

Information Availability



This month's "*Front Counter Mechanics*" addresses the future availability of service and repair information, but it's not an editorial urging you to participate in the decision-making process. There are other articles, and other venues, for that. It is, instead, a lopsided examination of the issue.

There are three sides to the information availability story: that of the manufacturers, that of the regulators and ours. As an *Import Service* reader, you already know our side of the story: If we can't get the information we need to fix our customer's cars, we're out of business.

This article is about the other two sides of the story. If you understand them, you'll be better prepared to guide your business as the issues of information availability are resolved in the months and years to come. Some of what you will read in this article may upset you, and that's good – Forewarned is forearmed. When planning strategy, it's always good to know the position of the opposing camp.

A Manufacturer's Perspective

Although what follows may look like the transcript of an actual interview, it's not. Rather, it's a synthetic composite of several conversations I've had during the past two years with representatives of a leading European car manufacturer — one that is named frequently by members of our profession when the issues of information availability are discussed. The people whose answers I've paraphrased are involved in managing their company at the national and world levels. To respect their confidentiality, I will not name them.

Import Service: What is your policy regarding the release of service and repair information to the aftermarket?

Manufacturer: Not to release anything more than the law absolutely requires.

Import Service: Why? Don't you think it's in your own best interest to give your customers freedom of choice in where they get their cars repaired?

Manufacturer: It's not that simple. Who is our customer, really? Yes, on one level our customer is the person who drives our car; but on another, it's the dealer who sells and services that car. We can't take care of one without taking care of the other.

Look at what's happening in the industry now. It's a world market. The Internet is changing how cars are bought and sold. Dealer margins are the thinnest they've ever been, and competition for new car sales is the strongest it's ever been.

When Lexus and Infiniti first entered the market, they had no pre-existing dealer sales contracts. In one step, they re-wrote the book and raised the bar. They could ensure a consistently high level of customer service because the new contracts were written that way. To survive as a company, we had to meet the competition, but we couldn't control the sales operations as they did. We had to change our relationship with our dealers while honoring existing agreements.

Dealerships are independent businesses. Changing our relationship with them is a matter of negotiation — it's give and take. What can we give? We can't give the margins we used to; the marketplace won't allow that. We can, however, give them exclusive rights to service and repair information. It's become the core of a dealership's profitability.

All prior experience shows that dealerships lose their service and repair business to independents once the warranty is up. Our cars now have maintenance-free ignition systems, 100,000-mile service intervals, extended life hydraulic fluids and oil change intervals up to 15,000 miles long. Even scheduled maintenance is now included in the purchase price.

Cars have fewer service and repair opportunities now. If dealerships, as they have in the past, lose this business to independents after three or four years, they'll lose a major portion of their profitability. Without our dealers, we're out of business; so it's in our best interest as a company to protect the competitive edge of our dealers for as long as we can.

Import Service: How do you propose to service everyone's car conveniently? You don't have enough techs.

Manufacturer: Don't you think we've thought of that? We've revamped our training program, and more than doubled the number of techs we can train. Our policy on service and repair information isn't one we propose to maintain indefinitely. It will be modified according to circumstances. For example, we might release all the repair information for 1995 models in 2003, if that's where the crunch line hits.

Import Service: What about the convenience of having service facilities nearby? You don't have nearly as many dealerships as there are independent repair shops.

Manufacturer: We are considering satellite repair facilities and the option of mobile repair with loaner vehicles.

Import Service: Aren't you concerned that your policy only adds power to the arguments that the aftermarket is using in its bid to sway public opinion and influence legislation?

Manufacturer: We don't believe that this is much of an issue to our customers. They understand the importance of trade secrets and proprietary information.

Import Service: If service and repair is only available at dealerships, you lay yourself open to allegations of monopolistic practices and price-gouging. How do you intend to counter this?

Manufacturer: First of all, our dealers must maintain their customer satisfaction numbers to retain their rights to be dealers. If their CSI is consistently below the benchmarks for three months, we have the right to pull their franchise. Secondly, the cost of service and repair is way down on the list of what's important to our customers.

The Regulators' Proposal

Unlike people in business, who are answerable only to their bosses, boards of directors or customers, people who work for the EPA are charged with the added duties of accurately interpreting congressional mandates, implementing their interpretations on restricted budgets and doing so in a fashion that is both timely and calculated to offend the fewest voters.

Holly Pugliese works for the EPA's Office of Mobile Sources. Last November, she gave two presentations to explain proposed revisions to the Clean Air Act regulations that govern the availability of service and repair information. Both presentations were in Las Vegas: one at Automotive Aftermarket Industry Week, the event sponsored each year by SEMA, MEMA, and AAIA; the other at ASA's annual event — CARS.

Her proposal, if it remains intact, is good news for the aftermarket. It addresses the definition of *emissions-related*, the issues of web-based access to information, access to manufacturers' training, reprogramming of ECU's and scan tool capabilities.

Revisions to regulations don't happen all at once. The proposed revisions will be published for comment this April; final rules will be adopted by the end of the year. Right now, the 'pre-proposal' proposal includes the following elements:

Definition of Emissions-Related

The current definition, which is roughly: 'anything that affects emissions,' shall be expanded to 'anything related to the completion of an emissions repair.' This might, if needed, include information about anti-theft, chassis and body systems. The new definition also includes the ability to reprogram EPROM's. In Pugliese's words: "If an aftermarket shop has to take the car to a dealership before they can return it to their customer, the repair is not complete." Specific reprogramming methods haven't yet been decided upon. One being considered is the use of a generic 'black-box' interface between the vehicle and a standard scan tool. An SAE committee, working with the EPA, auto manufacturers and aftermarket scan tool companies, is developing technical specifications for this.

Website Requirements

By all accounts, the effort to provide service and repair information via the government's Fed World website has been a less than a stellar success. The EPA plans to address this by requiring 'emissions-related' service and repair information websites for all manufacturers with annual vehicle sales of more than 1000 (or 5000 — it's yet to be determined).

The websites must meet specific criteria: They must be in English. They must include repair manuals, TSB's, wiring diagrams, the conditions that turn on the MIL, idle and limp-home strategies, self-test enable criteria, fault identification logic diagrams, EPROM calibrations and non-proprietary parts manufacturing information (such as component operating ranges in specified units). Although they must use the standardized terminology defined by SAE J1930, they do not have to use the standardized format defined by SAE J2008 (many manufacturers are already well along in their web development process).

Users must be able to access information by model, year, key word or phrase, diagnostic procedure, VIN or fault code. The site must allow rapid identification of the latest calibrations. New information must be uploaded within three months of the model introduction. Additions, deletions and corrections must be made weekly.

The websites must be accessible to anyone and must include instructions on how to access the information, how much it costs and payment options (e.g., subscription versus cost per use). Access to the site may not require the use of proprietary hardware, software, viewers, browsers or formats; it may not require that a vehicle be actively connected at the user's site or that a VIN be entered. Websites must include standard web capabilities such as hyperlinking.

Access charges must be determined only by distribution costs, not by development costs. Factors used to evaluate reasonable cost shall include comparisons to what it would cost for a third party to establish and maintain the website.

Website performance must be up to accepted industry standards, using measures such as average download times and appropriate number of screens per search. The EPA can either specify these performance requirements or allow manufacturers to provide monthly or quarterly performance assessments provided by independent website evaluators. The regulations shall be written in a manner that allows flexibility for future changes that enhance the site's value to the end-user.

Manufacturers must also provide an electronic version of the complete website database to information intermediaries such as ALLDATA and Mitchell. The manufacturer will not bear responsibility for the accuracy of this database unless a fee is charged. Once manufacturers are in compliance with these regulations, they would have no requirements to distribute the information via any other media (such as CD-ROM's or books).

The model years to be included in these requirements are yet to be determined. In an ideal world, they would include 1994 and newer models, but are more likely to include only 1999 and newer models.

Training Via Satellite and the Internet

Manufacturers shall provide factory training to the aftermarket. They may do so either directly or via independent providers. Revenue may be collected from charges based upon the number of students or from advertising or from both. Class schedules must be posted on the website at least one week prior to broadcast and must include the course title, time of broadcast, recommended skill level and/or suggested prerequisite courses, the cost and mechanism for payment and the information needed to register and receive the transmission.

Generic and Enhanced Information for Scan Tools

Manufacturers shall provide, in English, both generic and enhanced information that includes safety precautions necessary before invoking scanner control, a description of the logic and performance limits and specifications used in the OEM-specific scanners; how to access the complete data stream; and how to initiate bi-directional control, self-tests and specific diagnostic routines (such as injector balance tests). CAN communications protocol shall be specified. This information shall be uploaded to a secure website in a specific format, and made available to ETI or a similar industry group.

Manufacturers must also make all OEM-specific diagnostic tools available for sale and provide either direct or third-party support for these tools. 'Decontenting' of the tools shall be illegal — meaning there can be no difference between the tools released for dealer use and those released to the aftermarket.

Regulations regarding scan tool information are to become effective 30 days after the final ruling is published. These regulations will eventually be extended to include heavy-duty trucks.

Make Your Opinion Known

Although I promised at the beginning that this article was not an editorial urging you to participate in the decision-making process, I never promised it wouldn't *have* that effect. The proposal is very preliminary. EPA is currently working with auto manufacturers, aftermarket service providers and scan tool companies to flesh out the details of the final proposal. Holly Pugliese has asked to hear from people in our profession about what the regulations need to be. The future of your business may depend upon it. She may be reached at: pugliese.holly@epa.gov or at: U.S. EPA, 2000 Traverwood, Ann Arbor, Michigan, 48108. ■

—By Chip Keen