



July 11, 2017

Ms. Maureen Ohlhausen  
Acting Chairman  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Ms. Terry Shelton  
Acting Deputy Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Chairman Ohlhausen and Deputy Administrator Shelton:

The undersigned organizations are writing regarding the June 28 public workshop “Connected Cars: Privacy, Security Issues Related to Connected, Automated Vehicles,” co-sponsored by the Federal Trade Commission (FTC) and the National Highway Traffic Safety Administration (NHTSA). While we are pleased that the agencies are focusing on the critical issues of data privacy and security related to connected vehicles, the undersigned groups are very concerned that key stakeholders from the vehicle service industry were not invited to participate in this session, despite our requests.

The organizations listed below represent the \$327 billion auto care industry that services 265 million vehicles in the U.S., employs 4.3 million Americans and generates 2.1 percent of GDP. Once a vehicle is out of warranty, the vast majority of car owners prefer independent vehicle service facilities to the franchised dealer network because of three important factors: price, convenience and trust. The existence of a competitive vehicle service industry keeps repair prices affordable while ensuring convenience and quality for U.S. car owners.

As was discussed at the workshop, vehicles are transmitting extensive amounts of data, all of which is only available to the manufacturer of each vehicle. Car owners are rarely aware of the data that is sent from their vehicle nor do they have any control whether it is, in fact, transmitted and where it is sent. Much of this data could be useful to the independent aftermarket industry in order to more quickly and accurately diagnose and repair customers’ vehicles.

Further, efforts to protect vehicles from cyber intrusions could also limit access to critical diagnostic information and further erode choices for consumers. The auto care industry has sought to work with the vehicle manufacturers to ensure cyber protections for vehicles while at the same time ensuring that car owners can continue to obtain affordable and convenient repairs.

We are concerned that this public workshop did not address what we believe to be a critical aspect of the dialogue on connected vehicles and the impact on future public policy decisions and, in turn, consumers.

Therefore, we would like to set up a joint meeting between our groups and both NHTSA and the FTC to more fully discuss this issue and how it will affect consumers and competition in the vehicle repair industry. We would also like to take this opportunity to share some of the potential solutions that we are developing to meet the cyber security challenges.

Thank you in advance for your attention. Please contact Aaron Lowe, senior vice president, regulatory and government affairs, Auto Care Association, at [aaron.lowe@autocare.org](mailto:aaron.lowe@autocare.org) should you have any questions and to set up a mutually convenient time and location for a meeting on this very critical issue.

Sincerely,

Bill Long  
President/COO  
Automotive Aftermarket Suppliers Association

Bill Hanvey  
President and CEO  
Auto Care Association

Dan Risley  
President and Executive Director  
Automotive Service Association

Ray Pohlman  
President  
Coalition for Auto Repair Equality

Greg Potter  
Executive Manager  
Equipment and Tool Institute