



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,

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.



Andreas Heiss
Government Affairs Manager, LKQ Corporation, Northeast Region
100 M Street, SE, Suite 300, Washington, DC 20003
arheiss@lkqcorp.com
(305) 720-1877

6/23/2026

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

Respectfully,

A handwritten signature in black ink, appearing to read 'Andreas Heiss', is written over a light blue horizontal line.

Andreas Heiss
Government Affairs Manager
LKQ Corporation