



SOCIETY OF COLLISION REPAIR SPECIALISTS

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Mr. Evans and Mr. Guilliams,

The Society of Collision Repair Specialists (SCRS) would like to provide input on the presentation material offered by your Definitions Committee during the November 2011 Collision Industry Conference (CIC) meeting held in Las Vegas.

First and foremost we would like to thank you, and each of the individuals on the committee, for attempting to bring clarity to nomenclature often used by entities interfacing with vehicle owners who are undergoing collision repair on their vehicles. SCRS contends that nomenclature becomes most important when the (non-expert) consumer is trying to understand an estimate or repair order. In our opinion, the driving force for standardized terminology should be language that is readily understood, not misleading, and correctly interpreted by the average consumer. Because we believe that clearly communicating with the motoring public is an important task, we do feel the need to express our concern over some of the draft terms.

We believe that the term **Used Part** is a fitting term to express a part removed from a donor vehicle. In our opinion, the industry would benefit most from one succinct description that clearly impresses upon the consumer what they are receiving, rather than having multiple descriptors for the same item. Even more beneficial, would be for the industry to establish one expectation of the term, rather than multiple terms for varying degrees of expectations. Member input has clearly indicated that the expectation when ordering a used part is that the part will come from a vehicle of the same year, make and model; by default, that means the part would be from an Original Equipment Manufacturer (OEM.) The market does not request "Recycled Aftermarket Parts" and therefore acknowledging it through a definition does not aid the industry as a whole.

We believe that the dialogue supporting terms such as "recycled/recyclable" is a matter of semantics which simply seeks to take advantage of nomenclature that appeals to a trend in consumer purchasing. If the role and mission of the committee is to clarify and bring universal understanding to nomenclature used in the repair process, we think singular, accurate definitions of existing terms are more important to consumer education, rather than re-marketing terms to make them more appealing to the consumer. Historically, nomenclature that has been introduced into the industry has had potential to mislead or confuse the consumer; descriptions such as "Like Kind and Quality," "Quality Replacement Part," and now "Recycled" fit the example of terms that seem to be designed to "sell" the part, rather than clearly explain it to the motoring public. Use of the adjective "quality" in any part description is subjective, potentially misleading, and adds no true value to the effort to objectively describe a part type, and should therefore be avoided in all descriptions.

Most importantly, we have concern over the proposed definition of **Like Kind and Quality Part**. Like Kind and Quality Parts (LKQ Parts) have traditionally referred to used parts that are of the same year, make, model, and condition as the part being replaced. The new draft definition your committee has proposed significantly lends itself to potentially redefining the meaning for the term to broadly include virtually any replacement part, including new OEM parts. This has widespread implications and gives the impression that the effort may be an attempt to try and define equivalency between all various part types. Redefining the term in such an inclusionary sense, has the potential to change the relevance of existing state laws and contracts, and such an attempt is discouraged by SCRS and the repairers we represent.

In summary, SCRS would be more supportive of limited definitions that succinctly define existing nomenclature, such as:

OEM PART: A new un-used part sold by the vehicle manufacturer

USED PART: An OEM part removed from a donor vehicle

AFTERMARKET PART: A new un-used part sold by a manufacturer, other than the original vehicle manufacturer

Again, we appreciate all the efforts of those involved in the committee, and hope that your mission statement is upheld in the committee's final work product to that our industry and the consumer's we serve can have a universal appreciation for the terms used in the repair process.

Sincerely,

Aaron Clark, SCRS Chairman

Aaron Schulenburg, SCRS Executive Director