

**OEM Website Audit Steering Committee  
Conference Call Notes  
December 9, 2004**

The third meeting of the OEM Website Audit Steering Committee took place by conference call on December 9, 2004. Participants on the call included Holly Pugliese (US EPA), John Cabaniss, John Daley, Eddie Ehlert, Bob Everett, Paul Foley, Ron Garrett, Bob Redding (Bill Haas' proxy), Dean Hermano, Aaron Lowe, Dave Scaler, Donnie Seyfer, and Ron Turner. Also on the call were Doran Stegura, Twohy Murray, and Monika Chandra from Perrin Quarles Associates, Inc.

**A. Introduction**

PQA began the meeting by asking the committee for comments on the meeting agenda. There were no additions to the meeting agenda.

**B. Technicians to Perform Audits**

During the previous call, Bill Haas agreed to make several revisions to the technician application. Following last week's call, another committee member suggested a new question be added to the survey addressing applicants' experience with emission testing. The member felt that such a question would be a clear indicator of an applicant's skills and abilities. According to the member, the question would not be used during the selection process but would be useful for statistical evaluation following the completion of the audit.

PQA asked for comments on the additional question and Bill Haas' application revisions. The committee supported the revisions and the addition of a new question. PQA asked Bill Haas to revise and finalize the application.

**C. Communication**

In the previous meeting, Bob Everett offered to share AASP's discussion forum with the Steering Committee as an alternative to the ongoing email conversations. PQA asked for comments on this suggestion. Bob Everett reiterated that the forum would be private and that members would be emailed when a post was made. He also mentioned that the forum would allow specific threads for different topics, which would save time. There were no objections to the use of the discussion forum. Bob Everett agreed to share the link via email and asked committee members to register with the site. Once registered with a user ID, committee members will be granted access to the private Steering Committee discussion forum.

The OEM Steering Committee's website will be available shortly. PQA is currently awaiting confirmation of the website address. Once the website address has been approved, that address will be circulated among committee members. PQA noted the possibility that the website may not be fully constructed initially. The first few days after the site address is created, users may be met with a message stating, "This site is currently under construction." PQA asked for comments on the website's status. One member asked for the URL. PQA supplied the committee with the address reminding committee members that the address had not been finalized. PQA is currently awaiting confirmation of the URL <http://www.oemaudit.com>.

#### **D. Overall Method for Conducting the Audit**

PQA asked for comments on a series of audit questions drafted by Holly Pugliese. The questions were divided into five sections in accordance with the two week interim deadlines agreed to by the committee during previous conference calls. Holly Pugliese emphasized that the questions were merely a starting point and encouraged suggestions.

One member, a technician himself, commented on the detail of the draft questions. The member believed that technicians would not encounter real world examples that would address the survey's questions. The member had only addressed a small portion of the draft questions during his work in 2004. EPA offered two suggestions. Auditors could either select a vehicle type and model year to concentrate their evaluation of the OEM site, or auditors could base the survey on all vehicles in their shop. The committee member agreed with EPA's second suggestion emphasizing the importance of questions with real world applicability. EPA agreed and noted that technicians could fill in the survey as related issues arose in their shops.

Another member commented on the use of regulatory language in the draft survey. Using question 1.5 as an example, the member noted that most technicians would struggle with that type of language used throughout the survey. The member felt the language and content of the questions should be revised to better address the type of work done by technicians. EPA agreed with this point.

EPA also reminded the committee that additional questions could be added to the survey as long as the questions related to OEM service information. One member suggested that technicians be allowed to add additional comments or questions regarding the OEM site. The member also commented that many technicians would not understand the questions. As an example, the member pointed to the phrase "long term" mentioned in section 5 of the survey. A second member suggested a "not applicable" or "N/A" option be added to the survey to help address this issue.

EPA attempted to summarize the discussion noting that many members seemed to support a "dual path." EPA suggested that different technicians answer different questions

based on the number of emission repairs in their shops. EPA also questioned whether questions should be distributed in multiple surveys over the course of several weeks, as originally suggested, or in one broader survey, which would require some response on a regular basis.

One member believed a single broad survey would be beneficial and would encompass more real world situations. The member also agreed that technicians should receive different sets of questions and suggested a control group answer the more specific regulatory questions outlined in the draft survey. Another member supported the suggestion that one group address the specific regulatory questions while another group perform a more general survey based on day to day activity in their shops. The member felt such a process would address the two overarching questions of the audit evaluation: Does the website provide the necessary information, and if so, how well is the information provided? Several members agreed that there was a necessity to include a general component in the survey. It was noted that some technicians may not have the vehicles available to complete the entire OEM survey.

One member questioned whether technicians could be prompted with the general survey upon first accessing the OEM site. EPA supported the idea but noted that the development of such a system would require too much time. Instead, EPA suggested the system be postponed until the second round of audit evaluations. The member responded by suggesting OEMs provide space on the site for comments. By including a comments section, OEMs could be quickly rated. Another member agreed and noted that in-use surveys would be useful beyond a technician's initial visit to the site. However, EPA remained firm that OEMs could not be expected to update their websites on such short notice. EPA noted that while some OEMs could make the changes quickly, others would need much more time.

EPA then asked the committee whether one questionnaire could be used to address both general and specific OEM questions. Auditors could potentially answer survey questions based on real world situations. However, auditors could also evaluate the OEMs based on vehicles currently or recently in their shops. Some members questioned whether technicians would commit adequate time to the survey. One member noted that technicians were forewarned on the auditor application of the time commitment required as a participant in the audit. Another member believed posting the audit information on the IATN website would draw a sufficient number of willing participants who would be thorough in their evaluation. The member also noted that many problems technicians face are not very complex. However, the member felt technicians would still commit time to investigate the issues further online perhaps outside of their shops.

EPA returned to the previous question asking the committee whether the audit should include one questionnaire or two. One committee member commented on the survey's draft questions noting that the questions did not specifically address the steps taken by technicians to solve real world problems. A second member agreed that the

questions should be revised. The member suggested that the survey include more open ended questions. According to the member, open ended questions would be more effective and would allow technicians to elaborate on real world solutions where OEM websites had been used. A third member noted that the survey already included a notes and comments column. Rather than adding more questions, the member suggested allowing technicians to include additional comments in the comments/notes section of the most relevant question.

EPA felt that the "dual path" would require only one survey, but the number of questionnaires necessary for the two types of survey questions was not finalized. PQA suggested that the survey's questions be finalized before deciding how many questionnaires would actually be necessary. To expedite this process, PQA proposed dividing the committee into several small groups. Each group would then be asked to edit one of the five proposed segments of questions. PQA reminded the steering committee members that they could replace the regulatory language of the questions with more commonly used language.

One member was confused as to the direction of the questions in the draft survey. The member referred to the first segment of questions listed in the draft survey and asked EPA if technicians would base their answers on specific vehicles. EPA responded that technicians should answer the questions based on vehicles that are currently or have recently been through their shop. Some questions were designed to be more general, but questions 1.1 to 1.6 were designed to apply specifically to the regulations, according to EPA.

The discussion then turned toward the design of audit questions. One member noted that most technicians work in OBDII and I/M environments and questioned how the survey would relate to non-OBDII and I/M technicians. EPA noted that not all shops would be able to answer every survey question. PQA reiterated the earlier suggestion to add a "not applicable" or "N/A" column to the survey. One of the technicians from the group stated that the committee's technicians should take the lead in designing audit questions. The committee's technicians could rephrase questions so that non-OBD technicians would still be able to complete the survey.

The decisions of the audit discussion were summarized by EPA. It was decided that auditors would be presented with two types of questions. One set of questions would be regulation specific and would be designed to assess the compliance of OEM websites. The other set of questions would be more general. Technicians would answer these questions based on real world problems, and the questions would be designed to assess the usability of the OEM websites. The committee remained undecided as to whether the questions would be presented in a single questionnaire or multiple questionnaires. EPA also summarized several general observations made by the group. Most importantly, the confusing regulatory language of the questions should be dropped for more common language. However, the questions should continue to target service information provided by the OEMs. In addition, a "N/A" option should be added to the survey.

To make the above revisions, PQA suggested that the committee divide into several small groups. The discussion forum was recommended as the ideal way to revise the questions. Discussion threads could be created for each question. Rather than revising the questions in subgroups, one member suggested each segment be assigned to a member of the committee. The revised questions could then be posted in the forum, allowing the entire committee to comment on the revisions. Donnie Seyfer volunteered to revise segments one and two. Ron Turner offered to help Donnie Seyfer with segment one. John Daley volunteered to revise segment three. Ron Turner volunteered to revise segment four. Holly Pugliese agreed to revise segment five. EPA and PQA emphasized that questions could be added or removed from any section.

One member questioned the objective of segment five, which addresses the structure and cost of the OEM websites. The member noted that most websites already provide long-term, mid-term, and short access. Those sites that do not provide this type of access have already been identified. EPA responded that the question was included for completeness. Another member suggested that the question be posed differently to address the specific ways OEMs have met the access requirement. Two general questions were suggested: Are the access tiers reasonable to the access needs, and are the access tiers cost effective? EPA noted that a cost effectiveness study had already been completed and that the OEM fees do meet what is required by the rule. EPA acknowledged that even though the question is useful, the committee's determination will have no effect on EPA's previous decision. One member suggested the survey address additional options provided by some sites. The member used Ford as an example. Ford allows users to select from several options in addition to long-term, mid-term, and short-term options to meet specific day to day needs. The member noted that the accessibility is well worth the price, and Ford and similar manufacturers should be commended for offering multiple access options. Another member noted the importance of the short term access option and noted that technicians select access based on business needs.

The committee agreed to address the audit questions further using a discussion forum. Bob Everett agreed to email committee members the discussion forum's internet address. He also agreed to create discussion threads for the five question segments. He suggested Donnie Seyfer, Ron Turner, John Daley, and Holly Pugliese create titles for their segments and include the title in the discussion thread.

## **E. Next Steps**

Prior to the next meeting, committee members will work to develop audit questions using the discussion forum. Four members were selected to make the initial revisions to the five segments of questions. The revised questions will be posted on the discussion forum by Tuesday afternoon, allowing the committee adequate time to comment on the

changes. The revisions made through the discussion forum will be discussed further during the next conference call on Thursday December 16, 2004 at 2:00 PM Eastern Standard time.

#### **F. Action Items**

- (1) Bill Haas will revise and finalize the technician application survey. The revisions will include the addition of a new question addressing applicant experience with emissions testing.
- (2) Committee members will register with AASP's discussion forum. The discussion forum will replace email as the Steering Committee's primary discussion tool. Bob Everett will provide the link.
- (3) The auditor survey will follow a "dual path." Some questions will be designed to specifically address the regulations while others will be more general and will focus on day to day problems encountered by technicians.
- (4) A "not applicable" or "N/A" option will be added to the auditor survey.
- (5) Donnie Seyfer, Ron Turner, John Daley, and Holly Pugliese will revise sections of the auditor survey. Donnie Seyfer will revise segments one and two. John Daley will revise segment three. Ron Turner will revise segment four and help Donnie Seyfer with segment one. Holly Pugliese will revise segment five. The revised questions will be posted on AASP's discussion forum by the end of business Tuesday. The committee will comment on the revised questions using the discussion forum.
- (6) The next conference call will be held on Thursday, December 16, 2004 at 2:00 PM Eastern Standard time. If a Steering Committee member is unable to attend, a proxy may be sent.