

**OEM Website Audit Steering Committee Conference Call Notes  
February 24, 2005**

The tenth meeting of the OEM Website Audit Steering Committee took place by conference call on February 24, 2005. Participants on the call included Holly Pugliese (U.S. EPA), John Cabaniss, John Daley, Tom Trisdale (Steve Douglas' proxy), Eddie Ehlert, Charlie Gorman, Aaron Lowe, Dave Scaler, Ron Turner, and Mark Warren. Also on the call were Monika Chandra and Twohy Murray from Perrin Quarles Associates, Inc.

**A. Introduction**

There were no additions to the agenda. PQA noted that the main purpose of the conference call would be to finalize the audit questionnaire.

**B. Technicians Who Have Applied to Perform Evaluations**

PQA announced that 196 technicians have applied to participate in the OEM audit. EPA mentioned that NADA had recently made efforts to publicize the OEM audit. EPA questioned whether the number of dealer technicians had grown. Based on the names and companies of technicians, it appears that at least two dealer technicians have applied. One member asked if technicians had requested to evaluate specific OEM websites. PQA responded that the only information submitted by technicians using the modified application was name, email, company, city, state, phone number, fax number, and position. The full technician application requests that technicians indicate the OEM website that they would prefer to audit. However, the application is currently under EPA internal review. Once EPA's review is complete, the application will be posted on the OEM audit website. The technicians who have expressed an interest in participating in the OEM audit will be contacted and asked to fill out the auditor application.

**C. Revised OEM Website Audit Questionnaire**

Rankings Column

During the February 17, 2005 conference call, a number of revisions were made to the questionnaire. As part of a compromise during the previous call, the Committee agreed to include both a rankings column and a yes/no column in segment 1. In addition, the Committee discussed at length whether to extend the rankings column beyond segment 1. EPA had largely refrained from commenting during the previous call. After reviewing the regulation, EPA agreed with many Steering Committee members that the questionnaire should include some subjective questions. However, EPA did not feel that the rankings column should be extended beyond segment 1, citing complaints from the OEM companies.

One member noted that the main concern of OEMs was that the questions would not be adequately worded to solicit both objective and subjective responses. According to the member, the OEMs were also concerned that some questions would be misinterpreted. However, the OEMs supported the inclusion of a yes/no column and a rankings column in segment 1.

Another member thought that without a rankings column, auditors would be unable to express their opinions of OEM websites. EPA noted that auditors were encouraged to include an explanation of their response in the notes column of each question and in the general comments section at the end of each segment. EPA believed that these aspects of the survey would provide auditors with ample opportunities to share their opinions of OEM websites. Although subjectivity was important to the survey, EPA noted that the EPA wished to discourage auditors from making judgments on the quality of the information provided by OEM websites. Another member felt that rankings would help OEMs improve their websites. The member believed that the OEMs and the Steering Committee were limiting the amount of information that could be collected by not extending the rankings column.

One member noted that without measurement criteria, auditors would have difficulty ranking OEM website features. Another member mentioned that he thought dissatisfied auditors would be more likely to answer "no" if a ranking column was not included. A third member noted that OEMs were not completely adverse to using rankings in surveys. The member cited Toyota's customer service survey. The first member questioned whether the objective of the audit was to measure compliance or user satisfaction. EPA responded that the primary goal of the audit was to determine if OEM websites included all features required under EPA's regulation. EPA added though that the audit also was designed to assess the usability of OEM websites. EPA believed that this dichotomy was both useful and important. A fourth member noted that although he felt that the OEMs were making a mistake by not supporting a ranking system throughout the survey, he would agree to limit the ranking column to segment 1.

One member commented on quality of mode 6 data, which is addressed in question 3.2a. He believed auditors should rate the quality of the information. EPA explained that the objective of the question was to identify the issues associated with mode 6 data. The member requested clarification on whether auditors were expected to answer question 3.2a in the notes column. A second member responded that relying on the notes column would be inefficient. While rankings could be quickly summarized, the notes would have to be examined thoroughly to gain insight into auditors' experience with the OEM websites. EPA commented that it did not have the authority to judge mode 6 data. The regulation only requires that OEMs provide the same information to the aftermarket companies that they provide to their dealerships. Another member agreed that the comments would be hard to interpret in their original form. However, the member believed that once the comments were summarized by PQA, the notes would prove to be more meaningful than the rankings that auditors could provide.

EPA agreed with the member's comment. However, one member remained concerned. Using the search engine feature as an example, he questioned how auditors would respond to an OEM website with a poorly designed search engine. The member felt that an inadequate search engine could be equivalent to the website not having a search engine at all. EPA disagreed and commented that auditors could note any dissatisfaction with a website in the notes column or the general comments section. EPA was committed to remaining within the boundaries of the regulation.

The Steering Committee agreed to compromise despite the differences in opinion. The rankings column will only be incorporated into segment 1. To encourage subjective comments in other segments of the survey, the language of the general instructions will be modified.

One member questioned whether the presence of a yes/no column and a rankings column in segment 1 would create confusion. EPA suggested modifying the general instructions to clarify how auditors were expected to respond to segment 1 questions. Another member proposed modifying the segment instructions as well. EPA supported the compromise and was convinced that the Committee would still collect a large amount of useful information.

One member supported the use of rankings in segment 1 but suggested a 1 to 5 ranking scheme instead of the 1 to 10 scheme originally proposed. The member believed that 10 rankings were not necessary. EPA did not have a preference. The Committee did not comment.

### General Instructions

A Steering Committee member felt that the language of the first paragraph should be revised to indicate that the objective of the audit was to both assess the compliance of OEM websites with the EPA regulation and evaluate the quality of OEM website features. He believed that this would help auditors understand the purpose of the notes column, the general comments sections, and the ranking column. As an alternative, EPA suggested striking the word "objective" from the first paragraph. The member agreed.

Another member noted that in the revised questionnaire, auditors were no longer required to provide a browser name. He believed that it was important for auditors to note both their browser and browser version. He also suggested asking auditors to list their operating system version. One member requested clarification on what browsers OEMs were required to support. The previous member responded that most OEMs chose to use Internet Explorer. EPA added that a specific browser was not included in the regulation. One member noted that it was impossible for OEMs to support all browsers. A fourth member commented that OEMs were moving towards a browser agnostic approach. Until then, users with incompatible browsers will continue to experience difficulty accessing

some OEMs. By requesting an auditor's software information, the Committee will be able to identify auditors who may have had trouble accessing OEM websites due to incompatibility.

Assuming that most technicians will complete the questionnaire in segments, one member suggested removing segment specific instructions from the general instructions and inserting the instructions into the introduction of the applicable segment. The member added that some of the segment instructions appeared to be inaccurate. EPA noticed this as well and attributed the inaccuracies to the recent edits of the survey. The member had several other small edits to the general instructions and agreed to email the revisions to EPA and PQA for review.

### Segment 1

One member mentioned that an OEM company disagreed with the statement in question 1.3. The OEM believed proprietary software could be used if it was available on the OEM website. EPA responded that use of the software must be approved by EPA and suggested that the OEM speak with the Agency directly regarding any issues concerning the rule. The member also noted that the second sentence of 1.3 had not been rephrased as a question. The question will be revised.

The member also questioned the intent of question 1.5 and the meaning of the word "access." He noted that access could be interpreted as the time required to download information, which would vary according to a number of factors including file format. Access could also refer to an auditor's subscription to an OEM website, which might be affected by external entities like Paypal. EPA agreed that the question could be misinterpreted. A second member also agreed and noted that auditors' access to documents would be determined by a number of factors external to the OEM including modem speed. The member suggested revising the question to read "access the service information you were looking for." Another member noted the revision created an overlap between questions 1.5 and 1.6. One member believed that the question also pertained to reprogramming software downloads, which can take up to eight hours. EPA suggested switching the order of questions 1.6 and 1.5.

One member was still confused as to the objective of question 1.5. He questioned whether 1.5 referred to the time required to find information or the time required to download information. EPA responded that the question was meant to address the time required to find information. EPA can not regulate the time required to download information. The member suggested clarifying this in the question.

### Segment 2

One member suggested providing two separate lines for the questions in question 2.1. EPA agreed.

### Segment 3

As was discussed earlier in the call, question 3.2a will be clarified. Auditors will be asked to respond in the notes column. One member noted that one OEM company believed more guidance was necessary in question 3.2a. The OEM suggested asking auditors to rank the usefulness of the information on a 1 to 4 scale. As an alternative, EPA suggested rephrasing the question to read, "How useful was the information in completing the repair you were performing?" EPA did not want to provide guidance for specific questions. Another member agreed that question 3.2a did not require clarification beyond the revisions discussed earlier.

One member questioned how auditors would respond to question 3.7, which relates to the availability of technical service bulletins (TSB). The member was aware of some OEMs that provide TSBs in print but do not appear to provide the TSBs online. EPA suggested adding the phrase "readily available" to the question. Another member disagreed noting that "readily available" in question 3.7 was too subjective because the auditor's experience with the website would determine how quickly the information was found. The previous member was concerned that some TSBs simply were not available. A third member noted that TSBs were a regulation requirement and that any cases of noncompliance should be reported with NASTF. The Committee agreed to add the phrase "readily available" to question 3.7.

### Segment 4

One member noted that the instructions between questions 4.11 and 4.12 had not been revised since the previous conference call. The OEMs utilizing alternative methods of reinitialization were not listed. EPA agreed to determine the OEMs and update the questionnaire.

EPA suggested adding a question relating to the time required to download reprogramming information, as discussed earlier in the call. The Committee believed that any problems associated with downloading the information would be expressed in the notes column of the applicable questions and general comments section of segment 4. An additional question will not be added.

### Segment 5

One member suggested rephrasing the second sentence of question 5.5 as a separate question. The Committee agreed. This will be listed as question 5.5c.

The Steering Committee member also suggested several revisions to question 5.12. The question currently lists five options. The member suggested changing option 3 from "experience" to "experience/familiarity with the product" and option 4 from "cost" to "price." In option 1, he felt "interface" should be removed. The member also proposed adding a sixth option, "completeness of information for the brands I service." Another

member believed question 5.12 should be listed following question 5.8. The previous member agreed. The member also agreed to email EPA and PQA a number of smaller revisions to segment 5.

Another member suggested rephrasing question 5.6a. He believed that auditors should also be asked to describe the documents purchased. This information would indicate which documents auditors found most useful. The Committee agreed with the proposed revision.

### Segment 6

There was some question as to the purpose of the "contact us" link of OEM websites. One member believed that the primary purpose of the feature was to assist users in finding information available on the website. EPA noted that the "contact us" link was a CARB requirement but was not mandatory under EPA's regulation. A second member suggested a series of revisions to help clarify question 6.2. He noted that the "contact us" link was not designed to assist users in "vehicle" trouble shooting or "technical assistance." A third Steering Committee member worried that the question still gave the impression that the "contact us" link was not designed to help users find information. Another member suggested adding "omissions" to the list of problems users were allowed to report using the "contact us" link. The Committee agreed with this suggestion. The revised question will read, "the 'contact us' link is required to allow users to reports problems, omissions, or errors with the website, not to assist in vehicle trouble shooting or technical assistance." Before adding the revised question to the survey, EPA will speak with CARB to ensure that the question still addresses CARB's requirements.

One member noted that most OEM websites already provided a "contact us" link. Consequently, he did not think that question 6.2 was necessary. A second member noted that while most websites do have a "contact us" link, it is difficult to locate in some websites. As a result, some technicians might answer "no" to question 6.2.

### **D. Next Steps**

Any additional edits or revisions that were not discussed during the call should be emailed to PQA. PQA will incorporate all revisions into a final draft of the audit questionnaire and will email the final draft to the Committee. Committee members are expected to respond with any revisions within 48 hours. Once the survey has been approved by the Steering Committee, the final draft will undergo an EPA internal review.

EPA noted that due to the difficulties in finalizing the audit questionnaire, the OEM audit was slightly behind schedule. One member asked EPA if an Information Collection Request (ICR) is required for the OEM audit. EPA believed that the OEM audit would be covered under an existing ICR. However, the Office of Management and Budget (OMB) is currently reviewing this issue. OMB requires ICRs in all cases where the federal government collects information from more than nine people. EPA acknowledged that

OMB may decide that EPA needs to submit an ICR specific to the OEM audit. In this case EPA would issue a Federal Register notice and estimate the burden on those affected. This process could delay the OEM audit by a two to three months. One member noted that participation in the OEM audit was completely voluntary. EPA responded that even voluntary surveys require ICRs. EPA added that the Steering Committee will be notified shortly whether a specific ICR for the OEM audit is required.

One member requested that an email be sent to the audit applicants to confirm that their application has been received and to provide an update on the status of the audit. EPA agreed to draft the email. It should be noted that a receipt confirmation is sent to each applicant when they apply.

#### **E. Action Items**

- (1) PQA will revise the general instructions to accurately reflect the objective of the OEM audit.
- (2) PQA will add "browser and version" and "operating system and version" to the auditor information section of the questionnaire.
- (3) PQA will add segment specific instructions to the introductory paragraph of each segment.
- (4) PQA will revise the language of questions 1.3 and 1.5. The order of questions 1.5 and 1.6 will be reversed.
- (5) PQA will create an additional row for the second question currently listed in question 2.1.
- (6) PQA will revise questions 3.2a and 3.7. Auditors will be asked to respond in the notes column of question 3.2a. The phrase "readily available" will be added to question 3.7.
- (7) EPA will determine the OEMs that currently use alternative methods of reinitialization.
- (8) PQA will revise the language of questions 5.5, 5.6a, and 5.12. Question 5.12 will be moved so that it follows question 5.8.
- (9) PQA will rephrase question 6.2 to clarify the purpose of the "contact us" link.

- (10) PQA will email Committee members a revised questionnaire the week of February 28, 2005. Committee members should send PQA any final revisions within 48 hours of receiving the email from PQA. PQA will then finalize the questionnaire and submit the final draft to EPA for internal review.
- (11) EPA will draft an email to send to the audit applicants in order to provide an update on the status of the project.