

**OEM Website Audit Steering Committee
Conference Call Notes
January 20, 2005**

The sixth meeting of the OEM Website Audit Steering Committee took place by conference call on January 20, 2005. Participants on the call included Holly Pugliese (US EPA), John Cabaniss, John Daley, Steve Douglas, Bob Everett, Ron Garrett, Charlie Gorman, Dean Hermano, Dave Scaler, Donnie Seyfer, Ron Turner, and Mark Warren. Doran Stegura, Monika Chandra and Twohy Murray from Perrin Quarles Associates, Inc. were also on the call.

A. Introduction

PQA began the meeting with an informal roll call. There were no additions to the agenda.

B. Communication

The OEM Audit website went live on Monday, January 17, 2005. PQA asked for suggestions on ways to improve the website. EPA commented that IATN liked the website and found it easy to use. PQA noted that in addition to the website being linked to the IATN site, Dean Hermano and Donnie Seyfer have also provided links on the California Air Resources Board (CARB) website and the NATEF website, respectively. PQA encouraged other committee members to do the same. John Cabaniss offered to link the OEM Audit website to the NASTF website. He plans to set up the link on Monday, January 24, 2005. He also offered to send a notice to NASTF subscribers regarding the website and the application process. He will include in the notice a note encouraging NASTF subscribers to provide links to the OEM Audit website. He questioned whether prior approval from EPA or other Steering Committee members was necessary before granting such authority to NASTF members. EPA responded that approval was not necessary in this case. Another member suggested providing links on the ASA website. Charlie Gorman also agreed to post a link on his company's website.

It was suggested by one member that a link to EPA's website be added to the OEM website's links page. The member noted that this link could direct users to the OEM regulation. EPA supported the suggestion and agreed to investigate the feasibility of adding this link to the site.

C. Technicians Who Have Applied to Perform Evaluations

PQA noted that 89 technicians had registered as of 1:15 PM Eastern Standard time on Thursday, January 20, 2005. Seventy of the technicians applied online, while 19 had previously expressed interest at the OEM Audit Conference in November 2004. The large number of technicians who have already applied suggests that the automotive community is

aware of the OEM audit. However, more technicians are needed. PQA asked for suggestions on increasing the number of applicants.

John Cabaniss suggested asking NASTF journalists and newsletter distributors to include information regarding the OEM audit in their future publications. He commented that a Pennsylvania journalist had approached him in mid-December offering to write a press release on the OEM audit. At the time, John declined, but he felt that with the website now available, a press release would be more beneficial. EPA questioned the audience of the Pennsylvania journalist. John responded that the journalist intended to write for a broad audience. EPA supported contacting journalists to increase publicity and noted that the announcement that has been distributed to the Steering Committee members could be used by journalists as well. EPA added that Tom Nash and a journalist from Automotive Aftermarket were interested in writing about the OEM Audit.

One member asked how many technicians would be necessary for the audit. As discussed during previous calls, there are 26 OEMs. The Committee agreed that 8 to 10 members should be selected to evaluate each OEM. This would require between 200 and 260 technicians. A selection process will only be necessary if more than 260 technicians apply. Some technicians may be asked to complete multiple audits if the number of applicants is insufficient.

EPA asked the Steering Committee to solidify its policy on dealership technicians. After reading the Steering Committee's conference call notes, Dave Lansberry of IATN concluded that dealer technicians would not be included in the audit. EPA responded to Dave's post on the IATN website by stating that dealer technicians were in no way excluded from participating in the audit, and the Committee hoped to draw from a variety of backgrounds and experience levels. One member agreed with EPA's statement noting that dealer technicians were welcome to participate but would not be allowed to evaluate their company's OEM. EPA offered to contact the National Automobile Dealers Association (NADA) to encourage more dealership technicians to apply. One member noted that NADA only has contacts with state organizations, which in turn have contacts with individual dealerships. Merely contacting NADA would not ensure that dealership technicians were notified. EPA still felt the effort would be worthwhile and plans to contact NADA. EPA also noted that dealership technicians could be notified through the IATN website, which already provides a link to the OEM Audit website.

To help identify dealership applicants, EPA suggested adding an additional question to the audit application. EPA proposed that applicants be asked to define their company as an "independent dealer", a "mass merchandiser", or a "franchise new car dealer". PQA commented that most dealership technicians could be identified simply by their company name. PQA identified only one applicant that appeared to be a dealership technician. To clarify the Steering Committee's position on dealership technicians, EPA agreed to make a second post on the IATN. EPA also asked Bob Everett to contact dealership technicians through AASP's website. He agreed to send an email to AASP members.

D. Revised OEM Website Audit Questionnaire

Based on the January 13, 2005 conference call, several revisions were made to the draft audit questionnaire. PQA asked for comments on the revisions and suggested that the Committee's discussion focus on the content and format of the questions. There were no comments on segments 1 or 2.

Segment 3

One member found the language of segment 3 still difficult to understand and asked EPA if outside sources could be asked to review the survey. The member felt that suggestions from outside experts might be helpful. EPA noted that, as discussed in the previous conference call, technicians associated with Steering Committee members will complete a preliminary evaluation of the audit questionnaire prior to its release to selected audit technicians. EPA also agreed that additional preliminary evaluations outside the scope of this effort may be beneficial as well. EPA requested that if the questionnaire is distributed to individuals beyond the Steering Committee for comment, it should be identified as a draft that is not meant for general distribution.

EPA reminded the Steering Committee that the questions in each segment cannot be expanded beyond the scope of the regulation. One member responded that the primary concern is the quality and clarity of the questions. A second member suggested that the OEM regulation be sent out with the draft audit questionnaire to help clarify the objective of each question. EPA also reminded the Steering Committee that the final audit questionnaire would have to be approved internally by EPA prior to its general distribution to the auditors.

Segment 4

During the January 13, 2005 conference call, the Committee agreed on several revisions to segment 4. The revisions were made by Holly Pugliese. Question 4.1, which included seven questions in the previous version of the draft survey, was reduced to four questions. The revised 4.1 now includes three questions relating to reprogramming, while the revised 4.2 contains one question addressing reinitialization. Both 4.1 and 4.2 are preceded by a screening question. The question requests that auditors who have not performed reprogramming or reinitialization, skip to the next question. In addition, three of the questions in the previous version of 4.1 were moved to segment 3 and are now listed as questions 3.6, 3.7, and 3.8.

Holly Pugliese asked for comments on these revisions. One member suggested adding a question asking technicians when they had last performed reprogramming or reinitialization. The member noted that reprogramming and reinitialization technology has changed in recent years, and he believed that only technicians who had used the technology within the past year should be asked to answer questions 4.1 and 4.2. A second member felt that an additional question was not necessary. Another member believed that all

technicians should have the opportunity to answer questions 4.1 and 4.2 regardless of their reprogramming or reinitialization experience. The member noted that many technicians look for the information but never use it. The member worried that such technicians would feel obligated to skip questions 4.1 and 4.2. A fourth member disagreed and noted that performing reprogramming or reinitialization requires a deeper understanding than simply searching for the information. The member felt that only the input of technicians that had performed reprogramming or reinitialization should be used.

Several committee members asserted that the response of technicians, who routinely access the information but never use it, should not be ignored. Several members agreed that it was still important to know if the technician had performed reprogramming or reinitialization tasks, but that regardless of whether these tasks had been performed, the auditor should still be given the opportunity to respond to questions 4.1 and 4.2. EPA agreed but commented that a time frame should be added to the question due to the recent changes in technology. EPA suggested the question only identify technicians who have performed reprogramming or initialization within the last year.

One member commented that questions 4.1 and 4.2 should be specific to the OEM the auditor is evaluating. The member also noted that the questions included in 4.1 and 4.2 did not pertain to actually performing reprogramming or reinitialization. Instead, the questions merely asked if the information is available. In many cases, the information is not available. EPA responded that the information could be available but might not be useful in performing reprogramming or reinitialization. Only those auditors who have performed such tasks could accurately judge the usefulness of the information. A second member commented that most reprogramming and reinitialization is completed by dealers but noted that dealer technicians only have experience with their specific car lines. Another member noted that most OEMs do not provide reprogramming and reinitialization information. By maximizing the number of technicians answering questions 4.1 and 4.2, the largest amount of information could be gained regarding the availability of reprogramming and reinitialization information on the OEMs.

EPA suggested that the screening questions be dropped and that all auditors be asked to answer questions 4.1 and 4.2 regardless of their experience performing reprogramming or reinitialization. One member agreed but commented that technicians should still be asked to list their relevant experience. Donnie Seyfer agreed to revise the questions and post his revisions on the discussion forum.

There were additional comments regarding the language of 4.1 and 4.2. One member suggested that several of the terms used in questions 4.1 and 4.2 needed to be more clearly defined. The member asked that the phrase "alternative reprogramming methodology" found in the third question of 4.1 be clarified. The member also felt that "reinitialization" should be defined. Most technicians do not know the difference between reprogramming and reinitialization. In addition, the member noted that reinitialization includes equipment other than the anti-theft immobilizer system, the only example listed in question 4.2. Holly Pugliese noted that the definition of reinitialization and the scope of

the equipment covered was pulled from the regulation. She agreed to review the regulation. Holly Pugliese and Mark Warren also agreed to help Donnie Seyfer revise questions 4.1 and 4.2.

It was suggested by one member that questions 4.3 to 4.7 be separated from 4.1 and 4.2. The member felt that the two sets of questions were unrelated. EPA agreed and suggested that questions 4.3 to 4.7 be moved to segment 3. Other revisions will be addressed using the AASP forum.

Segment 5

During the January 13, 2005 conference call, Steve Douglas and Aaron Lowe agreed to revise question 5.7, which addresses the effect of cost on OEM use. The Committee agreed during the previous call that cost was only one factor affecting use and that the question should be revised to identify additional factors. Using the theme of question 5.7, Steve and Aaron created seven new questions, which became 5.7 to 5.13. Steve Douglas noted that the questions were developed under the assumption that technicians would prefer to use an All-Data or Mitchell system with a single interface if the cost was comparable to that of OEMs. He then briefly described the revisions.

One member commented on the revised question 5.7. The member noted that Japanese and Asian OEMs should be grouped together. There are only a few OEMs that are exclusively Japanese or Asian. A second member added that Japanese and Asian are grouped in aftermarket resources. Steve Douglas agreed to remove Japanese as an option in question 5.7.

Question 5.12 was also critiqued. The question asks if OEM fees are passed on to the customer. One member felt that the answer was obvious and that the question was unnecessary. However, another member felt that it would be beneficial and that customers were typically willing to pay the extra cost as long as they knew why the additional cost was added. Steve Douglas recognized that the question was not critical to the audit but agreed that the results would be interesting. EPA agreed as well. However, EPA also noted that the questionnaire was restricted by the requirements in the regulation. To avoid potential legal issues, EPA suggested that the question be dropped.

One member commented on the applicability of question 5.2, which addresses the limitations of OEM subscriptions. The member noted that participating technicians were allowed free and unlimited access to the OEMs during the audit period. Another member suggested that auditors be asked to investigate the potential costs and limitations of OEM subscriptions. It was proposed that the question be rephrased to ask auditors if they had used the site as a paying customer. Those that had previously subscribed could evaluate the OEM based on this experience. There were no additional comments on the audit questionnaire.

E. Next Steps

PQA summarized the revisions to the questionnaire noting that questions 4.1, 4.2, 5.2, and 5.7 would be revised. All revisions should be made before Wednesday, January 25, 2005. PQA noted that EPA and PQA hoped to finalize the survey in the next few weeks and encouraged committee members to voice all comments and suggestions while changes could still be made. Once the survey is finalized, the Steering Committee's technicians will evaluate the survey's real world applicability. The Steering Committee agreed to postpone the discussion of the questionnaire's format until the next conference call. The next conference call will take place on January 27, 2005 at 2:00 PM Eastern Standard time.

F. Action Items

- (1) Several strategies were suggested to increase the number of technicians and gain additional publicity for the audit. John Cabaniss will contact NASTF regarding a website link to the OEM Audit website. Charlie Gorman will provide a link to his company's website. EPA agreed to contact NADA and post a notice on the IATN website encouraging dealer technicians to participate. Bob Everett will send an email to AASP members.
- (2) EPA and PQA will discuss the possibility of linking the OEM Audit website to EPA's web page containing the appropriate regulation.
- (3) EPA will reword and/or clarify the questions in segment 3.
- (4) Donnie Seyfer, Mark Warren, and Holly Pugliese will revise questions 4.1 and 4.2. The initial screening question, which prefaces 4.1 and 4.2, will be dropped. All technicians will be asked to respond to questions 4.1 and 4.2 regardless of their experience performing reprogramming and reinitialization. An additional question will be added to determine when or if the auditor has performed reprogramming or reinitialization.
- (5) The phrase "alternative reprogramming methodology", which is used in the third question of 4.1, will be clarified.
- (6) "Reinitialization" will be defined. Holly Pugliese will review the regulation for the official definition.
- (7) Questions 4.3 to 4.7 will be moved to segment three.
- (8) PQA will remove Japanese as an option in question 5.7.
- (9) Question 5.12 will be removed from the audit questionnaire.

- (10) Question 5.2 will be rephrased to apply only to auditors who have previously accessed the OEM website as a paying customer.
- (11) The next meeting will take place by conference call on January 27, 2005 at 2:00 PM Eastern Standard Time.