

July 7, 2009

Ms. Candace Thorson
NCOIL Conference
C/O The Philadelphia Marriott Downtown
1201 Market Street
Philadelphia, Pennsylvania 19107

Re: NCOIL Model Aftermarket Crash Parts Law

Dear Ms. Thorson:

Per our telephone discussion on June 30, 2009, we are providing you with the comments of CCC Information Services Inc. ("CCC") for legislators to consider in connection with their review of the Proposed Model Act Regarding Motor Vehicle Crash Parts and Repair (the "Act") at the Property-Casualty Insurance Committee meeting on July 11, 2009.

CCC is the provider of a leading repair estimating solution – called Pathways® Collision Estimating – used by more than 20,000 repair facilities, insurers and independent appraisers across the country. Our comments relate only to Section 3.B of the Act. We would ask, however, that our lack of comment on the remainder of the Act not be construed in any way as assent or agreement of CCC as to the other provisions of the Act. We request the elimination of the requirement in Section 3.B that notices be printed on "page one of the estimate." While our estimating tool (and to my knowledge, those of all estimating system providers) can and does print state mandated notices and disclaimers on estimates, we are not currently able to place them on the first page of the estimate. All such notices are printed at the end of the estimate, which may vary considerably in length due to the extent of repairs. With that in mind, if legislation requiring a notice on the first page of an estimate were to be adopted by any state, no repair facility, insurer, or independent appraiser preparing estimates would be able to comply, regardless of the system being used absent significant changes in the system.

The estimate format is hard coded with specific fields on page one that provide all necessary identifying and contact information and very specific space is provided to ensure a consistent format for all users of the tool to accommodate needs in every state. Users are unable to alter that format. CCC and other providers of estimating software would have to make the change to place a notice on page one without disrupting the format of the entire estimate.

To change the hard coded format of the estimating tool would require an enormous investment of time, effort, and expense, including a shift in resources already dedicated to other projects of value to the industry. Thus, to the extent that notices are required, we would ask that there be no restriction regarding where in the estimate those disclosures appear. This approach would be consistent with existing disclosure requirements throughout the nation.

We appreciate the Committee's consideration of this information as it reviews the Act.

Sincerely,



Michael E. Barber

MEB/dmt