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SAE ANSI Z26 Committee
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Re: ANSIZ26.1-2007 Section 7.3 Modified Glazing Marking

I would like to enter the following comments:

Regarding the process of developing section 7.3

1. Why weren't the National Glass Association, The National Windshield Repair Association, the International Window Film Association and others included in the process?
2. Please identify the committee members representing the interests of the following communities:
 - Windshield Repair
 - Aftermarket auto glass replacement
 - Auto glass adhesive manufacturers
 - Glass scratch removal
 - Mirror replacement
 - Window film application
 - Window film manufacturing
 - Collision repair industry
 - Salvage yards
3. Why were we told during the development stage that section 7.3 had nothing to do with the aftermarket, when it clearly does?
4. Why was a committee roster never made available?
5. Why were individuals who requested committee membership not included on the committee?

Regarding the marking of original equipment glazing relevant to repair

1. There are no descriptions explaining the meaning of the word "repair".
2. There are many types of repairs, which ones does this document refer to?
3. There is no demonstrated reason to mark the glass with a string of up to 15 characters and spaces regarding windshield repair or scratch removal.
4. Windshield repairs occur all over the windshield, with many vehicles having multiple repairs. Using the identification process put forth, no one could determine what company or individual did which repair. There is no demonstrated need for marking.

5. Windshield repair kits are sold on a retail basis in almost every auto parts store in the country. There are hundreds of thousands of do it yourself repairs. Compliance would be unenforceable. There is no demonstrated need for marking.
6. Marking of the windshield would be distasteful to many vehicle owners and there is no benefit.
7. Marking would require either sand blasting or etching. During the ROLAGS process a laminated glass manufacturer indicated that any process that breaks the surface tension of the glass increases the glass's susceptibility to cracking. Laminated glass manufacturers currently mark their products using paint. My concern is denigrating the glass in order to create a questionable identification process. Please address this issue.
8. This standard requires that anyone removing a scratch from the glass would have to mark the glass. Compliance would be unenforceable There is no demonstrated need for marking.
9. Interior and exterior mirrors, both rearview mirrors and cosmetic mirrors, would be required to be marked when replaced. Many are sold by auto parts retailers and installed by retail customers. Compliance would be unenforceable. There is no demonstrated need for marking.

Regarding the marking of original glazing relative to chemical processes

1. There are no descriptions explaining the meaning of "chemical processes".
2. Water repellent and deicing are chemical processes, are they covered?
3. What is the demonstrated need for marking chemical process?
4. Chemical processes have been in common practice for decades without adverse reactions. Compliance would be unenforceable. There is no demonstrated need for marking.
5. Every replaced windshield requires a chemical process be applied to the glass in the form of a primer for the adhesive. There is no demonstrated need for marking.
6. Almost every replaced rear window requires a chemical process be applied to the glass in the form of primer for the adhesive. There is no demonstrated need for marking.
7. Many replaced quarter glasses require a chemical process be applied to the glass in the form of primer for the adhesive. There is no demonstrated need for marking.
8. Chemical processes that repel or change the characteristics of water (Rain-X) on automotive glass require repeated applications. Such products are commonly sold over the counter in retail auto parts stores. The standard would require permanent marking of the glass each time the process was applied. Most vehicles have 6 windows and many people apply the product to every piece. Compliance would be unenforceable. There is no demonstrated need for marking.

General comments:

1. It is possible to envision a replaced windshield with 2 windshield repairs, one scratch removal, and three applications of water repellent to the windshield, requiring 7 markings containing a total of 105 characters and spaces. How do you envision compliance? Where on the windshield would you put 100+ characters?
2. There is no demonstrated value to these requirements.
3. The marking process requires shop designations and there is no system in place for shop designation.
4. No process of enforcement is described for either repairs or chemical treatments.
5. Have you checked with or included the states requiring period motor vehicle inspection in order to determine their position regarding marking windshields with up to 100 or more additional characters? If not, why not?
6. Marking will create a system so burdensome and restrictive that the number of repairs of all types would be diminished thereby creating market for newly manufactured glass. Please cite your legal rationality for restricting markets.
7. OEM manufacturers are exempted from marking processes that occurred after manufacturing but before delivery to the customer as long as the piece of glass remained in the OEM's custody. Following the standard as proposed, it would then be assumed that all unmarked processes on a piece of glass occurred while the glass was in the custody and control of the OEM.
8. Section 7.3 should be removed from the standard.

The developers of the standard did not thoroughly consider their recommendations. It appears to be a process that had been either hurried or developed by people with a narrow scope of experience. Excluding the stakeholders from the laminated glass repair community, the after market auto glass replacement community, the collision repair community, the glass recycling community, the mirror community and the water repellent community has led to a poorly crafted document.

Sincerely,

David Taylor
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Board of Directors, National Windshield Repair Association
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