Public Supplementary Submission

GM Holden Ltd – 31st October 2017

Response to "ACCC letter to GM Holden - New car retailing - 11 October 2017" - ACCC reference PRJ100210

Attachment A: Information and Document Request to GM Holden

Access to technical information to repair and service new cars

1. c-i-c

2a. Price charged and overview of each class of subscription:

Subscription Reference	Subscription Details	VALIDDAYS	PRICE $USD
TIS-COMP	Complete Service and Repair Information, including all diagnostic software and reprogramming. Includes all individual subscription options within this table - this is the full suite identical to all GM/Holden Dealers	1 Year	$3,125
GM-SI	Service and Repair Information eg: collision & mechanical repair procedures, diagnostic codes & procedures, wiring diagrams, maintenance procedures including oil life monitoring reset procedures	3 Days	$20
		1 Month	$150
		1 Year	$1,200
TIS-ALL	Same as Service Programming (TIS-SP) but also includes Tech 2 diagnostic software to read/clear/diagnose fault codes and electrical system functions	1 Year	$1,395
TIS-SP	Service Programming - Reprogramming all available modules with updated software and/or calibration files. Includes ability to link modules, including security systems	2 Days	$55
		3 Months	$275
		1 Year	$995
TIS-DIAG	Tech 2 diagnostic software to read/clear/diagnose fault codes and electrical system functions	1 Year	$750
TIS-GDS	Global Diagnostic Systems (GDS) which replaced Tech 2. Used for reading/clearing/diagnosing fault codes and electrical system functions.	3 Days	$57
		1 Month	$227
		1 Year	$575
TIS-T2W	Where the old Tech 2 tool is no longer available or serviceable, this emulates the Tech 2 software function on a computer. Used for diagnostics only.	3 Days	$55
TIS-CIP	Combination of "TIS-GDS" and "TIS-T2W"	1 Year	$775

2b. Software and internet browser required to access the acdelcotds.com website:

The following specifications are taken from the GM Dealer Infrastructure Guidelines, also available publically via the 'system requirements' link on acdelcotds.com. In summary Windows 7 or 10 'Professional' with IE11 is required:

2. LAPTOP & TABLET PC'S

	Good	Better	Best
Processor	Intel Core i3, i5, i7 1st – 4th Gen	Intel Core i3, i5 - 5th Gen* & above	Intel Core i7 - 5th Gen* & above
System memory (RAM)	4GB	4GB	8GB +
Hard Disk Drive	500GB	1 TB	1TB +
CD / DVD Drive (optional/external)	CD/DVD Combo	CD/DVD Combo	CD/DVD Combo
USB Ports	4	4+	4+
Display	13" 1366 x 768 (HD)	15" 1366 x 768 (HD)	17" 1920 x 1080 (HD)
Network Adapter	Wired: Gigabit Wireless: 802.11n	Wired: Gigabit+ Wireless: 802.11ac	Wired: Gigabit+ Wireless: 802.11ac
Operating System	Windows 7 Professional, 64 bit	Windows 10 Professional, 64 bit	Windows 10 Professional, 64 bit

II. SOFTWARE

Software is the program or operating information used by the dealership hardware to capture, store, manipulate, and display data on network hardware. Dealerships use software to capture customer data, automate business processes for selling and servicing vehicles, and communicate with other systems or networks.

	Good	Better	Best
Word Processing	MS Office Viewer	MS Office Viewer	Office 365 Pro Plus
Spreadsheets	MS Office Viewer	MS Office Viewer	Office 365 ProPlus
Presentation	MS Office Viewer	MS Office Viewer	Office 365 ProPlus
Web Browser	Internet Explorer, version IE11 (with current Service Pack) with the "compatibility view" enabled		
Java	Current 32-bit version of Java Runtime Environment, or the version recommended by each application		
Reader	Current version of Adobe Reader		
System Recovery	Full Operating System Recovery Package, Ensure the PC manufacturer or reseller provides the necessary recovery software to restore the operating system in the event of a major software failure. (Note: See Business Continuity Section)		
Desktop Anti-Virus	Enterprise Desktop Anti-virus solution that is updated automatically and managed through a centralized console.		

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2c. Types of information available on acdelcotds.com:

i. Technical Service Bulletins – found within "GM-SI" and "TIS-COMP" subscriptions per 2a. All bulletin types available including safety. Bulletins authored from 2013 are available against each vehicle model.

ii. (Re)initialisation codes – not accessible through acdelcotds.com. Codes are generally not required on vehicles from MY10 when using the GM tools with an internet connection and a valid acdelcotds.com subscription. Exceptions are radio replacements on some models (see 4) however "security codes' are supplied on a security card within the glovebox wallet / owners manual. In the event that the customer loses their security card and requires a key, radio or security code, the customer can request the code from Holden Customer Care or a Holden Dealership. They will be required to show proof of vehicle ownership.

iii. Software Updates and ECU calibration files – Using the GM tools with an internet connection and a valid acdelcotds.com subscription these can be accessed and updated into vehicles through the TIS-COMP, TIS-ALL, TIS-SP subscription options per 2a.

iv. New cars' environmental systems or standards – Other than software updates and ECU calibration files, no other environmental information is available, or required to service or repair a vehicle. Holden Dealers do not have access to any environmental information over and above that offered through acdelcotds.com.

v. Composition of Engine Oils – All service oil specifications including engine oil are detailed within the owners manual, supplied as a hard copy book in every vehicle. Currently GM-SI refers to the owner manual as the primary source of this information. Holden has an active project in work to have electronic versions of the owner manuals available within GM-SI. Additionally, service oil specifications are currently provided with all maintenance schedules to one company for consolidation and redistribution to industry.

2d. Types of Information not available through acdelcotds.com

- **Parts Catalogue:** Required only for genuine parts ordered through a Holden Dealer. Holden has no restrictions on the sale of parts, and the repairer should work through the Holden Dealer Parts Department to interpret the catalogue and order the required parts.
- **Technical Training:** Although not available for purchase, the training material is developed using the content within the service information (GM-SI) which is available per 2a.
- **Dealer Letters:** Communications that are related to internal processes, new model launch timing, news, and internal contact details. Technical topics are not addressed using Dealer letters. Dealer letters are not available and not required by independent repairers to service or repair Holden vehicles.
- **Security codes** eg: key codes used to enable locksmith cutting of replacement keys and security codes for immobiliser/ecu programming on pre MY10 vehicles, and some radio replacements. Originally supplied with the vehicle in the glovebox with the Owners Manual, and considered to belong to the owner of the vehicle. Holden will provide these codes to the owner of the vehicle with proof of ownership.

3. Information from 2d - availability in US and EU:

Parts Catalogue – not considered technical. Not available in US, available in EU
Technical Training – Aftermarket training available in EU and US
Dealer Letters – not considered technical. Not available in US. Unable to confirm EU at time of response
Security Codes – available for purchase in US and EU with extremely strict controls and governance

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4. Vehicles from 2012 – reinitialisation/security codes required to perform the following:

	Replacing Battery	Replacing Radio	Engine Oil	A/C Service	Brake Pads	Resetting service light	Other service/minor repairs
MY12 - MY15 Spark	Yes - for radio only	Yes	No	No	No	No	No
MY16 - MY18 Spark	No	No	No	No	No	No	No
MY12 - MY16 Barina	Yes - for radio only	Yes	No	No	No	No	No
MY17 - MY18 Barina	No	No	No	No	No	No	No
Cruze	No	No	No	No	No	No	No
Astra	No	No	No	No	No	No	No
Cascada	No	No	No	No	No	No	No
Insignia	No	No	No	No	No	No	No
Malibu	No	No	No	No	No	No	No
Volt	No	No	No	No	No	No	No
VE Commodore/Caprice + Variants	No	Yes	No	No	No	No	No
VF Commodore/Caprice + Variants	No	No	No	No	No	No	No
Trax	No	No	No	No	No	No	No
Captiva	No	Yes	No	No	No	No	No
MY12 - MY18 Colorado/Trailblazer	No	No	No	No	No	No	No

5. Release Dates: acdelcotds.com was released for the US in June 2001. The platform was made active for AU in 2010. Gme-infotech.com was released for EU in 2005.

    a. c-i-c

    b. c-i-c

    c. c-i-c

6. Development and maintenance of acdelcotds.com

    a. c-i-c

    b. c-i-c

    c. c-i-c

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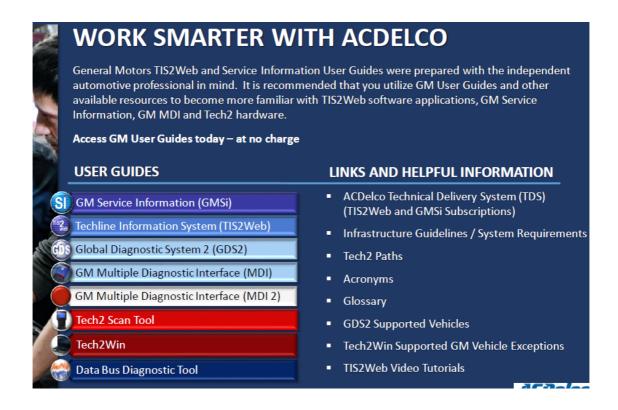**d. User testing** - Holden has not, and has no current plan for independent user testing of the site. There are currently very comprehensive user guides, video tutorials and acronym lists publically available (without subscription) through the acdelcotds.com home page:

https://service.gm.com/userguides/index.pdf

e. System Framework – the AU platform is an extension of the US solution. The EU solution is specific and unique to the EU market to support Opel and Vauxhall branded products (no longer owned by GM).

f. Per 6e **-** The technology and framework used in AU is identical to the US. The content is now authored in common global systems which has enabled the feed of data into the platform. Historically there have been regional differences in systems used to author content, making sharing of information difficult.

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