

RE: Opposition to LD 1228

From: Commercial Vehicle Solutions Network (CVSN)

Dear Honorable Members of the Committee,

On behalf of the **Commercial Vehicle Solutions Network (CVSN)**, we respectfully urge you to **oppose LD 1228** and instead support the **Working Group Amendment** to Maine's Data Access Law (LD 1677). CVSN represents independent parts distributors, manufacturers, and service providers in the commercial vehicle aftermarket—businesses that are critical to keeping trucks, fleets, and freight moving across Maine and the nation.

LD 1228 threatens the progress Maine has made on right to repair and undermines the strong public mandate established by the passage of LD 1677, which was supported by 84% of Maine voters. Critically, it attempts to remove **commercial and heavy-duty vehicles** from the protections provided in the Data Access Law—vehicles that are essential to Maine's economy, supply chain, and public well-being.

Why Commercial Vehicles Must Remain in the Law

Commercial vehicles are the backbone of Maine's economy. From delivering groceries and medical supplies to supporting agriculture, manufacturing, and small businesses, these vehicles must be maintained efficiently and affordably. Removing commercial vehicles from the Data Access Law would:

- **Deny small businesses and fleets the ability to choose their repair providers**
- **Force vehicle owners into costly, dealer-only repair channels**
- **Jeopardize the uptime of critical delivery vehicles across the state**
- **Contradict the very language and intent of the voter-approved referendum**

There is no functional difference in the need for diagnostic and repair data between a passenger car and a heavy-duty truck. Both generate repair codes and telematics data that independent shops need to access to diagnose and service the vehicle properly. Historically, the commercial vehicle aftermarket has had this access—but today, manufacturers are installing proprietary systems that lock out independent repairers. This shift threatens the very survival of Maine's independent truck repair shops and the timely maintenance of the fleets that keep Maine running.

The Working Group Got It Right

CVSN was encouraged by the thoughtful and collaborative process that led to the **Working Group Amendment**. After extensive input from experts across the repair and manufacturing industries, the working group concluded that commercial vehicles should remain included in the Data Access Law. In fact, the group **specifically recommended including both a heavy-duty vehicle manufacturer and an independent repairer specializing in heavy-duty vehicles** as members of the implementation Commission.

This reflects the reality that **commercial vehicle repair is highly technical, vital to public infrastructure, and facing the same challenges as the broader vehicle repair market**. By allowing the Commission—comprised of experts appointed by the Governor—to handle implementation, Maine will ensure that all aspects of the repair ecosystem, including heavy-duty vehicles, are addressed intelligently and equitably.

LD 1228 Undermines Implementation and Voter Intent

LD 1228 is not only unnecessary—it risks reversing the will of the people. The definitions and exclusions proposed in the bill introduce ambiguity, restrict access to essential repair data, and **threaten to create a two-tiered system** where some vehicle owners have rights while others, including truck operators, do not. This would be deeply harmful to Maine’s independent repair industry, commercial fleet operators, and the consumers and businesses who rely on timely deliveries and services every day.

We’ve Never Been Closer to a Fair Repair System for Commercial Vehicles

With the REPAIR Act gaining traction federally—now with over 27 bipartisan cosponsors in the U.S. House and explicitly including commercial vehicles—and with the voter-backed law in Maine as a national model, we are **closer than ever to achieving real repair rights for the commercial vehicle industry**.

LD 1228 would be a step backwards. Maine has an opportunity to lead the nation in supporting both automotive and commercial vehicle repair rights—and that means staying the course.

Conclusion

We respectfully urge the Committee to **reject LD 1228** and support the implementation framework proposed in the **Working Group Amendment**. The Commission’s expert-led structure is the right forum for continued development, compliance oversight, and

technical clarity. **Maine's voters spoke clearly: right to repair should include all vehicles—including trucks.**

Sincerely,

Kristen Kellogg

Senior Director, Government Affairs

Commercial Vehicle Solutions Network (CVSN)