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

**RE: Comments on Proposed Rule 230-RICR-30-05-3**

Dear Ms. Tindall-Woodman:

Thank you for the opportunity to comment on the Notice of Proposed Rulemaking for 230-RICR-30-05-3. My name is Andreas Heiss, and I am the Government Affairs Manager for the Northeast Region for LKQ Corporation. I am writing to express LKQ's concerns with the proposed changes. While LKQ understands the intent and safety concerns for this rule making, they create ambiguity around certification, risk consolidating certification control under a single organization, and restrict mobile-first operators like ours without clear alternatives for existing business models.

LKQ Corporation is a leading global provider of alternative and specialty parts to repair and accessorize automobiles and other vehicles. LKQ offers its customers a broad range of replacement systems, components, equipment and parts for automobiles, trucks, and recreational and performance vehicles. LKQ has a global industry leading team of over 46,000 employees operating in over 1,400 locations in 25 countries. LKQ has 2 facilities with 40-50 employees in RI. These facilities can be found in Cumberland and Johnston.

One of LKQ's brands, Elitek which operates in Rhode Island, is the largest U.S. provider of mobile, on-site vehicle services to automotive collision repairers, mechanical repairers and national fleets, providing a full array of repair solutions including diagnostics and calibration, re-flashing, programming, pre and post collision repair diagnostics and other mechanical services. Elitek gives any independent motor vehicle repairer the ability to have scans and calibrations done at their shops regardless of the tools they have on site. This speeds up repair times, cuts costs, and ultimately allows consumers to get their modern vehicles repaired at the shop of their choice. In the first quarter of 2026, Elitek worked on over 55,000 vehicles and its' technicians completed over 2,800 training hours.



There are multiple parts of this proposed rule that raise concerns from both a compliance and competitive standpoint. In Section 3.8, the rule states that technicians must hold “AGSC Technician Certification or equivalent”. The undefined term “equivalent” creates ambiguity and effectively gives AGSC disproportionate control over qualification standards. As written, it could be interpreted in practice as requiring AGSC certification specifically, which introduces both cost and competitive concerns. It also seems very self-serving in that to become AGSC certified, one must first be an AGSC member. This is all problematic because there are other widely recognized and nationally adopted training standards. Specifically, I-CAR, which already covers ADAS calibration processes at a high level. Elitek is a certified I-CAR administrator, and our technicians are trained through that program. There needs to be clear language recognizing programs like I-CAR as meeting or exceeding the requirement, otherwise enforcement becomes subjective and potentially exclusionary.

Another section of concern is the requirement of a “location” as it is defined in section 3.3 (B) 3. This definition requires a physical location or access to indoor facilities and requires mobile-only operators to demonstrate access to one. Elitek does not currently maintain a physical location in Rhode Island as it is not required as part of our mobile business model. LKQ, however, has two physical locations. As written, this would create a compliance gap for our model. “Access”, (not ownership) should satisfy the requirement and this should be explicitly clarified to include leased, shared, or partner facilities.

Section 3.4 (B) 4 requires that every applicant for a license must provide the name and address of any person that either directly or indirectly, has a financial interest in the business. LKQ is a publicly traded fortune 500 company. This would mean providing the names and addresses for thousands of individuals and does not seem applicable to the safety and repair of vehicles.

Finally, section 3.8 requires any license holder to be certified in Repair, Replacement and Calibration. Elitek does not physically repair glass and should only be required to be certified in the services we provide. Having to obtain certifications for practices we don’t perform is costly and unnecessary.

Ms. Tindall-Woodman, thank you for your time and for considering my comments. Though LKQ understands the direction and reasoning for this proposed rule, as currently constructed it creates ambiguity around acceptable certification pathways, risks consolidating certification control under a single organization, and potentially restricts mobile-first operators like Elitek without clear allowance for alternative business models that have long existed throughout the Country. LKQ urges the agency to reconsider this approach and adopt alternative language that accounts for and is practical for all businesses that provide ADAS services.



Please do not hesitate to contact me if you have any questions and I look forward to being included in any further discussions involving this matter. I can be reached at (305) 720-1877 or [arheiss@lkqcorp.com](mailto:arheiss@lkqcorp.com)

Respectfully,

A handwritten signature in black ink, appearing to read 'Andreas Heiss'. The signature is fluid and cursive, with a prominent initial 'A' and 'H'.

Andreas Heiss  
Government Affairs Manager  
LKQ Corporation