

**OEM Website Audit Steering Committee Conference Call Notes
February 17, 2005**

The ninth meeting of the OEM Website Audit Steering Committee took place by conference call on February 17, 2005. Participants on the call included Holly Pugliese (U.S. EPA), John Cabaniss, John Daley, Tom Trisdale (Steve Douglas' proxy), Bob Everett, Ron Garrett, Bill Haas, and Mark Warren. Also on the call were Monika Chandra and Twohy Murray from Perrin Quarles Associates, Inc.

A. Introduction

There were no additions or changes to the meeting agenda.

B. EPA Internal Review Update

The auditor application and questionnaire remain under EPA internal review. EPA notified its attorneys that the Steering Committee is in the process of revising the questionnaire. EPA's internal review cannot move forward until the questionnaire is finalized.

C. Technicians Who Have Applied to Perform Evaluations

PQA announced that 177 technicians have applied to participate in the audit. PQA noted that the number of applicants would likely increase once information about the audit appeared in the trade magazines.

One member noted that his company could provide between forty and fifty technical writers to the audit. Although the technical writers do not currently work in shops, the member noted that many of these writers have considerable experience and at some point, all have worked in or owned shops. Most of the technical writers are also ASE certified, and several are world masters. As editors, these writers frequently access the OEM websites, and the member was convinced that they would not have difficulty completing the auditor questionnaire with the exception of the cost questions in segment 5. The member believed the company's technical writers could broaden the experience and skill level auditors and would provide honest responses to the questionnaire.

PQA suggested waiting until the application period was complete before deciding to include the technical writers in the audit, and added that if the number of applicants was insufficient, then these writers could be used. The member agreed that this was the best course of action.

D. Revised OEM Website Audit Questionnaire

Several changes were made to the questionnaire based on discussion during the February 10, 2005 conference call. Two Steering Committee members made a number of changes, some of which were not discussed during the last call. In addition, EPA made several revisions to segment 5, which were agreed upon by the Committee during the last conference call. PQA suggested beginning the discussion with the revisions to segment 5.

Segment 5

Questions 5.2, 5.3, and 5.6 were revised based on discussion during the February 10, 2005 conference call. EPA explained that question 5.6 was designed to gain insight into the number of documents that were necessary to perform a repair. EPA added that the question was also meant to address the amount of time required to find these documents. One member felt that auditors should also be requested to note the cost of the documents. He noted that the cost of documents varies a great deal with some documents costing up to \$80. It was EPA's impression that the majority of OEM documents were priced at \$17. In light of the member's comment, EPA considered adding a specific question regarding document cost under question 5.6. However, EPA felt that too many questions were already contained in 5.6.

During the previous conference call, one Steering Committee member suggested adding two additional questions to 5.6 relating to the type and cost of the documents purchased. The Committee considered how to incorporate both EPA's and the member's revised questions into the survey. EPA noted that although the questions dealt with the same issue, EPA's question was much more specific and was relevant only to OEM websites with per document fees. The member's question addressed all OEM websites that provide information in addition to printable documents including service information, training materials, TSBs, CDs, and videos. EPA suggested replacing the original question 5.6 with EPA's revised question 5.6 and adding the member's question as question 5.7.

One Steering Committee member made a number of comments on the AASP discussion forum prior to the meeting regarding EPA's revised question 5.6. PQA summarized the member's major points. First, the member noted that it was important to know what repair was performed. He also found the hypothetical nature of the question problematic noting the difference between how much technicians would spend and how much they could spend. He added that documents could be used for multiple repairs, and EPA's revisions did not take this into account. Finally, the member noted that since access would be free during the audit, technicians would most likely access a greater number of documents. He was concerned that this might skew the results of the audit.

EPA again highlighted the need for two questions. The Committee agreed. PQA also suggested adding a secondary question to EPA's revised 5.6 relating to the total cost of the documents required for a repair.

EPA agreed with the member's comment that the type of repair was also important to question 5.6. One member agreed, but questioned whether the repair would be hypothetical or real. He suggested creating a hypothetical repair situation for all technicians to answer. EPA was hesitant to increase the size of the questionnaire. EPA commented that the Committee could not prevent auditors from answering the survey based on previous experiences with the OEM. Another member agreed that a question should be added relating to the type of repair performed. However, he cautioned the Committee that the question would lead to a wide range of responses and suggested asking auditors to select their repair from a predetermined list. One member disagreed and noted that the OEM websites only pertain to emissions repairs. The previous member was aware of this but was worried that technicians would expand the scope of the question beyond emissions repairs. As a solution, PQA suggested specifying that the question only referred to emissions repairs. PQA proposed asking, "what emissions repair were you trying to do?" The Committee agreed with the proposal. There were no further comments on segment 5.

General Instructions

PQA noted that browser version was added to the auditor information section. PQA requested comments on other aspects of the introduction and instructions. One member noted that the number of segments had been changed to six and that this should be reflected in the instructions. Another member suggested asking auditors to supply their internet connection. A member replied that the information was already requested in the auditor application.

Segment 1

During the February 10, 2005 conference call, two Steering Committee members suggested rephrasing segment 1 so that the questions required a yes or no response instead of a ranking. The meeting ended before the proposal could be fully discussed. The Steering Committee member noted that he was merely expressing the concerns of the OEM companies. He explained that the OEMs did not like the inconsistencies of the questionnaire and noted that segment 1 was the only segment with yes/no questions. The OEMs also felt that exclusively objective questions should be asked, since the only requirement of the EPA regulation is compliance.

One member supported the rating system and felt that OEMs should be judged on their performance. In reference to question 1.2, he noted that search engines have several levels of effectiveness. He was convinced that the performance of OEM websites could not be judged by yes/no questions and proposed that the Committee vote on the revision. He agreed that yes/no questions would identify OEM websites without search engines. However, no information relating to the performance of the search engine could be obtained. One Steering Committee member responded that auditors could list any issues associated with the search engine in the comments section.

EPA understood the OEMs' concerns. EPA noted that while the regulation only requires OEMs to comply with the requirements, the underlying language of regulation suggests that OEMs are expected to provide a quality product. EPA felt that there was a need for some subjectivity in the survey and asked for suggestions on how this might be accomplished. EPA supported the addition of the general comments section at the end of segment 6. However, EPA did not believe that the Committee should rely on auditors to explain every negative response.

One member suggested rephrasing the language of the questionnaire's instructions to encourage a greater number of comments. Another member suggested adding a general comments section, similar to the one proposed for segment 6, at the end of each segment. Another member offered an alternative solution. He suggested including both a yes/no column and a ratings column in segment 1. He also agreed with the suggestion to add a general comments section to the end of each segment.

Reiterating the point made by several other members earlier in the call, one member noted that the audit was designed to judge both the compliance and effectiveness of OEM websites. EPA agreed and noted that there were underlying expectations in the regulations. How well the requirements were met would play some role in EPA's determination of compliance. EPA supported the suggestion to have both a yes/no column and a ratings column in segment 1. EPA asked for comments from the Committee. The Committee felt that the compromise to have both a yes/no column and a ratings column in segment 1 was reasonable but noted that the questions in segment 1 would have to be rephrased. EPA and PQA agreed to rephrase the questions.

One Steering Committee member wondered if the concerns of the OEMs were partially based on the use of the word audit. In his opinion, an audit typically involved a test of compliance. He noted that when the OEMs agreed to participate, they were not aware that a ranking system would be used. He was concerned that the questionnaire was becoming an opinion poll rather than an audit. EPA responded that the entire survey was rooted in opinion. One member suggested referring to the audit as an evaluation instead of an audit. EPA noted that in earlier conversations with the OEMs, the nature of the audit and compliance had been clearly explained. EPA also mentioned that approximately 90% of the survey was objective and felt that some subjective questions were necessary. Regardless of how the questions were worded or structured, auditors would undoubtedly include their opinions. According to EPA, a ranking system would help auditors express these opinions and would prove beneficial when the final OEM audit report was written. EPA offered to meet privately with the OEMs to discuss specific issues the OEMs had with the questionnaire.

One member noted that question 1.4 would be difficult to phrase as a subjective question. A second member disagreed noting that level of effort and/or time needed to establish connectivity varies among OEM websites. For instance, some websites use Paypal, which can delay initial access to an OEM website. However, since auditors will

not sign up using the regular channels, the Paypal delay will not be addressed. Another member explained that the responses to question 1.4 could vary depending on how the auditor interpreted the question. He felt that the objective of the question was not clear and worried that some auditors would use the question as a chance to comment on problems associated with the Paypal system, which are unrelated to the OEM websites. The previous member responded that auditors would still have an opportunity to explain negative ratings in the comments field.

Segment 2

There was one minor revision to the introduction of segment 2. There were no comments on the revision.

Segment 3

_____As discussed on last week's conference call, a new segment for questions 3.9 to 3.13 was created. In addition, questions 3.2, 3.3 and 3.8 were revised. PQA asked for comments on these revisions. One member disagreed with the revision to question 3.3 noting that the revised question seemed to be incomplete. EPA agreed and suggested adding a secondary question to question 3.3.

Many of the questions in the survey include several questions related to the same subject. One member suggested that each question be listed on a separate line. For instance, if two questions were included in question 3.3, then the questions would become 3.3 and 3.3a. PQA agreed to make this revision.

One member felt that the revisions to question 3.2 changed the scope of the original question. He noted that while an OEM website may have mode 6 data available, the information provided by many OEMs is inaccurate. The member believed that the shortcomings of these OEMs would not be addressed by the revised question. EPA suggested adding a secondary question asking auditors to identify inaccuracies in the data, but the member felt that the ranking system agreed upon in segment 1 should be extended throughout the questionnaire. Another member noted that the OEM companies would not support such a revision. The other member was aware of this but believed that the extension of the ranking system was necessary in order to assess the effectiveness of the OEM websites. EPA agreed to consider extending the ranking system to other parts of the survey. One member reminded the Committee that some questions were purely objective and did not require a ranking. The previous member responded that in such cases, auditors would note that the question was not applicable.

EPA had specific concerns with extending the ranking system to question 3.2. EPA explained that under the regulation, OEMs were required to provide the same information to aftermarket companies as they provided to their dealership. If this requirement is satisfied, then the OEM is judged to be in compliance.

One member noted that the Committee could decide which ranked questions to include in the final report once the audit was completed. The member cautioned the Committee that the information could only be collected once. He added that without a ranking system, auditors would be limited in the amount of information that they could provide about the OEM websites. Another member explained that in his opinion, the audit had two purposes. First, the audit should judge the compliance of OEM websites with EPA's regulation. And second, the audit should collect information from users to judge the usefulness of the OEM websites and identify areas of improvement. He felt that these objectives needed to be made clear in the questionnaire's introduction.

EPA responded to the member's comments noting that the scope of the audit was limited by the regulation, and that some purely objective questions were required. Before making a final decision to extend the ranking system beyond segment 1, Holly Pugliese will speak with EPA's attorneys.

One member remained a strong supporter of the extension noting that mode 6 data was invaluable when it was correct. He also noted that the use of mode 6 data was beginning to expand in the automotive industry. As an example, the member referenced Ford, which is currently training technicians in mode 6. Mode 6 offers an essential view into the OBD system, according to the member. EPA responded that it does not have the authority to criticize the quality of mode 6 data, since the regulation only requires OEMs to offer the same information to aftermarket companies as they offer to their dealerships. The member maintained his position regarding the critical nature of mode 6 data.

Another member questioned how many auditors would have mode 6 and multiplexing experience. The previous member responded that many of the technicians trained by Ford and General Motors would have mode 6 and multiplexing experience. The member estimated that overall only about 1% of technicians use the technology. However, he noted that mode 6 and multiplexing were emerging technologies, and he believed that up to 90% of technicians would use the technology in the future. A third member agreed and estimated that 90 to 95% of the current audit applicants would have experience with mode 6 and multiplexing. He explained that his estimate was based on comments from the technician community. The member noted that most unskilled technicians were intimidated by the audit and had decided not to apply. EPA agreed to review the proposed extension of the rating system.

Segment 4

There were two additions to segment 4, that were both designed to help auditors save time. Question 4.8 was added for auditors examining OEMs that do not require reinitialization. Similarly, the statement preceding question 4.12 was designed for auditors evaluating OEMs that do not use alternative reinitialization methods. In both cases,

auditors evaluating OEMs that do not utilize these services are requested to skip to the next series of questions. The additions were supported by the Committee.

Segment 5

One member commented on question 5.3 and requested clarification on the objective of EPA's revised question. EPA explained that the question was designed to identify manufacturers that allow users to store downloaded information on a local computer. Honda was identified by the Committee as the only OEM that does not allow users to save documents on a local computer. Another member suggested rephrasing the question, so that the objective is more clearly stated. The member suggested replacing the phrase "download any information" with "save and store locally any information." EPA did not feel that the change was necessary, but agreed to consider revising the question.

Segment 6

Segment 6 was added to the survey. Most of the questions in segment 6 consist of questions originally assigned to segment 3. Two new questions were also added relating to the contact us feature required by EPA's regulation. EPA referenced questions 6.2 and 6.4 noting that, unlike EPA, CARB required a response within 48 hours. EPA supported the reference to 48 hours as long as it was clear to auditors that 48 hours was not an EPA regulatory requirement. As an alternative, one member suggested requesting that auditors indicate how long it took the OEM to respond. Another member noted that OEMs were only required to respond to connectivity and other user-related issues. EPA did not feel that a revision was necessary. One member commented that questions 6.2 and 6.4 were identical. PQA agreed to remove one of the questions. The Committee also agreed with one member's suggestion to add a general comments section to the end of each segment.

E. Next Steps

PQA agreed to email committee members a revised questionnaire by Monday, February 21, 2005. A conference call will be held on Thursday, February 24, 2005 at 2:00 PM Eastern Standard time to discuss these changes and to finalize the OEM audit questionnaire.

F. Action Items

- (1) PQA will add EPA's revised question 5.6 to the questionnaire. PQA will also add two secondary questions to EPA's revised 5.6. One question will address the cost of the documents necessary to perform a repair. The other question will ask auditors to note the type of repair that they performed. Steve Douglas' revised question 5.6 will be added as well.
- (2) PQA will include a yes/no column and a ratings column in segment 1 of the

questionnaire. Segment 1 questions will be rephrased in accordance with this change.

- (3) PQA will revise question 3.3.
- (4) PQA will list each question on a separate line.
- (5) EPA will consider extending the ranking column beyond segment 1.
- (6) PQA will revise question 5.3.
- (7) PQA will add a general comments section to the end of each segment.
- (8) The next conference call will take place on Thursday, February 24, 2005 at 2:00 p.m. Eastern Standard time.