Response to the ACCC's request for further information on accessing repair and service information and VACC/OurAuto Technical Services.

Prepared by the Victorian Automobile Chamber of Commerce April 2017



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About VACC

The Victorian Automobile Chamber of Commerce (VACC) is Victoria's peak automotive industry association, representing the interests of more than 5,000 members in over 20 retail automotive sectors that employ over 50,000 Victorians.

VACC members range from new and used vehicle dealers (passenger, truck, commercial, motorcycles, recreational and farm machinery), repairers (mechanical, electrical, body and repair specialist, i.e. radiators and engines), vehicle servicing (service stations, vehicle detailing, rental, windscreens), parts and component wholesale/retail and distribution and aftermarket manufacture (i.e. specialist vehicle, parts or component modification and/or manufacture), and automotive dismantlers and recyclers.

In addition to VACC, its sister organisations – the Motor Trade Associations, represent the automotive industry for their respective states/territories.

Background

VACC has been providing a Technical Information Service to the automotive industry for a number of decades.

The service consists of assisting VACC (& TACC) members to diagnose, service and repair motor vehicles, through providing guidance, advice, access to online technical information databases, printed technical information publications and knowledge building through technical training and the dissemination of technical information.

OurAuto, the commercial department of VACC, also provides this service to non VACC members throughout Australia and New Zealand via a subscription based model under the name of OurAuto Tech Centre.

Response to ACCC request for additional information

Provide a description of/information about the VACC OurAuto Tech Centre.

The service involves assisting VACC (& TACC) members to diagnose, service and repair motor vehicles, through providing guidance, advice, access to online technical information databases, printed technical information publications and the dissemination of technical information.

OurAuto, the commercial department of VACC, also provides access to this service to non VACC members throughout Australia and New Zealand via a subscription based model under the name of OurAuto Tech Centre. VACC assists automotive businesses with diagnostic, repair and service information via three mediums:

- Online Tech Online, Times Guide
- Print Tech Talk
- Phone Technical Advisory Service & Library Access

Number of subscribers, type of subscribers

Combined, the number of businesses with rights to access VACC Technical Services, either as a VACC/TACC Member or OurAuto Tech Centre subscriber is in excess of 6,000.

These businesses include new and used vehicle dealers (passenger, truck, commercial, motorcycles, recreational and farm machinery), repairers (mechanical, electrical, body and repair specialist, i.e. radiators and engines), vehicle servicing (service stations, vehicle detailing, rental, windscreens), parts and component wholesale/retail and distribution and aftermarket manufacture (i.e. specialist vehicle, parts or component modification and/or manufacture), and automotive dismantlers and recyclers.

Costs of subscribing, (Excluding GST)

VACC membership fees are based on the number of employees in a business, and range from \$598 pa to \$5,940 pa, inclusive of an additional technical fee.

OurAuto Tech Centre has an advertised price of \$1,200 pa for automotive businesses that are not VACC members.

Levels of service provided and a brief description of any other repair/service information services VACC provides.

Online - Tech Online & Times Guide

Web based program providing access to the most commonly used information in the light vehicle mechanical repair sector, and is broken down into differing technical topics, referred to as modules; plus recommended repair times for a number of mechanical operations.

Attachment A: 'Tech Online Modules'

The information available through Tech Online and Times Guide is a combination of information that has been researched and developed by VACC and information that is supplied under license by a third party information provider based in Europe. This third party provider is the holder of licenses with OEMs.

Print - Tech Talk

VACC researches, develops and prints a monthly technical journal, 16 pages in full colour, 11 editions pa, Tech Talk. This publication includes technical information and articles commonly requested by industry. Tech Talk is designed to assist industry to diagnose, repair and service motor vehicles. Tech Talk has been in circulation for over 30 years.

Phone - Technical Advisory Service

6 highly trained technicians, backed by an extensive automotive library, assist industry through providing technical advice, guidance, and documented diagnostic and repair information. The approximately 40,000 volume strong library includes full OEM workshop manuals, technical publications, 3rd party manuals and reference materials and VACC published technical publications.

The level of assistance that can be provided ranges from verbal advice - in line with Technical Advisors capabilities, knowledge and experience - to the dissemination of technical information pertinent to the vehicle and specific to the work being undertaken by the repairer. Assistance can also be provided through knowledge gained from interacting with industry on a daily basis and is not necessarily dependent on specific printed information being on hand.

Subscription levels

VACC members have access to all online and VACC published information as a part of their base membership. To access the library and receive assistance from a technical advisor members pay an additional \$150 fee.

OurAuto Tech Centre subscribers receive full service as a part of their subscription.

What repair/service information services do your competitors provide?

All information service providers have strengths and weaknesses. No one provider caters for all makes, models and variants in the Australian vehicle fleet and all have discrepancies in the depth of information available between models.

There are a number of alternate information service providers in the market. It would be better served for ACCC to seek a succinct service description and coverage from those entities.

In particular can you outline how VACC's services differ by subscription levels?

Some providers choose to provide a service based on high frequency of use and therefore provide information that is more likely to be referred to by technicians daily. This is determined by sales volumes, end user requests and restricted to what information the provider has access to.

VACC's Technical Service also provides frequently used information via Tech Online, in addition it provides new technology insights through the Tech Talk publication and can provide 'bumper to bumper' coverage from its library resources where available. A large proportion of VACC's information is developed in house, based on OEM specifications applicable to Australia.

What information does VACC need to operate its OurAuto service?

The information required by VACC to operate its OurAuto service is appropriately identified in:

- 1. New Car Retailing Industry a market study by the ACCC, Issues Paper. Section 5, Page 23 & 24
- 2. Supplementary Submission by the Motor Trades Association of Australia Limited (MTAA) to the ACCC New Car Retailing Industry Market Study Issues Paper, Page 4
- 3. VACC Response to the ACCC's request for further information on the type and scope of barriers to accessing repair and service information and car parts, and the impacts of those barriers, Pages 3,4 & 5.

What information is VACC able to get and what costs are associated with this? How does VACC get this information?

Whilst the information required is adequately defined in the documentation listed above, the breadth, depth and availability of such information varies markedly between manufacturers.

Many manufacturers / distributors are now providing improved access to repair information, however there is a lack of consistency, commonality and significant blockages with key areas.

There are also inconsistencies with the depth of information provided for vehicles in some jurisdictions when compared with what is provided for vehicles sold in Australia, even though they are sometimes accessed via the same online OEM source.

Due to its longevity in providing this service VACC has fostered numerous relationships locally and globally. Whilst VACC resources are not all encompassing, it has been able to amass a large amount of information to support the service.

VACC investment in providing this service is significant, it is only in recent times that this service is moving towards being cost neutral on an annual basis.

What would be the best sources of information to assist VACC/ OurAuto service e.g. car manufacturers, OE parts manufacturers etc and why?

It is VACC's view that it would be ideal for it to source information direct from the OEM locally, but as an alternative VACC is confident with OEM information sourced from a reputable 3rd party provider, that has the appropriate OEM agreements in place and that can identify and provide local content.

This assures that the information provided is fit for purpose and pertinent to the local market and easily updated. Although vehicles are now produced on global platforms, some required diagnostic, repair and service information is unique to local conditions and requirements.

The absence of licensing agreements with OEMs locally has resulted in VACC engaging with providers of online content from overseas.

If VACC obtains information from sources other than car manufacturers, e.g. licencing arrangements with entities in other jurisdictions, what are the advantages/disadvantages of this?

VACC engages with providers in other jurisdictions that are known to have agreements in place with OEMs. The advantages of this type of arrangement is that information is delivered in a standardised format. In contrast OEMs deliver information in a style and format that is unique to each OEM, making it harder to locate precise information or understand multiple manufacturer styles, formatting and layouts.

Provider costs can then be amortised across a number of clientele and numerous brands, rather than multiple subscriptions or licenses with every brand.

VACC goes to great lengths to ensure that the information it provides is pertinent to the nuances of vehicles in the Australian market. VACC's online arrangement and processes have a high focus on uploading information that is generic across global platforms or has been identified as being specific to the Australian market. Although all care is taken, it is not an absolute guarantee to deliver perfect results, however the expertise of VACC technical staff also allows them to cross reference information between models and even vehicle makes when a platform is shared.

VACC has been able to negotiate favourable terms, conditions and processes to alleviate any concerns with delivery or surety of service.

Third party aggregators, such as VACC, play an important role in access to information. Australia is one of the most complex vehicle markets in the world, with a comparatively low number of vehicle sales. 219,740 light vehicles have been sold in 2017, spread across 50 different manufacturers and 365 different models. (VFACTs March 2017).

Third party aggregators allow for simplicity in sourcing information, cost effectiveness and ease in circulation of updates or corrections to original information. However with a comparatively small market, return on investment for all information providers is a challenge.

What information is VACC unable to get for the OurAuto service? Provide a brief description of the type of information and breakdown by manufacturer/model if possible.

The type of information is adequately described in the following documentation:

- 1. New Car Retailing Industry a market study by the ACCC, Issues Paper. Section 5, Page 23 & 24
- 2. Supplementary Submission by the Motor Trades Association of Australia Limited (MTAA) to the ACCC New Car Retailing Industry Market Study Issues Paper, Page 4
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Due to the complexity of the Australian vehicle fleet, the number of manufacturers that have sold vehicles throughout the last 10 years (avg age of vehicle fleet), and the number of models and variants of those models, inconsistency of depth and breadth of OE information access, it would require a major research project to define gaps broken down by manufacturer/model.

Is there any particular information that subscribers have indicated they need/want but your service is unable to provide?

Yes, but this is on a case by case basis and cannot necessarily be identified by a broad reaching description or blanket statement.

In some cases specific information that has been requested for a particular vehicle may be accessible, however the same request for information on a different vehicle not be able to be resolved.

For example, a large number of Diagnostic Trouble Codes (DTCs) are accessible and SAE protocols list generic codes relating to defined systems of vehicles. However SAE protocols also allow for 'manufacturer defined' DTCs. Some manufacturers readily make all DTCs accessible, others only provide access to the SAE defined generic codes, and some do not make code tables readily available at all.

As a result, a number of aftermarket providers only provide information relating to the SAE protocols and do not provide information on manufacturer specific DTCs. VACC has a high focus on providing manufacturer defined DTCs where available.

Overview of the amount of moving parts in a modern car and how this may have changed over time.

Please refer to Attachment C - Examples of Vehicle Technology

Attachment A: 'Tech Online Modules'



TechOnline Times G	Suide TechTalk OEM Tech
Example Modules	Brief Description
Auto Transmissions	Component Specifications, Fault Code Table and Access, Component Inspection and Test data, PIN Data, Component and wiring diagrams
Body Tech	Body measurements
Common Faults	Common faults, test and rectification
Electronic Braking Control	Component Specifications, Fault Code Table and Access, Component Inspection and Test data, PIN Data, Component and wiring diagrams
Engine Management	Component Specifications, Fault Code Table and Access, Component Inspection and Test data, PIN Data, Component and wiring diagrams
Programming and Relearn	Manual relearn and reprogramming procedures. Key/immobiliser, Central Locking, Power windows/sunroof, Audio and Navigation, diagrams
Serpentine Belts	Removal and installation procedures, diagrams
Service Schedule	Service requirements, intervals and recommended times where available
SRS Airbags	Component Specifications, Fault Code Table and Access, Component Inspection and Test data, PIN Data, Component and wiring diagrams
Tech Data	Model Information, Lubrication Specifications, Electric, Fuel & Brake systems specifications, Cooling and Air Con Specifications, Tightening Torques, Diagrams
TechTalk	Links to model specific Tech Talk articles
Timing Belts	Removal and installation procedures, diagrams
Vehicle Identification	Vehicle Identification data, location of identifiers, diagrams
Wheel Alignments	Wheel alignment and suspension specification
Times Guide	Link to mechanical repair Times Guide

Note: All modules available are not shown above. All modules are not applicable to every vehicle. Whilst coverage is excellent, every module is not available for all vehicles due to lack of base information.

Attachment C - Examples of Vehicle Technology

Automotive technology is rapidly advancing in less than a decade the workshop manuals relating to one model of vehicle has increased in size and cost tenfold. For example:

- The 2000 Toyota Tarago workshop manuals consists of 3 volumes at a purchase cost of approximately \$400.
- The 2010 Toyota Tarago workshop manual consists of 31 volumes, each volume double the size of the 2000 model and at a purchase cost of approximately \$3,000.

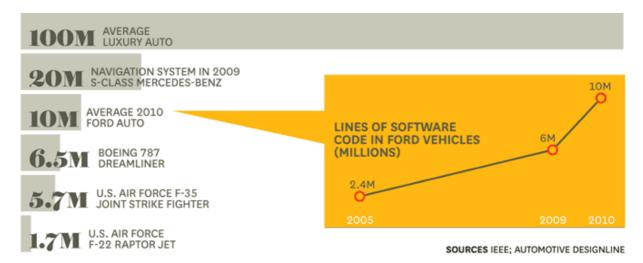




A quote from the Harvard Business Review 2010 states:

"The typical car contains about 2,000 components, 30,000 parts, and 10 million lines of software code."

The article also included the following software code comparison.



This information is now 7 years old.

With each advancement of technology the quantity of information required to diagnose, repair and service vehicles increases.