

RE: Opposition to LD 292 – Right to Repair Protections Must Include Heavy-Duty and Commercial Vehicles

Dear Members of the Housing and Economic Development Committee,

On behalf of the **Commercial Vehicle Solutions Network (CVSN)**—the premier trade association representing independent aftermarket distributors, repair shops, and suppliers serving the commercial vehicle industry—we respectfully urge you to **oppose LD 292** in its current form.

While we appreciate efforts to implement the Automotive Right to Repair Working Group’s recommendations, **LD 292 introduces harmful changes** that threaten the foundational intent of Maine’s Data Access Law, which was overwhelmingly supported by 84% of voters.

Heavy-Duty and Commercial Vehicles Must Remain Covered

Maine's voters made their will crystal clear: **they want fair and equal access to repair data for all vehicles—passenger and commercial alike**. LD 292, however, undermines this mandate by attempting to **remove the independent oversight entity and scale back core protections that ensure fair repair access for commercial vehicles**.

Commercial vehicles, including **trucks over 14,000 pounds**, are the **backbone of Maine’s economy**, delivering groceries, fuel, medical supplies, and more. Restricting access to their repair data will:

- **Disrupt supply chains**, as independent repair shops are denied critical diagnostic information;
- **Drive up repair costs** for small fleets and businesses already stretched thin;
- **Reduce competition**, funneling repair work to a limited number of manufacturer-affiliated dealerships;
- **Threaten public safety** by delaying essential repairs and inspections on vehicles that keep Maine running.

There is **no functional difference** between the data needs of a heavy-duty vehicle and a passenger car when it comes to diagnostics and repair. Modern trucks generate codes, telematics data, and sensor feedback that must be accessed and interpreted quickly and accurately—often in rural areas where independent repair shops are the only option.

Right to Repair is About Fairness—For All Vehicle Owners

Independent commercial vehicle service providers in Maine are **not asking for trade secrets or proprietary data**—only for the same fair and reasonable access to information that authorized dealers receive. LD 292 walks back this commitment by:

- Weakening or omitting key implementation and enforcement provisions from previous versions of the law;
- Narrowing definitions in ways that risk excluding diagnostic and telematics data critical to repair work;
- Replacing the collaborative independent entity with a vague enforcement structure lacking technical accountability.

This is not just a technical issue—it's a **jobs issue**, a **fairness issue**, and a **small business issue**. Independent commercial vehicle shops employ thousands of Mainers, from mechanics and warehouse staff to parts suppliers and technicians. They need a level playing field to compete, and LD 292 fails to provide it.

Let the Experts Lead the Way

The Working Group spent months engaging across the industry to deliver thoughtful, consensus-based recommendations. CVSN strongly supports the adoption of those recommendations, including the establishment of a **Right to Repair Commission** that includes experts in **heavy-duty vehicles** and **independent repairers**.

Rather than override that work, the Legislature should honor it by **ensuring that heavy-duty vehicles remain fully protected** under Maine's data access law, with clear implementation guidelines, meaningful enforcement mechanisms, and broad industry representation.

Conclusion

We urge the Committee to reject LD 292 as drafted and adopt an amendment that restores and reinforces the protections intended by the Data Access Law. **Commercial vehicles must remain in scope**. Anything less undermines the law's integrity, the public's will, and the livelihoods of those who keep Maine moving.

Sincerely,

Kristen Kellogg

Senior Director, Government Affairs

Commercial Vehicle Solutions Network (CVSN)