

Consultation response CMA Motor Vehicle Block Exemption Order (MVBE0)

Within the above regulation I would like to suggest the following areas are considered in more detail.

Summary: - OEM Electronic Parts Catalogues (EPC) to be made publicly available for use by end consumer, aftermarket parts retailer or aftermarket repairer.

Relates to paragraph 5.25 and 5.26

Reason – EPC’s contain all OEM parts and fitment data. In not allowing the consumer (or repairer) direct access creates a competitive and commercial disadvantage to that end user.

Detail:

EPC’s contain all parts data and fitment information for each model of vehicle an OEM has produced and is currently producing. It contains upwards of 500,000 part lines (for each manufacturer), collated in an organic manner over the time the vehicle was in production.

It is currently difficult to impossible for an end consumer to find out the correct part number to complete the repair of his or her vehicle. At best the current process is to contact a main dealer (OEM) and ask for the part number. But this assumes that the consumer knows what part to ask for. An aftermarket repairer has to go through a similar process, although they may have more of an idea as to what the part may be called.

The EPC has not just the part number, but also an image or schematic for that part number, divided into sections such as transmission, engine, electrical; to assist the authorised repairer in locating the correct part.

This process makes it very difficult for an end consumer to purchase the correct part outside of the dealer network.

There has been some parts mapping work from motor factors to match an aftermarket part with a OEM part however the difficulty in doing this (as EPC access is not shared, and the significant volume of parts available) means that only a very small percentage of the total OEM parts file has been completed (<5%). And this work is often inaccurate leading to competitive disadvantage to aftermarket repairers or end consumers as the wrong part is often supplied if ordered through this process.

I think the MVBE0 should be explicit around the sharing of EPC data in that OEM’s should allow access to anyone that requires it, at the same price and in the same format as it’s own dealer network. It may also go further by compelling the OEM to display the entire parts catalogue online, available to anyone.

Advantages:

- Clear transparency of all the parts available by model
- Aftermarket suppliers can easily and correctly cross reference the OEM part with their OES part leading to:
- Consumers can order parts either via the OEM, or use their data to cross reference a potentially cheaper part elsewhere, with significantly increased confidence that the part will fit their vehicle.

- An increase in competitiveness of parts pricing as the secrecy of the OEM around sharing parts data is removed, thus removing an abuse of power by keeping competitive data out of the market place.