

**From:** [Chris Roberts](#)  
**To:** [FamiliesCommunities Committee](#)  
**Subject:** Review of Bill 203 - Fair Trading (Motor Vehicle Repair Pricing Protection for Consumers) Amendment Act, 2016  
**Date:** Friday, September 30, 2016 8:18:35 AM

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Sir / Ma'am,

As per your email regarding the Fair Trading Amendment Act of 2016, the legislation applies to the private consumer and I do believe that additional responsibility placed on the passenger vehicle service and sales sector can only provide a measure of protection to all consumers. The legislation must also be aware that the AMVIC regulations cover a broad spectrum of competencies and vehicular equipment.

Our business services both on and off road wheeled and tracked vehicles that are upfitted with permanently mounted equipment (cranes, winches, aerial devices, vacuum packages etc.) The process we now undertake with our clientele requires a quotation process, an approval along with a purchase order and payment terms. Our equipment can cost anywhere from \$100,000.00 to over \$1,000,000.00 to supply, assembly and deliver to the customer. In short we are already accommodating much of what is being proposed with the legislative amendment.

What does concern me, as a business owner, is we are now effectively adding blanket legislation to an industry that is not akin to the automotive dealership and repair shop industry. Without actually distinguishing between private consumer and business to business equipment supply we now have the potential to confuse and add overall costs to the process that is operating (for the most part) in the framework proposed due to the nature of cost and contract requirements.

Further to warranties, manufacturers dictate the warranty policies that we as equipment dealers provide coverage for, with a poorly constructed blanket statement on warranty policy, interpretation can effectively drive internal costs for dealers up and thus reduce services to the commercial consumer due to consequence of legislative reprisal and the inability to cover costs. With the current economic conditions in the Province we are now operating on the slimmest of margins and our clientele are operating in the same manner, both finding additional costs very difficult to absorb.

What I would like to convey to your committee is the awareness of the various segments of the markets that this may impact if not considered correctly. Yes, as a private consumer to know that there are legislative implements in place to require the businesses I frequent are operating to the best and most fair practices available provides me with a measure of comfort. But, I would implore that solutions are discussed and enacted that recognize all aspects of whom is involved. We should be distinguishing private to commercial / industrial and be mindful of the consequences throughout the spectrum of the industries affected.

Thank you very much for this opportunity to share my thoughts regarding Bill 203

Very best regards,

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