

Maine Congressional testimony 4/10/2015

My name is Larry Cobb, I'm the general manager of New England Kenworth. We are the franchised dealer for Kenworth Trucks in ME, NH & VT. We employ 85 people in Maine and I have lived in Maine all my life. I do not represent the Kenworth Truck OEM. We are a truck dealer selling and servicing the Kenworth product.

I'm here to testify why there needs to be a separation of the Commercial Truck industry from the automotive consumer industry as it relates to the right to repair law.

You're asking for a platform that doesn't exist in the commercial truck industry to comply with the right to repair rules.

Please allow me to give you an example so that it's easier to understand the apples and orange differences between the consumer auto industry and the commercial truck industry- specifically trucks in excess of 10,000 lbs GVW.

Using a Ford F150 as the example- the information to repair a Ford F150 can be a printed book or a downloaded file. It will cover several years of production and several models and trim levels because an automobile is a vertically integrated product using Ford engines with a Ford transmission and Ford brakes and Ford ABS system etc. this downloaded file or printed book will cover thousands and thousands of F150 VIN #'s

Now let's look at a commercial truck- this can be a Kenworth, Freightliner, Mack, Western Star etc. If you wanted a repair manual for the diagnostics and repair info for one of these trucks you can acquire the repair manual or download the truck file but it's only valid for just that one VIN #- let me repeat that- only for the one VIN #. Commercial trucks are custom ordered by the customer. The customer selects the components from several OEMs that will build the best truck for his application. The customer picks everything from the cab roof lights to the engine manufacturer, the transmission manufacturer and the brake manufacturer all the way to the frame material, frame width and length and the tire brand, size and weight rating. A commercial truck custom designed to haul logs on the Golden Road is a completely different truck and different OEMs than a truck that hauls groceries for Hannaford Bros up and down Interstate 95. Because a truck uses several components from several OEMs, we as a dealer must access many OEMs. We don't access them through Kenworth our OEM. We must go directly to the OEM that makes the engine, transmission, Emission system, brakes or ABS system. We have a different manufacturer and OEM for the emission system. Each requires credentials, training, franchise requirements, unique hardware and software. We don't have a single source for the necessary information because every truck is completely different than the last one we worked on. That platform doesn't exist.

In the case of Kenworth – and like other truck OEMs- there are

2- engine OEM's

3- Transmission OEM's

2- Axle OEM's

2- Brake and ABS OEMs

6-Tire OEMs

3- 5th wheel OEMs

2- safety and collision mitigation OEM's

4- steering component OEM's

And many more

None of the diagnostic information for me to repair these components comes through Kenworth the truck OEM. I have licensing, subscriptions and precise training with them all.

The truck purchase as well as the truck repair is a business-to-business transaction and not a consumer transaction. The truck owner has access to the information about his/her truck through telematics. It's up to the truck owner to share it with his chosen repair facility.

*Unlike the Auto industry, Right to repair already exists in the commercial truck industry. As an example- If your Kenworth truck has a Cummins engine and you need it repaired. You don't have to come back to New England Kenworth for the repair. You can go to a Freightliner, Volvo, Western Star, Peterbilt or independent to have that Cummins issue taken care of. You're not forced to go back to Kenworth for the repair. The other truck dealers that I listed can fix the issue.

To sum this up

Please separate the automotive consumer industry from the Commercial truck industry because you're asking for a platform that allows everyone access but doesn't exist. Nor will it for a component-built vehicle vs a vertically integrated automobile and the car industry.

Thanks