

February 17, 2026

The Honorable Chip Curry
The Honorable Traci Gere
Committee on Housing and Economic Development
Maine Legislature
Augusta, ME 04333

Dear Senator Curry and Representative Gere,

The Auto Care Association supports LD 2211 and strongly opposes the removal of commercial vehicles from the existing Right to Repair law.

Auto Care Association is a national trade organization comprised of more than 3000-member companies and affiliates that manufacture, distribute, and sell aftermarket motor vehicle parts, accessories, services, tools, equipment, materials, and supplies for light and heavy-duty vehicles. Auto Care Association is the voice of the light-duty and heavy-duty aftermarket industry – a \$516 billion plus industry comprised of more than 4.9 million American professionals. In Maine, our industry includes 8,361 jobs and generates \$2.9 billion in economic activity and \$581.7 million in wages.

The Maine Right to Repair law correctly includes heavy-duty and commercial vehicles to ensure that large fleets and small businesses can keep their businesses and supply chains running in the State. Contrary to the testimony of manufacturers, there is no difference between the components of a truck and the components of a passenger vehicle for purposes of maintenance and repair data. For purposes of repair and maintenance data, light and heavy-duty vehicles are the same even if their form and function are different.

Independent dealers and repair shops have accessed repair data and managed mixed-OEM configurations since there have been trucks. In fact, franchised truck dealers often sublet repair work to independent repairers when appropriate. Maine law appropriately preserves this historical access to repair and maintenance data into the future as light-duty and heavy-duty vehicles become more technologically sophisticated. The commercial vehicle market is (and should be) as competitive as the light-duty market – fleet owners need choices to drive down prices and increase safety and accountability. If manufacturers and their captive dealers are the only option for repairs, the inevitable outcome is that fleets will pay more, have longer repair wait times, and jeopardize the health of America's supply chains.

Opponents of right to repair claim that because heavy-duty trucks are often comprised of components from different manufacturers, fleet owners should not get repair data. This argument is factually inaccurate. Independent repair professionals have been accessing repair data on

multi-component trucks for decades. It's true that heavy-duty trucks are often comprised of components from different manufacturers, but fleet owners have dealt with that complexity for decades, with access to the components and software required to maintain and repair the trucks.

The opponents' argument rests on a fundamental misunderstanding of how heavy-duty vehicles have always been designed, serviced, and repaired. Heavy-duty trucks are often bespoke vehicles comprised of components and Electric Control Units (ECUs) from multiple manufacturers — engine, transmission, brakes, etc. In a multi-manufacturer environment, trucks have a central controller that connects the multiple component parts and translates messages between different standards to allow the components to communicate and the truck to function. For bespoke trucks, this controller is often a custom module built by the vehicle integrator — it connects the ECUs from different suppliers. For example, in a single truck, a Cummins engine ECU broadcasts torque, RPM, and fuel rate to the centralized control network and the Allison transmission ECU will read that data and adjust the truck's shift strategy. The presence of multiple component manufacturers has never prevented lawful repair access. What has changed is not vehicle architecture, but the increasing use of software controls, gateways, and contractual restrictions to selectively limit access to data that was historically available to vehicle owners and independent repair providers.

Repair professionals have accessed repair and maintenance data on multi-vendor trucks for over 100 years. This access occurs either through the centralized control system or by connecting diagnostic tools directly to individual ECUs, depending on how the vehicle owner configures the truck. In a bespoke heavy-duty truck, most repair and maintenance data passes through the gateway ECU. Modern trucks are trending toward centralized gateways because (i) they simplify service (one diagnostic connector); (ii) they handle security and access control (e.g., authenticated diagnostic sessions); and (iii) they manage over the air updates and data logging across subsystems. Some components, however, may require direct access via their own service interfaces.

In either case, each component generates and broadcasts its own diagnostic and repair information — it is just a matter of whether the integrator builds a central data access point or separate data access points. In both cases, the manufacturer provides the repair data. There is nothing new or unique about this multi-vendor environment. Allowing manufacturers to cite multivendor complexity as a basis for withholding repair data would effectively permit design choices to dictate competition outcomes, contrary to long-standing repair norms in the commercial trucking industry.

Right to repair for commercial vehicles is critically important to our industry because it affords commercial vehicle owners the ability to efficiently complete repair and maintenance, improving commercial vehicle uptime. As we have learned in the recent past and continue to learn daily, keeping commercial vehicles running is imperative to a healthy and robust supply

chain, and the Maine law ensures that trucks in Maine can continue to operate unimpeded by the manufacturers' closed-loop systems.

Except for the new effective date, the unanimous recommendations of the Working Group are before you as LD 2211. The Working Group did not remove commercial vehicles from the law for all the reasons cited above. The existing right to repair law and LD 2211 respect the clear will of Maine voters, who supported the initiative by 84% in 2023, and reflects the consensus reached across stakeholders.

Please support LD 2211 and do not remove commercial vehicles from the right to repair law.

Sincerely,

A handwritten signature in black ink, appearing to read "William Hanvey". The signature is fluid and cursive, with a large, sweeping flourish at the end.

William Hanvey
President & CEO
Auto Care Association