



December 20, 2007

Secretariat at the Society of Automotive Engineers, Inc.,
Attn: John Turnbull
755 West Big Beaver Road, Suite 1600
Troy MI 48084

Re: ANSI/SAE Z26.1-2007

Dear Mr. Turnbull,

This letter is in response to the proposed draft of ANSI/SAE Z 26.1 2007. After reviewing the draft, Harmon Solutions Group (HSG) would like to express extreme concern for its pending approval, especially Section 7.3.

HSG is one of the largest Third Party Administrators (TPAs) in the insurance industry. We provide auto glass and property claims solutions for insurance and fleet customers.

HSG believes the draft Standard is too broad in its capacity due to its lack of defined terms. No where in the draft is the term *repair*, mentioned in Section 7.3, defined. This term needs further definition.

Historically, the Z26 Committee has limited its scope to OEM issues. Yet the language in section 7.3, as written, clearly moves beyond these applications. As HSG reads Section 7.3, the exemption of original glazing manufacturers from the provisions of that section aims the entire drafted Standard away from the original glazing manufacturer and toward the aftermarket industry. As written, Section 7.3 will mandate the marking of all aftermarket repaired auto glass. This mandate will minimize the use of the safest approach to the restoration of damaged auto glass – windshield repair. All of this leads HSG to believe the draft standard will result in a decrease in the number of repairs (raising a restraint of trade issue) and an increase in costs to insureds.

Every year millions of repairs are performed saving consumers hundreds of dollars with each repair. Should this section survive the standards making process it would increase consumer costs hundreds of millions of dollars annually. Such a change should not be made lightly and without thorough study and explanation. No good reason has been provided for making these changes. Please explain your reasoning.



Would SAE please clarify why they have aimed Section 7.3 at the aftermarket industry? What problems associated with the repair of automotive glass is the committee trying to address? Please provide evidence that Section 7.3 will address these issues. Also, please outline how SAE plans on implementing and enforcing its coding process.

HSG would also like to remind the committee that aftermarket auto glass repair is already governed by **ANSI/NGA/NWRA R1.1-2007, the Repair of Laminated Auto Glass Standard (ROLAGS)**. Why has the Z26 Committee decided to contradict and compete with ROLAGS which considered and rejected inclusion of marking? What information does SAE possess that might demonstrate that Section 7.3 needs to be implemented?

ROLAGS is in place to insure safe and proper repair of automotive glass. Adding marking to this process will not affect its proper technique and finished product. Please explain how SAE feels marking these modifications will insure a superior finished product.

HSG believes that SAE Z26.1 drifts out of the OEM market and into the aftermarket industry of automotive glass through the broad wording of Section 7.3. HSG recommends that SAE re-draft Section 7.3 so that it clearly limits itself to the original installation of automotive glazing. If this cannot be done so as to not affect the aftermarket repair industry, then HSG recommends that the entire Section be removed.

Sincerely,

Paul Gross
President
404 S Barstow Street
Eau Claire, WI 54701
Paul.gross@harmonsolutionsgroup.com