

Regarding any AV legislation we urge you to:

Include the Following Provisions from the 2023 SELF DRIVE Act Draft and the 2023 AV Framework Proposal

Licensing and Insurance – Legislation should prohibit discrimination on the basis of disability by states and any other governmental authorities in licensing and insurance. We strongly support the provisions that prohibit discriminatory licensing laws nationwide. We are disappointed to note this provision is missing from the 2026 SELF DRIVE Act which purports to ensure accessibility.

Highly Automated Vehicles Advisory Council – An Advisory Council comprised of industry, consumer, safety, labor, civil rights and other stakeholders is necessary to continue discussions and identify barriers, unintended impacts and solutions. Disability representation is critical and should be included within any advisory council and should also be required to consider accessibility needs. We are disappointed to note this provision is missing from the 2026 SELF DRIVE Act.

Include Accessibility and Strengthen the Following in the 2026 SELF DRIVE Act Draft, 2023 SELF DRIVE Act and the 2023 AV Framework Proposal

Safety Case, Frameworks and Self-Assessment Rulemakings – The 2026 SELF DRIVE Act requires objective content for a safety case from AV manufacturers. Thus, the USDOT Secretary must issue a final rule that prescribes a safety standard to be met. Listed requirements for the safety case do not explicitly include accessibility features that would make the vehicle safe for disabled passengers or pedestrians. We strongly encourage any safety case requirements

include accessible human machine interfaces that would ensure accessibility for people with sensory and cognitive disabilities, as well as physical accessibility of the vehicle for wheelchair users. We support inclusion of ADS detection and appropriate response to any vulnerable road user and encourage strengthening this language to ensure a broad range of disabled and other road users are detected. The 2023 SELF DRIVE Act Draft and 2023 AV Framework Proposal direct NHTSA to initiate safety rulemakings and safety assessments for entities developing AVs. The timelines in the proposals differ. We support the SELF DRIVE Act draft's inclusion of accessibility including non-visual accessibility, in the safety assessment. **The Access to AVs Draft requires a safety rulemaking for accessible AV HMIs and a rule for automated driving systems (ADS) to assess and validate the performance of sensing, perception and response to disabled people outside the vehicle.**

Any safety framework rulemaking must also include a requirement for USDOT to consider the needs of all disabled travelers, including people with physical, sensory (those that are blind or low vision or Deaf or hard of hearing) and intellectual and developmental disabilities. A mandate from Congress for all AV-related rulemakings would ensure inclusion. The vehicle's ADS HMI and object detection outside the vehicle are critical in any safety framework. HMI must be accessible to people with sensory and cognitive disabilities for AVs to reach their full potential. A Disability Rights Education & Defense Fund brief on ableism in AV AI and algorithms recommends standards be set to ensure AVs can detect all people with disabilities and other members of marginalized communities outside the vehicle.¹⁰ Research and recent anecdotes suggest that not all AVs are being taught to detect people seated in their wheelchairs, service animal users, or people with darker skin tones, among others.

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Existing FMVSS must be updated to ensure the safety of AVs, including level 4 and 5. We strongly encourage Congress to require USDOT to include a review of how updated FMVSS will ensure the safety of fully accessible AVs, including those that are both electric and autonomous, and are built with wheelchair ramps and will require testing and deployment of automatic securement systems.¹¹ The federal safety framework must assume deployment of, and advance progress toward, fully accessible passenger vehicles (both large and small) as well as accessibility standards. These standards will not only increase public trust of AVs, but also a roadmap for those in the industry seeking to develop and deploy the safest, most accessible vehicle.

Examples of FMVSS related standards that require attention for passenger-related accessible

ergonomics are active suspension and kneeling capabilities for level entry, vehicle doorway height and width for entry, rear passenger entry for ambulatory self-or assisted passenger transfers, passenger restraint systems, ramps and mobility equipment securement, and grab assistance throughout vehicles that allow for perpendicular movement. Any updates to the FMVSS must maintain the current exemptions to crashworthiness for modified vehicles to install a ramp until vehicles are fully accessible and such modification is no longer required for physical access. **The Access to AVs Draft requires a standard for automated restraint systems for wheelchair users and ramps and ramp installations.**

Preemption – There is a provision in the 2026 SELF DRIVE Act Draft that preempts state or political subdivisions of a state to maintain, enforce, prescribe, or continue in any effect any law or regulation regarding the design, construction, or performance of ADS-equipped vehicles if the manufacturer develops a safety case. We are concerned this provision may unintentionally preempt AV accessibility or equity performance measures or requirements at the state or local level, including state laws that would mandate vehicle environmental standards to mitigate harm. While we understand the need for federal standards of vehicle design and construction, we also encourage allowing states and local jurisdictions to seek higher performance requirements that also ensure the greatest access and benefits for disabled and other historically underserved travelers. Many cities like New York City, Chicago, and San Francisco have taken the lead in defining accessibility parity for mobility solutions that use public roads and streets to operate. Their leadership and innovation for service needs to continue to be allowed and local and state levels. **The Access to AVs Draft bill prohibits discrimination on the basis of disability by AV operators that would protect the rights of disabled passengers and pedestrians should preemption be included.**

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Vehicle Safety Data Repository – The 2026 SELF DRIVE Act requires the establishment of a

National Automated Vehicle Safety Data Repository to receive and store data from a covered crash. Required data includes whether vulnerable road users including pedestrians or wheelchair users were involved. We recommend including whether assistive devices such as wheelchairs, walkers, or service animals were damaged or harmed.

USDOT Personnel and Staffing, Resources for Development – The 2026 SELF DRIVE Act Draft does not provide funding or staff to USDOT to implement requirements. The AV Framework Proposal authorizes funds to NHTSA and requires a report on the staffing and resource needs for USDOT, including additional personnel or resources needed in the 10-year period following the bill's passage. The Secretary is to consider the staffing of the Highly Automated Systems Safety Center of Excellence. We strongly encourage including in the report the staffing and resource needs required to ensure accessibility and safety are prioritized in the development of AVs, as well as creating a department within the Center for Excellence, or a separate center, focused on accessibility of AVs. We also encourage the hiring of experts with disabilities who bring their own lived experience and informed perspective.

Consider Adding Provisions not included in the 2026 SELF DRIVE Act draft

Infrastructure Data and Considerations – For travelers with disabilities to safely utilize, enter and exit an AV the surrounding infrastructure must be accessible. When data is collected through mapping or other means, AV service providers and government entities should collect and share infrastructure accessibility information, including areas where pick-ups and drop-offs may be unsafe. This data could then be used to identify necessary improvements.

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A mandate for the U.S. Access Board to draft AV standards is critical in any legislative framework. In addition, including a deadline within which the Department of Justice and USDOT must adopt the standards and providing sufficient funding for the Access Board to develop the standards is necessary.

Thank you for your consideration. Please contact CT Tyson at ctyson@dredf.org and Sarah Malaier, smalaier@afb.org, with any questions. We are eager to support your efforts to

enhance safety and mobility for all.

Sincerely,

CT Tyson, Disability Rights Education & Defense Fund, ctyson@dredf.org

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Danica Gonzalves, Paralyzed Veterans of America, danicag@pva.org

Sarah Malaier, American Foundation for the Blind, smalaier@afb.org

Tyler Beck, Epilepsy Foundation of America, tbeck@efga.org

Sarah Bellish, Cure SMA, sarah.bellish@curesma.org

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² Dingell, Latta Statement on DOT AV Framework (April 2025). <https://debbiedingell.house.gov/news/documentsingle.aspx?DocumentID=5644>.

³ Consortium for Constituents with Disabilities Transportation Task Force Autonomous Vehicle Principles, updated May 2022. Available at <https://www.c-c-d.org/fichiers/CCD-Disability-AV-Framework-Hearing-Letter-072523-FINAL.pdf>.

⁴ CCD Transportation Task Force August 23, 2019 feedback on AV Bill Issues, including disability access, advisory committees, rulemakings, exemptions, privacy, safety evaluation reports and accessibility features, crash data, resources for NHTSA, consumer education, studies examining potential impacts, and infrastructure available at <https://www.c-c-d.org/fichiers/CCD-Transpo-TF-Feedback-on-AV-Bill-Issues-082319.pdf>. November 4, 2019 Feedback on AV Legislation Sections, including on a HAV advisory council, and disability exemptions available at: <https://www.c-c-d.org/fichiers/CCD-Transp-TF-Feedback-on-AV-Sections-110419.pdf>. December 9, 2019 Feedback on AV Legislation Sections, including on new FMVSS and licensing and insurance available at <https://www.c-c-d.org/fichiers/CCD-Transp-TF-Feedback-on-AV-Sections-120919.pdf>. February 21, 2020 Feedback on AV Legislation Sections, including on consumer education, cybersecurity, personnel and staffing, and additional considerations available at: <https://www.c-c-d.org/fichiers/CCD-AV-Sections-Response-02-21-20.pdf>.

⁵ Autonomous Vehicles and Increased Accessibility Workshops (May 3, July 19, September 10, 2019). Hosted by the Alliance of Automobile Manufacturers (an organization preceding the Alliance for Automotive Innovation). Washington, D.C. Summary Report, agendas and presentations available at <https://www.autosinnovate.org/avaccessibility>.

⁶ U.S. Department of Labor (October 2019). Autonomous Vehicles: Driving Employment for People with Disabilities. Available at <https://www.dol.gov/odep/topics/AV-Info-Guide-Revised.doc>.

⁷ A Bureau of Transportation Statistics (BTS) study of adults with disabilities found that roughly half of respondents 18 to 64 reported living in a household with income under \$25,000. Bureau of Transportation Statistics (2018). Travel Patterns of American Adults with Disabilities. Available at <https://www.bts.gov/travel-patterns-with-disabilities>.

⁸ The aftermarket modifications for wheelchair accessibility are vitally important for the ability of wheelchair users to travel outside their homes. However, wheelchair users face an uncomfortable tradeoff between that access and their safety since the modifications may decrease the overall crashworthiness of the vehicle. People with disabilities regularly choose access over safety. This tradeoff exists because neither manufacturers nor NHTSA have obligations to make today's passenger vehicles both safe and accessible to all people with disabilities and fail to do

so voluntarily. As long as this tension exists, nothing in the proposed legislation should diminish access to after-market modifications of vehicles to provide vehicle access to people with disabilities.

⁹ National Disability Institute (December 30, 2022). Economic Impacts of Removing Transportation Barriers to Employment for Individuals with Disabilities Through Autonomous Vehicle Adoption. Available at <https://www.nationaldisabilityinstitute.org/reports/autonomous-vehicle-adoption/>.

¹⁰ Ian Moura for the Disability Rights Education and Defense Fund (November 2022). Addressing Disability & Ableist Bias in Autonomous Vehicles: Ensuring Safety, Equity & Accessibility in Detection, Collision Algorithms & Data Collection. Available at <https://dredf.org/addressing-disability-and-ableist-bias-in-avs/>.

¹¹ The industry's safety standards for independent wheelchair securement and passenger restraint should be adopted by NHTSA and integrated into the FMVSS.

¹² We support provisions prohibiting some predispute arbitration claims. We also encourage remedies available under applicable civil rights laws be included.

¹³ The US Access Board is an independent federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards. Learn more and review the guidelines and standards they have developed at <https://www.access-board.gov/>.

¹⁴ US Department of Transportation Inclusive Design Challenge Resources. Available at <https://www.transportation.gov/inclusive-design-challenge/resources>.

¹⁵ Autonomous Vehicles and Increased Accessibility Workshops (2019). Available at <https://www.autosinnovate.org/avaccessibility>.



January 9, 2026

The Honorable Jonathan Morrison
Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Administrator Morrison:

Motor vehicle safety is a top priority for the members of Alliance for Automotive Innovation.¹ We appreciate the National Highway Traffic Safety Administration's (NHTSA) continued leadership in advancing motor vehicle safety.

This Association's members recognize that, if NHTSA establishes future FMVSS covering Advanced Driver Assistance System (ADAS) technologies, it can alter the obligations of entities that might engage in aftermarket modifications of vehicles as a business where those modifications affect vehicle performance required by FMVSS. Given increased public and policymaker interest in aftermarket vehicle modifications and their interactions with ADAS, we believe there is value in NHTSA convening a workshop, technical working group, or other forum with vehicle manufacturers, the aftermarket equipment industry, and other stakeholders to examine how vehicle modification may affect ADAS performance.

As ADAS and other crash avoidance features continue to be deployed in the market, this is likely to remain a long-term issue. This presents an important opportunity for NHTSA to examine this complex issue and identify a balanced path forward to ensure that the ADAS of modified vehicles can continue to operate as originally designed. Safe vehicles are a top priority. NHTSA's expertise and leadership on this issue would be valuable in ensuring the continued effectiveness of ADAS technologies when deployed in the U.S. market.

We look forward to continued engagement with NHTSA on this important and evolving safety issue. Thank you for your commitment to a safe and innovative automotive industry in America.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Bozzella".

John Bozzella
President & CEO
Alliance for Automotive Innovation

¹ Alliance for Automotive Innovation represents the full auto industry, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing over 5 percent of the country's GDP, responsible for supporting nearly 11 million jobs, and driving \$1.5 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector.

January 12, 2026

The Honorable Gus Bilirakis, Chair
The Honorable Jan Schakowsky, Ranking Member
Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
U.S. House of Representatives
Washington, D.C. 20515

Dear Chair Bilirakis and Ranking Member Schakowsky:

In advance of tomorrow's hearing, "Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership," the undersigned write to oppose the Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution Act of 2026 (SELF DRIVE Act) and the Motor Vehicle Modernization Act, as currently drafted, which would undermine the safety for vehicles equipped with an automated driving system (ADS). Rather, we urge the advancement of solutions proven to improve safety on our Nation's roadways.

Our high-level concerns with these provisions include:

No New Safety Standards for Foundational Safety Technologies or the ADS

- The legislation does not establish safety standards to ensure that the ADS will "see" and safely respond to all road users, vehicles and infrastructure in the roadway environment (aka a "Vision Test"). These basic protections are needed for all road users on America's public roadways.
- Rather, the language focuses on the manufacturers establishing a "safety case" which will neither be required to be submitted (rather, submitted upon request by the U.S. Department of Transportation (U.S. DOT) Secretary), nor are there requirements to independently verify the safety case and operations of the ADS.
- Regulatory directives for the safety case are not required as the legislative language uses "may" rather than "shall."

Mass Exemptions from Federal Motor Vehicle Safety Standards (FMVSS)

- Permits up to 90,000 vehicles (currently 2,500 allowed) to be exempted from FMVSS including for human controls and extends the length of exemptions to five years (currently one year).
- Requires U.S. DOT to rule on exemption application within one year of receipt of application or automatically approved.

State Preemption

- For manufacturers that establish a safety case, states are broadly preempted from taking actions that can be interpreted as hampering operations. These may include state level requirements to report safety and crash data and to limit operations due to safety deficiencies. It also may impact enforcement of traffic safety laws and limit crash investigations.

Restricts Public Access to Safety Data, Weakens Data Collection and Repeals the Standing General Order (SGO)

- The language proposes a new safety data collection which is more limited than the National Highway Traffic Safety Administration's (NHTSA) SGO, needlessly applies confidential business information (CBI) protections to data submitted to NHTSA which have been used previously to keep critical basic crash information out of public view.

- Allows state DOTs to potentially review data from AV manufacturers but restricts them from discussing what they learn about potential safety issues due to CBI restrictions.
- Repeals the SGO once the data repository is established. This will enshrine a system in which NHTSA and the public are not getting sufficient information about the operations of AVs on public roads. The SGO should be strengthened, not repealed.

Expands Allowances for Testing and Demonstration

- Under current law, motor vehicle manufacturers can introduce vehicles into interstate commerce that do not comply with federal safety standards for the sole purposes of testing and evaluation. The bill expands the current law to allow manufacturers of ADS, ADS-equipped vehicles and components of ADS which may result in more vehicles equipped with unproven ADS, absent minimum safeguards on our roadways.
- Expands current law to also allow manufacturers using this provision to engage in commercial operations including the carrying of members of the public as passengers and the transportation of freight.

No Workforce Protections Are Included

- The bill allows for payment for testing operations potentially exacerbating workforce issues for certain working drivers.

No Accessibility Requirements Are Established

- While the AV industry has consistently included accessibility and mobility improvements for people with disabilities as a top priority, the SELF DRIVE Act does not advance such and may hamper states' ability to uphold such protections already established. The Motor Vehicle Modernization Act includes a study on wheelchair securement, but this is insufficient considering the issue has been known and discussed for over a decade and should have been addressed by the AV industry.

No Establishment of Safety Considerations for Remote Operators

- AV operations are using remote operators (ROs) to overcome deficiencies in their ADS and bolster their operations.
- Information on the scope of ROs and the safety deficiencies they are addressing is currently undocumented, yet needs to be, to understand the safety and readiness of related ADS.
- Safety issues related to use of ROs must be addressed including but not limited to restrictions on the number of vehicles each RO is managing, limitations on hours of service (HOS), requirements for a commercial drivers license (CDL) and experience operating related vehicles.

We do not oppose the advancement of vehicles equipped with ADS and urge this Subcommittee to strengthen safety data collection and access and advance safeguards and improvements to ensure that they only operate on roadways and in scenarios for which they are designed to safely do so.

Thank you for your consideration of these issues. We respectfully request this letter be included in the hearing record.

Sincerely,

Advocates for Highway and Auto Safety

League of American Bicyclists

America Walks

Missouri Bicycle & Pedestrian Federation

American Public Health Association

Northern Virginia Families for Safe Streets

Center for Auto Safety

Public Citizen

Consumer Federation of America

Safety Research & Strategies

Consumers for Auto Reliability and Safety

Truck Safety Coalition

Joan Claybrook
Former NHTSA Administrator

Virginia Citizens Consumer Council

Kids and Car Safety

cc: The Honorable Brett Guthrie, Chair, Committee on Energy and Commerce
The Honorable Frank Pallone, Ranking Member, Committee on Energy and Commerce
Members of the Subcommittee on Commerce, Manufacturing, and Trade

January 12, 2026

The Honorable Gus Bilirakis, Chair
The Honorable Jan Schakowsky, Ranking Member
House Energy and Commerce Subcommittee on Commerce, Manufacturing, and Trade
United States House of Representatives
Washington, D.C. 20515

Dear Chair Bilirakis and Ranking Member Schakowsky:

In advance of the upcoming January 13, 2026, hearing, “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership,” the undersigned submit this letter to underscore the human and economic benefits of vehicle safety technologies. Compelling and consistent research demonstrates that these safety systems not only save lives, but they also are cost effective. We respectfully request this letter be included in the hearing record.

We are keenly aware of the impacts from crashes on America’s roads. On average, 112 people were killed every day on roads in the U.S., totaling nearly 41,000 fatalities in 2023.¹ This is a 24 percent increase in deaths in just a decade.² An additional 2.44 million people were injured.³ Early projections for 2024 traffic fatalities remain at a similar historic high level; over 39,000 people are estimated to have been killed that year.⁴

Moreover, the annual economic cost of motor vehicle crashes in 2019 was nearly \$340 billion.⁵ Updated for inflation only, that number rises to \$429 billion in 2025. When loss of life, pain and decreased quality of life are added to economic costs, it is estimated to exceed \$1.75 trillion.⁶ Research from the Network of Employers for Traffic Safety (NETS), finds motor vehicle crashes cost employers \$72.2 billion in direct crash-related expenses in 2019.⁷

According to the National Highway Traffic Safety Administration (NHTSA), vehicle safety technologies and the associated safety standards have prevented more than 860,000 deaths, 49 million nonfatal injuries and damage to 35 million vehicles.⁸ In addition, during that time frame the comprehensive societal benefits amounted to \$17.3 trillion, using 2019 dollars.⁹

The recent regulatory action undertaken by NHTSA to require automatic emergency braking (AEB) on light passenger vehicles is an excellent example of the benefits of requiring effective safety systems on passenger motor vehicles. The agency predicts that AEB will save 362 lives, mitigate over 24,000 injuries annually and result in a yearly cost benefit of between \$5.8-\$7.2 billion.¹⁰ Moreover, research performed by the Insurance Institute for Highway Safety (IIHS) has found that AEB can reduce front-to-rear crashes with injuries by 56 percent.¹¹

Additionally, the IIHS found that impaired driving prevention technology will yield similarly high societal benefits. An updated analysis based on data from 2019 through 2022 indicates that, once the technology is widely deployed, as many as 10,812 lives would have been saved each year.¹²

As property-casualty insurers we are very aware of the rising costs associated with repairing vehicles with more sophisticated technology, but it would be a mistake to focus exclusively on the costs of such technology when we are aware of the tremendous benefits so many safety advances have provided millions of Americans.

We urge this Subcommittee to protect the vehicle safety technology improvements included in the Bipartisan Infrastructure Law (Pub. L. 117-58) and to once again advance a bipartisan safety title in the next surface transportation reauthorization bill to address the deaths and injuries that occur on America's roads. Thank you for your consideration of these issues.

Sincerely,

Allstate Insurance Company

American Property Casualty Insurance Association (APCIA)

Amica Mutual Insurance Company

Farmers Insurance

Independent Insurance Agents & Brokers of America (Big "I")

Liberty Mutual Insurance

National Association of Mutual Insurance Companies (NAMIC)

NJM Insurance Group

Nationwide Mutual Insurance Company

Selective Insurance Company of America

State Farm Mutual Automobile Insurance Company

cc: The Hon. Brett Guthrie, House Energy and Commerce Committee Chair
The Hon. Frank Pallone, House Energy and Commerce Committee Ranking Member
Members of the Subcommittee on Commerce, Manufacturing, and Trade

¹ Traffic Safety Facts Research Note: Overview of Motor Vehicle Traffic Crashes In 2023, NHTSA, Apr. 2025, DOT HS 813 705, (Overview 2023).

² Overview 2023; and Traffic Safety Facts 2022: A Compilation of Motor Vehicle Traffic Crash Data, NHTSA, Dec. 2024, DOT HS 813 656 (Annual Report 2022).; [comparing 2013 to 2023].

³ Overview 2023.

⁴ Traffic Safety Facts: Crash Stats, Early Estimate of Motor Vehicle Traffic Fatalities in 2024, NHTSA, Apr. 2025, DOT HS 813 710 (Early Estimates 2024).

⁵ Economic and Societal Impact 2019.

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- ⁶ CPI Inflation Calculator, BLS, available at https://www.bls.gov/data/inflation_calculator.htm, calculated from Jan. 2021 – Jan. 2025.
- ⁷ Cost of Motor Vehicle Crashes to Employers – 2019, Network of Employers for Traffic Safety, March 2021.
- ⁸ Kahane, C. J., & Simons, J. F. (2024, December). Fatalities, injuries, and crashes prevented by vehicle safety technologies and associated FMVSS, 1968 to 2019 – Passenger cars and LTVs (Report No. DOT HS 813 611). National Highway Traffic Safety Administration.
- ⁹ Simons, J. F., Blincoe, L. J., & Kahane, C. J. (2024, December). Historical analysis of costs and benefits of FMVSS for passenger cars and LTVs on a calendar-year basis (Report No. DOT HS 813 647). National Highway Traffic Safety Administration.
- ¹⁰ 89 FR 39686 (May 9, 2024).
- ¹¹ IIHS, Real-world benefits of crash avoidance technologies: summary of IIHS-HLDI findings.
- ¹² Alcohol and Drugs, IIHS Website, last accessed Aug. 7, 2025, available at <https://www.iihs.org/topics/alcohol-and-drugs#by-the-numbers>.



New Jersey Coalition of Automotive Retailers
856 River Road, Trenton, NJ 08628
Phone: 609.883.5056
Fax: 609.883.1093

Chairman: A. Andrew Shapiro
President: Laura C. Perrotta

January 13, 2026

Ranking Member Frank Pallone
House Committee on Energy and Commerce
2323 Rayburn House Office Building
Washington, DC 20515

Ranking Member Pallone:

On behalf of the 523 franchised auto and truck dealerships in New Jersey, I **urge you to oppose [H.R. 1566](#), the REPAIR Act and urge you to support H.R. 5221, the PART Act during the Commerce, Manufacturing and Trade Subcommittee hearing today.**

The **New Jersey dealers oppose the so-called “right to repair”** legislation due to the fact that the legislation has little to do with repairing a vehicle and instead provides third parties with access to consumer data and enables aftermarket parts manufacturers to reverse-engineer OEM parts. Please see NADA’s issue brief on this legislation attached. The bill is not about consumer choice since any third-party repair shop has access currently to the data it needs to repair vehicles today. In fact, I was just visiting a freightliner truck dealer in New Jersey the other day and they had purchased the software (*at a very low cost*) to fix Kenworth trucks in their service area. It is just as easy for a third-party repair shop to purchase telematics to repair a vehicle from any auto or truck manufacturer.

The bill poses vehicle and driver data security dangers by allowing broad data sharing through unfettered access and is designed to provide third parties the ability to tap into vehicle-generated data. The bill would enable aftermarket parts manufacturers reverse-engineer manufacturer parts. For more information see NADA’s issue brief attached opposing the “REPAIR Act ([H.R. 1566](#)); NADA Letter to [House](#) of Representatives (*attached*); and NADA’s [Section by Section](#) (*attached*) of problems with H.R. 1566.

Additionally, the **New Jersey dealers support the bipartisan PART Act (H.R.5221)**, to help law enforcement trace stolen catalytic converters and make the market more transparent to deter theft. Please see NADA’s issue brief attached. The New Jersey dealers have been dealing with these thefts for years, and this bill could truly help to put an end to this costly and preventable crime.

Thank you for your time and consideration. If you have any questions, feel free to call me at 571-239-0765.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Perrotta'.

Laura Perrotta
President



Written Statement for the Record from MEMA. The Vehicle Suppliers Association
Submitted to the U.S. House of Representatives Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade

“Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership.”

January 13, 2026

Background

MEMA, The Vehicle Suppliers Association, is the leading trade association in the U.S. for vehicle suppliers, parts manufacturers, and remanufacturers. The mobility sector depends on the resiliency and strength of suppliers, and MEMA has been the voice of the supplier industry since 1904. MEMA’s members design and manufacture the technology, components, and services that enable the production of new vehicles, as well as the essential maintenance and repair of the more than 295 million highway vehicles that are currently on the road in the U.S. The vehicle supplier sector shares the Administration’s objectives of strengthening the domestic manufacturing base, growing U.S. manufacturing jobs, and ensuring more opportunities for communities across the U.S. With more than 932,000 individuals employed across the nation, vehicle suppliers represent the largest sector of manufacturing jobs in the U.S.

MEMA and its member companies appreciate the opportunity to provide comments to the Subcommittee on Commerce, Manufacturing, and Trade.

The Supplier Industry’s Central Role in Vehicle Safety

Vehicle suppliers are the designers and innovators at the forefront of motor vehicle safety technology development. They play a foundational role in creating, testing, and manufacturing many of the critical safety systems integrated into modern vehicles. From traditional safety features such as airbags, seat belts, braking systems, and electronic stability control, to the newest generation of advanced driver assistance systems (ADAS), suppliers bring the technical expertise and manufacturing precision essential to saving lives on U.S. roads.

Suppliers invest heavily in research and development, pioneering technologies that are subsequently incorporated into vehicles and provided to consumers. Their deep understanding of component design, integration challenges, and real-world operational dynamics allows suppliers

to innovate solutions that improve crash prevention, reduce the severity of accidents, and enhance occupant protection. Many safety innovations first emerge at the supplier level before being adopted as standard equipment by Original Equipment Manufacturers (OEMs), underscoring the supplier industry's pivotal role in advancing vehicle safety.

Beyond engineering and innovation, suppliers are integral partners throughout the vehicle lifecycle. They collaborate closely with OEMs, regulatory agencies like the National Highway Traffic Safety Administration (NHTSA), and other stakeholders to ensure that new safety technologies meet rigorous performance standards and regulatory requirements. This partnership ensures that components and systems are not only effective, but also reliable and durable under diverse driving conditions.

Suppliers also contribute significantly to safety validation and testing. Through extensive laboratory testing, simulation, and real-world evaluation, they help verify that safety systems perform as intended under a wide range of scenarios. This testing expertise supports regulatory compliance and provides critical data used to refine and enhance safety standards and consumer information programs such as the New Car Assessment Program (NCAP).

Moreover, suppliers are actively engaged in ongoing monitoring and improvement of vehicle safety post-production to identify emerging safety issues quickly and develop corrective measures. This continuous improvement cycle enables faster response to potential defects, supports efficient recall processes, and fosters the ongoing enhancement of vehicle safety technologies.

The complex, interconnected nature of modern vehicle systems requires a collaborative safety framework. No single entity—OEM, supplier, regulator, or infrastructure provider—can fully ensure vehicle safety alone. MEMA believes that a modern, effective motor vehicle safety framework must recognize and support the shared responsibility among all stakeholders, with suppliers playing a critical and proactive role in every stage from design to deployment and beyond.

As the industry embraces transformative technologies such as greater levels of automation, vehicle connectivity and advanced human machine interfaces, the role of suppliers becomes even more crucial. Suppliers develop cameras, sensors, software, cybersecurity protections, and advanced electronic systems that enable these innovations to function safely and reliably. MEMA and its members are committed to working closely with Congress, federal agencies, and industry partners to ensure that these cutting-edge safety technologies are rigorously tested, properly regulated, and widely deployed to protect all road users.

MEMA appreciates the legislation noticed for this hearing and looks forward to continuing to work with the sponsors as this process moves forward. MEMA would also like to highlight and convey its support for several bills and provisions that will be discussed at the hearing.

Motor Vehicle Modernization Act (Discussion Draft/Chairman Brett Guthrie)

Federal Motor Vehicle Safety Standards (FMVSS) have been central to reducing roadway fatalities and injuries for decades, but many standards have not kept pace with rapid advances in technology or the evolution of modern driver-assistance systems. Several FMVSS still rest on design assumptions that no longer reflect how today's software-defined, sensor-intensive, electrified vehicles function. As global markets modernize their regulatory frameworks more quickly, the United States risks lagging behind, creating uncertainty for manufacturers and slowing deployment of safety technologies validated elsewhere.

New Car Assessment Program (NCAP) Reform

The U.S. New Car Assessment Program once set the global benchmark for vehicle safety information but now trails programs in Europe, Japan, and Korea, which have progressed to incorporate evaluations of advanced driver-assistance systems, pedestrian protection, and emerging crash-avoidance technologies. As the U.S. NCAP does not reflect modern safety technologies in its rating system, consumers are left without clear, comparable information about the features that can help to prevent crashes and save lives. Global misalignment also increases complexity for companies, which are subsequently required to navigate multiple safety rating regimes.

MEMA supports the NCAP provisions in the legislation which would:

- Establish a dedicated NCAP Office within NHTSA led by an Associate Administrator.
 - Responsibilities include:
 - Creating roadmaps for expanding NCAP testing.
 - Administering voluntary performance testing.
 - Conducting consumer education about vehicle safety technologies.
 - Creation of a new NCAP Advisory Committee with stakeholders, including dedicated seats for vehicle supplier representatives.
- Require NHTSA to submit to the relevant congressional committees a report that assesses the feasibility of establishing a public-private partnership, a private entity, or any other similar entity to NCAP, including by assessing the various factors, including motor vehicle safety ratings used internationally that are similar to NCAP as well as Monroney label considerations.

In its official priorities for the surface transportation reauthorization, MEMA called for Congress to direct NHTSA to publish a transparent, forward-looking roadmap for NCAP modernization that fully incorporates supplier technical expertise. Suppliers design and manufacture the majority of the technologies addressed by the NCAP program and roadmap. The supplier industry's participation in this process is essential to ensuring that performance metrics reflect real-world capabilities. MEMA also called for the NCAP program to actively incorporate ADAS technologies into the vehicle star rating and the Monroney labels so that consumers can easily understand a vehicle's safety technologies and ratings at the point of sale. MEMA further indicated that supplier representation should be included in any advisory committee to ensure a comprehensive and technically sound modernization effort.

MEMA is pleased that the reforms included in Chairman Guthrie's bill will move us towards these goals and we thank the Chairman for his leadership on these critical issues.

Vehicle Safety Rulemaking and Research Priority Plan

The U.S. Congress has called upon NHTSA to update its standards and ensure that the U.S. keeps pace with other key nations and regions around the world. However, numerous rulemakings required by Congress remain incomplete—some years overdue—including updates to headlamp performance, alignment requirements, and implementation of Adaptive Driving Beam headlights; minimum performance requirements for lane-keeping and lane-departure warning systems; heavy-vehicle automatic emergency braking standards; battery safety requirements for electrified vehicles; and standards enabling camera-based mirror systems. Additional updates are needed to ensure compatibility with automated vehicle designs that diverge from legacy assumptions about controls, interiors, and system architecture.

Regulatory stagnation discourages investment, impedes innovation and slows progress toward next-generation safety performance.

Chairman Guthrie's legislation will require NHTSA to create a rulemaking and research priority plan that:

- Lists all planned safety rulemakings over the next 36 months, including:
 - Statutory authority.
 - Research status and links to supporting data.
 - Whether related technologies are assessed in NCAP.
 - Whether industry performance criteria exist.
 - Expected rulemaking milestones (advanced notice, proposed rule, final rule).
 - Lists research priorities with objectives and timelines.
 - Compares current vs. previous priority plans (except the first one).

- Public posting and submission to congressional committees are required.
- If the plans fail to be delivered on time, then NHTSA must report the reason and a revised timeline.

MEMA's surface transportation priority document urged Congress to direct NHTSA to address the challenges of unfinished congressionally mandated rules and guidance. MEMA is pleased that Chairman Guthrie's bill emphasizes the importance of this work, which will provide much needed stability and certainty for companies.

Testing and Evaluation of Motor Vehicle Equipment: Parity for Vehicle Suppliers

The 2015 FAST Act granted automakers—but not suppliers—the authority to test and evaluate certain vehicles on public roads under defined conditions. Although intended to accelerate innovation, this statutory framework inadvertently excluded the companies responsible for designing and creating important safety systems as well as relevant hardware and software. As a result, under current federal law, suppliers are limited in what they can test—such as braking systems, advanced sensors, powertrain components, and by-wire steering and braking—without partnering with a vehicle manufacturer. This limitation slows safety validation, impedes innovation timelines, restricts competition, and creates unnecessary dependency within the development process.

MEMA members develop and seek to test a wide range of technologies on public roads, including but not limited to, highway navigation systems that manage lane keeping, lane changes, overtaking, and routing with minimal driver input; urban navigation systems that manage traffic lights, stop signs, and complex intersections while still requiring the driver to remain ready to intervene; lane keep assist systems; sensor fusion for automatic emergency braking, including pedestrian and cyclist protection; road departure mitigation; high beam switch assist; traffic jam assist; and highway assist systems.

Public roads expose technologies to unpredictable driver behavior and everyday operating scenarios that cannot be fully replicated on closed test tracks. While test tracks remain essential for controlled, repeatable, and safety-focused testing, real-world data gathered on public roads is critical for identifying comfort- and safety-related issues before products reach consumers.

MEMA's surface transportation priority document requested that Congress amend current law to provide parity to suppliers concerning the ability to conduct public-road testing and evaluation of advanced vehicle technologies. We are pleased to be joined in this effort by the National Consumers League (NCL), and MEMA strongly supports the provision included in the Motor Vehicle Modernization Act of 2025.

SELF Drive Act (Discussion Draft/Rep. Bob Latta and Rep. Debbie Dingell)

Suppliers develop the majority of technologies that are fundamental for automated driving, including cameras, radar, lidar, ultrasonic sensors, by-wire steering and braking systems, control software, computing platforms, and sensor fusion algorithms. Despite this central role, existing federal frameworks do not consistently recognize suppliers' essential contributions. Suppliers are often excluded from direct testing authority and performance assessment processes, even though they design, manufacture, and refine the systems at the core of automated vehicle functionality.

The discussion draft of the SELF Drive Act noticed for this hearing would establish a comprehensive national framework for the regulation of vehicles equipped with automated driving systems (ADS), including vehicles capable of partial or fully automated operation. The bill sets uniform federal safety requirements for ADS and ADS-equipped vehicles. It is intended to facilitate the safe testing, evaluation, and deployment of automated vehicles while avoiding a patchwork of conflicting state regulations by preempting certain state laws in favor of consistent federal standards.

To accomplish these goals, the Act amends Title 49 of the U.S. Code to grant the Department of Transportation and the National Highway Traffic Safety Administration clear authority over ADS oversight. This includes establishing requirements for manufacturer safety cases, defining conditions for testing and limited commercial operation, permitting ADS-dedicated vehicles without traditional manual controls under specified safety conditions, and creating a national automated vehicle safety data repository for crash and mileage reporting. Together, these provisions are intended to enable data-driven federal safety oversight of automated vehicles throughout their development and deployment lifecycle.

MEMA's surface transportation priority document urged Congress to create a modernized AV framework that would enable suppliers to independently test and evaluate ADS technologies on public roads with appropriate requirements. MEMA is supportive of this discussion draft and looks forward to continuing to engage with Representatives Latta and Dingell as the process moves forward to ensure that vehicle suppliers' priorities are reflected.



MEMA Aftermarket Support for the REPAIR Act (H.R. 1566/Rep. Neal Dunn and Rep. Marie Gluesenkamp Perez)

MEMA Aftermarket represents the manufacturers that produce the parts, tools, diagnostic equipment, and service technologies required to maintain vehicles throughout their complete lifespan. As vehicles rely increasingly on software and embedded electronics, safety-critical maintenance depends on timely access to diagnostic and repair information. Without such access, many vehicles may become difficult or impossible to service, reducing consumer choice and increasing the risk that vehicles remain on the road in unsafe conditions.

As vehicles become increasingly complex and software-driven, access to diagnostic and repair data is critical for consumers and independent repair shops alike. Without clear standards and protections, there is a risk of enabling monopolistic control over repair information, which drives up costs for consumers, limits choice, and stifles innovation. The REPAIR Act prevents this anti-consumer scenario by ensuring that vehicle owners maintain the right to access and control their own vehicle data and choose where and how their vehicle is repaired.

By curbing potential anti-competitive behavior and safeguarding access to essential repair tools and information, the REPAIR Act creates a level playing field for the entire aftermarket industry—including thousands of small businesses and repair shops across the country. These provisions are not only vital for affordability and convenience, but also for ensuring that the free market determines decisions in the repair sector.

The bipartisan REPAIR Act (H.R. 1566), sponsored by Representatives Neal Dunn and Marie Gluesenkamp Perez, establishes a secure, standardized framework to ensure that suppliers, independent repairers, and authorized service providers can access the information necessary to diagnose and repair vehicles safely and effectively.

MEMA Aftermarket strongly supports inclusion of the REPAIR Act in the surface transportation reauthorization. Preserving access to critical repair and diagnostic data promotes competition, reduces repair costs for consumers, and, most importantly, keeps vehicles in safe operating condition across their full lifespan.

Conclusion

Vehicle suppliers are the foundation of automotive safety innovation and a critical pillar of the U.S. manufacturing economy. The policies outlined in this testimony are essential to maintaining U.S. leadership in safety technology and accelerating the deployment of innovations that save lives and prevent injuries on the nation's roads.

MEMA and its members stand ready to work with Congress, NHTSA, and all stakeholders to advance these priorities, support a strong domestic manufacturing base, and ensure that American roads remain among the safest in the world.

Thank you for the opportunity to provide this testimony for the record.

POWERSPORTS INDUSTRY



2025 ECONOMIC IMPACT IN U.S. TOTAL

\$50.9 Billion

THE VALUE OF THE POWERSPORTS
RETAIL MARKETPLACE

1,261,300

ESTIMATED NEW POWERSPORTS
RETAIL SALES

DIRECT ECONOMIC CONTRIBUTIONS OF POWERSPORTS RETAILERS

10,690

NUMBER OF POWERSPORTS
RETAILERS

116,000

PEOPLE EMPLOYED AT
DEALERSHIPS

\$5.0 B

TOTAL PAYROLL

2023 U.S. ON-ROAD MOTORCYCLE PURCHASERS 35 YEARS & YOUNGER



46% were first-time buyers



\$70K was their median income



9% were interested in
electric motorcycles



41% primarily used their motorcycle for
commuting to work/school

For more information about the motorcycle and powersports industry in your district, please contact the MIC's Government Relations Office at (703) 416-0444. To receive our weekly Ride Report, please visit mic.org.



MOTORCYCLE
INDUSTRY
COUNCIL®

Source: 2023 MIC Retail Outlet Audit
2022 MIC Retail Outlet Profile Study
2023 Motorcycle Consumer
Experience Study

2023 MIC Motorcycle Statistical Annual
2023 Estimated New Powersports Retail Sales, Motorcycle Industry Council, Inc., Irvine, CA
U.S. Department of Transportation, Federal Highway Administration, November 2024

Motorcycle Riders Foundation

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*"The only national motorcyclists' rights organization
dedicated to on-street riders"*



January 12, 2026

The Honorable Gus Bilirakis
Chairman Subcommittee on Commerce, Manufacturing and Trade
United States House of Representatives
Washington, DC 20515

Dear Chairman Bilirakis:

On behalf of the Motorcycle Riders Foundation (MRF) and the millions of motorcyclists we represent nationwide, I write to express our strong support for H.R. 3385, legislation to update the federal definition of a motorcycle.

The current federal definition of a motorcycle has not kept pace with modern vehicle design and technology. Over time, outdated language has created confusion for regulators, manufacturers, state agencies, and most importantly riders. H.R. 3385 provides a necessary update to this definition, ensuring that motorcycles are clearly distinguished from other vehicle categories and regulated appropriately.

In recent years, a new type of vehicle has entered our roadways, commonly referred to as an *autocycle*. These autocycles are currently classified as motorcycles under federal law, yet they bear little resemblance to a traditional motorcycle and possess vastly different operational characteristics.

The Motorcycle Riders Foundation believes this ambiguity surrounding autocycles has created an unnecessary patchwork of rules and regulations from state to state regarding licensing, insurance, safety statistics, registration, and training requirements. This inconsistent approach undermines both rider safety and sound policymaking and further demonstrates why a modernized federal definition is long overdue.

This clarity is especially important as federal agencies continue to develop and implement safety, environmental, and transportation rules. When motorcycles are inaccurately grouped with passenger vehicles or emerging vehicle classes, riders can face unintended regulatory burdens, and standards that do not reflect the unique performance, design, and use of motorcycles. H.R. 3385 helps prevent these unintended consequences by establishing a commonsense definition rooted in how motorcycles are actually built and operated.

The MRF has long advocated for fair and accurate treatment of motorcycles in federal policy. Riders deserve regulations that enhance safety and mobility without imposing one-size-fits-all

Motorcycle Riders Foundation

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*"The only national motorcyclists' rights organization
dedicated to on-street riders"*



rules designed for cars and trucks. Updating the federal definition of a motorcycle is a foundational step toward that goal.

We respectfully urge you to support and advance H.R. 3385. The Motorcycle Riders Foundation stands ready to work with you and your colleagues to ensure that federal transportation policy reflects the realities of motorcycling in the 21st century.

Thank you for your continued commitment to America's riders.

Sincerely,

Kirk "Hardtail" Willard
President
Motorcycle Riders Foundation

NADA Further Comments on the “REPAIR Act” (H.R. 1566)

Nov. 13, 2025

Section-by-Section Analysis

Section 1. Short Title (Page 2, Lines 1-4)

The Committee should consider changing the title of the bill as the legislation overall has little to do with repairing a vehicle. The bill would provide third party access to consumer vehicle data and could enable aftermarket parts manufacturers to reverse engineer OEM parts and tools. Moreover, the underlying premise of the bill is fundamentally flawed, as access to the information independent repair shops need to repair a vehicle is readily available from auto and truck manufacturers as well as the private market.

Section 2. Maintaining Competition and Data Privacy after Consumers Purchase Motor Vehicles (Page 2, Lines 5-25) (Pages 3-10)

Section 2(a)(1)(D) Access to Data to Produce or Offer Compatible Aftermarket Parts (Page 3, Lines 5-10)

- This subparagraph requires that no manufacturer may impair the ability of an aftermarket parts manufacturer among others to **produce** or offer compatible aftermarket parts.
- This section is unnecessary since the bill’s stated purpose is to ensure access to vehicle repair data and tools. There is no public need to grant aftermarket parts manufacturers **the right** to potentially reverse engineer original, genuine OEM auto and truck parts, including safety critical parts to accomplish the bill’s purpose. Additionally, the language in Sec. 2(a)(6), which states that nothing in the bill may be construed to “limit or expand any law or right relating to intellectual property,” may conflict with Sec. 2(a)(1)(D).
 - The bill should explicitly state that OEMs are not required to disclose information that would enable aftermarket parts makers to produce imitation parts if such information involves the OEMs’ intellectual property or trade secrets, while ensuring that an OEM’s research and development activities are appropriately safeguarded.
- This provision could confer an unfair advantage to enable aftermarket parts manufacturers to reverse-engineer OEM parts to create and market potentially inferior parts and even counterfeit auto parts.
- Counterfeit auto parts have become a problem in the U.S. and can be a safety risk. (<https://www.usatoday.com/story/money/cars/2025/05/30/counterfeit-auto-parts-in-us/83921051007/>). Note a recent Transportation Department [safety advisory notice](#) about the rise in counterfeit and substandard safety devices.

We strongly recommend subparagraph (D) be struck or at least be made clear that automakers will not be forced to share information with aftermarket parts makers so they can manufacture imitation auto parts. This section is unnecessary for a bill whose purpose is to ensure safe and secure access to vehicle repair and maintenance data. There is not a public need for allowing aftermarket parts manufacturers the right to reverse-engineer original, genuine OEM auto and truck parts, including safety critical parts.

Section 2(a)(1)(E) (Page 3, lines 12-16)

- This subparagraph would bar an OEM from employing any technological barrier or specified legal barrier that impairs the ability of an independent repairer to diagnose, repair and maintain a motor vehicle in the same manner as an OEM or dealer.
- Dealers, not independent repairers, are authorized by their manufacturer sales and service agreements to perform recall and warranty work. Under these agreements, dealers must invest a significant amount of their own capital in first-rate technician training and state-of-the-art diagnostic and repair tools to keep up with the latest technology to repair vehicles safely and securely.
- Under this provision, independent repairers will have a legal right to recall and warranty information without any of the cost or training dealers must currently bear.
 - Is it the intent of this legislation to grant independent repairers the legal right to perform recall and warranty work?
 - In a separate paragraph of the bill, Sec. 2(a)(3), the bill explicitly includes an exception for “recall and warranty repairs.” If it is not the bill’s intent to give independent repairers the right to perform recall and warranty work, why is this exception absent from Sec. 2(a)(1)(E)?

Section 2(a)(3)(A) Prohibition on Certain Mandates Related to Repairs (Page 5, Lines 13-15)

- This provision states that a motor vehicle manufacturer may not mandate or imply a mandate to use a particular brand or manufacturer of parts, tools, or motor vehicle equipment.
- Proponents of H.R. 1566 have not provided any evidence of OEMs mandating, or implying to mandate, a particular brand of parts. Apart from a 1-800 number, franchised OEMs do not interact with customers. Except for direct sellers, OEMs do not retail or fix the vehicles they manufacture.
- The Committee should first ascertain that this is a problem before imposing undue government interference in the form of a commercial speech prohibition that comes with a significant fine (see Sec. 5(a)).

Section 2(a)(3)(B) Prohibition on Certain Mandates Related to Repairs (Page 5, Lines 16-25)

- OEMs design and perform rigorous testing of parts and tools for quality, fit, reliability and safety. Under this subparagraph, manufacturers would be prohibited from recommending the use of any particular brand or manufacturer of parts, tools, or motor vehicle equipment without a notice stating that customers can use other parts, tools, or motor vehicle equipment.
- Apart from advertisements, OEMs do not recommend parts to customers; their dealers sometimes do.
 - Under this provision, is the intent to impute liability to an OEM if one of their dealers recommends an OEM part without the congressionally mandated caveat? If “no,” there is no purpose to this provision, unless it is Congress’ intent to regulate the print ads of OEMs touting their own auto parts.
 - If an OEM recommended in a print ad that consumers use “genuine GM parts” for their GM car, would that ad also have to include the sentence on page 5, lines 22-25, to comply with this provision, and in the same font size?

- Have proponents of H.R. 1566 provided the Committee with any evidence that service customers are generally unaware that they are already free to choose any brand of part they want?
- For fair application, should insurance companies be required to state that *“Vehicle owners should consider their options when repairing their insured vehicle, as non-genuine OEM parts may not offer the same quality, fit, reliability and safety”* when processing an auto claim?
- For fair application, should aftermarket parts distributors also be prohibited from recommending their own products without a caveat?
 - While this provision only confers liability for non-compliance on the OEMs, is the intent of this provision to transfer liability to dealers, who routinely interact with consumers, on behalf of the OEM?
- The Committee should be aware that dealers already offer aftermarket or remanufactured parts options to their customers if circumstances warrant. Dealers regularly offer this to their customers despite the absence of a federal government mandate.
- **We strongly recommend paragraph (3) be struck.**

Section 2(a)(4) Prohibition on Certain Limitations (Page 6, Lines 1-5)

- OEMs “may not limit the number or types of persons who a motor vehicle owner may designate as simultaneous designees under this subsection.”
 - Besides the following subparagraph limitation, shouldn’t there be a limit on who can share and receive this data as a designee?
 - Could a foreign aftermarket manufacturer that is known to be an auto parts counterfeiter be a designee?
 - Couldn’t having unlimited designees create unforeseen privacy and cybersecurity risks for vehicle systems?

Section 2(a)(5) Limitation (Page 6, Lines 6-13)

- This paragraph prohibits a motor vehicle manufacturer, any affiliate of a manufacturer or any person working on behalf of a manufacturer from being considered or treated the same way as a motor vehicle owner or their designee.
- The bill does not include, or is at best ambiguous, regarding dealer protections when servicing brands not associated with their franchise.
- Dealers could be construed as a “person working on behalf of [a] manufacturer.” Dealers also routinely service out-of-franchise models. Under this provision, dealers may be barred from accessing the tools and information in the same manner as independent repairers for trade-ins that are out of their franchise.
- We strongly recommend either striking subparagraph (5) or amending it to prevent interference by OEMs in a dealer’s non-OEM repair services by explicitly stating that a new car dealer when working on vehicles outside its franchise line-make has the same rights under the law as the non-dealer repairers.

Section 2(a)(7) Requirements for Persons Receiving Vehicle Generated Data – (Pages 7-10)

- Sec. 2(a)(7)(C) would allow vehicle owner consent to grant broad access to sell, license or transfer vehicle-generated data further demonstrates that the bill is not about vehicle repair but access to vehicle data.
- The definition for vehicle generated data is extremely broad and is not limited to diagnostic and repair data.
- The bill provides that “direct, real-time in-vehicle data” can be **sold** “to any other person” [Sec. 2(a)(7)(C)(ii)] with the consent of the motor vehicle owner.
 - What qualifies as consumer consent? Could the consent process be structured so that it effectively leads consumers to grant third-party access without fully understanding the terms or with a real opportunity to choose? For example, could signing a repair authorization, accepting fine print terms by checking a box, or requiring an opt-out instead of an opt-in be considered consumer permission to share or sell their data?
 - What public policy rationale has independent repairers given Congress which warrants granting them the legal right to sell customer data?
 - Apart from gaining the ability to sell customer data, does this provision bar independent repairers from using the data to market to customers?
- Sec. 2(a)(7)(D) gives aftermarket parts manufacturers the ability to glean vehicle data “for purposes...related to the manufacture or service of such...parts.” [Sec. 2(a)(7)(D)(i)] This data cannot be deleted even if requested by the motor vehicle owner. [Sec. (2)(a)(7)(B)]
- Proponents of H.R. 1566 have failed to articulate a compelling reason why these provisions are necessary to address what proponents purport to be a lack of information or tools to fix a vehicle.

Section 3. Fair Competition After Vehicles are Sold Advisory Committee (Pages 11-14) (Page 15, Lines 1-7)

- This section establishes an advisory committee made up of 11 individuals from various industry stakeholders, including but not limited to automobile insurers, aftermarket tools and parts manufacturers, motor vehicle parts retailers, and motor vehicle parts distributors, to provide recommendations on issues facing the repair industry.
- Under the 2014 Memorandum of Understanding that is still in effect, independent repair facilities have access to the same diagnostic and repair information that auto manufacturers make available to authorized dealer networks. This agreement was reaffirmed by the OEMs with a 2023 industry commitment.
- Automakers and independent repairers already have a longstanding formal mechanism through the [National Automotive Service Task Force](#) (NASTF) to ensure service information, tool information and training data is made available from every truck and auto manufacturer. NASTF also includes a dispute resolution mechanism. In addition, multiple private entities such as [OEM1Stop.com](#) have been created by automakers for repair technicians to find repair and diagnostic information on most vehicles.
- Among the participants of this new advisory committee would be a representative of a “motor vehicle dealership service center.”
 - Why is this new and undefined term used, since the term “motor vehicle dealer” is already defined in this bill and in law?

- Proponents of H.R. 1566 have yet to articulate why creation of an advisory committee, whose composition is biased in favor of the aftermarket industry, and which could exist indefinitely, is necessary.
- **We recommend striking Sec. 3 to reduce unnecessary government spending and bureaucracy.**

Section 4. Rulemaking (Page 15, Lines 8-16)

- This section requires the National Highway Traffic Safety Administration in consultation with the Federal Trade Commission (FTC) to promulgate regulations to require motor vehicle manufacturers and motor vehicle dealers to inform motor vehicle owners about their rights under this Act at the time of vehicle purchase.
- This rulemaking adds more paperwork to an already paperwork-intensive process when buying a car.
- According to NADA's chief economist, this new regulatory burden **will cost over \$100 million annually**. Additionally, the provision is overbroad, as new car purchasers already need not worry about repairing their new vehicle at the point of sale, as new vehicles typically come with a manufacturer's warranty for the first few years or designated miles of ownership.
- This new regulatory paperwork burden would also be duplicative when retailing a new vehicle, as both dealer and OEM would have to give the purchaser the same information.
- This new regulatory burden and potential significant fines by the FTC for non-compliance would only apply to franchised dealers and OEMs; independent dealers (who support H.R. 1566) are exempt.

In Sec. (6)(12), "motor vehicle dealer" means a dealer as defined in Sec. 30102(a) of title 49. That definition is: "dealer means a person selling and distributing new motor vehicles or motor vehicle equipment primarily to purchasers that in good faith purchase the vehicles or equipment other than for resale." Independent dealers are exempt from this legislation because they do not sell or distribute "new" motor vehicles.

- Because this section unnecessarily expands federal regulation and will cost over \$100 million annually, **we strongly recommend striking Sec. 4.**

Section 5. Enforcement by Federal Trade Commission (Page 15, Lines 17-25) (Pages 16-17) (Page 18, Lines 1-5)

- This section treats violations "of this Act or a regulation promulgated under this Act" as an unfair or deceptive act or practice. This section sets out an enforcement structure under the FTC just for violations of this law.
- The FTC has been enforcing unfair or deceptive acts or practices (UDAP) violations since 1938; why special rules (i.e., Sec. 5(c)) must be created for an issue that has not been justified is unclear.

Section 6. Definitions

Section 6(11) Motor Vehicle (Page 21, Lines 10-21)

- The definition of a motor vehicle should be limited to vehicles with a gross vehicle weight rating of 10,000 pounds or less. The bill treats medium- and heavy-duty trucks the same as light-duty vehicles, although heavy-duty trucks, such as school buses and cement mixers, are sold to

businesses and governments, not consumers. Furthermore, the bill ignores the significant differences between light-duty vehicles, which are mass produced for the general public, and medium- and heavy-duty trucks, which are custom-built for specific purposes.

- No data or evidence has been produced by the bill's proponents showing that truck manufacturers are withholding information to prevent independent repairers from fixing heavy-duty trucks.
- Independent heavy-duty truck repair shops have access to the same diagnostic tools and information as dealerships per a 2015 MOU agreed to by the Commercial Vehicle Solutions Network, the Truck and Engine Manufacturers Association, the Equipment and Tool Institute, and the Auto Care Association, which is the main proponent of "right to repair."
- Proponents also fail to mention the millions of dollars in new, completely unnecessary regulatory costs this legislation would impose on heavy-duty truck dealers and OEMs.
- **We strongly recommend that this language be added after Sec. (6)(11)(A)(ii):**
 - **(iii) does not include a motor vehicle with a gross vehicle weight rating of 10,000 pounds or more."**

Section 6(12) Motor Vehicle Dealer (Page 21, Lines 22-25) (Page 22, Lines 1-2)

- The definition of "motor vehicle dealer" should only be cross-referenced back to the federal definition under 49 USC 30102(a)(2). Every franchised motor vehicle dealer, by definition, already has "an agreement with a motor vehicle manufacturer related to diagnostics, repair, or service of a motor vehicle."

Section 6(21) Technological Barrier (Page 24, Lines 14-18)

- The definition for technological barrier is overly broad due to the inclusion of the phrase, "tends to make more difficult the ability of a person to exercise rights under this Act."

Section 7. Report to Congress (Page 25, Lines 20-24) (Page 26, Lines 1-19)

- This section is unnecessary as there is no need for mandated agency reports to be written and submitted to Congress every two years in perpetuity.
- **We recommend striking Sec. 7.**

Section 8. Relationship to State Laws (Page 26, Lines 20-25) (Page 27, Lines 1-2)

- This section preempts any State, or political subdivision of a State's right to maintain, enforce, prescribe, or continue in effect any law, rule, regulation, requirement, standard, or other provision having the force and effect of a law of the State, or political subdivision of the State, that is covered by any provision of this Act or any regulation promulgated pursuant to this Act.
- It is unclear why state law needs to be preempted in the first place as only Massachusetts and Maine have "right to repair" laws
- NADA is consulting with outside counsel to ascertain the scope of this provision to determine whether it will void essential state dealer franchise, data privacy or consumer protection laws.



Oppose So-Called “Right to Repair” Legislation (H.R. 1566/S. 1379)

ISSUE

The REPAIR Act is not about repair; it is about allowing third-party access to customer data. Advocates for “right to repair” legislation claim that independent automotive repair shops do not have access to the parts or data necessary to repair vehicles. However, the REPAIR Act is unnecessary as this concern was addressed by a 2014 Memorandum of Understanding between “right to repair” proponents and auto manufacturers, and reaffirmed by a [2023 industry commitment](#). Today, the information independent shops need to repair vehicles is readily [available](#) for every auto and truck manufacturer. **Members of Congress should not cosponsor H.R. 1566/S. 1379 since independent repair shops have what they need to fairly compete in today’s marketplace, and the legislation creates a significant new federal regulatory structure.**

BACKGROUND

The “REPAIR Act” has little to do with repairing a vehicle. For example, H.R. 1566 provides that “direct, real-time in-vehicle data” can be sold “to any other person” with the consent of the vehicle owner. Such consent could consist of the owner merely checking a box on a form authorizing service of their vehicle. The House bill also gives aftermarket parts manufacturers the ability to glean vehicle data “for purposes...related to the manufacture or service of such...parts.” This data cannot be deleted even if requested by the vehicle owner. In addition, both House and Senate bills mandate that no manufacturer “impairs the ability” or “employ[s] any barrier” for an aftermarket parts manufacturer “to produce” aftermarket parts. Proponents have failed to articulate a compelling reason for these provisions, which are unrelated to their claim that they lack information or tools to fix a vehicle.

The information necessary to repair vehicles is already widely available. In addition to the 2014 MOU, automakers and independent repairers have a longstanding formal mechanism through the [National Automotive Service Task Force](#) to ensure information for service, tools and training is available from every truck and auto manufacturer. Additionally, multiple private entities such as [oem1stop.com](#) provide this information, and the MOU created a resolution panel to remedy situations where an independent repair facility believes a manufacturer has failed to provide the necessary information to repair a vehicle. Even though the MOU is working as intended, “right to repair” proponents now want a new federal regulatory structure that does much more than address so-called “right to repair.”

The bills are so proscriptive that they forbid a manufacturer from even recommending their own auto parts unless the automaker also provides “in the same font” and “font size” what is obvious—that consumers are already free to choose their own auto repair parts. This legislation also includes a new paperwork burden which will unnecessarily lengthen the car-buying process for over 28 million purchasers annually and could cost in excess of \$100 million.

KEY POINTS

- **The “REPAIR Act” is unnecessary because the information necessary to repair vehicles is already available.** Aftermarket parts manufacturers and independent repair shops already have what they need to fairly compete in today’s marketplace. Currently 73% of post-warranty repairs are done outside of the dealer network.
- **The bills are not about repair but rather are designed to provide third parties access to consumer data and enable aftermarket parts manufacturers to reverse engineer OEM parts.** The requirement that no auto manufacturer may impair the ability of an aftermarket parts manufacturer to produce “knock-off” auto parts is unnecessary if the purpose of the bills is to ensure the “right to repair.”
- **H.R. 1566/S. 1379 would create an entirely new regulatory framework** — with a mandated rulemaking, new advisory panel, and reports to Congress every two years — all for a nonexistent problem. This new regulatory paperwork burden could cost over \$100 million annually, affecting 28 million transactions, and expose small business dealers to significant fines.

STATUS

Rep. Neal Dunn (R-Fla.) reintroduced H.R. 1566, the REPAIR Act and Sens. Ben Ray Lujan (D-N.M.) and Josh Hawley (R-Mo.) introduced S. 1379. NADA sent an opposition [letter](#) to all House members and an opposition [letter](#) to all Senators. **Members of Congress are urged not to cosponsor H.R. 1566/S. 1379.**

October 17, 2025



Protect Consumers and Small Businesses from Catalytic Converter Theft *Cosponsor the Bipartisan PART Act (H.R. 5221/S. 2238)*

ISSUE

Catalytic converters are attractive targets for thieves due to their precious metals, such as rhodium, platinum and palladium. Criminals can easily steal catalytic converters from unattended vehicles, and since catalytic converters are not readily traceable, there is a lucrative market for these stolen parts. These thefts are costing millions of dollars to businesses and individual vehicle owners alike and continue to be a significant problem. **Members of Congress should cosponsor the “Preventing Auto Recycling Theft Act” ([H.R. 5221/S. 2238](#)), which would help law enforcement combat catalytic converter theft by marking catalytic converters and creating a more transparent market that deters their theft.**

BACKGROUND

As required by the Clean Air Act, catalytic converters reduce toxic emissions from internal combustion engine vehicles using precious metals to remove toxic elements from the exhaust gases. The price of these precious metals rose sharply during the pandemic, contributing to a sharp increase in theft. Stolen catalytic converters can garner anywhere from \$20 to \$350 on the black market, with the replacement cost to vehicle owners averaging over \$2,500. Stolen catalytic converters are difficult to trace since they lack identification numbers tied to the vehicle, which hampers law enforcement from proving ownership and prosecuting theft.

Thefts have also turned [violent](#), with high-profile [tragedies](#) underscoring the urgency of addressing this issue. While several states, such as Minnesota and North Carolina, have enacted laws to address the issue, this crime frequently involves trafficking stolen parts across state lines and a federal framework is needed to aid the efforts of local law enforcement.

The PART Act addresses this crime by: 1) requiring new vehicles to have unique identifying numbers, a VIN or other traceable number, stamped on catalytic converters at the time of assembly; 2) establishing a \$7 million grant program to mark catalytic converters of vehicles already on the road at no cost to vehicle owners; 3) increasing record keeping requirements for purchasers; and 4) establishing a federal criminal penalty for the theft, sale, trafficking or known purchase of stolen catalytic converters of up to five years.

KEY POINTS

- **Catalytic converter theft skyrocketed after the pandemic** due to the precious metals contained in each device.
- **The PART Act would provide law enforcement the tools to trace stolen catalytic converters back to their source.** Catalytic converters are not one of the 18 vehicle parts required to be marked with a VIN or number traceable to a VIN. Law enforcement has stated that including such tracing in the legislation is critical to help deter the theft and trafficking of stolen catalytic converters since it would make it easier to prosecute criminals.
- **The PART Act provides a national framework to help law enforcement combat catalytic converter theft.** Since this crime frequently involves trafficking stolen parts across state lines, a federal standard is needed to help law enforcement.

STATUS

The PART Act was reintroduced by Sens. Amy Klobuchar (D-Minn.) and Bernie Moreno (R-Ohio) in the Senate and Reps. Jim Baird (R-Ind.) and Betty McCollum (D-Minn.) introduced companion legislation in the House. NADA and 119 other organizations sent a [letter](#) to Congress supporting passage of the PART Act last year. This Congress, the bill includes some non-controversial [revisions](#) to improve clarity and enhance enforcement. **Members are urged to cosponsor the PART Act to help curb the growing national problem of catalytic converter theft protect consumers, and free up valuable time for law enforcement organizations across the country.**

September 10, 2025



September 8, 2025

Dear Representative:

The National Automobile Dealers Association (NADA), which represents over 16,000 franchised new car dealers who employ 1.1 million Americans, and the American Truck Dealers (ATD), a division of NADA representing over 3,200 franchised medium- and heavy-duty truck dealers nationwide, strongly oppose H.R. 1566, the “Right to Equitable and Professional Auto Industry Repair Act” Act (REPAIR Act). We oppose this legislation as it has little to do with repairing a vehicle and raises serious vehicle privacy, intellectual property, and safety issues.

H.R. 1566 is built on the faulty premise that independent repair shops are unable to obtain parts or data necessary to repair a car. However, this matter was addressed in 2008 with the establishment of the National Automotive Service Task Force¹, which makes available service information, tool information and training data from auto manufacturers. In 2014, a Memorandum of Understanding² was signed by independent repairers and auto manufacturers which ensured repair information dealers received would also be made available to independent repair shops. This agreement was updated in 2023 to include telematics. Today, the information independent repair shops need to repair a vehicle is readily available from auto and truck manufacturers.

H.R. 1566 is overbroad and creates data privacy and intellectual property concerns. Sec. 2 of the bill would allow vehicle owners to give all vehicle data, including technical and compatibility information, software, and technology to any third party they designate “without restriction or limitation.” This provision raises serious privacy, data security and vehicle safety concerns. Section 2(a)(1)(D) would also compel auto and heavy-duty manufacturers to provide any “aftermarket parts manufacturer” the information necessary to “produce or offer compatible aftermarket parts,” meaning the information necessary to reverse engineer original, genuine OEM auto and truck parts, including safety critical parts. This provision, which has little to do with the ability to repair a vehicle, raises serious intellectual property concerns.

H.R. 1566 is also overbroad as it treats medium-and heavy-duty trucks the same as light-duty vehicles. No evidence has been produced by the bill’s proponents showing that truck manufacturers withhold information to prevent independent repairers from fixing heavy-duty trucks.

H.R. 1566 could reduce competition and consumer choice. Dealerships routinely service brands outside their franchise. However, this legislation may exclude franchised dealers from receiving vehicle-generated data needed to repair the vehicle that is outside their franchise. For example, in Section

¹ The National Automotive Service Task Force (NASTF) is a not-for-profit organization established to facilitate the identification and correction of gaps in the availability and accessibility of automotive service information, service training, diagnostic tools and equipment, and communications.

² Both light duty and heavy-duty vehicle manufacturers have entered into nationwide [agreements](#) to provide repair information.

2(a)(5) of the bill, a franchised dealer may be barred from receiving the repair information necessary from another automaker to repair vehicles outside of their franchise. This legislation could put dealers at a competitive disadvantage and limit where customers can take their vehicle for repairs.

H.R. 1566 would place a new unnecessary and unfair regulatory burden on franchised dealers. Sec. 4 of the bill requires the National Highway Traffic Safety Administration to “promulgate regulations” requiring more government paperwork “at the point of purchase of a motor vehicle.” Failure to comply with this new regulation could result in a fine up to \$51,744 per violation. Additionally, this new regulatory burden and fine would only apply to franchised dealers; independent dealers are exempt.

Finally, a 2024 Government Accountability Office [report](#) confirmed the information and tools necessary to repair vehicles are already available to independent repair shops. The report found that of the eight automakers GAO interviewed, all confirmed that “they provide to independent repair shops, on fair and reasonable conditions, equal access to the information, data, and tools needed for repairs, and will continue to do so.” In fact, independent repair shops currently perform more than 70% of all non-warranty repairs, and according to the Auto Care Association, which supports this legislation, their total revenue grew 43% from 2014-2022.

H.R. 1566 is touted by its proponents as a “Right to Repair” bill, but the legislation has little to do with repairing a vehicle. Instead, the bill creates unlimited open access to third parties which raises new vehicle privacy, intellectual property, and safety concerns, while mandating a new, untested regulatory burden. **NADA urges you to not cosponsor or vote for H.R. 1566.** Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Stanton", with a stylized flourish at the end.

Mike Stanton
President and CEO



Creating Efficient, Sustainable, Safe Fleets

GENERAL CORRESPONDENCE

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P.O. Box 412963
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609-720-0882

info@nafa.org

January 12, 2026,

Chairman Bilirakis and Ranking Member Schakowsky:

As the leading national association representing public and private fleet managers, NAFA appreciates your attention to critical fleet issues in your upcoming hearing, Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership. We respectfully request that this letter be included in the hearing record.

NAFA is the national association of private and public fleet managers. Fleets purchase approximately 20 percent of all vehicles sold in the United States, move more than \$10 trillion in goods annually, and contribute roughly \$800 billion to the U.S. economy. Fleets provide critical public services, including fire and police response, school transportation, public transit, and road and utility maintenance and repair. Fleets also ensure that manufacturers receive the raw materials they need, grocery and retail stores remain stocked, and packages are delivered to homes and businesses. Because of this scale, policies affecting fleet operations have direct implications for economic stability, public safety, and consumer affordability nationwide.

With respect to the issues before the Committee, catalytic converter theft and unfettered fleet access to the data their vehicles generate are both operationally and economically consequential for fleet operators.

Thieves steal catalytic converters from vehicles and sell them to scrap dealers for the value of metals such as platinum. This leaves vehicles unusable, and replacement can cost thousands of dollars per incident. The Preventing Auto Recycling Theft (PART) Act, by requiring converters to bear clearly marked identification numbers, permitting them to be associated with individual vehicles, and requiring entities purchasing converters in the secondary (scrap) market to keep transaction records, would meaningfully deter this criminal activity. The legislation also establishes criminal penalties for theft or resale of converters, creating consequences for what is currently a low-risk activity for thieves. NAFA supports these provisions as a practical, enforcement-focused approach to disrupting illicit resale channels and reducing catalytic converter theft nationwide.

Another critical issue for fleets is access to the extensive data that modern vehicles generate. This data includes vehicle component performance, such as battery health, as well as vehicle usage information, including acceleration, braking, and speed. Fleets rely on this data to ensure safe operation, timely maintenance, cost control, and efficient deployment of vehicles. This

information is increasingly transmitted via telematics—over-the-air, cellular-based systems that allow remote access to vehicle data.

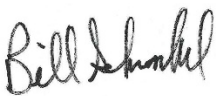
Vehicle manufacturers are increasingly using telematics systems to control and monetize access to data generated by vehicles that fleets own or lease. While manufacturers design the hardware and software systems, fleets operate the vehicles, bear the operational risk, and depend on continuous access to this data to meet safety, service, and compliance obligations. Restricting or paywalling access to essential vehicle data raises fleet operating costs and can negatively affect maintenance, uptime, and safety outcomes.

Both the Data Rights for Information and Vehicle Electronics in Real-Time (DRIVER) Act and the Auto Data Privacy and Autonomy Act would ensure that fleets have appropriate access to critical data generated by the vehicles they own or lease without being forced to repurchase their own operational data. NAFA supports these approaches as balanced, pro-competition policies that protect safety and consumer affordability.

The REPAIR Act, by contrast, would explicitly authorize manufacturers to charge for vehicle data access, effectively granting manufacturers exclusive control over customer vehicle data. This approach would undermine fleets' ability to manage their vehicles efficiently and safely while increasing costs across both public and private fleets. NAFA has consistently opposed this framework.

We appreciate your attention to these important policy matters and stand ready to serve as a technical and operational resource to the Committee as it considers legislative options affecting fleet safety, consumer affordability, and U.S. automotive leadership.

Respectfully,



Bill Schankel
CEO
NAFA Fleet Management Association



The Honorable Gus Bilirakis
Chairman
Subcommittee on Commerce, Manufacturing,
and Trade
House Committee on Energy and Commerce
2306 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Jan Schakowsky
Ranking Member
Subcommittee on Commerce, Manufacturing,
and Trade
House Committee on Energy and Commerce
2408 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Bilirakis and Ranking Member Schakowsky,

On behalf of the **National Automotive Service Task Force (NASTF)**, we appreciate the committee's commitment to ensuring that Americans have the tools and data needed to fix their vehicles. That is a commitment we share and, in fact, is NASTF's purpose.

As you consider legislation affecting automotive right to repair, we wanted to provide background on the role NASTF plays in ensuring an equal playing field for all automotive service professionals.

Background on NASTF

The National Automotive Service Task Force (NASTF) is a not-for-profit, 501(c)(6), established in 2000 to facilitate the identification and correction of gaps in the availability and accessibility of automotive service information, service training, diagnostic tools and equipment, and communications.

NASTF is the largest automotive repair trade association with 53,892 members and over 8,000 vehicle security professionals who perform over 300,000 secure transactions per year.

NASTF is a cooperative effort among the automotive service industry, the equipment and tool industry and automobile manufacturers (OEMs). There is no cost to participate in NASTF, which is open to professional auto service technicians, shop owners, service writers, OEM service employees or any other automotive industry professional.

NASTF helps to ensure an equal playing field for all automotive service professionals and serves as an intermediary between the technician and OEMs.

NASTF's Role in Ensuring Automotive Right to Repair

NASTF operates under the Automotive Service Information Standards (ASIS) agreement signed by nearly all automakers in 2008. The agreement requires automakers to offer all information and tools available to their franchise dealer to independent repairers. It also establishes NASTF as the resource for delivery of vehicle security information related to repair and producing keys for the aftermarket.

Further, the 2013 Massachusetts Right to Repair law and the 2014 industry wide Memorandum of Understanding (the “MOU”) require automobile manufacturers (OEMs) to make available for purchase to owners and independent repair facilities, at a fair and reasonable cost, the tools and data necessary to diagnosis and repair vehicles. This must be the same diagnostic and repair information provided to dealers.

NASTF is named in the 2013 Massachusetts Repair law and the 2014 MOU as the mediator for aftermarket technicians and automakers when the above information is unavailable. When a technician encounters an issue where information is missing or a support system is broken, they can submit a request for assistance¹ and NASTF will contact the correct individual at the automaker for assistance. **NASTF receives an average of 140 requests per year and has a 90% resolution rate.**

The majority of automakers have very good systems in place to support repairers. NASTF assists with the occasional issue that affects everyone using the system, oftentimes independent and dealer alike. Technicians facing the same or similar problems are encouraged to add their experience to the original request. This helps automakers understand the scope of the issue, most of which are related to information technology (IT). NASTF also employs a number of specialist members who inform us of issues so that we can take them to the appropriate brand before they cause significant downtime for the impacted technicians.

NASTF is aware of additional efforts² in the industry to gather technician concerns with repair information, specifically from the Auto Care Association. We have proactively reached out to provide support and ensure the concerns collected are addressed by manufacturers through the established “service information request” process. We are disappointed that the Auto Care Association has recently declined our request to support resolving these technicians’ concerns as we are confident that we could resolve the majority of these issues with the help of our OEM partners.

¹ https://wp.nastf.org/?page_id=842

² <https://www.autocare.org/government-relations/resources/toolkit/right-to-repair-media-kit-for-drivers-and-shops>

Secure Data Release Model

NASTF also operates the Secure Data Release Model (SDRM).³ This system allows automakers to share security related information and tool functions with independent repairers and locksmiths

Background checked, credentialed Vehicle Security Professionals (VSPs) using the SDRM process can purchase key and immobilizer codes, PIN numbers and special tool access from automaker websites. Each transaction is monitored and validated by NASTF.

As always, NASTF will continue to work to ensure that the tools and data needed for owners and independent repair facilities to repair vehicles is available and to solve industry-wide concerns.

Please reach out with any further questions about NASTF's work and our role in ensuring automotive right to repair.

Sincerely,

Donny Seyfer
Executive Officer
National Automotive Service Task Force
dseyfer@nastf.org
303-994-8643

³ https://wp.nastf.org/?page_id=367



**National Safety Council Statement for the Record
House Committee on Energy and Commerce
Commerce, Manufacturing, and Trade Subcommittee
“Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice
and Affordability, And Cement U.S. Automotive Leadership”**

Chairs Guthrie and Bilirakis and Ranking Members Pallone and Schakowsky:

Thank you so much for hosting this timely legislative hearing on solutions the United States government can implement to eliminate fatalities and serious injuries stemming from motor vehicle crashes. In 2023, 44,762 people died in motor vehicle crashes in the United States.¹ Given numerous advancements in motor vehicle design and advanced driver assistance systems (ADAS), the time is now for an all-of-government approach to substantively reduce the dangers people face every day while using the transportation system.

The National Safety Council

The National Safety Council (NSC) is America’s leading nonprofit safety advocate — and has been for over 110 years. As a mission-based organization, we work to eliminate the leading causes of preventable death and injury, focusing our efforts on the workplace and roadway. We create a culture of safety to protect people from hazard and injury in the workplace and beyond so they can live their fullest lives. Our more than 13,000 member companies and federal agency partners represent employees at nearly 41,000 U.S. worksites.

Motor Vehicle Modernization Act

NSC greatly appreciates the efforts of Members of Congress to ensure the continued commitment of the National Highway Traffic Safety Administration (NHTSA) to the New Car Assessment Program (NCAP). As it stands today, NCAP has not kept pace with motor vehicle technology advancements and motor vehicle original equipment manufacturers (OEMs) look to other sources for validators of vehicle safety and technology.² The solution is not to eliminate NCAP; however, NHTSA must invest in updating its list of preferred technologies and testing procedures to keep pace with third-party validators and versions of NCAP in other countries.³

NSC also supports the transparency sought after by the Motor Vehicle Modernization Act regarding rulemaking efforts at NHTSA. As it stands today, NHTSA is behind on several key

¹ <https://injuryfacts.nsc.org/motor-vehicle/overview/introduction/>

² <https://www.iihs.org/ratings/top-safety-picks#criteria>

³ <https://www.euroncap.com/en/car-safety/the-ratings-explained/>

safety proceedings which when complete, can positively affect numerous risky driving behaviors, including distracted driving and impaired driving.

NSC does not support language in the current version of the Motor Vehicle Modernization Act that aims to replace NHTSA crash testing procedures with voluntary performance testing by motor vehicle OEMs. While self-certification may be appropriate for Federal Motor Vehicle Safety Standards (FMVSS) compliance, NHTSA must not cede any involvement in the performance testing of vehicle safety systems that are part of NCAP. United States consumers rely on NHTSA to provide unbiased safety ratings on new vehicles entering the market. Motor vehicle OEMs should not be expected to do the work of a regulator. Given the numerous safety challenges that exist in the United States, Americans are looking for an active motor vehicle regulator to ensure vehicle safety and compliance.

Finally, NSC believes the NCAP Advisory Committee as proposed within the legislative text of the Motor Vehicle Modernization Act should be updated to include equal participation by safety organizations and vehicle manufacturers. OEMs have a diversity of thought based on the economic bottom line of each individual company and their perspectives will be shaped by the vehicles they are trying to sell. Similarly, safety organizations have different perspectives on how best to shape NCAP so it is successful moving forward. Ensuring these opinions are heard at the Advisory Committee is key to a strong NCAP.

Safety is Not for Sale Act

NSC supports the aims and goals of the Safety is Not for Sale Act. Too often, consumers are asked to pay higher prices for technology on new vehicles which will keep them safe while driving.⁴ NSC believes safety technologies available for any model of motor vehicle should be standard and not part of an added 'safety package.'

Additionally, NSC supports the limited aspects of technology that are included in this legislation. Automatic Emergency Braking (AEB), lane keeping assist, driver support systems and digital crash notification are all technologies that have a positive impact on safety. While more technologies may be recognized by the appointed Commission, this is a positive starting point where NHTSA has published research on the importance of these safety technologies.

Safely Ensuring Lives Future Deployment and Research in Vehicle Evolution Act (SELF DRIVE Act)

NSC recognizes that automated driving systems (ADS) are being tested and deployed across the United States at a record pace. While ADS technology may have a recognized safety benefit in the future, today that benefit is not fully realized. Strong federal oversight, including a national

⁴ <https://www.euroncap.com/en/car-safety/the-ratings-explained/>

framework for safe ADS deployment, will be critical to ensuring the development and deployment of new technology that does not put current road users in novel and dangerous predicaments. Furthermore, continued staffing and research by NHTSA will be key to ensuring ADS technology performs in a predictable way that is compliant with rules of the road in every jurisdiction within the United States.

NSC does not support a distinction between an “ADS-dedicated vehicle” and an “ADS-equipped vehicle.” Using the SAE J3016 Levels of Automation Guide, industry distinguishes between “driver support features” and “automated driving features.”⁵ This nomenclature has become standard regulatory language. Level 3 systems, which will be first to market for personally owned vehicles, are ADS technology and should be regulated in the same way Levels 4 and 5 systems are regulated.⁶

NSC is concerned that the SELF DRIVE Act purports to reclassify a driver of Level 3 ADS equipped motor vehicles as an “in-vehicle fallback-ready user.” Level 3 systems require operators of vehicles to remain capable of reengaging in the driving task should the system notify the driver to take control. To maintain a high level of behavioral safety, Congress and NHTSA should continue using the term “driver” with regards to operators of Level 3 systems. This ensure the operator continues to follow the rules of the road before getting in the driver’s seat including being free from impairment.

States and NHTSA must collaborate on enforcement protocols for driver distraction with respect to operating Level 3 vehicles. For Level 3 vehicles, law enforcement will need to know when the vehicle is operating in this mode so as to prevent unnecessary stops for inattentiveness during the driving task by the driver.

NSC appreciates the delineation in the legislative text of what is required of safety cases by ADS manufacturers. Safety cases are critical to the operations of ADS technology as it certifies that a vehicle is safe to operate within its Operational Design Domain (ODD). NSC believes the aspects of a safety case that are listed as optional within the legislative text should be required. Regulators should know the safety management system of manufacturers, change process procedures to ensure timely software and hardware updates, and safety monitoring practices. Additionally, NSC suggests changing the legislative text to require safety cases for ADS-equipped vehicles be made available to NHTSA and not subject to a request. Finally, NSC believes the requirements listed in the legislative text should match what is current in voluntary industry standards and NHTSA requirements to ensure the highest level of safety.

Crash reporting is critical to understanding how an ADS-equipped motor vehicle failed to comply with relevant safety procedures. However, the SELF DRIVE Act could likely make access to information near impossible. By suggesting that all shared crash information is confidential

⁵ <https://www.sae.org/news/blog/sae-levels-driving-automation-clarity-refinements>

⁶ <https://www.sae.org/articles/2025/11/gm-forward-event-nyc>

business information, there could be little information to vet vehicles available to third-party safety advocates and research organizations. While there is text to establish “a system to publicly share the data collected for the repository,” that text is not compatible with Section A which deems “any information shared with a relevant State transportation regulatory agency is protected by the confidential business information protections and procedures.”⁷ Finally, NSC does not support weakening the reporting requirements from the current Standard General Order.⁸

NSC cannot support a broad preemption statute that risks safety in individual states. States have the best information related to digital infrastructure, road design, licensing regimes, insurance requirements and traffic law needed for successful ADS operations. Federal preemption makes sense for safety requirements related to the design of ADS-equipped vehicles. However, States should be able to require more than the base threshold in the legislative text for safety cases and crash reporting.

NSC supports innovation and thorough testing of ADS technologies before deployment in various ODD environments. With needed changes, this legislation could set the foundation for a national framework for autonomous vehicle deployment within the United States.

AV Safety Data Act

NSC supports the requirements for autonomous vehicle crash reporting in this legislation as it complies with the Third Amended Standing General Order (SGO). These requirements for ADS data and Advanced Driver Assistance Systems (ADAS) data should be included in the SELF DRIVE Act to aid in a national framework for autonomous vehicle testing and deployment.

Driver Technology and Pedestrian Safety Act

NSC supports research to determine the safety of new vehicle technologies entering the market. Given the announcements of Level 3 systems soon available for purchase and the vast amount of motor vehicles with touchscreens and other technological advancements, it's important to know if innovation is having an adverse effect on safety.

While NSC would like NHTSA to independently conduct this research, the staffing challenges of NHTSA are well documented.⁹ The National Academies of Sciences, Engineering, and Medicine has the relevant expertise to conduct this research, evidenced by the longstanding contributions of the Transportation Research Board (TRB) to vehicle and vulnerable road user safety.

⁷ https://d1dth6e84htgma.cloudfront.net/03_H_R_SELF_DRIVE_Act_c6810113bc.pdf

⁸ <https://www.nhtsa.gov/laws-regulations/standing-general-order-crash-reporting>

⁹ <https://www.reuters.com/business/world-at-work/us-auto-safety-agency-shedding-more-than-25-employees-2025-07-17/>

Deployment of Required Impairment Prevention Vehicle Equipment to Honor the Abbas Family Legacy to Terminate Drunk Driving Act (DRIVE to HALT Drunk Driving Act)

Alcohol-impaired driving is the leading risky driving behavior in the United States, responsible for 12,429 fatalities in 2023.¹⁰ To end this scourge, Congress passed the HALT Act through IIJA requiring NHTSA to implement a final rule for advanced impaired drunk driving prevention technology. While NHTSA has published and received comments on their Advanced Notice of Proposed Rulemaking (ANPRM), NHTSA has not moved forward with an updated proposal citing the agency will be reviewing comments until May 2026.¹¹

In the time since the ANPRM, numerous organizations have announced having the technology ready to implement this final rule.¹² NSC supports the DRIVE to HALT Drunk Driving Act because it rightfully requires a threshold of vehicles in the United States to have drunk driving prevention technology that meets either Driver Alcohol Detection System for Safety (DADSS) or European NCAP specifications. The problems of alcohol-impaired driving and distracted driving, which the ANPRM requires the technology to recognize, are too great to wait years to solve.

No Kill Switches in Cars Act

Alcohol-impaired driving is a serious problem that needs serious solutions. Repealing the requirement for NHTSA to advance a final rule on impairment recognition technology will not lead to advancements in alcohol-impaired driving prevention. NSC cannot support this bill.

Know Before You Drive Act

Naming conventions of vehicle technology systems should be accurate and instill confidence in the public that technology will accomplish what the name suggests. Too often, the American public has over relied on technology that has not achieved its goal. Terms such as “Full Self Driving” have been rightly criticized as inaccurate and have possibly even led to motor vehicle crashes.¹³

Additionally, NSC supports the right of consumers to know what technologies, including partial automation and safety technologies, are included in their vehicles. With the support of OEMs, NHTSA and the National Transportation Safety Board (NTSB), NSC launched MyCarDoesWhat in 2015.¹⁴ This consumer education campaign details which safety and convenience technologies

¹⁰ <https://www.nhtsa.gov/risky-driving/drunk-driving>

¹¹ <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=2127-AM50>

¹² <https://seeingmachines.com/wp-content/uploads/2025/10/SEE-PR-Seeing-Machines-unveils-impairment-detection-FINAL-05-09-25.pdf>

¹³ <https://www.cnn.com/2021/10/26/ntsb-head-criticizes-teslas-self-driving-features-calls-them-misleading.html>

¹⁴ <https://www.safetyandhealthmagazine.com/articles/13133-nsc-launches-mycardoeswhat-vehicle-safety-campaign#:~:text=Home%20%C2%BB%20NSC%20launches%20'MyCarDoesWhat',said%20in%20a%20press%20release.>

are available in vehicles being sold in the United States.¹⁵ This information should be known to every consumer at the time of vehicle purchase.

NSC supports the Know Before You Drive Act.

Safe Streets for Everyone Act

According to the Insurance Institute of Highway Safety (IIHS), AEB systems would reduce rear-end crashes by 40%. This technology would prevent 28,000 crashes and 12,000 injuries.¹⁶ To continue to support lifesaving technology, the Safe Streets for Everyone requires that the AEB FMVSS requires functionality in daylight and low light conditions, meets speed thresholds for pedestrian protection, and detects and responds to cyclists.

It is imperative that automatic braking systems respond to vulnerable road users including pedestrians and cyclists. In 2023, 7,318 pedestrians died and this technology may be useful in stemming these types of fatalities.¹⁷ NSC supports the Safe Streets for Everyone Act and requests OEMs to implement these enhancements to AEB systems today.

Conclusion

Eliminating serious injuries and fatalities from motor vehicle crashes should be the commitment of everyone involved in motor vehicle sales and traffic safety. Together, we must work quickly through rulemaking and consumer education to ensure that vehicles on the nation's roads are as safe as possible. Safe vehicles and positive driver behavior are critical in our efforts to reach vision zero in the United States.

NSC looks forward to continuing to partner with this Committee and all interested stakeholders to ensure safety is not ceded to innovation.

¹⁵ <https://www.mycardoeswhat.org/>

¹⁶ https://www.nhtsa.gov/sites/nhtsa.gov/files/aeb_factsheet_031616.pdf

¹⁷ <https://www.ghsa.org/sites/default/files/2024-11/2023%20Pedestrian%20Traffic%20Fatalities%20by%20State.pdf>



NATIONAL CONSUMERS LEAGUE

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January 13, 2026

The Honorable Brett Guthrie
Chair
Energy & Commerce Committee
United States House of Representatives
Washington, D.C. 20515

The Honorable Frank Pallone, Jr.
Ranking Member
Energy & Commerce Committee
United States House of Representatives
Washington, D.C. 20515

The Honorable Gus M. Bilirakis
Chair
Commerce, Manufacturing, and Trade
Subcommittee
United States House of Representatives
Washington, D.C. 20515

The Honorable Jan Schakowsky
Ranking Member
Commerce, Manufacturing, and Trade
Subcommittee
United States House of Representatives
Washington, D.C. 20515

Dear Chairs Guthrie and Bilirakis, and Ranking Members Pallone and Schakowsky,

The National Consumers League (NCL) respectfully submits this letter for the hearing titled “*Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership.*” We applaud you for seeking to reduce the unacceptable loss of life, physical injuries, and economic costs attributable to motor vehicle crashes.

Each year, approximately 40,000 lives are lost and 2.6 million people are injured in [traffic crashes](#). That’s enough fatalities to fill the average Major League Baseball stadium—enough injuries to affect nearly every resident of the state of Alabama. Traffic crashes [cost society](#) nearly a trillion dollars in medical bills, emergency services, lost productivity, insurance costs, workplace loss, legal expenses, and property damage. That’s enough money to purchase more than 26 million mid-size SUVs, ten million more than the total number of cars sold in 2024.

The death and destruction on our nation’s roads does not have to be the price we pay for commuting to work, dropping the kids off at school, or picking up groceries. In the remainder of the letter, we detail several NCL policy proposals to address the unacceptable number of deaths and injuries from traffic crashes and provide feedback on bills and discussion drafts slated for consideration at the hearing.

Legislative Proposals

Safety is Not for Sale

NCL has [found](#) that some advanced driving assistance systems (ADAS) are sold as luxury items that must be purchased for an extra fee or as part of expensive add-on packages. These additional costs may put these life-saving technologies out of reach for many Americans.

- *Policy Recommendation:* Make it unlawful for sellers of optional ADAS systems to bundle those systems with non-safety-related equipment.
- *Draft Text:* NCL applauds Ranking Member Pallone for releasing a discussion draft to address this pressing issue.

Rideshare Recalls

Nearly one in six Uber and Lyft vehicles are operating under an active recall, according to an investigation by the [Government Accountability Office](#). These rideshare vehicles pose serious threats not only to passengers and drivers but also to the general public.

- *Policy Recommendation:* Mandate that rideshare platforms notify their drivers of any outstanding safety recalls affecting the driver's vehicle. Prohibit such vehicles from operating on the platform if a recall has not been addressed within 5 days, or if a "do not drive" warning has been issued. If a stop driving warning has not been issued, prohibit such vehicles from operating on the platform if the recall has not been addressed within 60 days of notification, provided a remedy is available.
- *Draft Text:* Please see page 6.

Combating Vehicle Theft

Engine immobilizers, which are anti-theft devices that prevent vehicles from being hot-wired, are standard equipment on nearly all vehicles. But between 2011 and 2021, only 26 percent of Kias and Hyundais deployed in the United States were [equipped](#) with immobilizers. In comparison, nearly 96 percent of model year 2015 vehicles deployed by other manufacturers were equipped with immobilizers. In 2021, this gap led to a surge in thefts after viral TikTok videos showed that these vehicles could easily be stolen using just a screwdriver and a USB cable. While Canada mandates immobilizers by law, the United States does not. The National Highway Traffic Safety Administration (NHTSA) currently permits manufacturers meeting Canada's immobilizer standards to be [exempt](#) from NHTSA's vehicle theft standards.

- *Policy Recommendation:* By statute, harmonize America's immobilizer standards with Canada's. Permit NHTSA to modify such standard as necessary to mitigate the risk of theft.
- *Draft Text:* Please see page 9.

Closing the Pipeline of Safety Defects

Noncompliant and defective motor vehicle equipment is readily available for purchase on prominent online marketplaces, including eBay, Walmart.com, and Amazon. Such equipment endangers public safety and harms domestic manufacturers, who lose market share to noncompliant producers. Concerning product listings include **car and booster seats** (i.e., fabric car and booster seats that may lack the structural integrity, anchorage, and harnessing to adequately secure an infant or toddler), **motorcycle helmets** (i.e., plastic motorcycle helmets that are unlikely to meet federal requirements for impact absorption, penetration resistance, and strap retention), and **LED headlamps** (i.e., ultra-bright headlamps not permitted by NHTSA for installation). While NHTSA has the authority to compel manufacturers of motor vehicle equipment to conduct recalls and remedies, it does not have the power to compel online marketplaces to remove listings of defective equipment and address the danger. NHTSA has found it difficult to locate many international fly-by-night sellers who flood online marketplaces with defective products.

- *Policy Recommendation:* Grant NHTSA the authority to compel online marketplaces to take down postings of defective motor vehicle equipment. If defective motor vehicle equipment is sold on the platform, online marketplaces must notify purchasers and facilitate the replacement of the equipment or issuance of a refund.
- *Draft Text:* Please see page 12.

Feedback on Legislation and Discussion Draft Under Consideration

In the following section, the NCL provides preliminary feedback on some of the bills and discussion drafts slated for consideration at the legislative hearing. NCL intends to provide more fulsome comments and redlines on the various legislation and discussion drafts as the Committee continues through the legislative process.

Motor Vehicle Modernization Act

The Motor Vehicle Modernization Act seeks to enact several reforms to improve NHTSA's effectiveness and efficiency.

- **Sec. 8. Project Management Practices** – This section requires NHTSA to update procedures for rulemakings and reports to require the use of leading project schedule management practices. The Government Accountability Office (GAO) [found](#) that NHTSA has not consistently followed leading project schedule management practices when developing mandated rulemakings and reports. These practices, which include establishing milestones and sequencing activities, can help manage project timeframes and reduce delays. GAO recommended that NHTSA update procedures for rulemakings and reports to require the use of leading project schedule management practices. NCL believes that enshrining these GAO recommendations into law is an important tool for oversight and accountability, thereby helping to ensure a more responsive and effective NHTSA.

- Sec. 9. General Exemptions – This section expands NHTSA’s authority to permit noncompliant vehicles on the nation’s roads. Current law permits manufacturers of motor vehicles to deploy non-compliant vehicles for testing or evaluation, provided that those vehicles are not sold. A provision in the Motor Vehicle Modernization Act seeks to expand that authority to apply to suppliers. Further, the SELF DRIVE Act discussion draft seeks to create a federal framework for the introduction of noncompliant autonomous vehicles (AVs). It is unclear why manufacturers would need to deploy noncompliant vehicles at the levels contemplated in Sec. 9 and without meaningful limitations on commercial use. Such a high number of noncompliant vehicles on the nation’s roads presents safety risks.
- Sec. 10. Testing and Evaluation of Motor Vehicle Equipment – This section permits suppliers manufacturing motor vehicle equipment prior to 2016 to deploy noncompliant motor vehicle equipment for the purposes of testing or demonstration, provided such motor vehicle or motor vehicle equipment is not sold at the conclusion of testing. Suppliers should have the authority to test innovative safety devices with reasonable commercial limitations. NCL supports this provision.

Safety is Not for Sale

NCL strongly supports the Safety is Not for Sale discussion draft. Such legislation is vital to ensuring consumers have more accessible and affordable access to lifesaving automobile safety features.

SELF DRIVE Act

The SELF DRIVE Act seeks to “ensure continued United States leadership in the global automotive and autonomous driving sector, improve road safety, mobility, and accessibility, and create American jobs” by supporting the deployment of AVs, which are vehicles capable of performing the entire driving task without human intervention. We applaud Representative Latta (R-OH) and Dingell (D-MI) for embarking on this legislative effort to support the safe and responsible deployment of AVs. NCL believes that it is important for the United States to establish such a framework for AV deployment.

In its current form, the legislation presents concerns related to safety, accessibility, justice, and economic opportunity. We are optimistic that these concerns can be resolved and stand ready to work closely with the authors of the discussion draft and committee staff to refine the text.

DRIVER Act

The DRIVER Act provides owners the right to access, control, and delete data collected by their vehicle. Any state or local law related to this provision is preempted. Further, the legislation prohibits manufacturers from selling vehicle data unless they grant consumers the right to opt out of such sales

Consumers should have the right to access, control, and delete data collected by their vehicle. We look forward to working with the bill sponsors to ensure that the legislation, including the preemption provision, strengthens consumer protections.

DRIVE to HALT Drunk Driving Act

The DRIVE to HALT Drunk Driving Act requires larger manufacturers to deploy passive drunk and impaired driving technologies that meet minimum performance requirements. Based on NHTSA data, more than 12,000 deaths and nearly 400,000 serious injuries occurred in 2023 due to impaired driving. This proactive measure will undoubtedly save lives and begin to address the tragic and preventable crisis of drunk driving.

No Kill Switches in Cars Act

The No Kill Switches in Cars Act strikes a mandate directing NHTSA to establish performance standards requiring vehicles to be equipped with drunk and impaired driving technology. Drunk drivers are the true kill switch, not revolutionary safety technologies designed to stop them. This misguided bill would result in more unnecessary deaths and injuries on our nation's roads.

PART Act

The PART Act requires NHTSA to mandate that catalytic converters be affixed with antitheft markings, establishes a grant program to facilitate the marking of catalytic converters currently deployed in interstate commerce, and increases criminal penalties for catalytic converter theft. We are encouraged that the Committee is taking action to prevent catalytic converter theft, which has become a major consumer and environmental protection issue.

Know Before You Drive Act

The Know Before You Drive Act prohibits manufacturers from making misleading representations about the capabilities and limitations of AVs and partially automated vehicles. This discussion draft establishes vital protections preventing consumer confusion and misuse of partial driving automation.

We thank you for considering our perspective on improving roadway safety, automobile innovation, and American competitiveness, and stand ready to work with you on these various legislative proposals.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally Greenberg", with a stylized, cursive script.

Sally Greenberg
President and CEO
The National Consumers League

Section 1. Short Title.

This Act may be cited as “[TBD]”.

Section 2. Transportation Network Company Recall Notification.

(a) IN GENERAL.—Chapter 301 of title 49, United States Code, is amended by inserting after section 30129 the following:

“§ 30130. Transportation Network Company Recall Obligations.

"(a) Transportation Network Company Recall Notifications and Remedies

“(1) IN GENERAL.— A transportation network company shall provide a notification to a TNC driver of an open recall affecting their TNC vehicle as soon as practicable, but not later than 5 days, after publication of the motor vehicle safety recall information in a recall database.

“(2) REMEDIES.— A transportation network company may not connect a passenger to a TNC vehicle with an open recall on the later of the date that is 60 days after—

“(A) a notification described in paragraph (1) is provided to a TNC driver;
or

“(B) the earliest remedy date for such vehicle published in a recall database.

“(3) DO NOT DRIVE WARNINGS.— A transportation network company may not connect a passenger to a TNC vehicle with an open recall not later than 5 days after—

“(A) a notification described in paragraph (1) is provided to a TNC driver;
and

“(B) a do not drive warning for such vehicle is published in a recall database.

“(4) CONTENT OF NOTIFICATIONS.— Notification of a recall by a transportation network company required under paragraph (2) or paragraph (3) shall contain motor vehicle safety recall information available to the public in a recall database.

“(5) METHOD OF NOTIFICATIONS.— A transportation network company shall notify a TNC driver of an open recall affecting their TNC vehicle by electronic means, including electronic mail and alerts transmitted through the digital network.

“(6) EFFECTIVE DATE.— This subsection shall take effect 180 days after the date of the enactment of this [TBD] Act.

“(b) REMEDY REPORT.—

(1) IN GENERAL.— Not later than 1 year after the date of enactment of this Act and every year thereafter, a transportation network company shall submit a report to the Secretary detailing—

(A) the practices and process adopted by the transportation network company to comply with subsection (a);

(B) the annual recall completion rate of all TNC vehicles by manufacturer, model year, component (such as brakes, fuel systems, and air bags), and vehicle type (such as passenger car, sports utility vehicle, and pick-up truck) for the year before the report is submitted.

“(2) PUBLIC AVAILABILITY.— The Secretary shall make any report submitted by a transportation network company under paragraph (5) publicly available not later than 30 days after receipt.

“(c) DEFINITIONS.— In this subsection—

“(1) COVERED VEHICLE.— The term “covered vehicle” means a motor vehicle with a gross vehicle weight rating of 10,000 pounds or less except that, for vehicles powered primarily by means of electric battery power, the weight of the electric battery or batteries shall not count towards the gross vehicle weight rating.

“(2) OPEN RECALL.— The term “open recall” means a defect or noncompliance that has not been remedied.

“(3) PASSENGER.— The term “passenger” means an individual who is matched with a TNC driver by using a TNC platform.

“(4) RECALL DATABASE.— The term “recall database” means a database of motor vehicle safety recall information that—

(A) is made available to the public on the Internet;

(B) is searchable by vehicle identification number;

(C) is in a format that preserves consumer privacy; and

(D) includes information about open recalls.

“(5) SECRETARY.—The term “Secretary” means the Secretary of Transportation.

“(6) TNC DRIVER.— The term “TNC driver” means an individual who contracts with a transportation network company and provides transportation services to passengers.

“(7) TNC PLATFORM.— The term “TNC platform” means an online-enabled application or digital network made available by a transportation network company to connect riders to TNC drivers for the purpose of providing pre-arranged transportation services.

“(8) TNC VEHICLE.— The term “TNC vehicle” means a covered vehicle owned, leased, or otherwise authorized for use by a TNC driver that the TNC driver uses to provide pre-arranged transportation services.

“(9) TRANSPORTATION NETWORK COMPANY. — The term “transportation network company”—

“(A) means a corporation, partnership, sole proprietorship, or other entity, that makes available an online-enabled application or digital network to connect passengers to TNC drivers for the driver to transport the passenger using a motor vehicle owned, leased, or otherwise authorized for use by the driver to a point chosen by the passenger; and

“(B) does not include a shared-expense carpool or vanpool arrangement that is not intended to generate profit for the driver.”

(b) ENFORCEMENT AUTHORITY.—Section 30165(a)(1) of title 49, United States Code, is amended by inserting “30130,” after “30127,”.

(c) CLERICAL AMENDMENT.—The analysis for chapter 301 of title 49, United States Code, is amended by inserting after the item relating to section 30129 the following:

“30130. Transportation Network Company Recall Obligations.”.

Section 1. Short Title.

This Act may be cited as “[TBD]”.

Section 2. Immobilizers

(a) IN GENERAL.—Chapter 331 of title 49, United States Code, is amended by inserting after section 33118 the following:

“§ 33119. Immobilizers

“(a) In general.— Not later than 2 years after the date of enactment of this Act, each new covered passenger motor vehicle shall be equipped with an immobilizer as standard equipment that meets—

“(1) the minimum performance standards of subsections 8 through 21 of C.R.C, c. 1038.114, *Theft Protection and Rollaway Prevention* (as in effect on the date of enactment of this Act);

“(2) the National Standard of Canada ANSI/CAN/UL/ULC 338, *Standard for Vehicle Theft Deterrent Equipment and Systems: Electronic Immobilization System and Aftermarket Installation Requirements* (as in effect on the date of enactment of this Act);

“(3) the United Nations Economic Commission for Europe (UN/ECE) Regulation No. 97 (ECE R97), *Uniform Provisions Concerning Approval of Vehicle Alarm System (VAS) and Motor Vehicles with Regard to Their Alarm System (AS)* (as in effect on the date of enactment of this Act); or

“(4) the UN/ECE Regulation No. 116 (ECE R116), *Uniform Technical Prescriptions Concerning the Protection of Motor Vehicles Against Unauthorized Use* (as in effect on the date of enactment of this Act).

“(b) Amendments.— Notwithstanding any other provision of this chapter, the Secretary may amend the minimum performance standards for immobilizers established in subsection (a) if the amended standard —

“(1) mitigates unreasonable risk of the theft of covered passenger motor vehicles;

“(2) is practicable; and

“(3) provides relevant objective criteria.”

(b) Definitions.—

(1) IN GENERAL.—Section 33101 of title 49, United States Code, is amended—

(A) in the matter preceding paragraph (1), by striking “chapter—” and inserting “chapter:”;

(B) in each of paragraphs (1) through (13)—

(i) by inserting “The term” after the paragraph designation; and

(ii) by inserting a paragraph heading, the text of which is comprised of the term defined in that paragraph;

(C) by redesignating paragraphs (3), (4), (5), (6), (7), (8), (9), (10), and (11) as paragraphs (4), (5), (7), (8), (9), (10), (11), (12), and (13);

(D) by inserting before paragraph (4) the following:

“(3) Covered Passenger Motor Vehicle.— The term “covered passenger motor vehicle” means a motor vehicle that has a gross vehicle weight rating of not more than 10,000 pounds except that, for vehicles powered primarily by means of electric battery power, the weight of the electric battery or batteries shall not count towards the gross vehicle weight rating;

(E) by inserting before paragraph (7) (as so redesignated) the following:

“(6) Immobilizer.— The term “immobilizer” means motor vehicle equipment that, when activated, is designed to prevent a covered passenger motor vehicle from being powered by its own propulsion system.”

(c) Prohibited acts.—

(1) IN GENERAL.— Section 33114 of title 49, United States Code, is amended—

(A) in paragraph (1) of subsection (a), striking “33102 or 33103” and inserting “33102, 33103, or 33119”; and

(B) in subsection (b) inserting “ prescribed under section 33102 or 33103” after “conformity with the standard”.

(d) Civil penalties and enforcement.—

(1) IN GENERAL.— Section 33115 of title 49, United States Code, is amended in in subsection (a) by—

(A) redesignating paragraphs (2), (3), (4), and (5) as paragraphs (3), (4), (5), and (6);

(B) by inserting before paragraph (2) the following:

“(2) Immobilizer penalties.— A person that violates section 33119 of this title, or a regulation prescribed thereunder, is liable to the United States Government for a civil penalty of not more than \$21,000 for each violation. A separate violation occurs for each covered passenger motor vehicle or immobilizer and for each failure to meet a the minimum performance standard established in that section. The maximum penalty under this paragraph for a related series of violations is \$105,000,000.”

(e) Preemption of State and local law.— Section 33118 of title 49, United States Code, is amended by striking “33102 or 33103” and inserting “33102, 33103, or 33119”.

SECTION 1. SHORT TITLE; TABLE OF CONTENTS.

(a) SHORT TITLE.—This Act may be cited as the “[TBD]”.

(b) TABLE OF CONTENTS.—

Sec. 1. Short title; table of contents.

Sec. 2. Notifications and remedies for covered online marketplaces.

Sec. 3. Effective date.

SECTION 2. NOTIFICATIONS AND REMEDIES FOR COVERED ONLINE MARKETPLACES.

(a) DEFINITIONS.—Section 30102(a) of title 49, United States Code, is amended—

(1) by redesignating paragraphs (1), (2), (3), (4), (5), (6), (7), (8), (9), (10), (11), (12) and (13) as paragraphs (2), (3), (4), (5), (6), (7), (8), (9), (10), (11), (12), (13), and (14), respectively;

(2) by inserting before paragraph (2) (as so redesignated) the following—

“(1) COVERED ONLINE MARKETPLACE.-

“(A) IN GENERAL.— The term "covered online marketplace" means any person that operates a consumer-directed electronically based or accessed platform that-

“(I) includes features that allow for, facilitate, or enable third-party sellers to sell, offer for sale, or introduce in interstate commerce motor vehicle equipment;

“(II) is used by one or more third-party sellers for such purposes; and

“(III) has a contractual or similar relationship with consumers governing their use of the platform to purchase motor vehicle equipment.”

“(B) EXCLUSION.— The term “covered online marketplace” does not include a dealer that—

“(I) is licensed by a State to engage in the sale of motor vehicles;

“(II) takes title to, holds an ownership interest in, or takes physical custody of a motor vehicle; and

“(III) is predominantly engaged in the sale and servicing of motor vehicles or the leasing and servicing of motor vehicles.

“(C) THIRD-PARTY SELLER.— For the purposes of subparagraph (A), the term "third-party seller" means any person that sells, offers for sale, or introduces in interstate commerce motor vehicle equipment through a consumer-directed electronically based or accessed platform that such person does not own or operate.”

(b) NOTIFICATIONS OF DEFECTS AND NONCOMPLIANCE.—Section 30118 of title 49, United States Code, is amended in subsection (a) by inserting “and each covered online marketplace allowing for, facilitating, or enabling the sale, offering for sale, or introduction in interstate commerce of the motor vehicle equipment” after “manufacturer of a motor vehicle or replacement equipment.”

(c) IN GENERAL.—Chapter 301 of title 49, United States Code, is amended by inserting after section 30120A the following:

“§ 30120B. Notification and remedy obligations of covered online marketplaces

“(a) IN GENERAL.—No covered online marketplace may allow for, facilitate, or enable the sale, offering for sale, or introduction in interstate commerce of motor vehicle equipment that is subject to a decision under section 30118(b) or a notice required under section 30118(c) in a condition that it may be reasonably used for its original purpose unless—

“(1) the defect or noncompliance is remedied as required by this title before the sale, offering for sale, or introduction in interstate commerce of the equipment; or

“(2) notification of the defect or noncompliance is required under section 30118(b) but enforcement of the order is set aside in a civil action to which section 30121(e) applies.

“(b) RECALL ORDERS.— The Secretary of Transportation shall order a covered online marketplace to give notification of and remedy defective or noncompliant motor vehicle equipment that was sold, offered for sale, or introduced in interstate commerce through the covered online marketplace if the Secretary—

“(1) makes a final decision under section 30118(b) that the motor vehicle equipment—

“(A) contains a defect related to motor vehicle safety; or

“(B) does not comply with an applicable motor vehicle safety standard prescribed under this chapter; or

“(2) receives a notification under subsection 30118(c) from the manufacturer of the motor vehicle equipment.

“(c) EXEMPTIONS.— A covered online marketplace shall not be required to comply with the requirement in subsection (a) or an order issued under subsection (b) with respect to a defective or noncompliant motor vehicle equipment if the Secretary decides under subsection 30118(d) that the defect or noncompliance is inconsequential to motor vehicle safety.

“(d) REMEDIES.—

“(1) IN GENERAL.— A covered online marketplace issued an order under subsection (b) shall remedy the defect or noncompliance by providing or facilitating, including through third-party sellers—

“(A) any of the following remedies the covered online marketplace chooses—

“(i) the replacement of the motor vehicle equipment without charge to the first purchaser; or

“(ii) a refund of the total purchase price, including the cost of shipping and handling, to the first purchaser; and

“(B) reimbursement for the reasonable and necessary expenses of repairing or replacing the equipment to a first purchaser who incurred such expenses within a reasonable time in advance of the notification under subsection (e).

“(2) TIMELINE.— The covered online marketplace shall remedy the defect or noncompliance as soon as practicable, but not later than 15 days after giving a notification required under subsection (e) of such defect or noncompliance.

“(3) NONAPPLICATION.—

“(A) PURCHASE PERIOD.— The requirement that a remedy be provided without charge does not apply if the motor vehicle equipment was bought by the first purchaser more than 15 calendar years before the Secretary issues the covered online marketplace an order under subsection (b).

“(B) APPEALS.— This subsection does not apply during any period in which enforcement of an order under subsection (b) is restrained or the order is set aside in a civil action to which section 30121(e) of this title applies.

“(e) NOTIFICATION.—

“(1) NOTIFICATION.—

“(A) IN GENERAL.— A covered online marketplace issued an order under subsection (b) shall give notification of the defect or noncompliance—

“(i) to the first purchaser, if such purchaser’s contact information is reasonably ascertainable, by—

“(I) electronic means, including electronic mail and alerts transmitted through a covered online marketplace; or

“(II) first-class or certified mail; or

“(ii) by public notice in the way required by the Secretary if the Secretary determines that such public notice is required for motor vehicle safety; or

“(iii) in a manner otherwise prescribed by the Secretary by regulation.

“(B) DETERMINATION.— In making a determination under clause (A)(ii), the Secretary shall consider—

“(i) the magnitude of the risk to motor vehicle safety caused by the defect or noncompliance; and

“(ii) the cost of public notice compared to the additional number of first purchasers the notice may reach.

“(2) CONTENT.—The notification shall contain—

“(A) a clear description of the defect or noncompliance;

“(B) the measures to be taken to obtain a remedy of the defect or noncompliance;

“(C) a statement that the covered online marketplace giving notice will provide or facilitate the remedy of the defect or noncompliance without charge to the first purchaser, as required by subsection (d);

“(D) the earliest date on which the defect or noncompliance will be remedied without charge to the first purchaser under subsection (d);

“(E) the procedure the recipient of a notice is to follow to inform the Secretary when a covered online marketplace does not remedy the defect or noncompliance under subsection (d);

“(F) a statement that it is unlawful to sell or lease the defective or noncompliant motor vehicle equipment under subsection 30120(j);

“(G) instructions on disposing of the equipment, rendering the equipment to a condition that it cannot be reasonably used for its original purpose, or otherwise preventing the equipment from being sold, offered for sale, or introduced into interstate commerce; and

“(H) any other information the Secretary prescribes by regulation.”

“(3) TIMING FOR NOTIFICATION.— Notification required under this subsection shall be given within 15 days, or within a reasonable time prescribed by the Secretary, after the covered online marketplace is issued the order described in subsection (b).

“(4) ADDITIONAL NOTIFICATIONS.— If the Secretary decides that a notification sent by a covered online marketplace under this section has not resulted in an adequate number of motor vehicle equipment being remedied, the Secretary may order the covered online marketplace to send additional notifications.

“(f) RECALL REPORT.—

“(1) IN GENERAL.— Not later than 5 working days after receiving an order under subsection (b), the covered online marketplace shall submit to the Secretary a recall report including—

“(A) the third-party seller of the motor vehicle equipment subject to the order;

“(B) a description of the items of motor vehicle equipment subject to the order;

“(C) the total number of defective or noncompliant motor vehicle equipment subject to the order that have been sold, offered for sale, or introduced into interstate commerce through the covered online marketplace.

“(D) a description of the program of the covered online marketplace for remedying the defective or noncompliant motor vehicle equipment subject to the order;

“(E) the estimated dates upon which the covered online marketplace will give the notifications under subsection (e) and perform or facilitate a remedy under subsection (d);

“(F) a description of how, to the extent practicable, the covered online marketplace will prevent the sale, offer for sale, and introduction in interstate commerce of the defective or noncompliant motor vehicle equipment subject to the order; and

“(G) any other information the Secretary prescribes by regulation.

“(2) ADDENDUM.— If any of the information described in subparagraphs (1)(C) through (G) is not known to the covered online marketplace 5 working days after the issuance of an order under subsection (b), the covered online marketplace shall submit to the Secretary such information not later than 5 working days after the information becomes known to the covered online marketplace.

“(3) MATERIAL CHANGES.—The covered online marketplace shall submit to the Secretary amendments to the report not later than 5 days after the covered online marketplace knows that the information contained in the report is inaccurate or has materially changed.

“(g) RECALL STATUS REPORT.—

“(1) IN GENERAL.— With respect to an order issued under subsection (b), each covered online marketplace that is giving notification under subsection (e) and performing or facilitating a remedy under subsection (d) shall submit to the Secretary a recall status report including—

“(A) the date notification began and the date completed, if applicable;

“(B) the number of motor vehicle equipment involved in the notification campaign;

“(C) the cumulative number of motor vehicle equipment that has been remedied;

“(D) the cumulative number of offerings for sale of the motor vehicle equipment removed from the covered online marketplace; and

“(E) any other information the Secretary prescribes by regulation.”

“(2) NUMBER OF SUBMISSIONS.—Each covered online marketplace is required to submit a recall status report—

“(A) by the applicable date described in section 573.7(d) of title 49, Code of Federal Regulations (or a successor regulation) for each of 8 consecutive quarters, beginning with the quarter in which the campaign was initiated; and

“(B) for each of the 3 years beginning after the date of completion of the last quarter for which a report was submitted under subparagraph (A).

“(h) PUBLIC AVAILABILITY.—The Secretary shall publish each report or amendment to a report described in subsections (f) and (g) in the Federal Register not later than 30 days after receipt of the report or amendment.

“(i) HEARINGS ABOUT MEETING NOTIFICATION AND REMEDY REQUIREMENTS.—

“(1) IN GENERAL.— On the motion of the Secretary or on petition of any interested person, the Secretary may conduct a hearing to decide whether the covered online marketplace has reasonably met the notification and remedy requirements required under this section.

“(2) PRESENTATIONS.— Any interested person may make written and oral presentations of information, views, and arguments on whether the covered online marketplace has not reasonably met the notification or remedy requirements.

“(3) RESOLUTION.—If the Secretary decides that the covered online marketplace has not reasonably met the notification or remedy requirements, the Secretary shall order the covered online marketplace to take specified action to meet those requirements and may take any other action authorized under this chapter.

(d) PROVISIONAL NOTIFICATION AND CIVIL ACTIONS TO ENFORCE.—Section 30121 of title 49, United States Code, is amended—

(1) in paragraph (a)(1)—

(A) by inserting “or covered online marketplace” after “manufacturer”;

(B) by inserting “or under section 30120B(b) of this title” after “section 30118(b) of this title”;

(C) in subsection (A) by inserting “or covered online marketplace” after “manufacturer”;

(D) in subsection (E)—

(i) by inserting “or covered online marketplace” after “manufacturer”; and

(ii) by inserting “or under section 30120B(d) of this title” after “section 30120 of this title”;

(2) in paragraph (a)(2)—

(A) by inserting “or covered online marketplace” after “manufacturer”; and

(B) by inserting “or under section 30120B(e) of this title” after “section 30118(b) of this title”;

(3) in paragraph (b)(1)—

(A) by inserting “or covered online marketplace” after “manufacturer” each place it appears; and

(B) by inserting “or under section 30120B(e) of this title” after “section 30119(c) and (d) of this title”.

(4) in paragraph (b)(2)—

(A) by inserting “or covered online marketplace” after “manufacturer” each place it appears; and

(B) by inserting “or under section 30120B(b) of this title” after “section 30118(b) of this title”;

(5) in subsection (c), by inserting “with respect to a manufacturer” after “subsection (a) of this section”;

(6) by redesignating subsection (d) as subsection (e);

(7) by inserting before subsection (e) (as so redesignated) the following—

“(d) ORDERS TO COVERED ONLINE MARKETPLACES.—If the Secretary prevails in a civil action referred to in subsection (a) of this section with respect to a covered online marketplace, the Secretary shall order the covered online marketplace—

“(1) to notify each first purchaser described in section 30120B(e) of this title of the outcome of the action and other information the Secretary requires, and notification under this subsection may be combined with notification required under section 30120B(e) of this title;

“(2) to specify the earliest date on which the defect or noncompliance will be remedied without charge to the first purchaser under section 30120B(d); and

“(3) if notification was required under subsection (a) of this section, to reimburse a first purchaser for reasonable and necessary expenses (in an amount that is not more than the amount specified in the order of the Secretary under subsection (a)) incurred for repairing or replacing the defective or noncompliance during the period beginning on the date that notification was required to be issued and ending on the date the first purchaser receives the notification under this subsection.”;

(8) in subsection (e) (as so redesignated)—

(A) by inserting “or under section 30120B(b) of this title” after “section 30118(b) of this title”;

(B) by inserting “or covered online marketplace” after “manufacturer”; and

(C) by striking “under section 30118(b) shall be consolidated” and inserting “under section 30118(b) or under section 30120B(b) shall be consolidated”.

(e) ACTIONS BY THE ATTORNEY GENERAL.—Section 30163 of title 49, United States Code, is amended—

(1) in subsection (a);

(1) by striking “and” in paragraph (1);

(2) by striking “.” and inserting “; and” in subparagraph (2)(B) ;

(3) by adding at the end the following—

“(3) the allowance, facilitation, or enabling of the sale, offering for sale, or introduction in interstate commerce of motor vehicle equipment through a covered online marketplace if the equipment is subject to a decision under section 30118(b) or a notice required under section 30118(c).”

SECTION 3. EFFECTIVE DATE.

This Act shall take effect on the date that is 1 year after the date of enactment of this Act.



NEW JERSEY STATE **AFL-CIO**

10/30/25

Dear

Representative:

Please Oppose HR-1566: Right to Repair Act

On behalf of our affiliated union, the International Association of Machinists and Aerospace Workers (IAMAW), we respectfully ask you to vote “no” on this bill if it comes before you for consideration.

In September 2025, the New Jersey State Legislature unanimously passed S-3309, and it was subsequently signed into law by Governor Murphy. This law ensures proper wages for auto mechanics. HR-1566, commonly known as the REPAIR Act, would significantly hinder the effectiveness of this new law.

Before the enactment of this state law, auto manufacturers paid mechanics a significantly lower rate – approximately 40% less – for warranty work as compared to what customers paid for the same exact repair for an out-of-warranty vehicle at auto dealerships.

The REPAIR Act (sponsored by Rep. Neil Dunn: R-FL) would undermine this state law because it would allow independent repair shops to perform work and repairs on customers’ vehicles and be compensated by the manufacturer at a lesser rate.

The existing pay structure should remain intact and not be negatively impacted by the REPAIR Act.

We appreciate your consideration of our position on this important legislation and respectfully ask you to vote “no” if it comes before the House of Representatives for a vote.

In Unity,



Charles Wowkanech
President



Laurel Brennan
Secretary-Treasurer

“The Voice for Working Families in New Jersey”

This email was sent to lward@njafcio.org

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NJ State AFL-CIO · 106 West State St. · Trenton, NJ 08608-1102 · USA

January 12, 2026

The Honorable Brett Guthrie
Chair
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Frank Pallone, Jr.
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

Dear Chair Guthrie and Ranking Member Pallone,

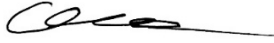
The National League of Cities remains committed to providing substantial feedback to the Energy and Commerce Committee to improve the Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution (SELF DRIVE) Act of 2026. With thousands of autonomous cars driving on city streets and passenger rides increasing every day, America's cities have gained extensive practical understanding of how autonomous vehicles can integrate into roads today and where regulatory blind spots are causing clear risks to public safety without appropriate accountability. We appreciated the opportunity to provide the Committee input directly from first responders and local authorities who have significant experience with AV operations, yet further work is needed.

As state and local government associations have shared with this Committee during previous Congressional sessions where SELF DRIVE was discussed and set aside, overly broad preemption will not advance autonomous vehicles safely. While the regulation of motor vehicle safety standards should remain a federal obligation, state and local governments are the primary authorities concerning operational safety, including regulating the operation of motor vehicles after such vehicles have been constructed, the operators of those motor vehicles, as well as the rules of the road governing how motor vehicles are required to be safely operated on public roadways.

As incubators of innovation and the level of government closest to the people, local governments must retain the authority to initiate the necessary choices that best serve constituents and protect local public safety, privacy, and efficiency of the road network as new technologies like autonomous vehicles develop over time. The SELF DRIVE Act as currently written will not ensure that autonomous vehicles consistently and reliably follow the rules of the road and are held accountable for safe operations in our communities.

We support a competitive American economy that embraces technology improvements including autonomous vehicles, but we must integrate them in a manner that ensures safe operations which is the role of states and local governments.

Sincerely,

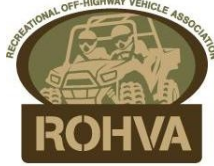
A handwritten signature in black ink, appearing to read 'Clarence E. Anthony', with a long horizontal stroke extending to the right.

Clarence E. Anthony
CEO and Executive Director

cc: Members of the House Energy and Commerce Committee



**MOTORCYCLE
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January 11, 2026

The Honorable Jan Schakowsky
Ranking Member, House Energy &
Commerce Subcommittee on Commerce,
Manufacturing, and Trade
2323 Rayburn House Office Building
Washington, DC 20515

RE: Exclude Motorcycles from H.R. 1566, the Right to Equitable and Professional Auto Industry Repair (REPAIR) Act

Dear Ranking Member Schakowsky:

The Motorcycle Industry Council (MIC)¹, the Specialty Vehicle Institute of America (SVIA)², and the Recreational Off-Highway Vehicle Association (ROHVA)³ represent several hundred companies in the powersports industry. H.R. 1566 will be considered on January 13 at the House Energy and Commerce Subcommittee on Commerce, Manufacturing, and Trade. We urge that H.R. 1566, the REPAIR Act, be **amended to specifically exclude motorcycles and off-highway vehicles from the scope of the provisions**. In the absence of an amendment, our organizations oppose the bill.

Our member companies have several problems and concerns with including motorcycles and off-highway vehicles in motor vehicle right-to-repair legislation:

1. Motorcycles are excluded from the Massachusetts right to repair law, which appears to be the law on which this legislation is based.
2. Non-factory trained technicians working on motorcycles and off-highway vehicles is a serious safety concern, as is the litigation risk of untrained individuals performing work on such vehicles.
3. Franchised dealers, which are largely small businesses, will be economically harmed by H.R. 1566.
4. H.R. 1566 introduces dangerously broad language that threatens the foundation of American manufacturing.
5. National Highway Traffic Safety Administration (NHTSA) believes the Massachusetts right to repair law “poses significant safety concerns.”

Motorcycles are excluded from the Massachusetts right to repair law

It appears to be the intent of motor vehicle right to repair legislation to model such legislation after the Massachusetts right to repair law. Motorcycles were ultimately excluded from the Massachusetts right

¹ The Motorcycle Industry Council (MIC) is a not-for-profit, national trade association representing several hundred manufacturers, distributors, dealers and retailers of motorcycles, scooters, motorcycle parts, accessories and related goods, and allied trades.

² The Specialty Vehicle Institute of America (SVIA) is the national not-for-profit trade association representing manufacturers, dealers, and distributors of all-terrain vehicles (ATVs) in the United States. SVIA’s primary goal is to promote safe and responsible use of ATVs.

³ The Recreational Off-Highway Vehicle Association (ROHVA) is a national, not-for-profit trade association formed to promote the safe and responsible use of recreational off-highway vehicles (ROVs – sometimes referred to as side-by-sides or UTVs) manufactured or distributed in North America. ROHVA is also accredited by the American National Standards Institute (ANSI) to serve as the Standards Developing Organization for ROVs. More information on the standard can be found at <https://rohva.org/ansi-standard/>.

to repair law (and automobile MOU) because they are different than automobiles in terms of the diagnostic connector standard mandated by motor vehicle right to repair laws. Motorcycles, ATVs and ROVs often cannot comply with provisions typically included in motor vehicle right to repair legislation due to factors such as different (or non-existing) data ports. Automobiles, on the other hand, have uniform ports on their vehicles. Other state legislators recognize this difference and specifically excluded motorcycles from the definition of motor vehicle for purposes of the right to repair law ([Chapter 93K](#)). Off-highway vehicles are also excluded from the Massachusetts law because it applies only to on-highway motor vehicles.

New York and Minnesota also recently passed right to repair legislation which specifically excluded motorcycles, ATVs and off-highway vehicles. We urge Congress to follow the lead of those states by excluding motorcycles and off-highway vehicles from H.R. 1566 as follows:

(8) Motor Vehicle. – The term “motor vehicle” has the meaning given such term in section 30102(a) of title 49, United States Code, but excludes motorcycle, motorized bicycle, all-terrain vehicle, and off-highway recreational vehicle, and of the term “motor vehicle trailer” in section 390 of title 49, Code of Federal Regulations.

Safety and Litigation Concerns

Serious safety concerns exist relating to the inherent danger of allowing non-factory trained technicians, untrained mechanics, and owners to perform certain work on motorcycles and off-highway vehicles if they are captured under any right to repair legislation. This is particularly of concern during the warranty period where dealers and manufacturers need to know exactly what repairs were done or attempted in order to ensure compliance with warranties. Today’s vehicles are highly computerized with systems that control emissions, stability control, antilock brakes, and a host of other activities. Many of these systems are government-mandated in order to ensure proper protection of the vehicle users and to protect against Clean Air Act violations. Untrained individuals or illegal tampering with coding could cause vehicle failure, endanger drivers/riders, and increase emissions in violation of government standards.

Litigation risk is another concern associated with allowing non-factory trained technicians to perform certain work on motorcycles and off-highway vehicles. If environmental or safety override attempts result in clean air violations, destruction of property, injury, or death, and manufacturers are likely to be swept up in lawsuits, regardless of who may be liable for such damage and injuries due to unqualified individuals tampering or attempting repairs.

Small Business Franchised Dealers

H.R. 1566 would harm economically small business franchised dealers. Dealers have invested heavily in training, special tooling, and equipment to service vehicles. Franchised dealers sign a dealer agreement giving them access to service information, technical expertise, and special tools required to diagnose and repair original equipment products. This is a substantial monetary investment. If tools and technical information are provided to customers and unauthorized independent repair shops, the franchised dealer’s investment is compromised.

In 2025, the value of the powersports retail marketplace in the United States was \$51 billion, with an estimated 1.2 million new powersports retail sales and 10,690 powersports retailers. With thousands of powersports retailers across the country, it is certainly difficult to make the case that users of our products do not have access to service and parts when necessary.

Threat to the Foundation of American Manufacturing

Under the guise of right to repair, H.R. 1566 introduces dangerously broad language that threatens the foundation of American manufacturing. We are deeply concerned by provisions prohibiting any design

choice that 'tends to make it more difficult' for aftermarket providers to compete—a standard so vague it invites endless, predatory litigation. This mandate constitutes an unprecedented infringement on property rights, deviating from free-market principles by forcing companies to 'open-source' their intellectual property. By requiring OEMs to share sensitive ECU coding and diagnostic data, H.R. 1566 forces manufacturers to design vehicles to a 'least common denominator' rather than innovating and introducing technologies that set their products apart from the competition. Ultimately, H.R. 1566 places American innovation at risk, stripping away the protections our companies need to maintain a competitive edge against global adversaries like China."

NHTSA Right to Repair Concerns

Although Massachusetts has set the standard on motor vehicle right to repair, in a recent letter to the Counsel for Vehicle Manufacturers⁴, the National Highway Traffic Safety Administration believes the Massachusetts right to repair law "poses significant safety concerns." NHTSA also states in the letter, dated June 13, 2023, that "open access to vehicle manufacturers' telematics offerings with the ability to remotely send commands allows for manipulation of systems on a vehicle, including safety-critical functions such as steering, acceleration, or braking, as well as equipment required by Federal Motor Vehicle Safety Standards (FMVSS)...A malicious actor here or abroad could utilize such open access to remotely command vehicles to operate dangerously, including attacking multiple vehicles concurrently." These points should be considered before proceeding with any right to repair legislation. Imagine if you will a bad actor shutting off a motorcycle that is traveling at highway speed which could cause loss of control of the vehicle resulting in injuries or death. Unlike automobiles with four wheels and plenty of protection around them, a motorcycle the is suddenly shut off – losing stability control, antilock brakes, etc. – would be extremely dangerous.

We support preserving consumer access to high-quality and affordable vehicle repair but not at the expense of placing American innovation at risk, stripping away the protections of U.S. companies, having non-factory-trained technicians, untrained mechanics, and owners perform certain work on motorcycles and off-highway vehicles, which could ultimately lead to product failure, injury, or death. Therefore, we urge you to specifically exclude motorcycles and off-highway vehicles from the provisions of H.R. 1566.

Thank you for considering our comments. Should you have any questions, please contact me at 571-684-6144.

Sincerely,



Scott P. Schloegel
Senior Vice President, Government Relations

⁴ NHTSA letter to the Counsel for Vehicle Manufacturers dated 6-13-23:
<https://www.documentcloud.org/documents/23846414-nhtsa-letter>

Testing & Evaluation Parity for Vehicle Suppliers

A Safety-Focused, Innovation-Enabling Update for the Highway Bill Reauthorization

Vehicle suppliers—auto parts manufacturers—design and build many of the systems that directly determine a vehicle’s safety, efficiency, and performance, including braking systems, emissions controls, sensors, and powertrain components. These technologies must be validated in real-world driving conditions before reaching consumers.

The 2015 FAST Act granted automakers authority to conduct independent testing and evaluation on public roads under controlled and responsible conditions. That authority did not extend to suppliers, even though they develop critical technologies that also require on-road evaluation. As a result, suppliers may only conduct such testing at the national level when partnered with an automaker, slowing safety verification and delaying improvements that benefit consumers.

A federal framework would allow suppliers to do this at their facility locations around the country, which is particularly important as vehicle supplier presence has expanded throughout the United States in recent years.

Expanding federal authority is a narrow, practical update that strengthens safety and supports innovation without altering any existing automaker obligations or exemptions.

Why This Matters for Safety and Consumers

Strengthening Real-World Safety Validation

Many safety-critical systems cannot be fully validated through laboratory or closed-track testing. Controlled access to public roads allows suppliers to evaluate components in the same conditions Americans drive every day—different weather, terrain, road surfaces, and traffic environments. This leads to more complete safety data, faster identification of issues, and technologies that are better prepared to meet federal safety requirements and consumer expectations.

Advancing Innovation

Suppliers are responsible for a significant share of the innovation that improves vehicle safety and performance. Without the ability to independently test on public roads, development slows and consumers wait longer for safety-enhancing technologies. Testing parity would allow suppliers to validate innovations more efficiently while remaining fully accountable under the same controlled framework Congress established for automakers in 2015.

MEMA. The Vehicle Suppliers Association and the National Consumers League support extending this authority to suppliers to ensure that technologies are tested as thoroughly and safely as possible before reaching the public.



INTERNATIONAL UNION OF POLICE ASSOCIATIONS

THE ONLY UNION FOR LAW ENFORCEMENT OFFICERS

SAM A. CABRAL
International President

MICHAEL V. CRIVELLO
International Secretary-Treasurer

January 9, 2026

The Honorable Robert Latta
United States House of Representatives
2470 Rayburn House Office Building
Washington, DC 20515

Dear Congressman Latta,

The International Union of Police Associations, AFL-CIO, represents rank and file, active-duty law enforcement professionals across this great nation, including the U.S. territories of Puerto Rico and the Virgin Islands. I write to express our opposition to the **SELF-DRIVE Act** as currently drafted.

While we support responsible innovation, the SELF-DRIVE Act advances large-scale deployment of automated vehicles while weakening accountability, limiting state and local public safety authority, and exposing first responders to unproven operational risks.

The Act designates the automated driving system as the “driver” when engaged, yet fails to provide a practical framework for roadside enforcement, immediate fault determination, or criminal accountability. Officers responding to crashes will face vehicles with no human operator and delayed manufacturer responsibility, undermining established enforcement and judicial processes.

Equally concerning, the Act broadly preempts state and local authority to regulate automated vehicle operations, even when such regulation is necessary to address unique roadway conditions or emergency response realities. Communities should not be stripped of their ability to protect the public and the responders who serve them. Laws that work in Montana will not work in New York City.

The bill relies heavily on manufacturer self-certification to address emergency interaction, despite the absence of standardized responder overrides, guaranteed compliance with

lawful commands, or mandatory real-world testing with police, fire, and EMS personnel. Emergency scenes are unpredictable, and software assumptions are not a substitute for proven operational performance.

Additionally, delayed crash reporting timelines and restricted access to vehicle data hinder timely investigations and accountability. Cybersecurity vulnerabilities further expose responders to vehicles that may be remotely compromised and beyond their control. Finally, the Act permits commercial passenger and freight operations during so-called testing phases, effectively turning public roads into live laboratories without full safety validation or responder sign-off.

For these reasons, we respectfully urge Congress to withhold support for the SELF-DRIVE Act unless it is amended to:

- Establish clear, immediate accountability
- Preserve state and local public safety authority
- Require standardized responder overrides and real-world validation
- Provide immediate access to crash and system data
- Prohibit commercial operations until independent safety validation is complete

Innovation must enhance public safety, not undermine it. We stand ready to work with Congress to develop a framework that supports technological progress while protecting the men and women who respond when technology fails.

Respectfully,



Sam A. Cabral
International President
International Union of Police Associations



January 12, 2026

The Honorable Brett Guthrie
Chair, House Energy & Commerce
Committee
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Frank Pallone
Ranking Member, House Energy & Commerce Committee
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Gus Bilirakis
Chairman, Subcommittee on Commerce,
Manufacturing and Trade
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Jan Schakowsky
Ranking Member, Subcommittee on Commerce,
Manufacturing and Trade
2125 Rayburn House Office Building
Washington, D.C. 20515

Re: Statement for the Record by the Recycled Materials Association – House Energy & Commerce Subcommittee on Commerce, Manufacturing and Trade Hearing, “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership”

Dear Chairman Guthrie, Ranking Member Pallone, Chairman Bilirakis, and Ranking Member Schakowsky,

The Recycled Materials Association (ReMA), the leading organization dedicated to promoting safe, economically sustainable, and environmentally responsible recycling, writes to express concerns with H.R. 5221, the Preventing Auto Recycling Theft (PART) Act. ReMA represents 1,700 companies that play a critical role in supplying recycled materials to U.S. manufacturers, generating \$169 billion in economic impact and supporting nearly 600,000 jobs nationwide in 2024.¹

ReMA is the only national trade association representing the full end-of-life chain of custody for catalytic converters, including auto dismantlers, metal recyclers, downstream processors and smelters. It is estimated that more than 30 million catalytic converters are legally recycled every year – mainly through the recycling of end-of-life automobiles - returning those precious metals back to the manufacturing supply chain. These platinum group metals are critical inputs for a wide range of products, from biomedical supplies to capacitors needed for data center growth, and more.

The recycled materials industry recognizes the significant financial burden and distress that catalytic converter thefts impose on American families and has long worked with state and local governments and law enforcement to prevent these stolen materials from entering the marketplace. While ReMA supports strong, enforceable measures to deter catalytic converter theft, the PART Act as introduced does not fully account for the practical realities of the end-of-life vehicle supply chain or established chain of custody practices. As a result, certain provisions risk unintentionally disrupting legitimate recycling operations and the supply of critical materials without meaningfully strengthening theft prevention or improving enforcement outcomes.

¹ [Economic Impact Study - U.S. Based Recycled Materials Industry, 2024 Executive Summary](#)

While catalytic converter theft imposes real hardship on victims, theft-related material represents a small fraction of the catalytic converters recycled annually, underscoring the importance of targeted enforcement that disrupts criminal activity without impeding legitimate commerce. ReMA members believe that limiting purchase points and clearly defining who may lawfully possess detached catalytic converters are among the most effective ways to eliminate the black market that fuels this crime. Consistent with this approach, and to support these efforts, the industry developed ScrapTheftAlert.com, a voluntary tool that enables law enforcement to quickly notify recyclers of major thefts, share identifying information, and prevent stolen materials from reentering the legitimate supply chain.

Accordingly, ReMA respectfully requests the Committee consider the following targeted changes to ensure the legislation is workable, effective, and advances the shared goal of eliminating catalytic converter theft while reflecting the realities of, and without risking the disruption of, the end-of-life catalytic converter supply chain:

- **Tailor recordkeeping requirements to reflect the practical differences between business-to-business transactions and transactions involving individuals.** This section in particular must be clarified to indicate what information should be transferred at point of sale across the supply chain. Currently, there are 19 states² that have established separate recordkeeping requirements for individual vs. business sellers. Uniform recordkeeping requirements that fail to distinguish between individuals and business-to-businesses transactions would impose unnecessary burdens on lawful commerce without improving theft detection.

1) PURCHASES FROM INDIVIDUALS. — For transactions in which the seller is an individual, the purchaser must maintain a record of the following:

- (A) The name, address, telephone number and a photocopy of a government issued identification of the seller;*
- (B) the make, model, and vehicle identification number (VIN) of the vehicle from which the catalytic converter was removed, if available;*
- (C) a statement signed by the seller attesting that the catalytic converter is not stolen and is free of any liens or encumbrances and the seller has the right to sell it;*

2) PURCHASES FROM BUSINESSES. —For transactions between businesses that lawfully possess a catalytic converter or converter substrate the purchaser must maintain a record of the following:

- (A) a record of the transaction date, location of the transaction, and volume in accordance with the custom of the trade for the type of transaction*

- **Remove the reference to “motor vehicle parts that contain precious metals,”** to ensure the provision remains tailored to catalytic converters. ReMA supports strong, enforceable measures to deter and address catalytic converter theft, however, inclusion of this broader language risks

² AL, AZ, CA, CT, GA, IA, IN, KY, MN, MS, NC, NJ, NV, OK, OR, SC, TN, TX, WI. To note, ME does not set different recordkeeping requirements, but instead requires that catalytic converters be marked when they are removed from a vehicle, with different marking requirements for vehicle recyclers (VIN or the recycler’s license and stock number) vs from other persons (VIN). Additionally, 4 states only allow business sellers: DE, ID, MD, PA.

sweeping in lawful recycling of non-targeted vehicle components and imposing unnecessary compliance burdens on lawful automobile dismantlers and recyclers.

- **Preserve the recycling of catalytic converters, including those that may lack a VIN or Unique Identifying Number.** As drafted, the bill's recordkeeping requirements require the purchaser to obtain "the vehicle identification number or a unique part identification number marked, etched, or engraved on the converter that can be tied directly to the vehicle identification number of the vehicle," "while also including prohibition on the sale of catalytic converters that have had identifying markings "removed or otherwise tampered with." Together, these provisions fail to account for catalytic converters that were manufactured and placed into use prior to the enactment of the bill and its related regulatory requirements.

As a result, lawful catalytic converters that were never marked may be excluded from the legitimate recycling system through no fault of the recycler. While the legislation would require new catalytic converters to be marked with a VIN or Unique Identifying Number at the point of sale, and establishes a grant program to support marking, neither the marking requirements nor the grant program can take effect immediately. Given that vehicles typically take 12-15 years to reach a recycler – and that the average light vehicle on the road today is approximately 12.8 years old³ – there will be a lengthy transition period during which many catalytic converters would remain without marking and could be unintentionally excluded from the recycling system.

- **Reconsider classifying catalytic converters as "major parts" under federal law as it could conflict with – and potentially undermine – existing state frameworks.** Our laboratories of democracy have repeatedly demonstrated both the capacity and willingness to enact, strengthen, and revise catalytic converter laws to deter theft, target bad actors in the supply chain, equip law enforcement with the appropriate tools to investigate and prosecute these crimes, and ensure victims have access to meaningful recourse.

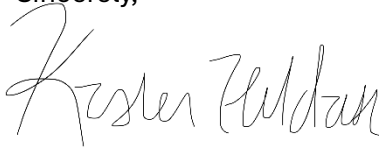
Every state except Wyoming regulates catalytic converter purchases through metals purchase requirements or related statutes, and in each case imposes additional or heightened restrictions beyond those applied to other recycled (or scrap) metal such as unique documentation, proof of ownership, and reporting requirements. The majority of these laws treat catalytic converters as restricted metal property, rather than as automobile parts governed under vehicle dismantling statutes. This very important distinction is a necessary tool for limiting legitimate purchase points that helps limit the black marketplace in which this crime thrives. In direct response to stakeholder concerns, 45 states have updated catalytic converter laws in the last five years. This provision would layer a duplicative federal recordkeeping and enforcement framework on top of an already robust and evolving state system. Even though well-intentioned, an additional federal overlay may complicate investigations and create unnecessary confusion, duplication, and potential loopholes without improving on-the-ground enforcement outcomes for crimes traditionally handled at the state and local level.

³ U.S. Department of Transportation, Bureau of Transportation Statistics, Average Age of Automobiles and Trucks in Operation in the United States (data table, including average age of passenger cars and light trucks), available at <https://www.bts.gov/content/average-age-automobiles-and-trucks-operation-united-states>

A more effective federal approach would support state enforcement efforts, improve information-sharing within law enforcement, and avoid imposing a one-size-fits-all federal transaction regime on a system already regulated at the state level.

ReMA stands ready to work with the Committee to strengthen the PART Act in a manner that effectively deters criminal activity without disrupting legitimate recycling operations or existing state enforcement frameworks. With targeted, practical adjustments, Congress can advance meaningful theft prevention while preserving lawful catalytic converter recycling infrastructure. Should you have any questions or wish to discuss these concerns further, please contact me at khildreth@recycledmaterials.org.

Sincerely,

A handwritten signature in black ink, reading "Kristen Hildreth". The signature is fluid and cursive, with the first name "Kristen" and last name "Hildreth" clearly distinguishable.

Kristen Hildreth
VP of Government Relations & Public Policy

January 12, 2026

The Honorable Gus Bilirakis, Chair
The Honorable Jan Schakowsky, Ranking Member
Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
U.S. House of Representatives
Washington, D.C. 20515

Dear Chair Bilirakis and Ranking Member Schakowsky:

In advance of the upcoming hearing, “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership,” the undersigned urge this Committee to advance proven solutions to improve safety on our Nation’s roadways. We respectfully request this letter be included in the hearing record.

Motor Vehicle Deaths Remain Historically High

America’s roads are moving an ever-increasing number of people and goods.¹ This activity comes with a significant yet preventable human toll as well as infrastructure challenges and a robust price tag. On average, 112 people were killed every day on roads in the U.S., totaling nearly 41,000 fatalities in 2023.² This is a 24 percent increase in deaths in just a decade.³ An additional 2.44 million people were injured.⁴ Early projections for 2024 traffic fatalities remain at a similar historic high level; over 39,000 people are estimated to have been killed that year.⁵

In addition to the physical and emotional repercussions and infrastructure damage due to motor vehicle crashes, the annual economic cost is approximately \$340 billion (2019 dollars).⁶ This figure equates to every person living in the U.S. essentially paying an annual “crash tax” of over \$1,000. Moreover, the total value of societal harm from motor vehicle crashes in 2019, which includes loss of life, pain and decreased quality of life, was nearly \$1.4 trillion.⁷ When adjusted solely for inflation, this figure amounts to over \$1.79 trillion.⁸ Research from the Network of Employers for Traffic Safety (NETS) finds motor vehicle crashes cost employers \$72.2 billion in direct crash-related expenses in 2019.⁹

These devastating crashes impact millions of Americans each year including the families of U.S. Department of Transportation (U.S. DOT) Secretary Duffy and Members of Congress. These tragedies result in long-lasting effects which often are not accounted for in statistics alone. For every single death and serious injury, there is a horrific ripple effect forever changing the lives of children, parents, friends and communities. We know the solutions to meaningfully reduce its impact which includes vehicle safety improvements.

Federal Safety Standards Prevent Motor Vehicle Crashes, Save Lives, Avert Injuries and Reduce Associated Costs

Consumer, public health and safety groups have always enthusiastically championed proven vehicle safety technology and for good reason -- it is one of the most effective strategies for preventing deaths and injuries. According to the National Highway Traffic Safety Administration (NHTSA), “[t]he FMVSS [Federal Motor Vehicle Safety Standards] remain NHTSA’s core way of ensuring that all motor vehicles provide the requisite level of safety performance and provide it within a technical timeframe.”¹⁰ In fact, the agency has estimated that from 1968 through 2019, NHTSA’s safety standards have prevented more than 860,000 deaths, 49 million nonfatal injuries and damage to 65 million vehicles.¹¹ In addition, during that time frame the comprehensive societal benefits amounted to \$17.3 trillion, using 2019 dollars.¹²

In 1991, the bipartisan Intermodal Surface Transportation Efficiency Act (ISTEA)¹³ included a mandate for front seat airbags as standard equipment. As a result, by 1997, every new car sold in the United States was equipped with this technology and the lives saved have been significant. Airbags have saved an estimated 50,457 lives from 1987 to 2017, according to NHTSA.¹⁴ Additional proven lifesaving technologies have been required as standard equipment in all vehicles in other federal legislation and regulatory proposals. They include: tire pressure monitoring systems;¹⁵ rear outboard 3-point safety belts;¹⁶ electronic stability control;¹⁷ rear safety belt reminder systems;¹⁸ brake transmission interlocks;¹⁹ safety belts on motorcoaches;²⁰ rear-view cameras;²¹ safer power window switches;²² advanced driver assistance systems (ADAS);²³ advanced impaired driving prevention technology;²⁴ rear designated seating position alert (hot cars);²⁵ enhanced vehicle hood and bumpers to better protect vulnerable road users;²⁶ and, advanced head lamps.²⁷

The recent regulatory action undertaken by NHTSA to require pedestrian automatic emergency braking (PAEB) on light passenger vehicles is an excellent example of the benefits of requiring effective safety systems on passenger motor vehicles. The agency predicts that PAEB will save 362 lives, mitigate over 24,000 injuries annually and result in a yearly cost benefit of between \$5.8-\$7.2 billion. The Final Rule for PAEB issued in 2024 also noted that the end user price for the safety technology for a popular make and model vehicle, a Toyota Camry, is \$240.24.²⁸ This cost is modest, particularly given the returns on the investment. Moreover, research performed by the Insurance Institute for Highway Safety (IIHS) has found that AEB can reduce front-to-rear crashes with injuries by 56 percent.

Research also demonstrates that lifesaving vehicle safety technologies are not resulting in increased prices for new cars. A 2023 study by Consumer Reports (CR) found that “[c]ommonly reported changes in average transaction prices appear to be primarily driven by shifts toward larger, more expensive SUVs and away from smaller and cheaper cars, rather than from the cost of technology improvements in individual models.”²⁹ As a result, CR concluded that “[t]hese findings prove that regulators can and should be aggressive in ensuring that automakers continue to deliver cost-effective technology improvements that save dollars and lives.”³⁰

Major Contributors of Crashes Must be Addressed with Effective Solutions

We urge this Committee to continue to seek to address the leading contributing factors to motor vehicle crashes. In 2023, alcohol impaired driving resulted in 12,429 people killed;³¹ speeding resulted in 11,775 people killed;³² 10,484 vehicle occupants killed in crashes were unrestrained;³³ and, crashes in which at least one driver was distracted resulted in 3,275 fatalities.³⁴ Additionally, in 2021, the most recent year for which data is available according to the Non-Traffic Surveillance (NTS) system, an estimated 3,990 people were killed in non-traffic motor vehicle crashes, an increase of 26 percent from 2020.³⁵ These issues are persistent, and the solutions are known and available, yet remain underused, underfunded or are not required as standard equipment in vehicles.

Advanced driver assistance systems (ADAS) can mitigate the issues of impairment, speeding, distraction and fatigue

Crashes, including those resultant from some of the leading contributors to fatalities, can be prevented or mitigated by automatic emergency braking (AEB) and other ADAS systems. Research by the Insurance Institute for Highway Safety (IIHS) has demonstrated crash reductions:³⁶

Automatic emergency braking

- ↓ 50% Front-to-rear crashes
- ↓ 56% Front-to-rear crashes with injuries
- ↓ 14% Claim rates for damage to other vehicles
- ↓ 24% Claim rates for injuries to people in other vehicles
- ↓ 41% Large truck front-to-rear crashes

Automatic emergency braking with pedestrian detection

- ↓ 27% Pedestrian crashes
- ↓ 30% Pedestrian injury crashes

Lane departure warning

- ↓ 11% Single-vehicle, sideswipe and head-on crashes
- ↓ 21% Injury crashes of the same types

Blind spot detection

- ↓ 14% Lane-change crashes
- ↓ 23% Lane-change crashes with injuries
- ↓ 7% Claim rates for damage to other vehicles
- ↓ 8% Claim rates for injuries to people in other vehicles

Rear automatic braking

- ↓ 78% Backing crashes (when combined with rearview camera and parking sensors)
- ↓ 9% Claim rates for damage to the insured vehicle
- ↓ 29% Claim rates for damage to other vehicles

Rearview cameras

- ↓ 17% Backing crashes

Rear cross-traffic alert

- ↓ 22% Backing crashes

We urge this Committee to conduct oversight to ensure the U.S. DOT issues the Final Rule for AEB in heavy vehicles and lane departure warning (LDW) and lane keeping assist (LKA) in passenger vehicles, as Congressionally mandated. Additionally, we urge Congress to direct NHTSA to enhance the AEB rule by including bicycle and motorcycle rider detection and response in all lighting conditions. Research conducted by IIHS earlier this year found that clothing which makes pedestrians stand out to human drivers may make them invisible to automated crash prevention systems, so ensuring AEB operates properly in all lighting conditions is essential.³⁷ The Final Rule for AEB in passenger vehicles must be swiftly complied with, absent added delay. We also urge Congress to direct U.S. DOT to issue standards and requirements for other vehicle safety technologies shown by research to reduce crashes and impacts, including as noted by IIHS research, blind spot detection, rear AEB and rear cross traffic alert.

Impaired Driving

In 2019, the total comprehensive cost of drunk driving over the .08 percent blood alcohol concentration (BAC) limit was estimated at nearly \$296 billion.³⁸ Adjusted for inflation only, that amounts to \$373 billion in 2025 dollars.³⁹ The total cost to employers of motor vehicle crashes with an alcohol-impaired employee or dependent driving (both on-the-job and off-the-job) was \$8 billion in 2018 (expressed in 2019 dollars).⁴⁰ Accounting for inflation only, that amounts to over \$10 billion in 2025 dollars.⁴¹

According to NHTSA, between 2011-2020, an average of almost 10,500 people were killed each year due to alcohol impaired driving crashes.⁴² The IIJA directed NHTSA to issue a FMVSS requiring passenger motor vehicles to be equipped with impaired driving prevention technology by 2024.⁴³ IIHS research estimates that passive impaired driving prevention technology will save more than 10,000 lives each year, once widely deployed.⁴⁴ The agency issued an Advanced Notice of Proposed Rulemaking (ANPRM) in January 2024 but has taken no further regulatory action.⁴⁵ Until NHTSA completes this overdue rulemaking, lives will continue to be needlessly lost, injuries suffered and associated costs expended. We urge this Committee to conduct oversight in furtherance of advancing this Congressional mandate.

Speeding

Speeding-related crashes cause \$46.4 billion in economic costs and \$225 billion in comprehensive costs (2019).⁴⁶ These costs account for 14 percent of all economic costs and 16 percent of all societal harm (measured as comprehensive costs) from motor vehicle crashes.⁴⁷ If these costs were updated for inflation alone, in 2025 they would equate to \$58.6 billion in economic costs and \$284 billion in comprehensive costs.⁴⁸ Speeding-related crashes cost employers nearly \$10 billion in 2018 (expressed in 2019 dollars); the majority are a result of off-the-job crashes.⁴⁹ If this cost were updated for inflation alone, in 2025 it would equate to \$12.6 billion.⁵⁰

Excess speed can contribute to both the frequency and severity of motor vehicle crashes. At higher speeds, additional time is required to stop a vehicle, and more distance is traveled before corrective maneuvers can be implemented. Speeding reduces a driver's ability to react to emergencies created by driver inattention, unsafe maneuvers of other vehicles, roadway hazards, vehicle issues (such as tire blowouts) or perilous weather conditions. Increases in speed also can mean life or death for vulnerable road users (VRUs) who lack the protective structure of a vehicle. While many drivers have a proclivity to exceed posted speed limits or may approve of higher speed limits, AAA has found that raising speed limits leads to a very minimal reduction in time on the road noting, "Raising speed limits is often thought of as a way to improve traffic flow and to allow drivers to get to their destinations more quickly. However, AAA research shows that driving at higher speeds increases risk which can outweigh the potential benefits of saving a few minutes of time."⁵¹

Intelligent speed assistance (ISA) can provide information to drivers about present speed limits, warn drivers when a vehicle speed is above the limit, prevent a vehicle from exceeding the speed limit, or maintain a set speed.⁵² The U.S. DOT Volpe Center released research, “New York City Intelligent Speed Assistance Pilot Evaluation,” in 2024 which showed “ISA produced a 64 percent reduction in overall speeding and an 82 percent decrease on high-speed roads.”⁵³ The IIHS found that more than “60% of drivers would find it acceptable if their vehicle provided an audible and visual warning when they exceeded the posted speed limit.”⁵⁴ The National Transportation Safety Board (NTSB) has recommended that NHTSA require ISA in all new vehicles that, at a minimum, warns drivers when they exceed the speed limit. States have already started acting on this technology; Washington State, Virginia and the District of Columbia have enacted laws for ISA use for repeat and/or extreme speeding offenders. All states should be incentivized to follow suit in the next surface transportation reauthorization bill.

Occupant Protection

Seat belt use is a proven lifesaver. From 1975 to 2019, seat belts prevented over 403,000 fatalities and saved society approximately \$2.5 trillion in economic costs.⁵⁵ Seat belts serve as the first line of defense against injury or death for vehicle occupants when crashes occur. According to NHTSA, the combination of an airbag plus a lap and shoulder belt reduces the risk of death in frontal crashes by 61 percent.⁵⁶ Sadly, for passenger vehicle occupant fatalities in 2023, it is estimated that nearly half (49 percent) were unrestrained.⁵⁷

Seat belt reminder systems have been proven to improve seat belt use and save lives.⁵⁸ Congress as part of the Moving Ahead for Progress in the 21st Century Act (MAP-21) directed NHTSA to amend federal safety standards to require these systems in the rear seats of passenger vehicles (previously these systems were only required for the front driver’s seat although most automakers also equipped the front passenger seat).⁵⁹ NHTSA recently issued a Final Rule requiring a seat belt use warning system for rear seats by September 1, 2027. The rule also updates and enhances the current seat belt warning requirements for the driver’s seatbelt and extends these requirements to the front outboard passenger seat by September 1, 2026.⁶⁰ We urge the Committee to conduct oversight to ensure it is implemented without delay to improve vehicle occupant safety.

Distracted Driving

Crashes in which at least one driver was identified as being distracted imposed an economic cost of \$98.2 billion in 2019.⁶¹ Adjusted for inflation only, that amounts to \$123.9 billion in 2025 dollars.⁶² In 2018, distracted driving crashes cost employers nearly \$19 billion.⁶³

Driver distraction is known to be a major contributor to motor vehicle crashes.⁶⁴ However, the true impact of distracted driving remains unclear due to issues with the underreporting of crashes involving distraction, including differences in police crash report coding and database limitations.⁶⁵

In 2023, over two trillion text and multimedia messages were sent or received in the U.S. Mobile wireless data traffic has risen dramatically over the last decade, from 3 trillion megabytes in 2010 to 100.1 trillion in 2023.⁶⁶ Research has shown that because of the degree of cognitive distraction these devices cause, the behavior of drivers using mobile phones (whether handheld or hands-free) is equivalent to the behavior of drivers at the threshold of the legal limit for alcohol in most states (0.08 percent BAC).⁶⁷ Crash risk increases dramatically – as much as four times higher – when a driver is using a mobile phone, with no significant safety difference between handheld and hands-free phones observed in many studies.⁶⁸ A study by the Virginia Tech Transportation Institute found that text messaging increased the risk of a safety-critical driving event (i.e., crashes, near-crashes, crash-relevant conflicts and unintentional lane deviations) by 23.2 times.⁶⁹ Sending or receiving a text message causes the driver's eyes to be off the road for an average of 4.6 seconds. When driving 55 miles per hour (mph), this is the equivalent of driving the entire length of a football field with one's eyes closed.⁷⁰

The IIJA directed U.S. DOT to conduct research regarding the installation and use of driver support systems, also known as driver monitoring systems, to minimize or eliminate driver distraction and automation complacency within three years and report to Congress within six months of the completion of the research.⁷¹ The Euro NCAP is already evaluating these systems including for non-fatigue impairment detection.⁷² In addition, several major automakers include some type of driver monitoring/ driver support technologies in their vehicles sold in the U.S. We urge the Committee to use its oversight authority to ensure the U.S. DOT releases the study and commences and completes rulemaking.

Vulnerable Road User (VRU) Safety

Crashes involving pedestrians resulted in \$17.6 billion in economic costs and \$112.5 billion in comprehensive costs in 2019.⁷³ Accounting for inflation alone, this would equate to \$22.2 billion in economic costs and \$142 billion in comprehensive costs in 2025.⁷⁴ Crashes involving bicyclists resulted in \$5.6 billion in economic costs and \$32.2 billion in comprehensive costs in 2019.⁷⁵ Accounting for inflation alone, this would equate to \$7 billion in economic costs and \$40.6 billion in comprehensive costs in 2025.⁷⁶

Lack of conspicuity is a roadway safety issue, especially for VRUs. Of the 7,522 pedestrians killed in traffic crashes in 2022, 78 percent occurred in dark conditions.⁷⁷ Also in 2022, there were 1,105 pedalcyclists fatalities, and 51 percent occurred in dark conditions.⁷⁸ Improvements to vehicle lighting would afford drivers additional time to identify and respond accordingly to pedestrians, bicycle riders and other VRUs in the roadway. The IIJA directed U.S. DOT to issue a Final Rule updating the headlamp standard (FMVSS 108) and permitting adaptive driving beam (ADB) headlamps within two years. ADB headlights are a lighting technology which uses headlight beam modification to increase illumination of the road while avoiding glare to other traffic. While the U.S. DOT has taken action to allow use of ADB, it should improve the standard and require them.⁷⁹ This action has been recommended by the NTSB and others.⁸⁰ According to IIHS, 44 percent of headlight systems tested on model year 2024 vehicles earned a good rating.⁸¹ About 23

percent of the systems tested were rated marginal or poor because of inadequate visibility, excessive glare from low beams for oncoming drivers, or both.⁸² Ensuring that the U.S. DOT takes action to improve the headlamp standard and advance a requirement should be pursued by the Committee.

Additionally, the IIJA included a provision directing NHTSA to issue a Notice for Public Comment on updating hood and bumper standards for passenger vehicles to “to reduce the number of injuries and fatalities suffered by pedestrians, bicyclists, or other vulnerable road users.”⁸³ In September 2024, NHTSA issued a Notice of Proposed Rulemaking (NPRM) to establish a new FMVSS to ensure passenger vehicles are designed to mitigate the risks of serious injuries and fatalities in crashes involving pedestrians including children.⁸⁴ The standard proposed in the NPRM would save 67 lives annually with the benefits far outpacing the costs by establishing test procedures simulating a head-to-hood impact and performance requirements to minimize the risk of head injury.⁸⁵ While this is a step in the right direction, we urge the Committee to ensure that the U.S. DOT pursues a comprehensive upgrade.

Annually, motorcycle crashes cost nearly \$17 billion in economic impacts and \$107 billion in societal harm as measured by comprehensive costs based on 2019 data.⁸⁶ Accounting for inflation alone, in 2025, this would equate to over \$21 billion in economic impacts and over \$135 billion in societal harm.⁸⁷ Serious injuries and fatalities accounted for 83 percent of total comprehensive costs of motorcycle crashes, compared to 60 percent of the total comprehensive costs of all motor vehicle crashes.⁸⁸

Motorcycle riders continue to be overrepresented in fatal traffic crashes.⁸⁹ IIHS evaluated on-road data and found motorcycle anti-lock braking systems (ABS) were associated with a 22 percent reduction in the rate of fatal crash involvements.⁹⁰ Requiring ABS as standard equipment via a FMVSS on new motorcycles will prevent and mitigate crashes. European Union General Safety Regulation (EU GSR) has required ABS fitment on motorcycles since 2016. IIHS most recently filed a Petition for Rulemaking to require ABS on motorcycles with NHTSA in 2023.⁹¹ We urge the Committee to pursue a standard for this safety improvement in the next surface transportation reauthorization.

Child Passenger Safety

Since 1990, over 1,100 unattended children have been killed in “hot cars,” and 7,500 more have been injured.⁹² Cost effective technology exists to prevent these tragedies now. The IIJA directed U.S. DOT to issue a Final Rule within two years requiring all new passenger motor vehicles weighing less than 10,000 pounds to be equipped with a system to alert the operator to check rear-designated seating positions after the vehicle engine or motor is deactivated by the operator. The U.S. DOT has not taken regulatory action and should issue a Final Rule which requires the system to detect occupants in the entire passenger compartment rather than rely on reminder systems which are less effective. Of note, Euro New Car Assessment Program (NCAP) added testing of child detection systems in 2023 (protocol), and from 2025 onwards will only be assigning points for direct sensing

systems.⁹³ We urge the Committee to direct U.S. DOT to comprehensively elevate NCAP and minimally adopt protocols from global NCAPs which have advanced beyond the U.S. program.

Automated Driving System (ADS) Safety

In addition to having the potential to save lives now, crash avoidance technologies may be foundational building blocks for a potentially automated driving future. An ADS equipped vehicle which includes autonomous vehicles (AV), will, depending upon its level, need to detect and respond to all road users, vehicles and infrastructure in the roadway environment in all lighting conditions and speeds (AEB), to monitor blind spots and take appropriate action (blind spot detection with intervention), to stay within its lane of traffic (LKA), to obey speed limits (ISA), and to know if the vehicle is occupied (occupant detection), especially if deployed as a shared system, among other responsibilities. We urge this Committee to advance safeguards for vehicles equipped with an ADS to ensure that they only operate on roadways and in scenarios for which they are designed to safety do so.

Thank you for your consideration of these issues. We look forward to working with you to address the public health crisis of motor vehicle crashes.

Sincerely,

Advocates for Highway and Auto Safety

America Walks

American Public Health Association

Center for Auto Safety

Christopher King Foundation

Citizens for Reliable and Safe Highways

Consumers for Auto Reliability and Safety

Consumer Federation of America

DRIVE SMART

Emergency Nurses Association

Families for Safe Streets

Families for Safe Streets Greater
Philadelphia

Families for Safe Streets San Diego

GreenLatinos

Joan Claybrook, Former NHTSA
Administrator

Kids and Car Safety

League of American Bicyclists

Missouri Bicycle & Pedestrian Federation

National Campaign for Transit Justice

National Coalition for Safer Roads

Northern Virginia Families for Safe Streets

Parents Against Tired Truckers

The White Line

Public Citizen

Transport Workers Union of America

Rails to Trails Conservancy

Trauma Foundation

Ride Illinois

Truck Safety Coalition

Safe Routes Partnership

Vision Zero Network

StopDistractions.org

cc: The Honorable Brett Guthrie, Chair, Committee on Energy and Commerce
The Honorable Frank Pallone, Ranking Member, Committee on Energy and Commerce
Members of the Subcommittee on Commerce, Manufacturing, and Trade

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The SELF DRIVE Act

The SELF DRIVE Act from Representatives Bob Latta and Debbie Dingell is bipartisan, groundbreaking legislation that enhances safety, strengthens U.S. technological competitiveness, expands mobility, and grows American jobs.

Need to Know

- Establishes appropriate federal and state authority to regulate autonomous vehicles. More than half of U.S. states have autonomous vehicle deployment statutes and these laws will remain in force going forward, providing states an important role in AV regulation as the federal government moves forward on vehicle design and performance policy.
- Raises the bar on safety of autonomous vehicles by requiring that the National Highway Traffic Safety Administration (NHTSA) enact federal rules requiring a safety case and establishing driving competency requirements.
- Promotes vehicle accessibility for people with disabilities by modernizing AV design regulations on manual controls, which will facilitate the development of next-generation vehicle platforms that better serve Americans.
- Strengthens autonomous vehicle incident reporting by enshrining requirements in statute, requiring NHTSA to codify particular requirements, and establishing information sharing with state transportation authorities.

Key Provisions in the SELF DRIVE Act

Section 3 requires manufacturers of automated driving systems (ADS) and ADS-equipped vehicles to develop and document a formal “safety case” before selling or importing those systems or vehicles in the U.S. It creates a mandatory, enforceable framework for automated driving systems, shifting ADS oversight toward documented, reviewable safety justifications before these systems can be sold or deployed in the U.S. Section 3 also defines what a required “safety case” for an automated driving system (ADS) must contain and sets minimum competencies an ADS must demonstrate.

Section 3 establishes a new National AV Safety Data Repository to formalize and standardize ADS incident and mileage reporting, improves federal and state access to safety data, and replaces the current crash reporting requirements with a permanent regulatory system.



The SELF DRIVE Act

Section 3 establishes cybersecurity protections by requiring a written cybersecurity plan describing how the manufacturer detects, prevents, and responds to cyberattacks, unauthorized intrusions, and malicious vehicle control commands. It also requires oversight and congressional reporting on the implementation of federal rules protecting the cybersecurity and supply chain security of connected vehicles.

Section 3 ensures that ADS-dedicated vehicles carrying human occupants include a way for occupants to command a safe stop and exit, while preventing regulators from forcing traditional human-driver controls onto ADS-dedicated vehicles.

Section 4 modernizes federal law around testing and evaluation to accommodate automated driving systems, allows carefully controlled commercial activity as part of testing, and gives the U.S. Department of Transportation tools to prevent testing exemptions from being used as a substitute for full regulatory compliance at scale.

Section 5 allows ADS-equipped vehicles to temporarily deactivate human-driver controls during automated operation, without violating “make inoperative” rules, while preserving the requirement that human control can be promptly restored and that overall ADS safety requirements are met.

Section 6 protects the security of connected vehicles by requiring that the Secretary of Commerce review the implementation of the final rule, Securing the Information and Communications Technology and Services Supply Chain, and briefing congressional committees following that review.

The SELF DRIVE Act is a massive step forward for American autonomous vehicle leadership. AVIA encourages strong support of the legislation.

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Marcus Umlauff
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* Executive Committee

January 12, 2026

Congressman Gus Bilirakis
Chairman
Subcommittee on Commerce,
Manufacturing, and Trade
2125 Rayburn House Office
Building Washington, DC 20515

Congresswoman Jan Schakowsky
Ranking Member
Subcommittee on Commerce,
Manufacturing, and Trade
2322 Rayburn House Office
Building Washington, DC 20515

RE: H.R. 6688, the "ADAS Functionality and Integrity Act"

Dear Chairman Bilirakis, Ranking Member Schakowsky, and Members of the Subcommittee:

Thank you for holding this important hearing on "Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership." I write on behalf of the Specialty Equipment Market Association (SEMA) and its 7,000 members in support of H.R. 6688, the "ADAS Functionality and Integrity Act," an important, bipartisan bill to ensure that vehicle owners and automotive businesses can properly and safely customize, modify, and calibrate motor vehicles with advanced driver assistance systems (ADAS).

ADAS is increasingly available throughout our nation's fleet of vehicles, with most new cars, trucks, and SUVs now featuring some advanced safety systems, such as forward collision warning (FCW), lane departure warning (LDW), and automatic emergency braking (AEB). Each automaker has their own way of implementing this new technology, whether through cameras, radar, LiDAR, or ultrasonic sensors. What remains consistent across the various ways of incorporating ADAS into a vehicle is the crucial step of calibrating and testing these systems to ensure they remain fully functional, thereby keeping drivers, passengers, other drivers, and pedestrians safe.

H.R. 6688 is integral to ensuring that ADAS is properly calibrated and tested for the full lifecycle of the vehicle, including when owners modify or customize their vehicles. The sensors and cameras that support ADAS can be taken out of calibration from everyday driving (such as hitting a pothole); post collision repair; and when common modifications are made, including the addition of bike racks, wraps to advertise a business, adjusting a vehicle's ride height to navigate difficult terrain on a farm or ranch, or other changes to the external profile to upgrade bumpers, lights, or add a snowplow.

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Millions of Americans modify and customize their vehicles to enhance their vehicles' safety, performance, and comfort. Their reasons for modifying vary. For some, it's a means for doing business and earning a livelihood; for others, it's how they recreate or express themselves. **Regardless of their needs and preferences, it is imperative that evidence-based calibration and testing procedures are in place to ensure that ADAS is properly functioning for the protection of people both inside and outside the vehicle.**

Currently, ADAS calibration and testing procedures are only available for stock vehicles, which haven't been altered since coming off the assembly line. Now is the time to address the information gap in ADAS functionality to ensure that modified and customized vehicles can be properly calibrated and tested, which H.R. 6688 will help accomplish.

It cannot be overstated how our nation's ability to support existing ADAS in our national fleet is a crucial step toward the safety of autonomous vehicles (AVs) and the public's future, wide adoption of these next-generation vehicles.

SEMA thanks Representative Diana Harshbarger and original sponsors Representatives Jay Obernolte, Gabe Vasquez, and Norma Torres for introducing the ADAS Functionality and Integrity Act. Their bill requires the National Highway Traffic Safety Administration (NHTSA) to create guidelines for model year 2028 and future vehicles that outline modification ranges and tolerances that maintain ADAS functionality. It also requires NHTSA to create test procedures to ensure vehicle service providers can properly calibrate ADAS.

SEMA strongly supports H.R. 6688, which is a critical step toward ensuring the safety of Americans on our nation's roads and highways.

Background on SEMA

SEMA is a non-profit trade association representing over **7,000 businesses that form the backbone of the specialty automotive aftermarket industry in the U.S.** Our members, many of whom are small businesses, drive innovation through the manufacturing, distribution, sale, and installation of specialty automotive aftermarket parts and components. SEMA is proud to represent an industry that supports over **1.3 million American jobs across every congressional district, while annually contributing \$337 billion to the American economy.** Our industry's scope is seen each year in Las Vegas, when SEMA holds its most well-known for putting on the world-famous Las Vegas SEMA Show, North America's largest trade show, with over 2,500 exhibitors and more than 160,000 industry attendees for a B2B-only showcase of our nation's engineering prowess.

SEMA members produce, sell, and install parts and equipment that enable the American people to modify and customize their vehicles for work and play, improving the safety, performance, and aesthetics of the cars and trucks they rely on each day. From simple

modifications like adding a tow hitch to haul a bike, boat, or camper, to attaching a snowplow to the front of a truck, to wrapping a work van as a way to advertise a small business, aftermarket modifications help the American people to put food on their table and to live their best lives.

I am proud of SEMA's work in helping the automotive aftermarket industry better understand how their products interact with ADAS and the steps needed to ensure the full functionality of these safety systems.

SEMA is the only organization that has dedicated the time, money, and resources to study the impact of modifications on the performance of ADAS. Our commitment to maintaining ADAS performance has been supported by significant financial investment of association funds. This includes the expansion of our SEMA Garage program in 2022, marked by our largest capital expenditure to date, which features a 45,000-square-foot, state-of-the-art engineering facility located outside of Detroit. The SEMA Garage Detroit houses SEMA's ADAS R&D Technology Center, with two dedicated ADAS labs designed to perform OEM-level and independent aftermarket calibrations, along with system diagnostics for both stock and modified vehicles. The SEMA Garage Detroit is the only aftermarket facility of its kind.

Last year, at the Detroit SEMA Garage, we hosted more than 70 professionals from the customization, collision, and repair industries for a robust gathering where stakeholders sought to address the most growing and pressing challenges associated with ADAS calibrations. What resulted was a clear, industry-wide roadmap to ensure ADAS functions safely and reliably in every vehicle, which we've shared with industry leaders, federal regulators, and lawmakers throughout Congress.

The SEMA Garage continues to advance our understanding of how aftermarket modifications impact ADAS performance across popular vehicles, including a series of white papers that look at the performance of ADAS in modified vehicles like the Chevrolet Silverado 1500, Ford F-150, Ford Bronco, Toyota Tacoma, and the Ram 1500. SEMA's research provides clear, data-driven insights into how sensor reliability is influenced by modifications such as lift kits, wheels, and suspension components. These findings help manufacturers, installers, and enthusiasts understand when recalibration is needed to preserve full ADAS functionality and have led to our conclusion that more needs to be done to ensure the proper functionality of these safety systems for the full lifecycle of a vehicle.

ADAS Guidelines for Modified Vehicles Must be Established

ADAS features are standard in most model year (MY) 2026 vehicles, providing peace of mind to safety-conscious consumers and offering the potential to significantly reduce crashes and road fatalities. **According to SEMA's [trend research](#), more than 90% of MY 2023 and newer vehicles are equipped with ADAS features.**

ADAS is a crucial tool for preventing vehicle crashes. However, **there are currently no**

standard procedures for automotive businesses to follow to properly test ADAS in modified vehicles, ensure calibration is complete and successful, or even determine when and whether calibration is necessary. Without reasonable pathways to calibrate, test, and validate ADAS functionality in modified vehicles, owners will not fully benefit from this technology.

ADAS sensors and cameras are subject to degradation and misalignment over time and can be impacted by even the most common modifications, such as adding bike racks, wrapping a vehicle, adding a winch to the front bumper, or lifting a vehicle to navigate rocky terrain, which is especially important for driving on farms, ranches, and other off-road environments. Given that common modifications, which have been relied upon for decades by millions of Americans, can impact ADAS features, such as FCW, LDW, and AEB, **now is the time for NHTSA to create guidelines that ensure vehicle owners and their automotive professionals have the information needed to maintain the safety and performance integrity of ADAS.** This includes having clear information to determine ADAS tolerances as well as establish proper testing and validation to confirm that the calibration was performed properly and successfully.

We commend automakers for their considerable investments in ADAS technology, which has the potential to save thousands of lives. However, it's no secret that the cost of new vehicles has rapidly increased over the last decade, and the inclusion of ADAS features are a significant factor in those costs. Given the reality that vehicle owners are paying for these safety features in their vehicles, **those who choose to modify or customize their vehicles are no less deserving of enjoying the safety benefits of ADAS than vehicle owners who choose to keep their vehicles in their stock condition.**

Additionally, as ADAS functions combine to form higher levels of self-driving capabilities, it is critical that these safety systems can be properly calibrated and tested. Transparency and guidelines to fill ADAS gaps will only increase trust in existing and future safety systems, including those found in AVs, which are increasingly present in our major cities.

H.R. 6688, the “ADAS Functionality and Integrity Act”

The ADAS Functionality and Integrity Act, if enacted into law, would ensure that vehicle owners and automotive businesses have the information needed to properly calibrate and test ADAS. This legislation is crucial for safely making common modifications, such as installing bike racks, wrapping a vehicle, replacing larger wheels and tires, or installing a winch or aftermarket bumpers, without compromising the functionality of ADAS.

The bill would require NHTSA to work with automakers, parts manufacturers, the aftermarket, and dealers to create guidelines that provide modification ranges and tolerances in terms of changes to ride height, wheel and tire sizes, overall static

geometry, physical displacement parameters, and sensor and camera function that maintain proper calibration for new vehicles starting in model year 2028.

H.R. 6688 requires NHTSA to create guidelines that establish ADAS test procedures, allowing the automotive businesses that owners choose to engage to properly test and validate that vehicle systems have been properly calibrated. The bill would also create a process for manufacturers to provide vehicle tolerance and system sensitivity information relevant to modification and calibration to vehicle owners and NHTSA within 30 days after the release of a passenger motor vehicle.

In addition to providing NHTSA with up to two years to develop guidelines, the bill would also require the agency to publish a study within one year of enactment on the resources needed to create and maintain guidelines annually for new vehicles.

Closing

Thank you again to the Subcommittee for holding this important hearing on motor vehicle safety, consumer choice, and affordability.

Americans deserve confidence that ADAS works as intended for the entire life of their vehicle. Currently, the industry lacks clear standards governing ADAS calibration and testing, and aftermarket businesses and vehicle owners need access to the necessary information and procedures needed to keep modern safety features functioning. This bill marks a critical step forward in the name of vehicle safety and in protecting the American people's ability to continue modifying and customizing the vehicles they own.

The ability to calibrate and test is deeply intertwined with ensuring that Americans can modify their vehicles to meet their needs, as it is key to maintaining vehicle quality and keeping owners and other road users safe. When vehicle owners and service professionals are not able to access the vehicle information needed to properly service, calibrate, and validate ADAS performance, those barriers impede vehicle owners' rights.

I appreciate your consideration of these comments and thank the Subcommittee for its consideration of H.R. 6688 for potential inclusion in the vehicle safety title of the surface transportation reauthorization bill.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Spagnola", with a horizontal line underneath.

Mike Spagnola
President and CEO



January 12, 2026

The Honorable Brett Guthrie
Chairman
Committee on Energy and Commerce
U.S. House of Representatives

The Honorable Frank Pallone
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives

The Honorable Gus M. Bilirakis
Chairman
Subcommittee on Commerce,
Manufacturing, and Trade
U.S. House of Representatives

The Honorable Janice D. Schakowsky
Ranking Member
Subcommittee on Commerce,
Manufacturing, and Trade
U.S. House of Representatives

Dear Chairmen Guthrie and Bilirakis and Ranking Members Pallone and Schakowsky:

The Society of Collision Repair Specialists (SCRS) appreciates the opportunity to submit comments for the record regarding proposed federal legislation impacting vehicle repair, consumer safety, and access to automotive repair information.

SCRS serves as the national voice for thousands of collision repair professionals across this country, The vast majority of whom operate small, family-owned independent businesses serving their local communities. Our members are responsible for repairing increasingly complex vehicles that integrate advanced materials, electronics, supplemental restraint systems (SRS), and advanced driver-assistance systems (ADAS).

These repairs are safety-critical, and to restore that safety and functionality the repairs must be performed in accordance with documented manufacturer repair procedures, utilizing appropriate tools and equipment, and with the skill demonstrated by properly trained technicians.

SCRS opposes the legislation currently introduced as the "REPAIR Act."

Our membership has clearly communicated with SCRS and with members of this committee that the proponents of this Act do not represent an understanding of the actual challenges facing independent repair businesses in our space.

While the stated intent of that proposal is to expand access to repair information, SCRS agrees with our members that the REPAIR Act does not accurately reflect or resolve the real-world challenges facing consumers or repair professionals who work to restore safety to America's roadways.

Independent collision repairers already have access to original equipment manufacturer (OEM) repair information and instructions, diagnostic tools, and training resources. The primary obstacles to safe and proper repairs are not access-related, but rather economic and systemic pressures that incentivize cost-cutting at the expense of OEM-required repair procedures.

The REPAIR Act increases accessibility to vehicle data, not to repair information, but provides no added accountability that the already-available repair information will be utilized to effectuate a proper repair for the consumer.

Small repair businesses are not interested in being responsible or liable for protecting large amounts of sensitive information such as location, biometrics, in-cabin and surround view observance, driving behavior, personal contacts, and more. Our industry's small businesses are already under pressure from technology companies who have interest in accessing and monetizing repair and claim-related data for commercial exploitation. Greater access to more information that isn't necessary for repair does not help repair businesses.

This is why SCRS instead **supports the SAFE Repair Act** proposal, a collaborative legislative framework developed jointly between repairers and the Alliance for Automotive Innovation. This proposal reflects extensive industry engagement and is narrowly focused on protecting consumer safety while preserving competition and consumer choice.

The SAFE Repair Act recognizes that vehicle repair today is fundamentally different from vehicle repair of the past. Modern vehicles require precise repair procedures, system initializations and calibrations, and specialized environments and equipment all ensure that safety systems function as designed.

The SAFE Repair Act proposal safeguards continued access to necessary information and tools while reinforcing the importance of performing repairs in a manner consistent with manufacturer requirements.

SCRS members regularly report pressure to deviate from OEM repair instructions, omit required procedures, or substitute parts for cheaper alternatives that do not provide the same fit, finish, meet the same specifications or protection of consumer investments. This is often driven by reimbursement constraints rather than technical necessity. These pressures push back against consumer education and often contend with consumer's preference in how they want their vehicle fixed and as a result place consumers at risk; creating untenable conditions for repair businesses committed to safety-first repairs.

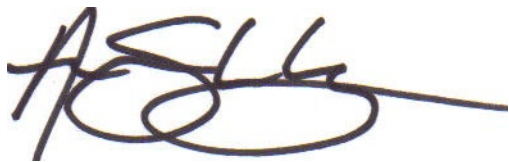
Many SCRS member businesses have made significant investments in advanced repair capabilities, including establishing in-house or separate independent ADAS calibration operations using the same equipment and information available to franchised dealerships. These investments demonstrate that independent repairers can perform complex, technology-driven repairs when allowed to do so without interference from insurance influence.

From a consumer perspective, the issue is straightforward: vehicle owners expect their cars to be repaired safely, correctly, and in accordance with manufacturer standards. The SAFE Repair Act supports that expectation by protecting consumer choice and reinforcing accountability in the repair process.

SCRS respectfully urges the Committee to carefully evaluate the unintended consequences of the REPAIR Act and to give serious consideration to alternatively supporting the SAFE Repair Act as a more effective, balanced, and safety-focused approach. This framework better reflects the realities of today's vehicles, today's repair environment, and the shared goal of ensuring that motorists can trust the safety of their vehicles when they return to the road.

Thank you for the opportunity to submit these comments for the record.

Respectfully submitted,

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Aaron Schulenburg
Executive Director
Society of Collision Repair Specialists

A handwritten signature in dark ink, appearing to read 'KMB' in a stylized, blocky font.

Michael Bradshaw
Chairman
Society of Collision Repair Specialists



Transport Workers Union of America, AFL-CIO

John Samuelson
International President

Alex Garcia
International Executive
Vice President

Jerome Lafragola
International
Secretary-Treasurer

Curtis Tate
International Administrative
Vice President

Mike Mayes
International Administrative
Vice President

"AMERICA'S FIGHTING DEMOCRATIC UNION"

January 8, 2026

The Honorable Gus Bilirakis
Chairman
Subcommittee on Commerce,
Manufacturing, and Trade
House Committee on Energy and
Commerce

The Honorable Jan Schakowsky
Ranking Member
Subcommittee on Commerce,
Manufacturing, and Trade
House Committee on Energy and
Commerce

RE: Statement for the Record: Hearing on Examining Legislative Options to
Strengthen Motor Vehicle Safety, Ensure Consumer Choice, and Cement U.S.
Automotive Leadership

Dear Chairman Bilirakis and Ranking Member Schakowsky,

On behalf of more than 160,000 members of the Transport Workers Union of America (TWU), I offer this statement for the record as part of the above-mentioned hearing. Specifically, the TWU is encouraged by two pieces of legislation on the subcommittee's agenda which attempt to address ongoing issues caused by autonomous vehicles (AVs): the draft legislation offered by Representatives Latta and Dingell (SELF DRIVE Act of 2026) and the AV Safety Data Act offered by Representative Mullin. Actions to regulate AVs are long overdue and these bills both deserve serious consideration as part of the subcommittee's work on the next surface transportation reauthorization.

TWU members operate, maintain, and service more than half of all public transportation trips in the United States. Additionally, our members work alongside and within areas congested with motor vehicles – including ground workers on airport tarmacs and bikeshare workers whose job site is on city streets. Seriously regulating and overseeing AVs is essential to both the safety of these workers and their long-term economic well-being. The AV Safety Data Act, which the TWU has endorsed, and the SELF DRIVE Act would both take critical steps to ensure workers' safety is never at risk due to AVs, both as drivers and as pedestrians on the surrounding streets.

Unregulated AVs are the most significant threat to roadway safety today. The overly permissive atmosphere created by federal inaction over the past decade has allowed thousands of driverless cars to be deployed with next to no enforceable safety standards. Manufacturers have been allowed to market “full self-driving” vehicles while arguing in court that these vehicles are meant solely to assist humans. An entire transportation industry is developing with the philosophy of failing fast and asking questions later – tenets anathema to both safety and job creation. Absent strong federal leadership to set standards and hold innovators accountable for their actions, this wild west atmosphere will continue to expand and undermine the safety of our national infrastructure.

We are encouraged that the SELF DRIVE Act would, for the first time, set enforceable safety standards on AVs. The discussion draft would ensure humans retain oversight and the ability to intervene to keep vehicles safe and preserve the existing division of responsibility between federal and state regulators. It is not comprehensive of all that the federal government should be doing to rein in the excesses of the AV industry and the TWU will continue to seek additional protections for worker safety and economic security with regard to AVs. However, the SELF DRIVE Act, especially in combination with the AV Safety Data Act, would be a start.

Minimum federal safety standards for AVs are urgently needed

Under our current regulatory structure, AV safety standards are in free fall. A patchwork of inadequate and dangerously lenient state laws is encouraging a race to the bottom, and a complacent federal government has allowed far too many risks into the system. Several times a week, new videos become available of AVs driving through police cordons, rolling over firefighting equipment, ignoring school bus stop signals, and engaging in other unsafe activities. As more AVs have been deployed, the situation has not gotten better, rather the dangers they pose have become more widespread. With no realistic minimum safety standard in place and with more AV developers entering the market as time goes on, it would be naïve to expect any safety improvements across the system without federal intervention.

Establishing a federal safety standard, enforced by NHTSA, will ensure that AVs meet our safety expectations *before* they are deployed onto our streets. Many of the AVs currently deployed do not meet the standards envisioned by SELF DRIVE Act and would have to be immediately withdrawn from service were this enacted. It is long past time that the federal government acknowledge its responsibility for these vehicles in the same manner it does for traditional cars, trucks, and buses.

Humans must retain oversight and the ability to intervene to keep vehicles safe

The most essential component of transportation safety is well-trained, qualified workers professionally conducting their duties. AVs, just like every other piece of equipment, will malfunction. The hardware and the software of these vehicles will break down. When this happens, humans must have the ability to intervene to prevent disaster.

These are not theoretical concerns in our transportation systems. In two crashes in 2019 and 2020, automated systems on the Boeing 737-MAX aircraft overrode human commands after failing to correctly respond to the environment, crashing at full speed and killing 346 people. In 2009, 9 people were killed, including the operator, on the Washington, DC Metro's Red Line when the positive train control system ignored the operator's command to brake and accelerated into a parked train just north of the U.S. Capitol. In both instances, had humans been allowed to intervene the crashes would have been avoided.

In addition to the obvious safety benefits of allowing human oversight and intervention in automated systems, AV developers must face a practical matter that many commercial vehicles will continue to require humans onboard even if they are not expected to operate their vehicle. Public transportation systems are obligated to provide services for the disabled community. Tour bus operators and other service companies may continue to want humans present to provide the services they do today for paying customers. In these cases, disallowing workers from accessing the controls to these vehicles would effectively hold them hostage. These workers would be trapped, entirely at the mercy of their employer and the competency of the automated system. It seems obvious that such situations should be prohibited.

The TWU does not believe that all vehicles must forever utilize the same methods of control present on our current fleets. We believe that equipment will change as safety improvements are developed. Certified operators will be able to work with any system to safely navigate our roads, provided the technology enables them to oversee and intervene as the workers deem necessary.

States and localities should continue to make operational decisions for AVs

NHTSA is poorly equipped to regulate car use at the street level. The agency's expertise has, since its inception, centered around the safety of the manufacturer and the products available in the market. It would be impossible for the NHTSA to review or assess the millions of corners, intersections, school zones, taxi stands, bus stops, and other commonplace traffic realities across the U.S.

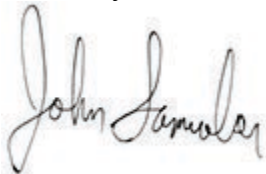
The current division of labor between NHTSA and state/local regulators works and should be applied to AVs. The safety of the vehicle itself should be solely a federal responsibility. However, where and how these vehicles are allowed to operate, what certifications are necessary for the operators, minimum amounts of insurance coverage, where it is safe for a vehicle to stop, and many (*many*) other decisions must be left up to state and local authorities who already have these rules in place. None of these issues should be interpreted to be part of an AVs “performance” and covered under NHTSA’s preemption powers.

More legislation is needed to fully regulate AVs

Unregulated AVs are the most significant threat to roadway safety today. Bad actors have been enabled by a patchwork of inadequate and dangerously lenient state laws which encourage a race to the bottom on standards and a complacent federal government that has allowed far too many risks into the system. Our institutions, including Congress, must do much more to ensure that AV profiteers, including Big Tech companies and their billionaire investors, actually live up to their own marketing claims on safety and job creation.

While the SELF DRIVE Act presented to the committee would take a long-overdue first step towards addressing the threats inherent in AV deployment, it leaves many issues left to be addressed. Mandating commercial motor vehicles continue to be overseen by qualified, certified human operators, ensuring that new jobs being created by this industry are good, union jobs, and requiring AVs to demonstrate an increased level of safety in our public transportation systems are some of the outstanding issues that must be tackled to truly regulate the industry. Many of these issues are outside of the Energy and Commerce committee’s jurisdiction and will need to be handled in other forums. The TWU will fight to ensure that every arm of our government ensures workers are the primary beneficiaries of AV deployment and that safety is never at risk from unproven technologies.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Samuelson". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Samuelson".

John Samuelson
International President



January 12, 2026

The Honorable Brett Guthrie, Chair and the Honorable Frank Pallone, Ranking Member
Committee on Energy and Commerce

The Honorable Gus Bilirakis, Chair and the Honorable Jan Schakowsky, Ranking Member
Subcommittee on Commerce, Manufacturing and Trade

U.S. House of Representatives
Washington, DC 20515

Dear Chairman Guthrie, Ranking Member Pallone, Chairman Bilirakis and Ranking Member Schakowsky:

The undersigned organizations write to voice our support for the progress made on the bipartisan SELF DRIVE Act discussion draft, which was recently announced by Representatives Bob Latta and Debbie Dingell. The SELF DRIVE Act would help ensure that millions of Americans are able to access the benefits of autonomous vehicles (“AVs”), which provide safer roads, greater supply chain resilience, create new economic and enhanced accessibility opportunities.

Autonomous vehicles have [driven](#) more than 145 million autonomous miles on U.S. public roads, a distance roughly equivalent to the distance between Earth and Mars. These vehicles undertake diverse operations, carrying passengers across major cities like Phoenix, Austin, Los Angeles, and San Francisco,

assisting with transit access in rural communities in the Midwest, filling in middle mile cargo roles in Arkansas, and hauling freight across Texas and beyond.

The SELF DRIVE Act makes strides toward enabling the safe and timely deployment of AV technology and solidifying the U.S. as the global leader in this transformative field. While AVs have been deployed in recent years, the United States lacks a federal policy framework to set uniform rules of the road for these vehicles. The SELF DRIVE Act would advance this objective in key ways.

First, the legislation authorizes key rulemakings related to AV safety. Second, it establishes cybersecurity requirements to make sure that AVs are secure from outside threats. Third, the proposal modernizes federal motor vehicle safety standards for the modern era by addressing standards for vehicles that operate without a human driver.

The SELF DRIVE Act will help the United States remain the global leader on AVs amidst fierce competition with the People's Republic of China. China is the United States's closest strategic competitor on autonomous vehicles and determined to replace the U.S. as the global leader. A strong federal policy framework will allow U.S. companies to compete and win in the global race on AVs.

Finally, autonomous vehicles are an opportunity to re-imagine how Americans move, but the federal government's rules must keep pace with the opportunity before us to build vehicles that are accessible for people with disabilities, including wheelchair users and nonvisual accessibility, and address new use cases. Legislation like the SELF DRIVE Act will lay the foundation for years of growth of AV technology and allow U.S. companies to lead the pack in developing standards and practices worldwide.

The undersigned organizations appreciate the Committee's consideration of this important bill to transform transportation as we know it. We look forward to working with Representatives Latta and Dingell, the Committee, and Congress on appropriate revisions throughout the process and more broadly to ensure the safe and timely deployment of AVs and American leadership in this game-changing technology.

Sincerely,

United for Autonomy

ITS America

U.S. Chamber of Commerce

American Council for the Blind

MEMA. The Vehicle Suppliers Association

United Spinal Association

American Trucking Associations

National Association of Manufacturers

Zero Emission Transportation Association

Autonomous Vehicle Industry Association

National Federation of the Blind

Association for Uncrewed Vehicle Systems International (AUVSI)

National Venture Capital Association

Reason Foundation

Bay Area Council

TechNet

Chamber of Progress

Truck & Engine

Dallas Regional Chamber

Manufacturers Association

January 12, 2026

The Honorable Gus Bilirakis, Chair
The Honorable Jan Schakowsky, Ranking Member
Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
U.S. House of Representatives
Washington, D.C. 20515

Dear Chair Bilirakis and Ranking Member Schakowsky:

As you prepare for the upcoming hearing, “Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, and Cement U.S. Automotive Leadership” we urge you to prioritize advancing requirements for safety technologies in vehicles. We respectfully request this letter be submitted to the hearing record.

Across our nation, families like ours are devastated by the loss of a loved one or the suffering of a serious injury due to motor vehicle crashes and incidents. A staggering 40,000 deaths and 2.44 million injuries occurred on America’s roads in 2023, amounting to a public health and safety crisis.

Traffic crashes, fatalities and injuries affect not only victims, survivors and their families, they also come with a hefty price tag for consumers. The annual economic cost of motor vehicle crashes was \$429 billion in 2025.ⁱ This equates to each person living in the U.S. essentially paying an annual “crash tax” of more than \$1,200.ⁱⁱ

Vehicle safety technologies are ready now to save lives, prevent injuries and reduce the financial impact of the crisis on America’s roads. Please prioritize getting them into new vehicles to ensure no other family experiences the grief and trauma that we confront every day. Research for this approach is clear, and additional information is provided below.

Solutions exist, and we urge you to conduct oversight on uncompleted Congressional directives and to advance additional solutions in the next surface transportation reauthorization bill, including:

- Rulemakings to ensure new cars and medium and large trucks will be equipped with comprehensive automatic emergency braking (AEB)
- Passenger vehicles equipped with impaired driving prevention technology
- Lane departure warning (LDW), lane keeping assistance (LKA) and driver support systems
- Systems to prevent unattended children from dying or suffering serious injuries in hot cars
- Intelligent speed assistance

We thank the Committee for its past leadership to protect families, communities and road users and ask that you continue to do so in the next surface transportation reauthorization bill. Our families want the safest vehicles on the roads. Whether you are a driver, a passenger, or outside a vehicle standing, walking, biking or rolling, everyone deserves safe public roadways.

Automatic emergency braking

Over the last two decades, deaths of vulnerable road users (VRU), which include bicycle riders, pedestrians, motorcycle riders and other road users outside the vehicle, have surpassed increases in traffic fatalities. Therefore, we urge you to advance a requirement for automatic emergency braking (AEB) to detect and respond to bicycle riders and motorcycle riders.

Alcohol-impaired driving

Alcohol impaired driving resulted in 12,429 people killed in 2023ⁱⁱⁱ and remains the largest single contributor to road fatalities. Over the last 10 years, on average, drunk drivers have been responsible for approximately 30 percent of all traffic fatalities annually.^{iv} Yet the advanced impaired driving prevention technology required in the IIJA is more than a year overdue. Lack of swift action defies understanding as the potential benefits are exceedingly high. According to research from IIHS released in July 2020, *Potential lives saved by in-vehicle alcohol detection systems*, alcohol-detection systems, once widely deployed, could save more than 9,000 lives a year in the U.S., accounting for more than 25% of road fatalities.^v A recent update of that analysis based on data from 2019 through 2022 indicates that as many as 10,812 lives would have been saved.^{vi} We urge the Committee to conduct oversight on the inaction of the law.

Driver distraction - Lane departure warning / Lane keeping assistance and Driver support systems

Driver distraction is a well-known and documented issue that is expanding due, at least in part, to reliance on smart phones, ubiquity of the technology and its ever-expanding uses. Crash risk increases dramatically – as much as four times higher – when a driver is using a mobile phone, with no significant safety difference between handheld and hands-free phones observed in many studies.^{vii}

The IIJA directed the U.S. Department of Transportation (DOT) to issue Final Rules for LDW and LKA as well as conduct research regarding the installation and use of driver support systems, also known as driver monitoring systems, to minimize or eliminate driver distraction and automation complacency within three years and report to Congress within six months of the completion of the research.^{viii} The DOT Secretary then must determine if one or more rulemakings are required. The DOT should issue the LDW and LKA Final Rules and should release the study and advance a Final Rule with a compliance date for driver support systems to prevent driver distraction, disengagement and automation complacency including for vehicles equipped with partial automated driving system (ADS) and to ensure driver capability. We urge you to conduct oversight to advance action on this vital technology.

Unattended children in hot cars

Children dying unattended in hot cars is a tragedy that can be prevented by the integration of available and inexpensive systems to detect and alert to an unattended child in the passenger compartment. More than 1,100 children have died in hot cars since 1990 and at least another 7,500 survived with varying types and severities of injuries.^{ix} Parents, caregivers and our youngest, most vulnerable passengers deserve this protection. The IIJA requirement to address this problem is more than two years overdue. We urge you to also conduct oversight on this lapse.

Intelligent speed assistance

In 2023, 11,775 people were killed in speeding-related crashes, accounting for 29 percent of total crash fatalities. Intelligent speed assistance (ISA) is a vehicle safety technology that helps drivers comply with speed limits by using global positioning system (GPS) data, cameras, digital maps or some combination of these to detect the legal speed limit. It can then warn the driver when they are speeding or prevent speeding. Laws have been passed in Washington State, Virginia and the District of Columbia for ISA use for repeat and/or extreme speeding offenders. We urge the Committee to incentivize all states to follow suit in the next surface transportation reauthorization bill.

Automated driving system safeguards

While one day vehicles equipped with automated driving systems (ADS) and autonomous vehicles (AV) may improve safety on our roadways, they are not a near term solution. Conversely, the identified vehicle safety technologies are ready now to save lives and curb costs. Getting them into new vehicles backed by performance standards must be our present focus to reach the goal of ending deaths on our roadways.

Sincerely,

Marissa Rodriguez, New City, NY

I lost my sweet, adorable 1 year old girl and boy twins, Luna & Phoenix, in July 2019 due to my loving husband accidentally leaving our babies in his car when he went to work. My family is devastated and broken.

Gunnar Naughton, Riley, KS

I lost my niece Brooklyn to a frontover accident in 2021. Life has never been the same for our family after such a loss.

Mitchell Millsap, Elkins, AR

Uncle of Brooklyn Cline killed due to a front over.

Angela and Scott Jones, Gilbert, AZ

Parents of Charlotte Jones, who was passed away on 9/3/19, due to a hot car tragedy.

Michelle Ramsey, Houston, TX

In 2016, two drunk and impaired drivers changed my family forever. I lost two sons, Khaiden(6) and Samuel (4), while my daughter, myself and a Good Samaritan were severely injured.

Rose Kehoe, Arlington, VA

We lost our dear son, Braylon Meade, to an impaired driver over three years ago.

Marc Benardout, Los Angeles, CA

My son Noah was a pedestrian killed by a drunk driver going at double the speed limit through a city street intersection. His killer served just 6 weeks in prison before being released.

Cheryl Bransom, Portland, OR

Our son, Douglas Bransom, was killed in 2006 at age 7 in a front over incident by our neighbor.

Phil Bransom, Portland, OR

Our son, Douglas Bransom, was killed in 2006 at age 7 in a front over incident by our neighbor.

Jon Naser, Canonsburg, PA

18 years ago my dad, Jim, was taking my 8 year old sister, Liz, and 2 of her friends to basketball practice when they were hit by a drunk driver. Jim was killed instantly while Liz was severely injured.

Clara Shelton, Denver, CO

My brother, Sam, was an 18-year-old college freshman when he was killed by a drunk and drugged driver who was going well over the speed limit.

George Murphy, Jacksonville, IL

On a beautiful July 4th Wednesday in 1984, my 24-year-old daughter, Kellie Murphy Wheatley, was struck and killed instantly. The impaired driver was a local 68 individual with three previous DUI arrests, and no convictions.

Eileen Zadrozny, Westfield, NJ

My beautiful 23 year-old son Ryan was killed by a drunk driver on 12/1/24. The drunk driver was going 105 mph on an urban street when he killed my son who was crossing in a crosswalk. This driver had also killed another person in a similar way in 2011.

Scott Lockard, Tacoma, WA

My 18-year-old daughter was killed by an underage drunk driver. He was traveling the wrong way on interstate five and hit my head on.

Catherine Koessl, Kenosha, WI

My parents, Dr. Vincent and Mary Rizzo, and uncle, Dr. Michael Rizzo, were killed on April 5, 2019 by a drunk driver with a BAC of .316.

Emily Stein, Medford, MA

My dad was killed by a driver programming her GPS. He was 61 about to become a grandpa with my first child.

Brenda Johnson, Highland, IL

My son Joshua Melton, age 18, was killed by a drunk driver doing over 130 mph. The accused had a DUI when he was 20, and 3 months later killed my son.

Cindy Ortega, Albuquerque, NM

My son was killed by a drugged and drunk driver in Santa Fe, NM in July of 2016. He was only 36 years young and had a whole life ahead of him until this tragedy.

Tyler Cestia, New Iberia, LA

James Lee, Carbondale, KS

In February 2023, my oldest child, Alyssa, was killed by a drunk driver. She was 16. Alyssa's killer was nearly 3 times the legal limit to drive.

Kathryn Prescott, Brooklyn, NY

On September 7th 2021, I was struck and then run over by a 33 cement truck. All four left-side wheels of the vehicle rolled over my legs and pelvis, crushing bone, severing arteries and leaving me to undergo 14 surgeries and complete over four years of physical therapy. On top of the physical ramifications, my crash effectively ended a career I'd spent 20 years trying to build and completely upended multiple other aspects of my life. The driver didn't stop – never hit the brakes.

Lisa Alleman, Lakewood, OH

My husband was killed in a highway accident and that brought the importance of safety measures to my mind.

Linda Wilburn. Ardmore, OK

Orbie's Mom

Kim Telep, St. Ignace, MI

My husband was pulled over on the New Jersey turnpike checking his work vehicle when a trucker veered off the road and hit my husband and his vehicle. My husband died as a result of his injuries nine days later.

Aparna Mulchandani, Hackensack, NJ

We lost our 22 year-old son, Elan, when he was rear ended by a truck going at 65 miles per hour while he was stopped in traffic on his way to work.

Jaideep Mulchandani, Hackensack, NJ

Our 22 year-old son, Elan ""Izi"" Mulchandani would not have been killed by a truck that didn't stop and rear ended him if the truck had AEB. This happened on December 2024.

David Gross, Dufur, OR

I lost my son over eight years ago when an out-of-control semi crashed into him as he sat astride his cycle, stopped in a work zone.

Barbara Galgiani, Stockton, CA

My nephew Paul Katuszonek was killed by a driver that had been driving for too many hours and did not see that Paul was stopped for a flagman.

Anna Guardipee, Salem, VA

In October of 2019 while stopped in traffic in a construction zone, my friend and I were crashed into by a tractor trailer driven by a driver who was texting. He never hit his brakes and crashed us at almost 60 miles an hour the impact left me paralyzed from the chest down and killed Jenny.

Mrs. Rosalind Reddick, Zebulon, NC

Our son, Elijah Jayden Hawkins-Maynor, transitioned to Paradise on October 5, 2023 due to an impaired drug and drunk driver. He was a passenger in a vehicle with three other people that collided with a tree. While the others survived, Elijah tragically succumbed to his injuries.

Franklin Wood, Falls Church, VA

My daughter, Dana Wood, and her friend Jessica were both killed on October 15, 2002, on I-95 in Virginia. Dana and her friend were driving to East Carolina University when a truck driver, who neither slowed nor attempted to change lanes, struck Dana's disabled car pushing it 1,500 feet down the highway.

Angela Suter, Hagerstown, MD

My daughter 27 was killed in a tractor trailer crash Oct 3 2024 when the driver never hit the brakes. She was killed instantly.

Dawn King, Davisburg, MI

My father was killed December 23, 2004 when his car, slowed in traffic, was struck from behind by a semi driven by a sleepy driver who didn't see all stopped traffic ahead.

Melanie De Leon, Katy, TX

My sister, Melissa De Leon (48yrs old), was killed in under-ride truck crash on February 24, 2023 in South Texas. Six weeks later, when traveling home from Katy, TX to visit my family for the Easter Holiday on Highway 77 South, a speeding semi-truck traveling Northbound lost control in the rain and flew into the median coming within feet of hitting/killing my pregnant wife and I as we were in a standstill due to southbound traffic.

Paul L. Huffman, Roanoke, VA

Laura Fredricks, Becket, MA

My daughter, Emily Claire Fredricks, was killed on November 28, 2017, in Philadelphia, Pennsylvania. She was a cyclist and was killed by the driver of a private sanitation truck.

Gage Evans, Arvada, CO

My husband would likely be alive today if the truck that killed him had been equipped with and employed Automatic Emergency Braking (AEB) and Intelligent Speed Assistance (ISA). It was traveling at upwards of 80 m/p/h on the ramp off highway I 70 into a line of stopped traffic on Colfax Avenue in Lakewood, Colorado in 2019.

Lori Johnson, San Diego, CA

AEB would not have saved my family in particular but other families associated with Truck Safety Coalition may not have lost their loved ones had AEB been in big trucks.

Angela Sims-Fuelling, Myrtle Beach, SC

If AEB were on trucks my husband would be alive. The truck driver hit him at 55 miles hour. AEB would have slowed the truck and he would have had a chance to survive.

Ronnie Hamby Jr, Ellsworth, KS

If my truck had the AEB system, my truck wreck might not have been as bad let alone happened as it would have started my reaction time sooner.

Michael White, Boulder, CO

Until July 29th, 2023, we were living one story. The story of a mom and dad watching their 17-year-old son chase his dreams as a US national cycling champion and member of the US National Cycling Team across multiple cycling disciplines. That story ended instantly, when Magnus was killed by a driver on his last training ride before departing to Scotland to represent the US at the Mountain Bike World Championships. A driver had passed out after an all-night bender, consuming whiskey, prescription drugs and cocaine. The driver never braked, drifted 18 feet to the right, and hit and killed our son.

Brian Goggin, Washington, DC

In July 2021, a distracted truck driver struck and killed my mother without stopping.

Gina Cancelliere, Las Vegas, NV

A drunk driver driving a pickup truck without operating its headlights at 9PM on 12/1/1999 hit me as a pedestrian. I was thrown 40 feet down the road. Suffered 2 collapsed lungs, lacerated liver, subdural hematoma, fractured ribs-pelvis-tailbone-pubic bone, optic nerve damage, countless bruises and stitches on the top of my head. I missed the last semester of college and 2 solid weeks of my life. I have chest tube scars, my left eye swells when I'm tired, my left hip is often sore.

Mike Doyle, Alexandria, VA

I am a crash survivor who started a pedestrian street safety advocacy group a year after I recovered from my injuries. I know that technology such as ASE helps to slow drivers down and saves lives. If the driver that crashed into me had today's sensor technology installed in his 5,000-pound SUV, my crash could have been avoided and the months of neurology rehab made moot.

Melissa Wandall, Bradenton, FL

My husband, Mark, was killed by a repeat red light runner. Mark was the passenger in a vehicle driven by my brother, Philip, who was doing all the right things. He was stopped at a red light and proceeded left when his green arrow allowed him to proceed. When he proceeded on green his vehicle was T-boned by the driver that ran the red light. My brother is physically and emotionally debilitated from this crash that took my young husband's life and left a newborn without her father.

Daniel Langenkamp, Bethesda, Maryland

My wife, Sarah Debbink Langenkamp, was killed in 2022 by the driver of a large truck while she was riding her bike home in an (unprotected) bike lane from our children's elementary school.

Jason Waldron Warren Michigan

I lost my entire family to a drunk and drugged driver. It took my Father Dean Waldron, my Stepmother Sherry Waldron My 4 y/o Brother Shane Waldron and my 12 y/o Brother Adrian Waldron I was the only survivor at 10 y/o. The Drunk driver also died.

Heather Geronemus, Fort Lauderdale, FL

My father, Dr. Robert Geronemus, a renowned nephrologist, was killed in car on pedestrian DUI hit and run on January 24, 2009.

Steven Benvenisti, Upper Saddle River, NJ

When I was a senior in college, a drunk driver crashed his vehicle into me while I was walking. My injuries were catastrophic, including a severe TBI, crushed legs, requiring 15 surgeries and more than 6 months of hospitalization.

Jody Miller, Triadelphia, WV

A drunk driver robbed me of my daughter, Heather, at the age of 21, just weeks prior to her graduation from the WVU School of Nursing....no graduation, no weddings, no more Christmas's, no more tomorrow's!

Sandy Melville, Rochester, MN

My 23 year-old son was crossing the street in Rochester Mn. On Black Friday Nov. 27th, 2010 and was hit and killed on impact one step from the curb by a repeat impaired driver with a BAC of .21.

Larry Coggins, Lakeland, FL

I spent 25 years in law enforcement, all in traffic, where I witnessed firsthand on a weekly basis in the busiest region in FL, what an impaired driver can do to themselves, their families, and more often than not, innocent people.

Kristine Villatoro, Front Royal, VA

My daughter, Anna Marie Dalton, was killed by an impaired driver on 2/19/19. She was only 23 years old and the prime of her life. Unfortunately the driver was stopped by police after they were observed driving on a multi use walking path. The driver did not have a license and had been on probation for a previous drug offense. My daughter was killed less than 8 minutes after the officer cleared the traffic stop.

Ava Fontenot, Gulfport, MS

Our 25 year-old son, Lindsey, was killed July 2, 2010 along with his friend. The drunk driver was killed also. Lindsey left behind a fiancé, his sister and his parents.

Ronald Thomas, Mosinee, WI

Our daughter, Kaytlyn Madison Thomas, graduated in May of 2021, turned 18 in June, and 14 days later was killed by an impaired wrong way driver on I39. She was only a month away from starting her college dream in fashion creation. The impaired driver was on the road for an hour. 45 minutes after the first 911 call, her drive ended when our daughter met her head on.

Ashley Evans, Knoxville, TN

My life was permanently changed by a preventable crash involving an impaired driver. On Wednesday morning of July 8th, 2020, in Sevierville, TN my 3-year-old identical twin daughters (Ella & Emma Lett) were going to a petting zoo with their grandparents (Mike & Judy Lett) when an impaired driver that was speeding rear-ended another vehicle causing it to cross the center line and collide head-on with the car my twins were riding in. Emma Grace Lett survived but her sister Ella Mae fought 5 days before she passed on July 13, 2020. The grandparents also suffered a number of injuries.

Juan Rodriguez, New City, NY

My family and I suffered the greatest loss of our twin babies, Luna and Phoenix, to a hot car death.

Roberta Thomas, Urbana, OH

My son, Robert Thomas, and his friend, Megan Branam, were killed by a drunk driver in April 2025. My son's girlfriend, Nevaeh Brown, was also in the car and suffered catastrophic injuries that left her in the hospital for almost two months and still healing through therapy. The driver had been to prison prior to this for an OVI and this was his fifth one. He was three times the legal limit.

Beatriz Viera, Somerset, NJ

My daughter passed away in a hot car accident.

Michelle Stuyvesant, Garland, TX**Marta Magellan, Miami, Florida**

My one-year-old grandson died due to an expectation that my husband, as usual, had brought him in from the car as he always did. But on that day, he was involved with workers fixing something in the back, and he simply assumed I had brought him and closed the baby's bedroom door, where we both thought he slept. Our darling Sammy died in a hot car accident, and our lives spiraled into a grief that will never end.

Jennifer Levi, Palisades, CA

Our 18 year-old son Braun Levi was it and killed by a repeat drunk driver with a suspended license.

Killian Cline, Liberty, MO

My daughter Brooklyn was killed in 2021 due to a frontover.

Justin Cline, Liberty, MO

My daughter Brooklyn was killed in 2021 due to a frontover.

Doretta McHugh, Summerville, SC

If these safety measures had been in the vehicle of the drunk driver that killed my son, Daniel Everett Coy, he may still be here. That man ran a red light, turning left in the path of my son who had the green light, right of way on very busy road when he was on his motorcycle. If alcohol detection systems were on board that vehicle, a Mercedes-Benz, he wouldn't have been able to drive away from 2 separate bars where he imbibed 8-90% proof drinks in a matter of 4 hours. Four hours after the crash, he still had a BAC of 0.156, glassy eyes and slurred speech.

James Gersing, Miami, FL

My wife and I were watching our grandchild when several workmen met me at the house when we returned from the store. My wife told me to deal with them while she opened the house. The baby was asleep in the back seat and by the time we realized it, he was gone.

Kristi Hosea, Springfield, IL

My only cousin Jimmy was killed by an impaired driver in the state of Georgia. His loss changed the course of history in our family.

Tammy Duffy Chesapeake, VA

On May 19, 2017 my 18 yr old daughter Kaitlyn was a month away from graduating HS with plans to attend Virginia Tech premed/bio. A drunk and drugged furniture delivery truck driver hit and killed my beautiful daughter and our puppy with a 10,000 lb box truck. Her friend survived with a TBI and other life altering injuries.

Jamie Dill Evansville, Indiana

Parent of Oliver Dill who passed away in a hot car.

Stephanie Coggins Lakeland, FL

Being married to a state law enforcement officer for 25 years, I have seen and heard the horror stories about crashes where innocent lives were lost, families wiped out, and children orphaned at the hands of a drunk driver. It boggles my mind that the USA is behind European countries when it comes to adding lifesaving DUI prevention technology to all vehicles.

Tatiana Coriano Bayamon, Puerto Rico

I've been working directly with young people for four years, talking to them about the dangers of drinking and driving. Every day we wake up to tragic accidents that could have been prevented if we had used technology to our advantage.

Lynn Ivey Tallahassee, Florida

I'm a Victim Services Specialist for MADD North Florida for 19 years. I have seen firsthand the harm that comes to victims of impaired driving.

Tannan Millsap Elkins, Arkansas

Brooklyn Cline, killed due to frontover accident.

Kayla Naughton Riley, KS

Aunt of Brooklyn Cline, killed due to a frontover.

Jeannine South Lutz, Florida

As an impaired driving prevention advocate, I see firsthand every day how impaired driving ends and destroys innocent lives. The technology exists to save lives.

Josh Wright, Attorney from Birmingham, Alabama

Legal advocate and champion for stopping DUI injuries and deaths as a lawyer for over 25 years.

Karen Murphy Bristow, VA

My son could have been saved if safety measures were in place.

Cindy Ortega, Albuquerque, NM

My son was killed by a drunk driver 9 years ago and our lives were adversely changed forever.

Erynn Sendrick Daytona Beach, Florida

I've seen first-hand the devastation caused by drunk driving. I also understand that even good people make catastrophic decisions in moments of impaired judgment. This technology doesn't remove personal responsibility - it supports it, creating a safeguard that prevents one bad decision from destroying multiple lives.

Jill Duerstock Batesville, IN

My daughter was killed by a drunk driver in September 2023. She was a 3rd year nursing student who had so much left to give to the world. The driver barreled down the highway on the wrong side of the road and hit Riley and her boyfriend head on. He survived but has injuries that derailed his career as a police man and along with the emotional trauma will affect him forever.

Arlene Rosenbusch, Rockville, MD

My sister and her husband were killed by a drunk driver 10 years ago in Maryland.

Cynthia C. Hagain Lilburn, Georgia

My mother, Maria E. Hagain, age 58, my sister and only sibling, Jennifer M. Hagain, age 24, and my sister's fiancée, who lived with us, Eric M. Geiger, age 22, all of Lilburn, Georgia, were killed by an underage drunk driver on a trip to visit my dad, who was working in North Carolina. It will be 30 years on March 1st since all three were killed along with the 20-year-old drunk driver and his 23-year-old passenger (both Marines). It will be 30 years since three people were injured in a third car, which included a 5-year-old girl and her parents. Eight lives impacted. Five lives lost forever

Erin Holley Charleston, SC.

My precious 5-week-old son was left by myself and my husband in a parked car accidentally midday in June in SC. (We both believed the other had moved him to my vehicle when we parked our other car). We returned within 20 minutes (just ahead of EMS whom we had called for help), and he was fine, thank G*d! But 10 months later a boy in his same daycare class died in a parking lot outside his dad's workplace (the dad drove to work accidentally without stopping at daycare).

Deona Bien-Olathe KS

Mother of Aslyn Ryan who died at 1 year of age in 2004 from a hot car tragedy after her sitter inadvertently left her in a hot car.

Penelope Roa Murnane**Larry Liberatore Odenton, MD**

My son was killed by a truck driver who fell asleep at the wheel.

Megan Aurelius League City, TX

Mother of Lillian Guerra (5mo) who died in a hot car in Texas in 2013.

Kristi McElroy Orlando, FL

Over 12,000 people are killed annually due to Impaired Driving - please help save lives!

Anne Callery Redwood City, CA

In 2017, my husband was killed by an impaired driver.

Annette Barrera Las Vegas, NV

September 14, 2012, Annette Barrera was struck by a drunk driver at 55 mph. The drunk driver left the scene, but was picked up just down the street. Annette Barrera was taken to an emergency room for extensive medical attention. Attention that would include a brain surgery, a filter placed in her leg, years of therapy to get minimal functioning back and a lifetime of hardship.

Russ Swift Port St Lucie, FL

Had AEB been available in the vehicle our son was riding in, the vehicle would never have driven under the side of a tractor-trailer stall across both lanes of the highway.

Penelope Murnane Santa Rosa Beach, FL

On April 19, 1981 our car was hit by a drunk driver around 10:00 am. My mom, dad, and brother all perished because of that action by the drunk driver. I survived because a hero following us stopped and pulled me out of our car. I was 12, my Mom was 40 and my Dad was 35, my brother was 14.

Kelly Kalinowski Scottsdale, AZ

Daughter a survivor of a truck crash with 5 deaths. No evidence of braking for stopped traffic on I-40.

Olivia Kalinowski Scottsdale, Arizona

I am a survivor of a truck crash with 5 deaths and no evidence of breaking.

Cynthia Hernandez Santa Maria, CA

While AEB likely would not have prevented my daughter's crash, it has the potential to prevent thousands of truck crash deaths and injuries and must be standard on all classes of commercial motor vehicles.

Denise McCalister Tampa, Florida

I've worked with both DUI offenders and victims and have seen the devastating effects of impaired driving.

Robyn Morton Pinellas Park, Florida

I've worked with both DUI offenders and victims and have seen the lasting effects it brings. Being the mother of a retired Law Enforcement DUI Officer, I have seen the effects it has on not only families/victims, but those who are boots on the ground to remove impaired drivers from our roadways. My son lost his best friend to an impaired driver 11 years ago and he still struggles with it today.

Jodie Edwards Liberty Township, OH

Parent of a child who died due to being inadvertently left in a hot car.

Sonia Burgess Lake City, SC

My 24 year old daughter was rear ended by an 18 wheeler. She and her 3 friends died on the scene.

Catherine Shapiro Hypoluxo, Florida

As a cyclist I have had 3 friends hit by impaired drivers while riding their bikes. Tragically 2 of them were killed, 1 survived and thankfully is healthy today. As the Program Manager for MADD South Florida, it's critical to implement DUI technology to save innocent lives.

Jan Taylor Weeks North Bethesda, Maryland

Automatic Emergency Braking could have saved our children's lives, our family and all of our futures. In July, 2009, our beautiful and amazing sons Stone Weeks, 24, and Holt Weeks, 20, were happily on their way home to Washington DC from Rice University in Houston. Driving on Interstate 81 in Virginia with only an hour left to go, Stone and Holt were in the right-hand lane preparing to exit onto Interstate 66 -- when traffic stopped because

of a jack- knifed tractor trailer ahead. The brothers stopped at the end of the miles-long line, and were then slammed from behind by a 40-ton Peterbilt tractor trailer rig traveling full-speed. The severity of the impact shot Stone's and Holt's car under the tractor trailer ahead of them. Catastrophic fire obliterated their car and both tractor trailers. This carnage and devastation melted and seared the road to the extent it had to be remilled and repaved.

Tamecha Buck Lawrenceville, Georgia

On August 2, 2021, myself and my 2 sons Javarius (19) & Chase (8) were all traveling back from a trip to the Grand Canyon when a drunk driver driving the wrong way hit us head on.

Fay Swenson Rapid City, SD

Our son Brad was killed by a speeding drunk/drugged driver who got herself and her dog out and never even tried to get Brad out and he burnt up in his car.

Amy Froehlich Appleton, Wisconsin

Our innocent and amazing son who was driving safely to go hiking, was killed instantly by a 5th time Drunk Offender going at a rate of over 80 mph in a 35 mph zone.

Susan Salhaney Grosse Pointe, Michigan

My brother was killed in 2022 during a charity bike ride for Make A Wish in Michigan. An impaired driver hit his team of five riders. The crash resulted in two fatalities, one of which was my brother.

Shirelle Green Clinton, MD

My 23-year-old son, Matéo died from injuries he sustained in a crash with a friend who had been drinking.

Taylor Greeson Lansing, Michigan

Helen Disney-Greeson, Martin Stott, and Jason Betcher deserve to still be here today. Three individuals taken by three different impaired drivers in three different years.

Cynthia Naughton Manhattan, KS

Grandmother of Brooklyn Cline, killed in a front over.

Eileen and Stan Zadrozny Westfield, New Jersey

On December 1, 2024, our beautiful 23 year-old son Ryan was crossing the street when he was killed by a drunk driver who was going 105 mph on an urban street. This driver had also killed another person in a similar way in 2011.

Linda Wickett Travelers Rest, SC

I am a friend and former colleague of Marta Magellan. She lost her grandson, Sammy Joe Schnall, son of Monique and Jeremy Schnall, because he was left in a hot car, not purposely but because everyone thought someone else had brought him into his room.

Roy Crawford Whitesburg, Kentucky

My 16 year old son was killed by an illegal trucker.

Jennifer Mooney Tierney Kernersville, NC

I lost my father in a horrific truck crash. While AEB may not have saved him, there is no denying that it could and has saved many.

Westin & Dawn Peabody Phoenix, AZ

Parents of Maya Peabody who died in a hot car 2008.

Judy Cotton Fleming Island, FL

I have been involved with Mothers Against Drunk Driving (MADD) for over 26 years, first as a volunteer and the last 13 years as a Victim Services Specialist.

Timothy Moorman, Sr. Fleming Island, FL

I tragically took the life of a 19-year-old young woman in Jacksonville, FL, on 9/25/2003 while driving under the influence of alcohol. It was not only life ending for my victim, but life altering for me. I have since dedicated my life to helping end drunk and drugged driving and have been volunteering for MADD since my release from prison in 2010

Ellen Snelling Temple Terrace, Florida

My Aunt Martha was critically injured by a drunk driver in 1997 in Sarasota. She was airlifted to a trauma hospital and admitted to the ICU. She remained in the hospital for several weeks, followed by months of rehab.

Michelle Grubbs La Center, Kentucky

I lost my 26 yr old son, his fiancé & 3 of her family members in a preventable truck crash in 2021.

Colin Campbell Los Angeles, California

My two teenage children were murdered by a drunk and high driver, and repeat DUI offender, on June 12, 2019. Their names are Ruby and Hart Campbell and they were beautiful, brilliant and talented.

Sarah Sheets Kerrville, Texas

I experienced a near miss 10 years ago when a myriad of circumstances allowed me to forget the most important person in my life, my then 9 month old daughter. I went into the bank and realized what I'd done 20 minutes later and rushed to her. She was ok. It can happen to anyone. Technology exists that would prevent unthinkable tragedy. It needs to be utilized.

Jatnaely Vega Puerto Rico

I am writing out of concern for human safety. Impaired driving continues to harm innocent lives, and preventable tragedies occur every day. Proven technology exists to help stop impaired driving before it happens. I urge you to support the immediate implementation of DUI prevention technology to help save lives.

Limaris Ortiz San Juan, P.R.

I see a lot of news report deaths because a drunk driving crashes. Like society we have the responsibility to take action to stop that fatal decision to drive while the person is drunk.

Julie Huntington Queens, NY

My Dad was senselessly killed by a reckless truck driver while driving on the Ohio Turnpike in 2019. Automated safety features like Automatic Emergency Braking could have saved his life.

Carol Leister El Dorado Hills, California

My 21-year-old son Scott Leister was killed by a drunk driver on the San Francisco-Oakland Bay Bridge on August 17, 2008. Scott was killed and the other passengers were injured when a speeding drunk driver hit their car from behind. Scott planned to get a medical degree to provide international humanitarian aid to those in need. .

Ida Crosby Orangeburg, South Carolina

My 19 year old son, Dominic Grenier, was killed on May 1, 2021 by a drunk driver. The drunk driver was a repeat offender with a suspended license. This technology could've saved my son's life. I will never fully recover from losing him. It is past time for the law to be implemented. Thank you.

Sherrill Futrell, Davis, CA

Friend hit by drunk driver.

Esmi Rosales-Cruz Kenosha, WI

Parent of Zac Shipley who passed away due to a frontover accident.

Jacy Good White Plains, NY

Lost my parents and was left paralyzed at the hands of a cell phone distracted driver.

Nereda Pugh Philadelphia, PA

I lost my son to a hit and run driver, while riding his bike in July of 2022. I've been advocating with FSS since then. I have also been working with Vision Zero as an Ambassador since 2025.

Martha Warmuth, Murfreesboro, TN

Our 28 year old daughter was hit and killed by a negligent, distracted driver in Boston in 2016. She was a beautiful, smart caring person who was successful in her career. This technology would have saved her.

Shane O'Neal Lowell, MA

I lost my youngest brother, Will O'Neal, in September of 2024 to a fatal crash. Will was biking home in Brooklyn, NY when a driver struck him in an intersection, ending his life at 26 years old. We need to do more to protect our most vulnerable road users and ensure everyone gets home safely. "

Kristin Whitaker Tampa, FL

My son passed away and it would have been preventable with the aid of increased vehicle safety measures to detect and prevent it.

Ian Shipley Kenosha, WI

Lost son from a frontal accident.

Angela Sims-Fuelling Myrtle Beach, SC

My husband Jim was killed January 4, 2022 by a truck driver you failed to stop or use his breaks. If his truck was equipped with Automatic Emergency Breaking (AEB) it would've decreased or stopped the impact and my husband would still be alive.

Deidre Hankins Tampa, Florida

In 2016 my son and his girlfriend were hit by a drunk driver. She was killed and he was in the hospital for three weeks. It is a devastating tragedy and totally preventable. We need this technology to prevent others from experiencing this kind of pain and loss. Please pass whatever bills are needed in order to advance the life-saving technology in vehicles. Thank you!

John Moore Tampa, Florida

Speeding quite likely was a contributing factor in the vehicle that struck my passenger side while executing my left turn. I had looked to my right before proceeding, but to no avail.

Stephanie Ronan, Rocky Mount, North Carolina

It has been seven years since an impaired driver crashed into me. On September 29, 2018 my life and my family's life was changed forever. Today, my body is held together by hardware in my neck, ribs, leg, and femur. I live every single day with chronic pain, limited range of motion in my neck and shoulder, and the constant reminders that my body will never be the same. The impaired driver didn't just crash into me — he crashed into my children's lives, too. He took away the mother they once knew. No one else should ever have to endure the pain, trauma, and loss that my family and I live with every single day because there is technology available to end impaired driving with the Halt Act.

Jeff & Val Shipley Kenosha, WI

Lost our grandson Zac Shipley age=3 from a front rollover accident due to the driver not knowing he was in front of the car.

Susan Becker Indianapolis, IN

Our son and our daughter's twin brother, Emery Becker was killed by a drunk driver the early morning hours of 18 Mar 2018 in LA where was living and working. He was pronounced dead at the scene. I am sharing Emery's story to have it be different for other families. The HALT act will allow it to be different. Please think about your family, your children, your children's children. . Thank you for your support in the effort to end drunk and impaired driving. Susan, Vic and Clara #emeryforever25

Rev, Martha Ann Matter Tampa, FL

As a pastor I have conducted funerals for people killed by drunk drivers, as well as helping families work through their grief. People killed by drunk drivers have died needlessly and their families experienced senseless grief. We have to stop all this.

Amy Cohen, NY, NY

My 12-year-old son was killed in front of our home. He was an athlete, musician, and a scholar. He deserved to grow up. Getting from 8th grade to soccer practice should not be a deadly act.

Jessica Hart, Washington, DC

My 5-year-old daughter Allie was killed while riding her bike in a crosswalk (at an all-way stop, in a school zone, in a residential neighborhood). Vehicle safety like automatic emergency braking could have stopped the driver from killing her.

Judith Kottick Jersey City, NJ

My daughter was killed by a reckless bus driver in Queens, NY. We should use all means available to protect our citizens from harm and death. Living without your child is a nightmare no parent should have to endure, especially when the loss is preventable.

Christy King Williamsburg, VA

On July 4, 2020, my son Christopher was killed in a car crash. He was a teenager full of life, deeply loved, and with his whole future ahead of him. He was not wearing a seat belt. I can't bring Christopher back, but I can fight to make sure other families don't receive the same devastating call. If sharing Christopher's story helps save even one life, then his life continues to make a difference. Thank you.

Britney Lee Sherman, TX

Older sister of Kaysen Neyland who passed away due to injuries sustained from being left in a hot vehicle.

Raelyn Balfour, San Antonio, TX

I am a decorated army veteran with almost 30 years of service. I lost my son in a car in 2008. No mother wants to feel what that feels like every day please I urge you to pass this legislation for bipartisanship to make sure that no mother feels the way I do every day thank you for your time."

Taylor Zaglia Holliston, MA

I am the mother of Fiona who passed away due to a hot car death.

Kate McGee New Canaan, CT

Lost 2-year old Luke in a front roll-over in 2019.

Whitney Rodden Spring Hill, KS

My 14mo old daughter Harper was killed in a front over accident at her daycare in 2016. Ever since then we have become child safety advocates to prevent this from happening to others.

Jamie Dill Evansville, Indiana

Parent of Oliver Dill that died in a hot car on July 9, 2019.

Simone Zaglia Holliston, MA

Our daughter Fiona's death was an accident that could have been prevented by the technology that alerts a driver of the presence of children/passengers in the back seat. She was, and for us will always represent, pure joy. Please ensure this technology is required in all passenger vehicles, thus bringing us in line with other developed countries. Thank you.

Pamela Cestia New Iberia, LA

My 2.5 year old son, Thomas, passed away due to a hot car accident. Having safer vehicles is key to eliminating hot car deaths.

Erica Boyer, mother of Noah Dreblow Chandler, Indiana

Noah was a front over in the driveway of his grandparents house. His grandfather was unable to see him due to his large vehicle."

Nan Potetz Phoenix City

My husband hit and killed my daughter, Erica Boyer, 15 mo old son Noah in our driveway, 2007. My husband Joe passed away Dec 1, 2024.

Dikeisha Whitlock-Pryer Houston, Texas

Our son Raymond Pryer loss his life tragically of a heat stroke after being left behind in a Daycare bus on July 19,2018 here in Houston, Texas. His death was senseless and preventable. We need your help please to stop such preventable deaths.

Erin Holley Charleston, SC

My son, Finn, was accidentally left in a parked car in Charleston midday in June when only 5 weeks old. We were moving into a new house, had a 4 year old daughter as well and hadn't slept in 5 weeks. These deaths of our most innocent, precious and beloved children (and pets) are easily preventable with the requirement of technology (affordable, already-in-existence!) in new vehicles. How regrettable it will be to lose even one defenseless life because we decided to go backwards and stop protecting them.

cc: The Honorable Brett Guthrie, Chair, Committee on Energy and Commerce
The Honorable Frank Pallone, Ranking Member, Committee on Energy and Commerce
Members of the Subcommittee on Commerce, Manufacturing, and Trade

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- i The Economic and Societal Impact of Motor Vehicle Crashes, 2019 (Revised), NHTSA, Feb 2023, DOT HS 813 403, available at <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813403>. [Economic Impact 2019], and CPI Inflation Calculator, US Bureau of Labor Statistics, https://www.bls.gov/data/inflation_calculator.htm, inflation values from Jan. 2019 to Jan. 2025
- ii The Economic and Societal Impact of Motor Vehicle Crashes, 2019 (Revised), NHTSA, Feb 2023, DOT HS 813 403, available at <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813403>. [Economic Impact 2019], and CPI Inflation Calculator, US Bureau of Labor Statistics, https://www.bls.gov/data/inflation_calculator.htm, inflation values from Jan. 2019 to Jan. 2025
- iii Traffic Safety Facts Research Note, Overview of Motor Vehicle Traffic Crashes in 2023. DOT HS 813 705, April 2025.
- iv Traffic Safety Facts 2022: A Compilation of Motor Vehicle Traffic Crash Data, NHTSA, DOT HS 813 656, Apr. 2025 (Revised), available at <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813656>.
- v Potential Lives Saved By In-Vehicle Alcohol Detection Systems, IIHS, available at <https://www.iihs.org/topics/bibliography/ref/2209>.
- vi Alcohol and Drugs, IIHS Website, last accessed Aug. 7, 2025, available at <https://www.iihs.org/topics/alcohol-and-drugs#by-the-numbers>.
- vii McEvoy, S.P.; Stevenson, M.R.; McCartt A.T.; Woodward, M.; Haworth, C; Palamara, P.; and Cercarelli, R. 2005. Role of mobile phones in motor vehicle crashes resulting in hospital attendance: a case-crossover study. *British Medical Journal* 331(7514):428; available at <http://www.bmj.com/content/331/7514/428>; and Redelmeier, D.A. and Tibshirani, R.J. 1997. Association between cellular-telephone call and motor vehicle collisions. *The New England Journal of Medicine* 336:453-58, available at <http://www.stat.wmich.edu/naranjo/articles/nejmcellphone.pdf>.
- viii Pub. L. 117-58, § 24209 (2021).
- ix Kids and Car Safety: Hot Car Deaths, available at: <https://www.kidsandcars.org/hot-cars/2024-deaths>.