

**OEM Website Audit Steering Committee Conference Call Notes
February 10, 2005**

The eighth meeting of the OEM Website Audit Steering Committee took place by conference call on February 10, 2005. Participants on the call included Holly Pugliese (U.S. EPA), John Cabaniss, John Daley, Steve Douglas, Eddie Ehlert, Charlie Gorman, Bill Haas, Aaron Lowe, Dave Scaler, Ron Turner, and Mark Warren. Monika Chandra, Doran Stegura, and Twohy Murray from Perrin Quarles Associates, Inc. were also on the call.

A. Introduction

PQA began the meeting with an informal roll call. There were no additions to the agenda.

B. EPA Internal Review Update

The OEM questionnaire and application have been submitted to EPA's attorneys for internal review. The application will be posted on the website once this process has been completed.

C. Revised Project Schedule

Due to a number of factors, the project schedule has been slightly revised. The start of the OEM website review was changed from March 2005 to April 2005. Consequently, the Draft Report, the Draft Report review, and the revision of the Draft Report will also begin one month later than originally planned. An additional month is necessary to allow the Steering Committee adequate time to assign technicians to the OEM websites. The revised schedule will be posted on the OEM audit website as soon as possible.

D. Technicians Who Have Applied to Perform Evaluations

PQA announced that 176 technicians have applied to participate in the OEM audit. Committee members should continue to generate interest in the OEM audit, since at least 200 technicians will be necessary. EPA noted that Doug Greenhouse of the National Automobile Dealers Association (NADA) had been contacted. Mr. Greenhouse plans to send out an email announcement of the OEM audit to the state dealership organizations during the week of February 14, 2005. One member noted that the audit was also being discussed on IATN. He added that news of the audit is expected to appear in the March trade publications. He predicted that this would lead to an increase in the number of applicants. EPA agreed to post another note on the IATN website regarding the change in the OEM audit schedule. Another member agreed to include a reminder of the audit in the upcoming NASTF newsletter.

E. Revised OEM Website Audit Questionnaire

A final draft of the OEM audit questionnaire was sent to committee members on Monday, January 31, 2005. Members were asked to comment on the revisions incorporated following the January 27, 2005 conference call. Based on comments received during the week of January 31, 2005, a revised questionnaire was sent to committee members on Friday, February 4, 2005. It was agreed that committee members with access to OEM websites could test the questionnaire. With the questionnaire nearly final, some committee members requested comment from a few technicians. Based on this final review, there were a number of additional comments on the questionnaire.

One member received two comments relating to question 5.2, which addresses the access costs of OEM websites. The member noted that basic access costs were not a problem. He explained that some websites, such as Audi and Volkswagen, charge additional fees to acquire the documents necessary for basic repairs. He questioned whether 5.2 was designed to target these OEMs and others that utilize a tiered cost structure. A second member suggested revising the question and asking auditors to estimate what the cost would have been to acquire all necessary documents and information. Another member noted that 5.6 already covered the additional cost of OEM documents. However, he added that 5.6 was too vague and suggested asking auditors to indicate the number and type of documents that were purchased. A fourth member agreed that 5.6 should be rephrased. He suggested changing "have you purchased" to "if you purchase." The third member disagreed and felt that "have you purchased" should not be changed. The member also noted that 5.6 encompasses additional resources such as training videos, which can not be accessed online.

One member felt that segment 5 should be completely removed from the survey. He believed that the cost questions did not relate to the compliance of OEMs. He also noted that segment 5 was purely hypothetical, since auditors would be granted free access to the OEM websites for the duration of the audit. He worried that some technicians might exaggerate their answers to appear more experienced. The only component of this segment that the member thought may be valuable was the additional cost required by OEM websites beyond the regular entry fee.

One member reiterated an earlier point that question 5.6 was too vague. He suggested adding an additional question relating specifically to websites that require a per document fee. The committee identified three OEMs, Porsche, Audi, and Volkswagen, that use per document fees. One member agreed that an additional question should be added but suggested that the question only be applicable to auditors evaluating the Porsche, Audi, and Volkswagen OEM websites. Another member disagreed, noting that some OEMs require additional fees in other areas. The member believed that the tiered cost structure of other websites should also be evaluated.

As a solution, one member suggested rephrasing question 5.2. The member suggested removing the phrase "if you have previously used this OEM website as a paying customer." Then as a followup question, he proposed asking, "Were there areas of the website that could not be accessed without additional fees?" EPA supported the revision and noted that auditors could also be asked to list the restricted areas. However, the Committee questioned how auditors with free access to the OEM would identify restricted areas. One member noted that auditors would be asked for a credit card number any time they attempted to access a restricted area. EPA commented that many aspects of the access rights of auditors were still being discussed. EPA did not yet know how auditors would gain access to pay portions of the OEM websites and suggested postponing further revisions until this could be discussed with the OEMs.

Another member realized that access would depend in part upon the equipment used by auditors. Other members agreed, but EPA was reluctant to add additional manufacturer specific questions to the survey. PQA estimated that 80 to 90% of OEMs would be covered by the general questions already outlined in the questionnaire.

The proposed revisions to segment 5 were summarized by EPA. EPA agreed to revise question 5.2. The phrase "if you have previously used this OEM website as a paying customer" will be dropped. EPA also agreed to examine the number of OEMs affected by the question and how the question would be answered. EPA felt that this would help identify any problems associated with the question. In addition, EPA agreed to add a question relating specifically to OEM websites that require a per document fee.

One member questioned the objective of segment 5. He asked if the questions were designed to be answered as if the auditor were required to pay a fee for access. A member responded that this was indeed the purpose of segment 5. EPA agreed, but noted that an auditor's responses would obviously be based somewhat on past experiences. EPA added that most of the questions came directly from the regulation. Another member also felt that the cost questions were unnecessary and noted that EPA had already approved the cost structure of twenty two OEMs. EPA responded that the approval related solely to the price structure and costs. Segment 5 was meant to gain subjective opinions of OEM website costs. In support of EPA, one member stated that segment 5 met the stated goals of the OEM audit. Another member disagreed, stating that the objective of the audit was to identify noncompliance. The first member responded that noncompliance was important, but the applicability of OEM websites to the real world also deserved consideration.

According to EPA, both members were correct. However, EPA agreed that the audit should focus on the regulation. EPA noted that questions 5.1 through 5.4 related to specific provisions in the regulation. EPA added that regardless of the Steering Committee's findings, the fee structure of OEMs would not be reassessed. One member questioned whether 5.3 was included in the regulation. The member also commented that question 5.5 was too vague and should be revised or removed. The member believed

question 3.13 dealt with the same subject as 5.5 but in a more detailed manner. For this reason, the member felt that question 5.5 should be dropped from the questionnaire. However, other members found question 5.5 useful particularly in the context of the other questions in segment 5. One member noted that segment 3 and segment 5 dealt with different aspects of OEM websites. The member felt that auditors would answer the questions separately based on the content of the other questions in the segment.

Revisions to segment 3 were also proposed. One member suggested creating a separate segment for questions 3.9 through 3.13, called "Suggestions for Improvement," which could be placed at the end of the survey as Segment 6. Included in the new section would be a question asking for suggestions to improve the OEM website. The member noted that in conversations with the OEMs, he found that the OEM companies were particularly interested in ways to improve their websites. EPA agreed with this revision. PQA suggested naming the section "General Information."

Two members noted that they had several other specific revisions to the questionnaire and suggested that they draft a revised questionnaire for the Committee to review. One of these members suggested that with respect to question 5.3, comments on whether the users can download the information from the website should not be requested since it is not included in the regulation. He noted that the regulation only requires OEMs to allow users to print, not download, documents. EPA and other members agreed that it is not required, but responded that the question may provide some useful information. Other committee members agreed that the information was useful. EPA agreed to review the regulation and preamble before deciding how to phrase question 5.3.

Two small revisions to question 5.8 were also suggested. ALLDATA and Mitchell1 were incorrectly listed in the questionnaire. Both will be revised.

One member also had several additional comments relating to question 5.6. He suggested adding two secondary questions, including the type of documents purchased (e.g., training information, TSB, service information, etc.) and the cost of these documents. He claimed that asking auditors to rate the affordability of documents was too subjective. In addition, he suggested asking auditors the cost of acquiring all necessary documents to complete a repair. Another member noted that the audit should attempt to identify what the cost would have been in the absence of the OEM website, not necessarily the affordability of the documents available on the website. One member specifically suggested a question that would clarify how many documents were viewed prior to finding the necessary information, which would apply primarily to the VW, Audi, and Porsche sites that have a per document fee structure. If the cost of each OEM document was known, then the number of documents could be translated into a dollar amount. The question would provide insight into the amount of wasted time and money associated with using a given OEM website. Another member added that it would be necessary to know which documents were purchased, since the cost of documents can be variable.

One member noted that the cost of a document was essentially spread over several years and that OEMs only require users to purchase documents on one occasion. Several committee members disagreed and referenced the time out issue associated with several OEMs. EPA noted that this issue had been temporarily resolved.

One member suggested revising questions 4.10 through 4.12, which highlight OEMs offering alternative methods for reinitialization. He suggested listing the specific OEMs that provide this service. Another member agreed and proposed a screening question similar to 4.12. He claimed that this would save time for auditors. EPA requested that John Cabaniss draft this question.

One change was made to the auditor information section of the questionnaire, which precedes the introduction. In addition to listing a browser name, one member felt that it was necessary for auditors to note their browser version. The field will be revised and listed as "Browser/Version."

The remainder of the call was spent discussing the rating system used in segment 1. Two members felt that the rating system should be eliminated and that the questions should be rephrased. They felt that the audit was designed to identify noncompliance. Rather than asking "how well does the website," these members suggested asking "does the website." This would force auditors to respond with a yes or no. Most other members disagreed with the suggestion. One member pointed to question 1.4, which he felt could not adequately be answered with a yes or no, and another stated that the question was too vague. It was generally agreed that adding the question "How long did it take you to connect?" would address this issue.

Another member referenced question 1.2, noting that a yes/no answer would be inadequate. A second member agreed, but conceded that question 1.1 could be changed to a yes/no question. One member explained that by requiring a yes/no answer, auditors would be more likely to include detailed comments. Others disagreed noting that there would be no way to assess an auditor's response if they listed no without an explanation and that ranking systems were common and useful in statistical analyses. The member responded that a statistical analysis involving ten opinions on ten questions would be invalid. One member recognized this point, but noted that the final report would have to include conclusions. Another member restated his opinion that the questions should not judge how well an OEM meets the regulatory requirements, but should address only whether the OEM meets the requirements.

EPA was not ready to share an opinion on the matter. To keep the discussion moving forward, EPA suggested that the Committee continue to debate the issue using the AASP discussion forum. Following a request by EPA, Steve Douglas and John Cabaniss agreed to draft a questionnaire with all of their proposed changes.

F. Next Steps

Steve Douglas and John Cabaniss will share the revised questionnaire with the Committee as soon as possible. Committee members are encouraged to make comments on the revisions using the AASP discussion forum. The comments will be discussed during the next conference call, which will take place on Thursday, February 17, 2005 at 2:00 PM Eastern Standard time.

G. Action Items

- (1) EPA will post information relating to the revised OEM audit schedule on the IATN website.
- (2) John Cabaniss will include a note regarding the OEM audit in the upcoming NASTF newsletter.
- (3) EPA and PQA will revise questions 5.2 and 5.6. Question 5.2 will be rephrased. The phrase "if you have previously used this OEM website as a paying customer" will be removed. The second question in 5.2 will also be removed. The phrase "have you purchased" in question 5.6 will be changed to "if you purchased." A question relating to manufacturers utilizing per document fees will be added to 5.6.
- (4) PQA will create a new segment entitled "General Information" for questions 3.9 through 3.13. An additional question will be added to the segment relating specifically to how the website could be improved.
- (5) PQA will change All-Data to ALLDATA in question 5.8. PQA will also change Mitchell to Mitchell1 in question 5.8.
- (6) John Cabaniss will draft a screening question, which would apply to questions 4.10 to 4.12.
- (7) PQA will revise the auditor information section at the beginning of the questionnaire. Auditors will also be asked to note their browser version.
- (8) John Cabaniss and Steve Douglas will submit to the Steering Committee a revised questionnaire, which will include any changes not discussed during the conference call. Steering Committee members will discuss the revisions and other issues raised during the call using AASP's discussion forum.
- (9) The next conference call will take place on Thursday, February 17, 2005 at 2:00 PM Eastern Standard time.