



SILVERHILL ACURA
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October 27, 2016

Submission to the Standing Committee on Families and Communities

RE: Bill 203

Dear Committee Members,

Thank you for the opportunity to submit our concerns to the members of the Standing Committee for Families and communities in regards to Bill 203 – Fair Trading (Motor Vehicle Repair Pricing Protection for Consumers) Amendment Act, 2016, proposed by MLA Carson. Respectfully, we are in opposition to this legislation for a multitude of reasons.

To begin, Bill 203 is not necessary, as in Alberta we are fortunate to have the Alberta Motor Vehicle Industry Council (AMVIC) which is unique to other provinces. This regulatory body is an independent authority who is accountable to the Alberta Government. AMVIC mediates and monitors vehicle repair services and complaints from consumers. Bill 203 would be a duplication of effort. As shared by AMVIC, from the period of June 30, 2014 to July 1, 2014, consumer complaints regarding vehicle repairs have amounted to 1/10000th of 1%.

In our opinion, another underlying fault of this proposed legislation is that in its creation, the vested industry was not consulted. As drafted, Bill 203 is based on outdated and old scenarios within our industry. This lack of consultation, is clearly illustrated in Bill 203 sections 57.2 and 57.3, ***Estimate and Estimate fee***. To be fair, consumer authorization of estimates and service work repair is attained before any work is completed. The legislation states that allowable estimation costs will be prescribed by the regulations. An estimation is based on experience and the complexity of the repair, this cannot be grouped into one specific set estimate charge. Best practices and procedures within our industry already provide the majority of estimates to our clients free of charge. Nominal fees may be estimated for diagnostic tests that are required. These charges are communicated to our customers. Respectfully, as a business, the cost of any estimate should be a competitive advantage for that repair facility.

This brings us to the legislation's section of 57.8, **Posting Signs**. With respect and integrity forefront in all of our operations, we find this to be insulting and unnecessary.

Bill 203 also requires further development in the area of section 57.11, **Warranty**. This section needs further clarification. It is unrealistic that a consumer is responsible to contact a subcontractor in regard to a warranty situation. In our opinion, the responsibility to correct a concern with a subcontractor lies with the repairer, not the customer. This section also proposes to legislate business relationships between repair facilities and parts manufacturers. Please provide evidence that this is actually an issue that needs control beyond the Fair trading Act.

In summary, we have chosen to point out a small number flaws that are illustrated within the draft of Bill 203. We have been a reputable repair facility in the city of Calgary since 1987. We employ over 80 staff and are proud to be a member in good standing of the Better Business Bureau. We have invested greatly into this industry and we work very hard to attract and retain our customers. Bill 203 has been drafted in a way that reflects a lack of knowledge about our industry. This legislation is unnecessary and would require full consultation with all vested Ministries and the automobile repair industry to better represent forward thinking.

We welcome the opportunity to participate in this consultation.

Sincerely,

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