

February 18, 2015

General Law Committee  
Legislative Office Building, Room 3500  
State Capitol  
Hartford, CT 06106

Dear Member of the General Law Committee:

I am writing today on behalf of the Auto Care Association and our Connecticut members, in support of Senate Bill No. S 99. The Auto Care Association is a Bethesda, Md.-based association comprised of more than 23,000 members and affiliates that manufacture distribute, and sell motor vehicle parts, accessories, service, tool, equipment, materials and supplies. There are approximately 2,500 auto care businesses in Connecticut with \$3.2B in annual sales.

We strongly support the idea of requiring a copy of the Magnuson-Moss Warranty Act to be provided to every purchaser of a new vehicle. The anti-tying provisions in the act are some of the strongest regulations protecting consumers. As it states in Sec. 2302 of USC Title 15, Chapter 50, manufacturers may not tie (condition) any warranty to the purchase of original equipment (OE) parts:

*Prohibition on conditions for written or implied warranty;*

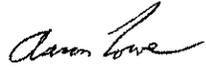
*No warrantor of a consumer product may condition his written or implied warranty of such product on the consumer's using, in connection with such product, any article or service (other than article or service provided without charge under the terms of the warranty) which is identified by brand, trade, or corporate name;*

Yet, most consumers are unaware of their rights under federal law when a warranty is denied by a dealer. The result is that the car owners or the repair is saddled with the cost of the repair when in many cases the cost should have been borne by the manufacturer. While the Auto Care Association has been vigilant on this issue, consumers and repair shop owners struggle on a regular basis with misleading statements from vehicle manufacturers and their dealer network regarding repair and warranty issues.

In fact, during a periodic review of the Act we submitted comments that essentially recommended that the Federal Trade Commission (FTC) require that information on Magnuson Moss be presented to the consumer when a warranty is denied based on the use of a non-original equipment part or service.

We have documented significant violations of the Act by manufacturers and would be happy to provide copies of our communications with the FTC to you and your staff upon request. Please feel free to contact me with any questions or requests.

Sincerely,

A handwritten signature in cursive script, appearing to read "Aaron Lowe".

Aaron Lowe  
Senior Vice President of Regulatory and Government Affairs