



June 22, 2026

Sara Tindall-Woodman, Esq.
Department of Business Regulation
1511 Pontiac Ave, Building 68-1
Cranston, RI 02920

Re: ADAS Amendments to 230-RICR-30-05-2 and 230-RICR-30-05-3

Dear Attorney Tindall-Woodman:

This statement is submitted on behalf of the American Property Casualty Insurance Association (APCIA).¹ We appreciate your request for feedback and ongoing efforts to modernize regulations to keep pace with an ever-changing industry. The proposals as drafted are sound. However, we believe an additional regulatory change is needed.

Rhode Island General Law § 27-9.1-4(31) makes the following an unfair claims practice (emphasis added):
Refusing to pay an auto body repair shop for documented necessary sublet services paid out to vendors or incurred by the auto body repair shop, **for specialty or unique services** performed in the overall repair process, including costs and labor incurred to research, coordinate, administrate, or facilitate the necessary sublet service, and an automotive industry standard markup. Examples of sublet services include, but are not limited to, towing, transportation, suspension, alignments, electronic calibrations, diagnostic work, mechanical work, and paid charges to release a vehicle;

Under the proposed regulatory changes, ADAS calibration services may still be performed by the repair facility or by a qualified third-party provider and remain eligible for reimbursement when documented, necessary, and transparently itemized. However, adding ADAS certification as a baseline requirement for auto body and glass repair shops should disqualify it as a “specialty or unique” service under § 27-9.1-4(31). To clarify this point, we urge revisions to 230-RICR-20-40-2. While there are several potential locations and ways to draft this clarification, below is one possible location and language proposal:

2.8(C)(6) Advanced Driver Assistance System (ADAS) calibrations are not specialty or unique services.

Please reach out if we can be of further assistance on this issue.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jonathan Schreiber", is written over a horizontal line.

Jonathan Schreiber
Jonathan.schreiber@apci.org, (202) 828-7121

¹ Representing 67% of the U.S. property casualty insurance market, APCIA promotes and protects the viability of private competition for the benefit of consumers and insurers. APCIA members represent all sizes, structures, and regions, which protect families, communities, and businesses in the U.S. and across the globe. Several APCIA members are located in Rhode Island and many more do business here. APCIA members are integral to the state of Rhode Island. They write 76% of the property casualty insurance sold in this state. The P&C insurance industry employs over 3,200 Rhode Islanders, provides annual assistance of \$1.5 billion in claim payments to help customers in the state, and contributes over \$160 million annually to the state in premium taxes.