



Auto Repair Ltd.

110 – 2850 107 Avenue SE
Calgary, AB T2Z 3R7

October 17, 2016

To all committee members,

I would first like to thank you all for taking the time to reach out to members in our industry in regards to the private members bill 203 that was brought forward to our legislature this past spring. As a concerned small business owner, I feel that the bill has good intentions with respect to providing motor vehicle repair pricing protection for consumers but I find that a number of proposed changes conflicted with standard industry practices to which not only myself but my fellow technicians and consumers understand and have become accustomed to.

According to section 57.3, subsection (2), diagnostic time is included under a fee for the estimate and following in subsection (3), the repairer shall not charge a fee for an estimate if the work or repairs in question are authorized and carried out. My colleagues and I are unanimously opposed to this portion of this section as it does not have any consideration towards the livelihood of the repairer.

Vehicle manufacturers willingly provide labour times to assist repairers in estimating as well as creating a competitive market for the consumer when it comes to removal and installation of vehicle components. Unfortunately, even the vehicle manufacturer cannot predict a majority of diagnostic times required to determine a faulty or failed component. The repairer is thus charged with this task.

Most, if not all, published labour times do not include diagnostic procedures for replacing vehicle components. For example, if a consumer experiences an issue with their power window system and being unsure of the cause, they would naturally bring their vehicle to a repairer for an electrical diagnostic. The repairer would confirm the customer complaint and follow procedures provided by the vehicle manufacturer to check each component of the power window system. This system could consist of several components such as switches, motors, wiring, etc. Each of which may require some form of removal and testing to confirm it's operation.

Contrary to popular belief, diagnostic equipment is not designed to tell you exactly what is wrong but is meant to assist the repairer by providing results depending on the test being performed. The repairer may spend approximately one to two hours to narrow down the fault to a single component such as a switch. When estimating, the vehicle manufacturer may specify that this switch takes only fifteen minutes to remove and install. Thus, the repairer would spend one hour and fifteen minutes to correct the issue but only be compensated for fifteen minutes.

Statistically, a vast majority of consumers understand that vehicle components are subject to failure and sometimes require diagnostics to determine the cause and correction. While a very small percentage still need to be educated about proper repair procedures that us as repairers were instructed to do so in Alberta Technical Training Institutions which are governed by the Alberta Industry and Apprenticeship Training Program.

In summary, repairers perform diagnostics at the request of the consumer. If the consumer feels that a certain component requires replacement to correct the issue, then they would request replacement of that component. If the component that was replaced under request fails to correct the issue, the consumer may then request the repairer to diagnose the cause. So I ask you, why does this process need to change?

Regards,

David B. Banno
Automotive Service Technician