



October 17, 2016

RE: Bill 203
Fair Trading (Motor Vehicle Repair Pricing Protection for Consumers) Amendment
Act, 2016

WHO IS HAROLD'S AUTO SERVICE?

I own this second generation independent auto service repair facility in Lethbridge. Harold's Auto Service has provided quality vehicle maintenance and service since 1973. My husband and business partner, [REDACTED] died in a highway accident in 2015. [REDACTED] had worked with his parents in this business since 1994; I've been part of the business since 1996 and we purchased the balance of shares from his retiring parents in 2006. Today I carry on business with my son (who will take over when I retire) as well as two highly skilled service advisors, 5 full time journeyman auto technicians, one part time licensed auto technician, one shuttle driver/administration assistant and one contract employee.

In 2011 we were awarded the **BBB Business Ethics Award**. In 2010 we were awarded the **Chamber of Commerce / BDC Small Business of the Year Award**. In 2011, I was one of four finalists for the **Alberta Chambers of Commerce Marketing Award of Excellence**. Although we've been nominated on other occasions for the BBB Ethics award, I was not able to pursue the very time consuming submission requirements.

We do not take these honors lightly but continually seek new ways to pursue excellence in all areas of our business, including continuing education of our technical staff and especially to sustain fully transparent customer relations based upon the highest standards of personal and business ethics.

Business ethics and top quality technical expertise are and have been the benchmark of our company since [REDACTED] and I took over management. We form relationships of trust with our customers, offer free all day shuttle service to Lethbridge and close communities outside the city. We perform comprehensive complimentary visual vehicle inspections to help our customer protect their vehicle investments. We offer outstanding national warranty coverage and stand behind our work 100% (with two minor exceptions). We follow best practices for collection, disposal of &/or recycling of metals, plastics, fluids, contaminated products, contaminated fluids, etc. We pay above average wages to our extremely dedicated staff, offer employer paid health spending accounts, employee pay group benefits, pay for staff continuing education and OOP licensing requirements but most importantly, we consider deep rooted personal and business ethics to be the benchmark when we hire staff and care about the wellbeing and success of each staff member.

I was shocked with the initial draft of Bill 203 immediately recognizing immediate and future damage it would do to our industry and was deeply disappointed that the government hadn't felt it necessary to consult industry representatives and those impacted by Bill 203 or even consider that our input was necessary on such a major bill. Please accept my input below regarding the passage of Bill 203.

Beverly Kaltenbruner
Owner

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WHO IS IMPACTED BY BILL 203?:

I cannot overstate how problematic, damaging and largely unworkable are parts of Bill 203. My business will be deeply and negatively impacted along with our customers...many of whom have been clients for decades, along with their children and grandchildren who are now also our customers.

Even tow truck drivers who change tires or swap bad batteries in the dead of winter on cold and lonely roads in rural backwoods Alberta are impacted by Bill 203 along with independent service providers like myself, dealer service providers, parts jobbers (suppliers), used parts suppliers. I see no positive impact in this bill at the current time and every single one of these practitioners will suffer negative impact to one extent or another.

WHO & WHAT ELSE WILL SUFFER NEGATIVE IMPACT?

While the bill was put forward to protect consumers, they will experience negative overall impact to the service that's provided to them and most importantly, will bear the impact of increases to overall costs of auto repair and service that I and other shop owners will have no recourse but to pass along to consumers.

Our very precious and in-danger environment will suffer the impact of used parts returned to the customer instead of being properly handled by recycling stations, parts recyclers, metal crushers, hazardous waste handlers, remanufacturing plants. The average customer has no means of properly handling these often dangerous goods and substances and will end up filling their local landfill with the waste products or even worse, will dispose of them in ditches or abandon them in non-sanctioned dump sites or rural and/or construction areas.

Bill 203 does not adequately address what constitutes the complexities of repair and service and does not even acknowledge or address firm price quotes. Without an extremely clear knowledge of each of the well-defined levels of service and the processes that constitute vehicle service and repair, Bill 203 cannot improve consumer service expectations, results or avoid doing damage to thousands of workers in the industry and vehicle service providers, most of whom are small family businesses running with very thin profit margins.

Estimates

Estimates are simply a guess as to what service or repair will be required based solely on verbal customer supplied symptoms and observations &/or a quick test drive completed by one of the trained service advisors but without involving any chargeable technician or on-hoist diagnostic time.

Estimate Fees

There should never be a fee charged for estimates; ethics bar you from charging consumers even for your very best guess until you have proven the costs through diagnostic investigation.

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Quotes & subsequent authorization for work

Quotes are and can only be created after pinpoint diagnostics are complete; that is, after a licensed technician performs chargeable diagnostic procedures on or off hoist &/or including road tests in attempts to replicate the consumer's complaint. For some vehicle complaints, until technicians are able to replicates reported symptoms, it is impossible to provide the consumer with a firm quote as to the cost of the repairs because we simply don't know what's wrong.

There is no quote or estimate "fee" as such for achieving a firm diagnosis of a vehicle issue nor should there ever be one. There is however, for each and every single service and repair that we perform, extensive costs involved, some directly related to diagnostic time required for the technician's investigation. Diagnostic charges are not fictitious in nature; they are what technicians are trained to do and the means by which they resolve vehicle complaints.

Night drop repairs - Another major issue that estimates before repair slams head on to are the thousands of customers whose schedules do not mesh with our schedules or open hours of service facilities everywhere. There is rarely a day goes by that we don't arrive to work to find one or two or even six or seven vehicles waiting for service in the parking lot because consumers' time is valuable and over-extended. The government cannot legislate consumer convenience.

If my customer cannot come to the shop during business hours to drop off a vehicle (shift work, start work too early, stop work too late or sleep deprivation from shift work, early meetings, being unreachable during the day, etc etc etc), are these folks to not have their vehicles serviced? Are these folks to challenge employers who do not allow them to take calls during the day, or will you legislate employers to allow unlimited phone calls to accommodate Bill 203's rules for authorization prior to work being completed? Should they walk off the job because legislation says they have to meet provable government guidelines for how and when and where their vehicle repair and service is completed?

Strict unyielding adherence to repair guidelines is unworkable and does not in any way acknowledge the realities of today's fast paced world where consumers fit in vehicle service and repairs wherever they are able to fit them in....whether or not they "sign" &/or receive traceable authorization forms kept on file for proof.

Towed in vehicles – What of vehicles that are towed to our shop for repair? Do those folks then have to attend the shop by taxi or other means in order to meet proposed authorization rules?

Diagnosis / Diagnostic time –

Over the past 20 years I have seen a wide variety of situations arise. With the advent of computerized technology flooding the auto repair industry, it is patently preposterous to assume that government can legislate a one size fits all approach to a pinpoint diagnosis of any vehicle issue, whether it be mechanical or electronic. The realities of repair and service are exactly the same all vehicle service provider – no matter who or where they are.

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A simple electronic problem can be pinpointed perhaps in as little as 10-20 minutes, after which my shop would charge the customer for that same 10-20 minutes of diagnostic time. A more complicated electronic diagnosis involves multiple hours identifying &/or eliminating possible causes for the vehicle's condition. I have witnessed situations where an uncommon problem can take 5-6 or even more dedicated hours of diagnostic efforts by the most talented technician. The way Bill 203 is stated, this diagnostic time is considered part of the "Estimate" and not be a consumer chargeable cost if the consumer decides to proceed with the diagnosed repair. Who does the government feel should pay for the time needed to identify these consumer concerns?

A lot of vehicle concerns can be quickly identified. At Harold's Auto Service when requested to do a full brake inspection of all related components, if the consumer only wants that specific information in hand, they will be charged for the time it took my technician to determine the condition of all components. If consumers proceed with the repair, depending on circumstance, some or all of that inspection cost is discounted from the bill. Most independent service providers operate in similar fashion but inspection fees are not the same as diagnostic time spent searching for the unknown cause of vehicle complaint and cannot be absorbed by the service provider.

If I were forced to absorb diagnostic fees (as Bill 203 states), that would necessitate an exponential increase in labor fees that would most definitely be passed along to consumers and limit their ability to keep their vehicle safe and limit the impact to the environmental. I can't imagine the increase to my hourly labor rate or at this point even being able to formulate a means of properly covering my out of pocket costs. In Alberta, well qualified talented diagnostic technicians command annual remuneration in the range of \$60,000 to \$80,000 per year. One doesn't find talented auto technicians hanging around on street corners....in fact one can barely find them at all when actively recruiting. Sure there are always one's looking for work the good ones have jobs.

If the provincial government perceives that this industry operates with huge margins and profits, they are sadly misinformed while making decisions that affect my industry. Staffing costs comprise 50% of my overall outlay prior to costs for suppliers, diagnostic tools (and required annual tool software updates), utilities, rent, operational supplies, advertising, staff benefits, fuel, input taxes, CPP, EI, finance costs, professional services, insurance (life and liability), retooling, upkeep of equipment, building and safety standards, software (both technical diagnostic information software access and administrative hardware/software and upkeep). Then there's taxes, shipping, shop vehicles, shuttle services, professional memberships and the rapidly growing burden of WCB.

I am considered a successful shop but cannot bear the cost of drinks out with clients, company paid trips or any frivolities that other industries participate in on a regular basis. In the current economic downturn I investigated any areas where spending could be curtailed or cut back. There was not a single indulgent expense of any sort; the only place I can cut back is in staffing but then how do I carry on? I could not offer consumers the ethical and technical standards that they now enjoy. In the current economic downturn I have already slashed my own salary by 50% not because I earn exorbitant wages or benefits, but simply because that's what needs to happen when facing today's realities.

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There are too few talented technicians for me to have the luxury of laying off a single one of them to temporarily ease financial woes. My staff would be picked up immediately by other shops and their less valuable tech's would be out of work. Tech's are of high enough value that employers gladly cull current staff to acquire staff others I lay off leaving only the least talented technical staff available in the hiring market. Layoffs are a no win situation.

The bottom line on diagnostic time is, if I am barred from charging for the time and costs incurred to properly diagnose a consumer vehicle complaint, I may as well just shut the doors. I am not a charity and operating costs (including diagnostics) are already too high.

Consumer Authorization –

Once the consumer vehicle complaint and the proper course of complaint correction has been identified, Harold's Auto Service does not proceed with repairs or services until we have spoken with the consumer to explain the vehicle condition, offer options whenever possible and give them detailed costs of completing the repair or service. There are few if any situations where a blanket "repairs are authorized up to \$100 is a sufficient means of meeting consumer need. An unethical shop might be able to find a way to use up that amount without fixing the current vehicle complaint issue at all. In what way has that rule protected the consumer?

Spending maximums - The repair is what the repair is and the vehicle situation is what it is...just as the consumer's financial constraints are what they are. No consumer can rule how the repair is conducted; there is only the technically correct way to diagnose and fix it. For the vast majority of vehicle complaint situations, my service manager and service advisors will have a very good idea of whether or not the diagnostics and repair will fit inside a prescribed spending maximum. Presented with a consumer's \$100 maximum spending limit, they advise whether they think that maximum is going to be sufficient to achieve resolution of the vehicle complaint. However, if they feel that isn't going to be sufficient, the consumer is advised up front. Should the consumer authorize us to proceed, they are kept apprised of progress and any changes during the course of repair, and as usual, nothing is done for the consumer that they are not made aware of in advance. Most independent service providers follow this customer model

Keeping consumers aware – Prior to them leaving our shop in the morning or when booking the appointment (should the consumer be dropping off the vehicle early or the night before) we make sure we have a means to contact them to discuss diagnosis results. (Some consumers tell us, don't call, just fix it but in most cases, until we have spoken with them, we do not proceed with repairs or services unless and only in the case of services or repairs that are static in nature and consumers were quotes costs beforehand.

That being said, we do not do work that has not been authorized by the customer; period. Yet Bill 203 will make doing so an onerous, time-consuming process adding to overall consumer cost of repairs or negate repairs altogether, slowing work flow and creating unhappy consumers. All consumers want the work done as quickly as humanly possible....unless we have the luxury of them being out of town for a period of time, or the consumer has alternate transportation for the necessary period.

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There is never ending possibilities of repair/service situations that can and do occur, leaving no pat answers or pre-determined maximum repair values that can be assessed or approved by consumers prior to properly diagnosing the vehicle issue so even if the consumer is on a road trip or out of town on business we have means of presenting diagnostic findings prior to repairs proceeding. There are many cases in which consumers have been clients for years or decades and a high level of consumer/service provider trust has been achieved. That, in the consumer's mind, precludes necessary verbal or written authority. Unless a consumer specifically advises us not to contact them, even for consumers who have given blanket authorization to fix the issue, we do not proceed until we've spoken with them.

If unsuccessful in contacting consumers for authorization after diagnosis, and if we have not been given blanket authority to "just fix the problem", we do not proceed. Depending on the vehicle complaint issue it can be necessary to dismantle a large number of components to identify and pinpoint the source of the vehicle complaint. However, it is extremely rare to we find ourselves in a situation where we are unable to contact the customer to update them on the situation &/or for further authorization because we take time to have the necessary discussions beforehand to ensure expedient service for the consumer, and to not hold up our own workers and work flow.

These are the variances and realities of diagnosis and repair and there's no one-size-fits all situation that can be succinctly tucked into legislation.

Exceeding Estimate Restricted –

57.5(1) states that total repair amount cannot exceed the "estimate" by more than 10%...and further that if so, the consumer is not responsible for the increased costs yet Bill 203 states that we are in effect, disallowed from charging for the investigation necessary to provide a true quote to the consumer of costs.

You cannot legislate the wind, as you cannot legislate an industry to provide service to consumers at no charge or without recouping out of pocket costs and wages. We are not charitable organizations. We are service providers. We are not magicians nor mind or engine readers; in many instances it is impossible to even know what the problem is, let alone provide a quote for repair costs until we have spent (what can turn out to be several hours) time to investigate the vehicle issue which may very well exceed an 'estimated guess of costs'.

Bill 203 is attempting to simply vehicle repair and service as to defy logic, without paying heed to the realities of the complexities and challenges of repairing and servicing complex machines involving thousands and thousands of parts and related components that could be at fault. With no disrespect to the medical profession, we are not removing an appendix from an abdomen – a situation where there are limited variables as to what will be found inside the patient once the scalpel reveals the inner workings. Vehicle repairs have infinite possibilities due to the thousands of interacting and related components from the simple tiny screw and spring to the computer modules which in themselves are a minefield when viewed from a diagnostic point of view.

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Technicians often search for what could be a miniscule fault in an internal component which to reach to even test and examine, might necessitate 3-6 hours work and dismantling of parts. In many cases, until we identify the issue we often don't even know what it is that we are searching for....but we do know that symptoms of the same condition can differ between vehicle models, year of manufacture or the specific time during the year when a vehicle was manufactured. We also know that similar symptoms can be triggered by a different cause depending on the vehicle, model and manufacturer date.

What you likely don't know is that for two seemingly identical models standing side by side, there could be myriad differences in parts source, material quality etc. and that those factors can and do affect how service and repair of that vehicle is performed. It is also true that those particular factors are often not addressed in the technician diagnostic software available which creates time consuming repair issues.

There exists false belief that for modern vehicle repairs, one need only to hook up scan tool and that scanner magically gives us all the answers we need to achieve proper vehicle repair and service. That is simply not true except in limited circumstance. The scan tool is only one of a wide range of diagnostic tools that are used together to ferret out the requisite information necessary to identify and further resolve the consumer vehicle complaint.

There are certain cases where a diagnosis and repair quote can easily and quickly be achieved and presented to the consumer through relatively standard physical inspection and measurements (ie: brakes, tires, steering components, etc.) or via testing with a diagnostic machine (ie: battery, starter, alternator issues) but for the balance of electronic diagnosis and driveability concerns, diagnosis of vehicle complaint issues vary in complexity, tools necessary and time required. There is no one size fits all regulation or rule that can be equally applied to sufficiently address all vehicle repair situations because as time and model years pass, technology and vehicle component complexity increases continue to affect diagnostic ease.

Return of Parts

I believe most auto service providers already retain removed parts until after customer vehicles are picked up by consumers and have them available should the consumer wish to inspect them. That of course does not include every screw, washer, bolt, etc which would be an onerous task at best. If consumers wish to take used parts they can be available but it is exceedingly rare for consumers to request to take parts with them because unless the consumer is a trained parts person &/or auto technician, they have absolutely NO way of verifying that part is or is not defective, damaged or otherwise unusable in its current condition. Even if they are a technician, faults and damage are not readily visible.

Should a customer decide to take home the part, as Bill 203 suggests in "a clean container" (which can be an absurd suggestion depending on the particular part) that part has no further usage other than perhaps as boat anchor, door stopper or outdoor garden plant holder and will eventually make its way into the local landfill or be abandoned elsewhere where it shouldn't be.

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By the language of Bill 203 in its current form, for each consumer oil change service performed my company would be required to retain and store used oil filters in a "clean container" to return to the consumer.

The "average" consumer has no way or means or knowledge of proper handling/disposal of used parts, noxious chemicals and fluids that used parts often hold or are contaminated with, and likely little education as to the means of properly protecting themselves or the environment from noxious substances and metals once they have them at home.

Auto service providers collected metals are eventually sent to be crushed &/or recycled into other manufacturing processes. Environmentally hazardous waste and contaminated parts & or materials are collected, properly housed and picked up by licensed facilities as mandated by environmental regulation.

The "return of parts" section is particularly ill advised, poorly thought out and is simply adding another layer of unnecessary regulation to an industry already conforming to environment protection considerations.

Warranty

Warranty provided by most auto service providers far exceeds what you're calling for in Bill 203. My standard workmanship warranty covers all services and repairs for 1 year - 20,000 Km (non transferrable). In addition I carry the Auto-Select National Warranty program which offers Parts/Labor 365 days for non-commercial vehicles and commercial vehicles 2500HD series & under. We also honor many competitor & dealer warranties (with written proof of coverage).

While my warranty is likely more extensive than many service providers, it is not unusual for an independent service provider to offer very comprehensive plans at no additional charge to consumers. But there are and must be exceptions where no parts or labor warranty can be offered or implied:

1. When a consumer asks us to install parts purchased elsewhere. Over the course of the past 20 years the aftermarket vehicle parts market has become flooded with cheap, poorly produced parts from questionable manufacturers utilizing inadequate quality materials thus creating a situation in which our industry has had to become extremely particular about origin and quality of parts. If I cannot control the quality of the part, I cannot offer warranty coverage for the part or labor to install it.

Furthermore, if I cannot control the origin of the part, I will not and cannot be forced by any legislation to place my company in a position of responsibility for parts that could cause catastrophic, life threatening, or vehicle damaging failure and those consumers will be turned away. There are service providers who do not look at the situation in the same light and will follow instructions of the consumers, but they are doing disservice to consumer safety and the industry as a whole.

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2. When a consumer requests we replace parts or perform services based on vehicle complaints diagnosed elsewhere and we are not allowed the opportunity to perform our own diagnostic testing to confirm the correct repair or service is being performed. Accepting diagnosis performed by any other service facility and warranting resultant problems is preposterous at best.

By the same token, should a service or repair completed at my location fail, unless that vehicle breakdown or parts failure occurs at a substantial distance away making it completely unreasonable for the vehicle to be returned to my location, I reserve the right to discuss the failure with the other service provider and learn circumstance of the breakdown. It is unreasonable to expect me to simply write a cheque based on the word of just anyone.

Depending upon the particular supplier &/or part, there is at times no need to incur shipping costs back to my location. Some parts are considered to hazardous goods because of the nature of contaminated fluids within the component and should not be shipped.

Subtrades - As an ethical business I would NEVER refer a consumer to a sub-trade for warranty coverage. When specialized sub-trades are utilized, warranty responsibility lies only with me, the service provider chosen by the consumer. Responsibility for seeking warranty from the sub-trade should never be placed upon the consumer because that consumer did not contract nor choose the particular sub-trade. When I sub-let work to a specialty shop for exhaust or glass or any service, it is my job to ensure that the company I contract is of the highest technical expertise and ethical standards so that I can be certain I am providing the highest level service to the consumer and it is my responsibility to stand behind the work done by that subtrade company and extend my own warranty coverage to the consumer for that work. It is upon me to seek recompense from the subtrade.

The Elusive "Regulations"

This bland seemingly innocuous phrase presents vulnerability for our industry. Bill 203 has no definitive stipulation as to what "the regulations" are, who in fact, will define "the regulations" or even who will be or has been tasked with defining working terms and language of Bill 203 or its "regulations". The most disturbing part of "the regulations" is that there is no information provided stipulating what level of expertise, service knowledge or industry standards comprehension is required of any individual &/or group who makes these decisions and definitions. That is tantamount to my sitting on committee to decide what and how medical terms are defined and what they refer to in legislation regarding medical services provided to Albertans without having requisite expertise in that field of knowledge.

In order to not do immediate, imminent and/or permanent damage to this industry and the consumers it serves, it is ludicrous for any group or individual to take upon themselves responsibility for defining terms utilized in any Bill without first obtaining a high level of industry knowledge and full understanding of exactly what the industry itself defines to be an estimate, a quote, what diagnostic time comprises and when it's required and necessary to even formulate a diagnosis and further, prepare a quote for resolving the particular issue, etc., etc., etc.

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If Mr. Joe Average lawyer or doctor or engineer or farmer, etc etc takes upon themselves the duty and responsibility of further regulating the auto repair or in fact any industry, they need to first not decimate the industry with unworkable regulations that will have long-term negative implications and results. Simply being a consumer/driver does not constitute possessing sufficient knowledge with which one should create legally enforceable decisions and rules for how that industry goes about achieving the best results for all consumers.

FINALLY...

Consumer protection already exists in Alberta but as evidenced by the circumstance surrounding Bill 203, not even elected members of our legislature are aware of existing regulations, standards and protections.

In some points of Bill 203, the realities of repair and service have been over-simplified to the point of being completely devoid of reasonable application. In other areas of Bill 203, the realities of vehicle repair and service have been complicated to an unworkable point where service providers cannot reasonably nor economically provide the services for which we are being contracted and our business model cannot succeed in the long term. The end result is destined to be far higher costs for consumers and the environment.

As I'm sure happens with every service provider, consumer contact, quotes and diagnostic labor time becomes defined by the particular vehicle complaint. Each situation is unique depending upon the prior trust relationship formed with each consumer. Attempting through legislation to form a law that covers all repair and service circumstance is impossible due to the infinite variables within the incredibly complex machines we repair.

Consumers are advised when booking an appointment or when dropping off their vehicle that depending upon the type of repair or service necessary, they need to be available for us to contact them for authorization during the course of the process but because every situation is unique – apart from things like oil changes, wiper blade replacement, headlight alignment or tire swaps - there are myriad levels of complexity to each job all requiring different strategy to achieve best results for consumers. Even tires and tire replacement has become complicated by the advent of Tire Pressure Monitors/Sensors and systems.

Auto service and repair is complex, ever changing and must constantly evolve to meet the challenges of increased technological advancements. Attempts to legislate service and diagnostic procedures, is tantamount to legislating weather variables.

Bill 203 almost makes service providers somehow responsible for the condition of the vehicle and seems we need only wave our magic wands over vehicles to know instantly the why and wherefore of the condition and repair costs so that we don't have to pay our talented people for their work.

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My view of Alberta Auto Industry Standards and Consumer Protection

No matter the industry, no matter the legislation, ethical businesses will remain ethical and unethical businesses will always find ways to circumvent regulation and rules and continue to conduct themselves with dishonor.

We have the necessary solution already in place via AMVIC. However, I firmly believe the prevalent challenge facing consumers in Alberta's auto industry is not the actions of service providers, the majority of whom are ethical businesses. I believe the issue has been caused by the Province of Alberta in that after creating a comprehensive regulatory body and consumer protection organization in the form of AMVIC, the province itself failed consumers by not following through with the intent they had in setting up AMVIC the in following ways.

1. Alberta Transportation does not adequately educate consumers about AMVIC's power to regulate and enforce industry standards and protect consumers.
2. There is insufficient information given at time of vehicle purchase to tell consumers that AMVIC provides recourse action assistance if needed.
3. There is no AMVIC details taught in driver education programs.
4. Detailed consumer complaint strategies are not outlined when drivers register vehicles.
5. During purchase, lease or repair insufficient advice is provided to consumers outlining possible future issues and the assistance and options that are accessible through AMVIC.
6. Apart from the AMVIC brochures displayed in my waiting room, I've not seen any concise media message to consumers that says "got a vehicle service problem? AMVIC will help you achieve resolution." I have seen a few detail-starved TV spots about AMVIC but nothing that clearly states "If you feel you've been unjustly treated by a service provider, AMVIC help you will resolve that issues and that you, as an Alberta consumer, don't need to carry that burden alone."
7. The mandate of AMVIC, as I understand it, is not only to regulate and police the industry, but ferret out those who do not operate with high ethical standards. Either the Government of Alberta has failed to provide adequate funding for AMVIC staffing to do so or perhaps AMVIC financial resources are not being properly directed to this end.

Bill 203 passed First reading without seeking any input whatsoever from our industry, and would punish our industry rather than see AMVIC effectively manage and maximize consumer protection tools already in place. Bill 203 seems to not take into account realistic knowledge of the industry or give thought to long term impact of the bill on financial resources of consumers, overall health of the industry and security of jobs for thousands of dedicated individuals who work hard in this industry every day to do a good job for consumers.

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When my husband and I became involved in the industry and further, when we purchased this company, it was our absolute and publically stated intent:

1. To always do our best to educate consumers empowering them to make informed decisions regarding their vehicles and vehicle maintenance budgets.
2. That we as a company, we would only advise and do what's best for each consumer taking into account each individual's financial constraints and service expectations which vary widely.
3. That we would operate at the highest possible ethical standards and employ only those who held the same beliefs and standards.

While I cannot and should not speak for corporate entities or automotive manufacturers and their industry offshoots, I do not believe that our attitude falls far from the intent of most independent auto service providers in our province or elsewhere who get into this business for love of the machines and in order to foster a following of trust with their consumer customers.

If any member of the standing committee is interested in speaking with me, I would be happy to discuss my thoughts, feelings and concerns regarding Bill 203, AMVIC and consumer protection in the auto industry in Alberta.

Thank you. With respect,

Beverly Kaltenbruner
Member CIAA, CFIB, CTF and AMA recommended service facility.

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