



Members of the Oregon House of Representatives:

We are writing on behalf of the Oregon Automobile Dealers Association in support of HB 3152. This bill would establish limitations on the use of consumer data and other data generated in connection with automobile sales by an Oregon automobile dealer.

New car automobile dealers in Oregon receive, store and process a significant amount of digital information, including confidential information provided by consumers. Much of this information is gathered, stored and processed by technology partners who serve as subcontractors to the dealers, known as DMS (data management systems) providers.

Generally, this information can be divided into two parts; first, there is a significant amount of data generated regarding the business relationship between the dealer and the manufacturer. This data includes inventories, auto shipments, warranty, recall, registration, dealer incentive programs and numerous other subjects of the business relationship. The second grouping of data is data that is related to or generated by individual consumers. When a consumer buys a car at a dealership and uses the dealer's offices to secure financing, the financing data itself is part of the DMS IT system at the dealership. Additionally, dealers receive and transmit customer data to government agencies such as state titling and registration agencies.

The manufacturer in every case requires the dealer to use the manufacturer's approved IT system as a part of doing business with the manufacturer. The concern of dealers with regard to the entire data subject has recently been elevated because of announced intentions of their vendors to use consumer data.

Currently the DMS provider decides who has access to the data and can charge fees for access yielding an increased cost for services purchased by the dealer. Additionally, the dealer is ultimately responsible for the information in the DMS. This sensitive information should be controlled by the retailer directly working with the consumer, not a third party a dealer is required to use with no connection to the consumer.

HB 3152 would establish limitations on the use of data and the storage of data generated by automobile dealer, sets criteria for the use and protection of the significant amount of consumer data, including confidential data, generated in connection with the purchase of a new or used motor vehicle. The limitations apply to dealers, manufacturers, dealer data vendors and integrators.

On behalf of the Oregon Automobile Dealers Association, we respectfully encourage you to support HB 3152. Please give me a call if you would like to discuss this further.

Greg Remensperger

503-577-0550 Cell

503-213-1414 Office