autocare ASSOCIATION
Independence drives us.

7101 Wisconsin Avenue
Suite 1300
Bethesda, MD 20814
www.autocare.org

T: 301.654.6664
F: 301.654.3299
info@autocare.org

April 20, 2017

Maureen K. Ohlhausen
Chairman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Connected Cars Workshop and P175403

Chairman Ohlhausen:

The Auto Care Association, on behalf of the national independent vehicle maintenance and repair industry, is pleased to see the Federal Trade Commission (FTC) and National Highway Traffic Safety Administration (NHTSA) come together to discuss advanced vehicle technologies. The myriad issues posed by solutions for vehicle communications, telematics, infotainment, and others should be well vetted since their adoption will have a major impact on consumers, their data, privacy, protection, and competitive choices regarding service available for their vehicle.

The Auto Care Association is the voice of the $356.5 billion auto care industry. We provide advocacy, educational, networking, technology, market intelligence and communications resources to serve the collective interests of our members and the network of more than 500,000 auto care industry businesses across the country. Following the expiration of their new car warranty, the vast majority chose to have their vehicle repaired in the independent auto care industry based on price, convenience and trust.

As the request for comments accurately notes, advanced vehicles gather, store, and transmit an enormous amount of data ranging from vehicle operating status, location, driver behavior, and even passenger location, to name a few. According to research conducted by the Auto Care Association, most consumers are unaware of the data collection and transmission currently occurring from their vehicles, let alone what could be collected as technology advances. Furthermore, automakers are limiting access to their customer's data only to themselves, rather than providing consumers with transparency and choice regarding what is collected and with whom the data is shared. This presents several consumer protection concerns. We have provided additional information on the research conducted by the Auto Care Association as the end of these introductory comments.

The auto care industry can play a significant role in providing competitive choices to car owners regarding services available that can help promote safety and convenient repair options if the data from vehicles is permitted to be shared outside of the vehicle manufacturers networks. The association is well aware that the availability of the data from these systems clearly adds an additional layer of complexity to the question of data security. Therefore, the Auto Care Association has been

spearheading efforts with the Society for Automotive Engineers International (SAE) and the International Standards Organization (ISO) to generate an international vehicle communication security firewall protocol that can be implemented on both aftermarket technologies, as well as integrated into new vehicle technology architecture. Termed, the Secure Vehicle Interface (SVI), this standard is currently in development with a working group at SAE, and would provide a means to protect vehicle and consumer data that has the added benefit of creating the first steps in a means to consumers having control over who can securely access their data. Information on the SVI standard being developed is also included in these comments.

All of the questions that the FTC and NHTSA are seeking to address at the upcoming workshop, as well as in the request for comments, are central topics for the vehicle industry, technology sector, government, and consumers to be aware of and understand. The Auto Care Association respectively requests the opportunity to participate in the workshop on a panel or as an organization representing the aftermarket perspective to bring forward additional data, policy discussions, and in-depth reviews of the SVI standard. We are also available to answer any further questions the FTC and NHTSA have regarding these issues and the aftermarket.

Again, thank you for developing this workshop and soliciting comments for the record.

Sincerely,

Senior Vice President, Regulatory and Government Affairs
Auto Care Association

[Enclosures]

Stats to Know - Consumers

62%

of consumers haven't heard of telematics

81%

of consumers think *vehicle owners* should decide who has access to telematics data

Half

of consumers assume car owners have access to the data their car produces

7 out of 10

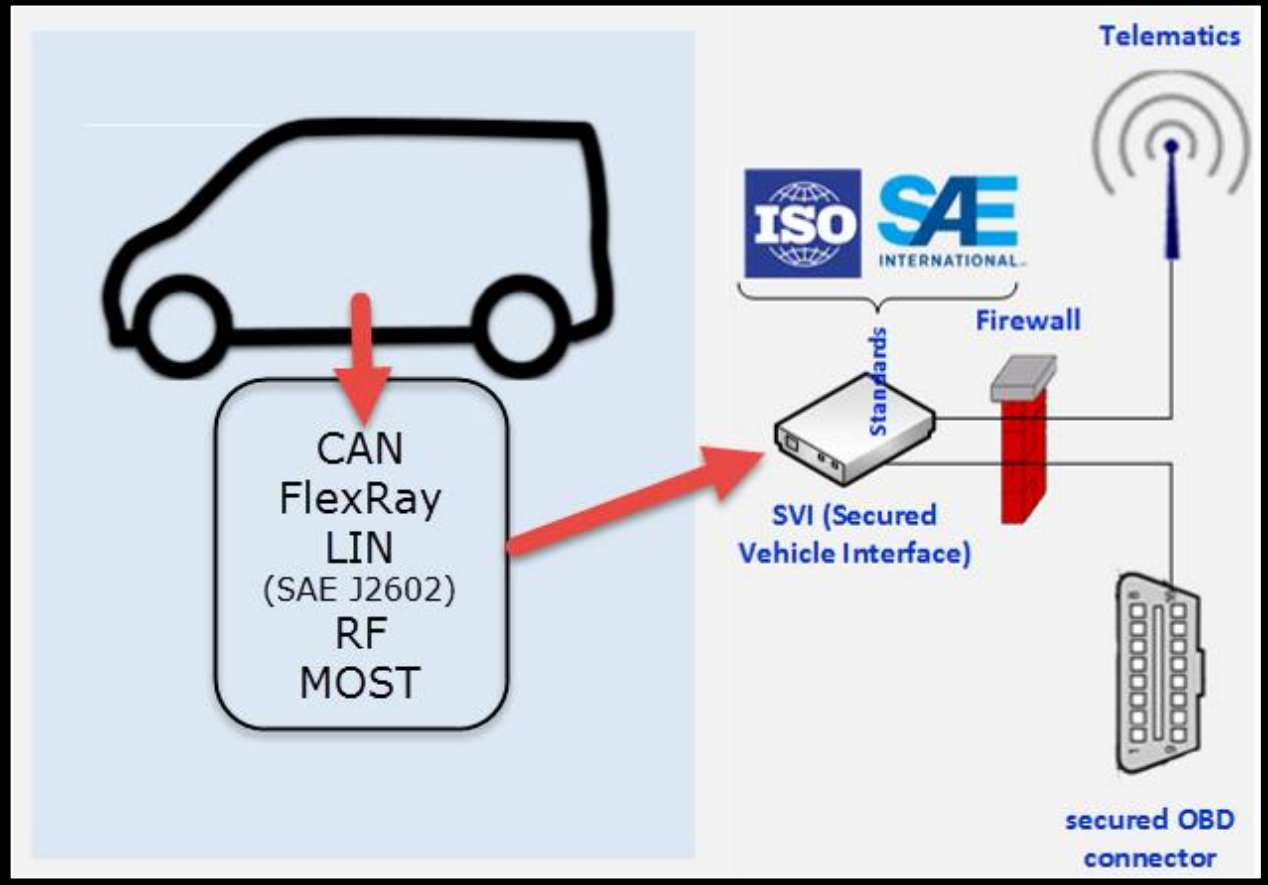
Over seven in ten car owners think their vehicle data being transmitted to the auto manufacturer is a problem and demand a change.

Consumers are willing to take action…

1. Sign a Petition (87%)
2. Write a letter to your congressman (65%)
3. Contact local elected official (62%)

Secure Vehicle Interface (SVI)

- Secure standardized vehicle interface for on-board vehicle networks
- Protects wireless & physical connections
- Software solution based on US & global standards defined by ISO, SAE, IEEE, DIN and other SDOs
- Identity and Access Management (IAM) provisioned through accepted best practices
- Equally supports OEM and aftermarket access to vehicle data
- SVI is `content agnostic' by design



ISO Secure Vehicle Interface (SVI)

Secure & ITS Compliant OBDII Connections

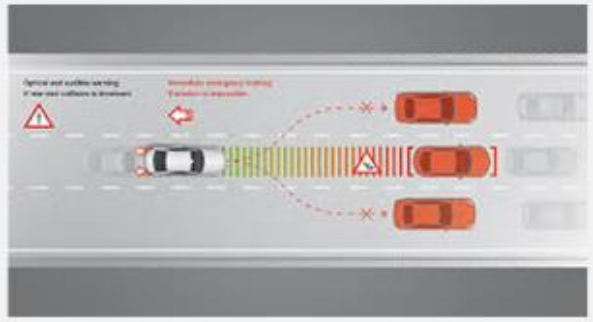
Divergence — Consolidation — Implementation — Enablement

Millions of vehicles

(different brands, types, safety systems, variants: proprietary safety system protocols and telematic systems)

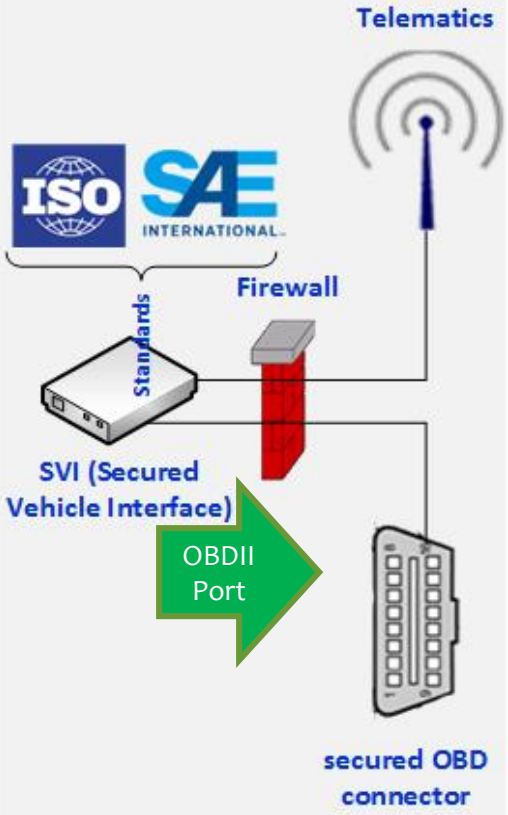
Active Safety

Automated Driving Assistance Systems



Truck Platooning

Legislation enforced Standards



Worldwide Industry

(standards compatible systems)

Roadside Assistance

Remote Roadworthiness

Enablement of worldwide Industry

Traffic Management

24/7 Remote Assistance

24/7 Remote Roadworthiness

Remote Diagnostics & Programming