



MTAA Limited

Supplementary Submission to the

ACCC New Car Retailing Industry

Market Study Issues Paper

March 2017

## *Access to Repair Information and data for new cars*

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### **MTAA Refined Recommendations**

- The Government instructs appropriate peak automotive representative organisations (signatories to the original 2014 Agreement) to develop and implement a solution for the accreditation and authorisation of all repairers wishing to access all Repair and Maintenance Information (RMI) including agreed security related information.
- That the MTAA Limited and Members facilitate and coordinate the development of a solution using the AASAS Accreditation Framework, as a starting point for a negotiated industry-led solution.
- That a solution be identified and finalised by 1 July 2018 and that the solution be implemented from 1 February 2019.
- That the Government participates in development of the framework and acts as, or appoints a mediator in areas of dispute during negotiations.
- That if the automotive sector cannot deliver such a solution, within the specified timeframe, then government will further explore appropriate legislation / regulation through a Mandated Code of Conduct.

## **Overview**

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- MTAA Limited restates its position that consumers must be able to properly exercise their right of choice. To do this in relation to motor vehicle repairs; consumers must be assured of protection, their safety is not compromised; and they can reasonably expect their choice of repairer to be able to access the necessary maintenance, service and repair information, vehicle data, parts, equipment and tools; and to undertake maintenance and repairs with appropriately qualified, trained, skilled and equipped professionals.
- Specific to the matters raised by the ACCC Market Study Team in relation to Access to Repair Information, MTAA and Members have undertaken further investigations over the past few weeks to gather additional information since the release of the issues paper and the provision of MTAA Limited's original submission.
- A survey conducted by MTAA Member, VACC, found that well over half (57.22%) of businesses surveyed experienced significant or moderate disruption to business resulting from the process of accessing repair information. For those automotive repairer businesses impacted this disruption is adding costs, reducing service levels and causing consumer detriment.

- MTAA Members business constituents reported that over time, repair workshops experienced a loss of customers (and subsequently revenue), due to their inability to carry out general repairs resulting from specific access to repair information Issues.
- An example of this additional analysis of specific blockages in accessing and using repair information including vehicle data is contained in a Supplementary Submission to the Market Study by MTAA Member, the Victorian Automobile Chamber of Commerce (VACC). This VACC supplementary submission details the primary specific concerns of repairers to be a lack of, or blocked, access to:
  - Technical Service Bulletins (TSB's).
  - Specific Repair and Service Information specific to component overhaul procedures, component specifications, collision repair methods and dimensions, maintenance specifications and adjustment procedures, safety instructions, wiring diagrams, diagnostic and testing procedures and fault codes and re-initialisation.
  - Diagnostic Information
  - Pass-thru Information
  - Recommended Manufacturer Repair Times
  - Service Schedules.
  - Some parts
- Many other issues, not uncommon over the past decade of this debate, also featured, which, while recognised by the MTAA as important considerations, are not necessarily believed symptomatic of the problems described above. For example: some repairers are concerned about having to pay anything for any information. Others are concerned about the price for the information. Some repairers do not want to be forced to purchase proprietary tools in order to undertake the repair for a particular brand and a range of related issues.
- However, as outlined above, the critical specific problems identified aligned to increasing complexity, increasing technology, increasing reliance on computing capability and therefore to vehicle data, interpretation of that data, and rectification.
- It was shown that while many manufacturers / distributors are now providing improved access to repair information as a direct result of the Heads of Agreement, there is a lack of consistency, commonality and significant blockages with key areas including some data.
- The information or data, either not available or requiring significant work arounds, largely align with those areas of vehicle data or information that were not addressed in the development of the Heads of Agreement. For example Agreement Signatories could not agree on addressing access to the data and information, which manufacturer and / or distributors, deemed security or environment systems.
- Further analysis was undertaken, and continues by MTAA Members, in what the MTAA believes can and cannot be accessed through manufacturer online portals and is outlined in the **following tables**. It is important to note that this MTAA Members interpretation of availability. The assumptions are those of MTAA Members and may or may not reflect the actual situation or the variable of the actual information being sought.

- It is designed to point out that while information portals are available and there is availability of information, it does appear to confirm the reported difficulties.

Manufacturer	Web Portal	Pass Thru	Origin	Accessibility	Notes
Alfa Romeo	<a href="http://www.technicalinformation.fiat.com">www.technicalinformation.fiat.com</a>	✓	EUROPE	Blocked	
Abarth	<a href="http://www.technicalinformation.fiat.com">www.technicalinformation.fiat.com</a>	✓	EUROPE	Blocked	
Audi	<a href="http://www.erwin.audi.com/erwin/showHome.do">www.erwin.audi.com/erwin/showHome.do</a>	✓	EUROPE	Accessible	Overseas Model Information Only
Aston Martin	<a href="http://www.astonmartintechno.com">www.astonmartintechno.com</a>	X	EUROPE	Accessible	Overseas Model Information Only
Bentley	<a href="https://erwin.bentleymotors.com">https://erwin.bentleymotors.com</a>	✓	EUROPE	Accessible	Overseas Model Information Only
BMW	<a href="https://oss.bmw.de/index.jsp">https://oss.bmw.de/index.jsp</a>	X	EUROPE	Accessible	Overseas Model Information Only
BMW	<a href="https://www.bmwtechinfo.com/">https://www.bmwtechinfo.com/</a>	✓	USA	Blocked	North America & Canada only
Citroen	<a href="http://service.citroen.com/pages/index.jsp">http://service.citroen.com/pages/index.jsp</a>	X	EUROPE	Accessible	Overseas Model Information Only
Chery	<a href="https://dealerportal.ateco.com.au/ateco/dealer/register.jsp">https://dealerportal.ateco.com.au/ateco/dealer/register.jsp</a>	X	AUSTRALIA	Blocked	Dealer Access only
Chrysler	<a href="https://www.techauthority.com/">https://www.techauthority.com/</a>	✓	USA	Accessible	Overseas Model Information Only
Dacia	<a href="http://www.infotech.renault.com">http://www.infotech.renault.com</a>	✓	EUROPE	Accessible	Overseas Model Information Only
Dodge	<a href="https://www.techauthority.com/">https://www.techauthority.com/</a>	✓	USA	Accessible	Overseas Model Information Only
Fiat	<a href="http://www.technicalinformation.fiat.com">www.technicalinformation.fiat.com</a>	✓	EUROPE	Blocked	
Ferrari	<a href="https://techinfo.ferrari.com/">https://techinfo.ferrari.com/</a>	✓	EUROPE	Blocked	
Ford	<a href="http://www.etis.ford.com">www.etis.ford.com</a>	✓	EUROPE	Accessible	Overseas Model Information Only
Ford	<a href="http://www.motorscraftservice.com">www.motorscraftservice.com</a>	X	USA	Accessible	Australian Specific Models Available
Great Wall	<a href="https://dealerportal.ateco.com.au/ateco/dealer/register.jsp">https://dealerportal.ateco.com.au/ateco/dealer/register.jsp</a>	X	AUSTRALIA	Blocked	Dealer Access only
Holden / GM	<a href="http://www.acelcords.com">www.acelcords.com</a>	✓	USA	Accessible	Australian Specific Models Available
Holden / GM	<a href="https://www.gme-infotech.com/">https://www.gme-infotech.com/</a>	X	EUROPE	Accessible	Overseas Model Information Only
Honda	<a href="https://techinfo.honda.com">https://techinfo.honda.com</a>	✓	USA	Blocked	North America & Canada only
Honda	<a href="http://www.techinfo.honda-eu.com/">http://www.techinfo.honda-eu.com/</a>	✓	EUROPE	Blocked	
Hyundai	<a href="https://www.hyundatechinfo.com/">https://www.hyundatechinfo.com/</a>	X	USA	Accessible	Overseas Model Information Only
Hyundai	<a href="http://service.hyundai-motor.com/euro5/index.tiles">http://service.hyundai-motor.com/euro5/index.tiles</a>	X	EUROPE	Blocked	
HYUNDAI	<a href="mailto:technical@hyundai.com.au">mailto:technical@hyundai.com.au</a>	X	AUSTRALIA	Accessible	EMAIL SERVICE
Hummer	<a href="http://www.acelcords.com">www.acelcords.com</a>	X	USA	Accessible	Overseas Model Information Only
Infinity	<a href="https://www.infiniti-techinfo.com">https://www.infiniti-techinfo.com</a>	✓	USA	Blocked	
Isuzu	<a href="https://isuzu-source.com">https://isuzu-source.com</a>	✓	USA	Blocked	
IVECO	<a href="https://techinformation.iveco.com/">https://techinformation.iveco.com/</a>	✓	EUROPE	Blocked	
Jaguar	<a href="http://tools.jaguar.lirex.com">http://tools.jaguar.lirex.com</a>	X	EUROPE	Accessible	Overseas Model Information Only
Jeep	<a href="https://www.technicalinformation.fiat.com">https://www.technicalinformation.fiat.com</a>	✓	EUROPE	Blocked	
Jeep	<a href="https://www.techauthority.com/">https://www.techauthority.com/</a>	✓	USA	Accessible	Overseas Model Information Only
Kia	<a href="https://www.kiatechinfo.com/index.asp">https://www.kiatechinfo.com/index.asp</a>	✓	USA	Blocked	
Kia	<a href="http://www.kia-hotline.com/euro5/login.tiles">http://www.kia-hotline.com/euro5/login.tiles</a>	✓	EUROPE	Blocked	
Lamborghini	<a href="https://erwin.lamborghini.com">https://erwin.lamborghini.com</a>	✓	EUROPE	Accessible	Overseas Model Information Only
Lamborghini	<a href="https://serviceinformation.lamborghini.com">https://serviceinformation.lamborghini.com</a>	✓	USA	Blocked	Available to Europe and USA
Land Rover	<a href="http://tools.landrover.lirex.com">http://tools.landrover.lirex.com</a>	X	EUROPE	Accessible	Overseas Model Information Only
LDV	<a href="https://dealerportal.ateco.com.au/ateco/dealer/register.jsp">https://dealerportal.ateco.com.au/ateco/dealer/register.jsp</a>	X	AUSTRALIA	Blocked	Dealer Access only
Lexus	<a href="https://lexusmanuals.com.au/">https://lexusmanuals.com.au/</a>	X	AUSTRALIA	Accessible	
Lexus	<a href="https://techinfo.toyota.com">https://techinfo.toyota.com</a>	✓	USA	Accessible	Overseas Model Information Only
Mazda	<a href="https://maps.mazdaeur.com">https://maps.mazdaeur.com</a>	✓	EUROPE	Blocked	
Mazda	<a href="https://mazdamanuals.com.au/">https://mazdamanuals.com.au/</a>	X	AUSTRALIA	Accessible	
Mazda	<a href="https://www.mazdaserviceinfo.com/Default.aspx">https://www.mazdaserviceinfo.com/Default.aspx</a>	✓	USA	Blocked	North America, Canada and Mexico



Mahindra	None Available			Blocked	
Maserati	<a href="http://techinfo.maserati.com">http://techinfo.maserati.com</a>	✓	EUROPE	Blocked	
Mercedes Benz	<a href="http://service-parts.mercedes-benz.com">http://service-parts.mercedes-benz.com</a>	✓	EUROPE	Blocked	European Countries and China
Mercedes Benz	<a href="http://www.startekinfo.com">www.startekinfo.com</a>	✓	USA	Blocked	North America & Canada only
Mini	<a href="https://www.minitechinfo.com/">https://www.minitechinfo.com/</a>	✓	USA	Blocked	North America, Canada and Puerto Rico only
Mini	<a href="https://oss.bmw.de/index.jsp">https://oss.bmw.de/index.jsp</a>	✓	EUROPE	Accessible	Overseas Model Information Only
Mitsubishi	<a href="http://www.mitsubishitechinfo.eu/subscription.aspx">http://www.mitsubishitechinfo.eu/subscription.aspx</a>	✓	EUROPE	Accessible	Overseas Model Information Only
Mitsubishi	<a href="https://mitsubishitechinfo.com/epacarb/">https://mitsubishitechinfo.com/epacarb/</a>	✓	USA	Blocked	North America, Canada and Puerto Rico only
Nissan	<a href="mailto:techdata@nissan.com.au">mailto:techdata@nissan.com.au</a> & <a href="mailto:techdata@nissan.com.au">mailto:techdata@nissan.com.au</a>	X	AUSTRALIA	Accessible	Email and authorisation service
Nissan	<a href="http://www.nissan-techinfo.com/home.aspx">http://www.nissan-techinfo.com/home.aspx</a>	✓	USA	Accessible	Overseas Model Information Only
Nissan	<a href="https://eu.nissan.biz/">https://eu.nissan.biz/</a>	✓	EUROPE	Blocked	
Opel	<a href="https://www.gme-infotech.com/">https://www.gme-infotech.com/</a>	✓	EUROPE	Accessible	Overseas Model Information Only
Peugeot	<a href="http://public.servicebox.peugeot.com">http://public.servicebox.peugeot.com</a>	X	EUROPE	Accessible	Overseas Model Information Only
Porsche	<a href="http://techinfo1.porsche.com">http://techinfo1.porsche.com</a>	X	EUROPE	Accessible	Overseas Model Information Only
Proton	<a href="mailto:tech@proton.com.au">mailto:tech@proton.com.au</a>	X	AUSTRALIA	Accessible	EMAIL Service Only
Renault	<a href="http://www.infotech.renault.com">http://www.infotech.renault.com</a>	✓	EUROPE	Accessible	Overseas Model Information Only
Rolls Royce	<a href="https://oss.bmw.de/index.jsp">https://oss.bmw.de/index.jsp</a>	✓	EUROPE	Accessible	Overseas Model Information Only
Saab	<a href="http://epiportal.com/5ite/SAAB">http://epiportal.com/5ite/SAAB</a>	✓	EUROPE	Blocked	
Seat	<a href="https://erwin.seat.com/erwin/showHome.do">https://erwin.seat.com/erwin/showHome.do</a>	✓	EUROPE	Accessible	Overseas Model Information Only
Skoda	<a href="https://erwin.skoda-auto.cz/erwin/showHome.do">https://erwin.skoda-auto.cz/erwin/showHome.do</a>	✓	EUROPE	Accessible	Overseas Model Information Only
Smart	<a href="http://www.smartekinfo.com">www.smartekinfo.com</a>	✓	USA	Blocked	
Ssangyong	<a href="https://dealerportal.ateco.com.au/ateco/dealer/register.jsp">https://dealerportal.ateco.com.au/ateco/dealer/register.jsp</a>	X	AUSTRALIA	Blocked	Dealer Only
Subaru	<a href="https://www.subaru.com.au/service/service-and-repair-manuals">https://www.subaru.com.au/service/service-and-repair-manuals</a>	X	AUSTRALIA	Accessible	Order Form for printed manuals from Japan - can take months
Subaru	<a href="https://techinfo.subaru.com/account/login.html">https://techinfo.subaru.com/account/login.html</a>	✓	USA	Accessible	Overseas Model Information Only
Subaru	<a href="https://www.subaru-repairinfo.com">https://www.subaru-repairinfo.com</a>	✓	EUROPE	Accessible	Overseas Model Information Only
Suzuki	<a href="http://www.suzuki.com.au/enquiry">http://www.suzuki.com.au/enquiry</a>	X	AUSTRALIA	Accessible	Enquiry form attached
Suzuki	<a href="https://suzukistopplus.com">https://suzukistopplus.com</a>	✓	USA	Blocked	North America & Canada only
Suzuki	<a href="http://serviceportal.suzuki.eu">http://serviceportal.suzuki.eu</a>	✓	EUROPE	Blocked	
TATA	<a href="http://www.tatamotors.com/services/repair-information/">http://www.tatamotors.com/services/repair-information/</a>	X	EUROPE	Blocked	
Toyota	<a href="https://toyotamanuals.com.au/subscription">https://toyotamanuals.com.au/subscription</a>	X	AUSTRALIA	Accessible	
Toyota	<a href="https://techinfo.toyota.com">https://techinfo.toyota.com</a>	✓	USA	Accessible	Overseas Model Information Only
Volkswagen	<a href="https://erwin.volkswagen.de/erwin/showHome.do">https://erwin.volkswagen.de/erwin/showHome.do</a>	✓	EUROPE	Accessible	Overseas Model Information Only
Volvo	<a href="http://www.volvotechinfo.com">www.volvotechinfo.com</a>	✓	USA	Blocked	North America, Canada and Puerto Rico only
<b>TRUCKS</b>					
Renault Trucks	<a href="http://www.infotech.renault.com">http://www.infotech.renault.com</a>		EUROPE	Accessible	Overseas Model Information Only
Isuzu Trucks	<a href="https://isuzutruckservice.com">https://isuzutruckservice.com</a>		USA	Accessible	Overseas Model Information Only
Isuzu Trucks	<a href="http://docs.isuzu.com.au/">http://docs.isuzu.com.au/</a>	X	AUSTRALIA	Accessible	Reference Information
Mercedes Benz	<a href="http://www2.mercedes-benz.co.uk">http://www2.mercedes-benz.co.uk</a>		EUROPE	Blocked	
International	<a href="http://www.internationaltrucks.com">http://www.internationaltrucks.com</a>		USA	Blocked	Required to contact Truck Dealer
Volvo Trucks	<a href="http://www.volvotrucks.com">http://www.volvotrucks.com</a>		EUROPE	Blocked	
Freightliner	<a href="https://secure.freightliner.com">https://secure.freightliner.com</a>		USA	Blocked	Only accessible from Massachusetts
Scania	<a href="https://tl.scania.com/">https://tl.scania.com/</a>		EUROPE	Accessible	Overseas Model Information Only
Hino	<a href="http://www.hino.com/service.html">http://www.hino.com/service.html</a>		USA	Blocked	Models applicable for the US Market
Foton	<a href="https://dealerportal.ateco.com.au/ateco/dealer/register.jsp">https://dealerportal.ateco.com.au/ateco/dealer/register.jsp</a>	X	AUSTRALIA	Blocked	Dealer Only
RAM Trucks	<a href="https://dealerportal.ateco.com.au/ateco/dealer/register.jsp">https://dealerportal.ateco.com.au/ateco/dealer/register.jsp</a>	X	AUSTRALIA	Blocked	Dealer Only

## The Current Heads of Agreement

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- MTAA in its previous submission suggested the merit in developing and implementing a mechanism, process or scheme for the accreditation and authorisation to access all Repair and Maintenance Information (RMI) including agreed and approved security related information.
- MTAA is aware some other peak associations have strongly disagreed with this suggestion citing that licensing and qualifications are sufficient. However MTAA believes one of blockages in providing improved access to vehicle data in the Australian market, including fault identification and reinitialisation codes, is that in some jurisdictions no licensing is required, (including Victoria, South Australia and Queensland). MTAA suggests that either uniform national licensing is required (highly unlikely in the short to medium term) or another mechanism to address the concern of secure and appropriate access to assist in assuring consumer protection.
- The MTAA has also previously highlighted that the Federation and Members have been exploring with some signatories of the Access to Repair Information Head of Agreement, options (including using existing established protocols in international jurisdictions as a starting point), to identify, develop and implement an industry-driven solution.
- MTAA has been attempting to facilitate and coordinate this action not only to address increasing concerns expressed in the previous section and in other Member submissions, but with a firm view to addressing Clause 'O' of the *'Heads of Agreement on Access to Service and Repair Information for Motor Vehicles December 2014'* which states:
  - o) The Signatory Parties agree to implement a process to develop protocols relating to vehicle data access and ownership. The Signatory Parties agree that progress should be reported within 12 months of commencement of this Agreement.
- However, the Federation and Members are increasingly frustrated by that no headway can be made to enhance the Agreement and solidify its purpose by exploring a whole of industry solution to the identified specific blockages and or specific vehicle data.
- MTAA and Members have heard no reasonable explanation why the Australian market is seemingly subjected to restrictions and blockages on access to certain types of information (that is available in other international jurisdictions), other than there is no mechanism or process that assures consumer safety and protection and enables the principles of the Heads of Agreement to be adhered to, as well as the intellectual property and other rights of market participants.
- MTAA would respectfully suggest that progress and resolution of this requirement, as enunciated in the Heads of Agreement, will go a considerable way to resolving many of the problems being experienced.

## Potential solutions to the information access impasse

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- MTAA and Members maintain its position outlined in the original submission that it is not in favour of total Government intervention through legislation and or regulation. MTAA is acutely aware that government intervention in a highly competitive and volatile market, already undergoing structural adjustment, could have unintended and unforeseen consequences that can negatively impact consumers and market participants including independent repairers who have little capacity to absorb any further compliance requirements.
- MTAA maintains that merely taking United States or European based legislation and or regulation and applying it unilaterally in Australia, as advocated by some, would fail to take into account matters peculiar to the Australian market. For example any government intervention would require a balancing of international jurisdiction solutions with the provisions and requirements of the Australian Consumer Law, and the interpretations of that law in State and Territory Jurisdictions. Regulations that might suit markets where there are of thousands of repair businesses, may not necessarily translate in the Australian market which possesses significant points of difference.
- Like the development of the Heads of Agreement, it is the preference of MTAA and Members that the industry itself; with guidance of existing overarching Commonwealth legislation and regulation; develop, implement, and administer, such a process or mechanism to the ultimate benefit of consumers as well as the sector.
- As motor vehicles continue to evolve, the complexity continues to increase, and the application of technology quickens, the task of maintaining and repairing the national fleet will likewise become more complex and demanding.
- MTAA Limited and Members are pleased to provide the Market Study details on a proposed solution framework called the Australian Automotive Security Accreditation Scheme (AASAS).
- It is recognised AASAS is not yet a solution in itself as there needs to be significant detail determined and agreement of participants on matters including those that could not be previously addressed. However, MTAA and Members respectfully suggest that this Framework provides the foundations for a solution and could with the will of participants provide a fit-for purpose, industry led solution.
- AASAS has been initiated as a proposed framework to address matters 'parked' from the original agreement, deal with concerns being experienced, and deliver a framework that Sector Industries could use as a starting point to deliver an industry-led solution. It is designed to ensure a vehicle owners vehicle data and personal information are not compromised during the servicing or repair of their vehicle.

- AASAS also responds to consumer concerns around the accessing of their vehicle data and it is anticipated these concerns will increase as vehicles become more data rich as a driver's personal information becomes more integrated with a vehicles electronic communication systems. There is also growing concern from industry surrounding the possibility of vehicle systems becoming compromised via software or firmware updates or via the addition of unauthorised and unsecured aftermarket components.
- If industry is not capable of initiating and agreeing on such a solution then there will be little alternative than initiating a proper and stronger Mandated Code of Conduct over sighted by the ACCC.
- The latter may also be used to address any other identified behaviours or issues arising from the market study.

## Conclusion

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- MTAA thanks the ACCC for the opportunity to make further comment on a critically important issue of access to service and repair information.
- MTAA is continuing analysis on other key areas and remains available to the New Car Retailing Market Study Team to assist as it explores other critical issues such as the deconstruction of Dealership Agreements, which can also significantly impact new car retailers and consumers.
- MTAA looks forward to providing any assistance to the market study team including any access it may require to Members of their business constituents.

MTAA National Secretariat  
March 2017

**ATTACHMENT: Australian Automotive Security Accreditation Scheme**





Draft Framework

## Australian Automotive Security Accreditation Scheme

### Background

The Australian Automotive Security Accreditation Scheme (AASAS) has been initiated to ensure a vehicle owner's vehicle data and personal information are not compromised during the servicing or repair of their vehicle. AASAS also responds to consumer concerns around the accessing of their vehicle data and it is anticipated these concerns will increase as vehicles become more data rich as a driver's personal information becomes more integrated with a vehicle's electronic communication system. There is also growing concern from industry surrounding the possibility of vehicle systems becoming compromised via software or firmware updates or via the addition of unauthorised and unsecured aftermarket components.

In addition, as software innovation continues to evolve and more control modules are being integrated into a vehicle, the frequency of required software updates are also set to increase. This is not too dissimilar to smart phones and PC's. As there are typically 200 million lines of software code in a car, many of the updates are aimed at fixing software bugs that can relate to security, safety, and environmental systems. AASAS ensures the vehicle owner is informed of outstanding software updates and the risks which may include safety related items, throughout the vehicle life cycle.

AASAS also seeks to provide solutions to key industry issues, such as access to vehicle repair information. Vehicle manufacturers have voiced major concerns about access to security, safety and environmental related information as well as the purchase of theft relevant parts by independent repairers and non-authorised dealers. AASAS is not sector specific and will be applicable to independent repairers, dealerships and other sectors who access vehicle security and data systems. A cross-sector adoption of the Scheme will ensure consumers have a consistent understanding of AASAS and will have confidence that a national standard is being applied across the industry.

AASAS is intended for professionals, automotive technicians and businesses involved in the service and repair of vehicles and their security and data systems. The Scheme will also apply to technical personnel who require access to these systems to undertake service, repair or diagnostic work, whether it is directly or indirectly related to a vehicle's security and data systems.

Examples of access can include replacement and reinitialisation of vehicle components, software updates, as well as registering vehicle keys if permitted by the manufacturer. Currently, access to security, safety and environmentally related repair information and reinitialisation codes is restricted to manufacturer authorised repair networks, which has limitations in the market and reduces consumer choice.

The Scheme aims at delivering a consistent and dependable level of consumer protection irrespective of whether consumers choose to have their vehicle serviced or repaired by a manufacturer dealership or by an independent repairer. The Scheme is designed to ensure high level standards are maintained across the industry and that annual accreditation requirements are complied with in a systematic and verifiable way. The Scheme has a key objective of enhancing the reputation and image of the automotive industry, as well as ensuring consumers have consistent vehicle data and personal security protections irrespective of where they choose to have their vehicle serviced or repaired.

AASAS meets a contemporary industry and consumer need and as such reaches further than existing laws in NSW and WA that require the registration of certain automotive tradespeople.

AASAS offers an industry led solution to a growing industry and community issue and seeks to raise standards through a positive consumer facing initiative. AASAS prepares the industry for a rapidly

## Australian Automotive Security Accreditation Scheme

changing automotive environment, where computers, personal safety and data security are becoming central to the buying considerations of consumers. The framework for the AASAS works on the principle that the Scheme must have sufficient rigour and credibility to properly satisfy the test for vehicle data security and personal information protections.

### Implementation

The implementation of the Scheme is contingent on the requirement for an accreditation Scheme being mandated through movement legislation. It is likely that any legislation in this area be related to the access of vehicle repair information and applied as a measure to protect vehicle manufacturer data.

### Requirements

AASAS is intended to operate on annual certification through which accreditation, by a business or service technician, can be initiated and maintained. The Scheme is targeted at all modes of transport and includes passenger and light commercial vehicles, motorcycles, and heavy vehicles.

Accreditation through the Scheme would include:

#### Probity & Police Checks

- Business owner requires annual police check.
- Technical employees require annual police check.
- Vehicle registration must be checked via VicRoads VRE. Or the equivalent state based registration check system.
- Working Visas must be valid and checked via VEVO.
- Evidence the business has not been subject to bankruptcy proceedings in the previous 12 months. ASIC check.
- Evidence the business is solvent.
- Any person who is testing or repairing a vehicle, must hold a current driver's licence.

#### Verification of vehicle owner

- The customer must present a valid driver's license as proof of identity along with at least one of the following supporting documents: a valid registration certificate, a valid insurance certificate.

#### Qualifications and Competencies

- A person must have a formal qualification sufficient for the job role they perform i.e. motor mechanic, administration.
- Ongoing training - Manufacturers must provide guidelines and instructions for updating software, reinitialising components and where applicable registering keys to the vehicle. This is a requirement on all QEM technical portals throughout the U.S.A and Europe that provide Pass-Thru programming.
- Ongoing training on how to protect the equipment in the workshop



## Australian Automotive Security Accreditation Scheme

### Standards & Compliance

- A proprietor must be appropriately licensed if required under each State to carry on the business of repairing motor vehicles.
- Record of repairs to be kept for minimum of 7 (same requirement for RWC and test reports years as per Road Safety Regulations 2009).
- Code of Practice and business rules – (MTAA and Members to develop).
  - Members must check for outstanding software updates and service campaigns and report back to vehicle owner
  - Members must not tamper with or alter manufacturers performance settings
- Authorisation forms for theft relevant parts – (under development).
- Implement a process for data privacy under the Australian Privacy Principles. (under development)
- The proprietor of the accredited business must conduct an audit of the operation at the time of application for accreditation renewal.
- If the proprietor is a corporation or is a natural person who is not a qualified mechanic, then there must be one nominated person suitable qualified and accredited to perform inspections and repairs at each accredited location.
- Replacement of theft relevant parts, and access to systems to apply those parts must be recorded on the AASAS reporting portal
- Access to any security related OEM information is to be recorded on the AASAS portal.
- Access to any personal information pertaining to the vehicle driver/owner is to be recorded on the AASAS portal.
- A proprietor must allow the AASAS Scheme Managers, free access to the accredited business during business hours and full cooperation must be given for assessing and auditing the operation or conducting investigations. (to be administered by relevant MTAA Member staff)
- All accredited sites must have a current e-mail address for communication with AASAS administrators
- All accredited sites must have a secure document destruction policy implemented

### Premises

The accredited proprietor must:

- Have the legal right to occupy any premises at which vehicles are examined and repaired.
- Be a retail motor vehicle repair or inspection facility that is readily accessible to members of the public.
- Be suitable for the purpose of examining and repairing vehicles.
- Have clear access and sufficient testing space for the categories of vehicles to be examined and repaired.
- Must obtain and hold any consent or approval required by the municipal council or other statutory body for the premises to be used for the examination and repairing of vehicles.
- Clearly present to their customers an annual AASAS certificate identifying the current period of accreditation.

### Data Management

The accredited proprietor must:

- Seek the customer's authorisation prior to commencing any work. (in writing, email, sms etc.)



## Australian Automotive Security Accreditation Scheme

- Complete an online authorisation form that includes the name, address, phone number, drivers licence, vehicle make, model, year, rego, VIN, odometer reading and disclaimer and signature or user acceptance. This form is saved to a central database stored on a MTAA Member server and backed up on an offsite server. This should have an application programming interface (API) built in so that other organisations e.g. Victoria Police, other MTA's can gain access.
- Have access to a secure database or workshop system that allows only authorised people under the Scheme access to information relating to a specific security related job. This must be recorded each time.

### Tooling & Equipment

- Computer software and hardware requirements – (Window's 7).
- Pass Thru device J2534 protocols.
- Secure data diagnostic equipment, (dedicated wireless network)
- Internet access.

### AASAS Application Form Requirements

The application information requirements for a business to become AASAS accredited include:

- Business Details.
- Type of Business.
- ACN / ABN.
- Personal Details.
- Professional Qualifications/Licenses.
- Driver's License/Passport Number.
- Applicant's Signature.

### Supporting Documents

- Proof of Insurance (\$10,000,000 public liability).
- Proof of business (letter head / business registration certificate listing depicting all business details).
- A copy of payroll documents listing any staff that are to be registered as an accredited security professional.

### Notes:

- Business plan to be developed.
- Funding to be investigated.
- Fees and accreditation costs?

## Australian Automotive Security Accreditation Scheme

### AASAS Administration

The AASAS administrators will be responsible for processing applications. Were the required information is not provided by a business, that business will not gain accreditation until the information is provided.

The administrator will be responsible for reviewing an application against the application criteria and conducting initial application business checks via the relevant organisations (E.g. ASIC). If the application meets the criteria and passes initial business checks, the administrator is responsible for ordering the necessary criminal history checks.

Other functions will include:

- Compliance audit every 1-2 years. (to be administered by relevant MTAA Member staff)
- Issue registration number/license number that will be used for identification purposes.
- Have procedures for the monitoring, auditing and sanctioning of proprietors, nominees and repairers. Suspend or cancel an accredited person for breaches of conditions.
- Review Committee to be established comprising of representatives from key stakeholders to review appeals.
- Send out relevant bulletins and notices.
- Field any enquiries made in regard to the Scheme.
- Dispute resolution process.