

Submitted on behalf of Robert Rosenfield, JN Phillips Auto Glass

Thank you for the opportunity to comment on the Division of Insurance Regulatory Review you are currently conducting. We are submitting our comments on 211CMR135.00 *Requirements Regarding Referrals to Motor Vehicle Glass Repair Shops*.

The passage of Chapter 208 of 2012 and subsequent promulgation of the regulations offer to the consumer a great measure of protection. We urge that these regulations should remain in place for the continued protection of the driving public within the Commonwealth.

These regulations are a key component in the protection of the consumer in matters of auto glass safety and in protection of consumer privacy.

Most importantly, proper repair of auto glass damage is integral to vehicle safety, especially with the advent of passenger airbags and automated driver assistance systems. This regulation addresses the matter of auto glass safety directly, and also indirectly through its reference to the auto glass shop registration system, which further serves to advance proper practices in auto glass repair and replacement by any provider in the Commonwealth.

In addition, the regulations protect consumer privacy within the repair process.

Therefore, we firmly believe that these regulations should remain in place to continue the protection of the residents of the Commonwealth. If I can be of any further assistance please do not hesitate to contact me.