



The Motor Vehicle Block Exemption Regulation (MVBER): An essential piece of legislation for providing repair and maintenance information in the automotive aftermarket

Final report for the Automotive Data Publishers Association (ADPA)

Technical support regarding the review of the MVBER

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1 Introduction

The Motor Vehicle Block Exemption Regulation (EU) 461/2010 (MVBER) is an **essential component of the European Union's legislative framework for competition in the automotive aftermarket sector**. For the past decade, the MVBER has allowed the automotive aftermarket to benefit from a block exemption, to ensure the effective and efficient operation of the market. The MVBER is supported by sector-specific Supplementary Guidelines (2010/C 138/05), which together with the Vertical Restraints Block Exemption Regulation (EU) 330/2020 and its corresponding guidelines, complete the legislative framework for competition in the automotive aftermarket sector. This report focuses on the provisions relating to the access to technical information by independent operators¹, which feature in the sector-specific Supplementary Guidelines. These provisions proved essential to the development of multi-brand services, which independent data publishers brought to the independent automotive aftermarket.

Prior to the expiry of the MVBER in 2023, the European Commission is conducting an ex-post evaluation on its operation. To inform the evaluation, the Commission has launched a public consultation which aims to gather evidence from key stakeholders in order to assess whether, and to what extent, the objectives of the MVBER have been fulfilled. Ricardo has been commissioned by the Automotive Data Publishers Association² (ADPA) to provide technical support regarding the review of the MVBER, through collating and reviewing ADPA's evidence on the functioning of the MVBER and the importance of its provisions on access to repair and maintenance information (RMI) for independent data publishers and multi-brand repairers. Ricardo is a global strategic consultancy, with expertise in the transport, energy and environment sectors. Ricardo provides in-depth evaluations of the effectiveness of international, national and local policies, through the use of robust and reliable evidence, to support the private sector, non-governmental organisations and government bodies, including the European Commission.

This report draws upon the technical expertise of ADPA members and the association's secretariat, to outline the essential role that the MVBER plays in **ensuring fair competition and consumer protection in the aftermarket**. The report concludes that there is the need to maintain and modernise the MVBER post-2023. To provide context to this conclusion, this report presents examples of how the volume and complexity of RMI have increased over the past decade (see Section 2.1). The report also outlines the essential role of independent data publishers, and their multi-brand RMI databases, in the aftermarket value chain (see Section 2.2), before providing an overview of the policy landscape, which highlights the vital role of the MVBER (see Section 3). Building upon this context, the report provides a concrete evaluation of the MVBER, assessing its effectiveness (see Section 4), as well as outlining the need for modernisation (see Section 5).

2 Market context

2.1 Volume and complexity of RMI

Since the introduction of the MVBER in 2010, **the volume and complexity of RMI has increased significantly**. This is primarily linked to the emergence of new vehicle technologies over the past decade, such as electric vehicle technologies, selective catalytic reduction (SCR) systems, and stop-start systems. In addition, vehicle electronic systems have also become more complex. For example, newer vehicle models are fitted with up to 80 electronic control units (ECUs), which has resulted in increasingly complex layers of RMI (e.g. vehicle wiring diagrams require a greater magnitude of connections). In addition, vehicle parts have become more specialised, resulting in a higher volume of RMI, which is tailored to specific vehicle models.

¹ Provisions 62 – 68 in the sector-specific Supplementary Guidelines relate to the access to technical information by independent operators.

² ADPA is an automotive sector association, which represents independent data publishers in the aftermarket. ADPA promotes and protects the rights of its members through aiming to ensure fair access to automotive data and information, and to provide competitive framework conditions for independent data publishers (ADPA, 2020).

Electronic systems and software have become increasingly intrinsic to the operation of newer vehicles. Of particular note, **early forms of advanced driver assistance systems (ADAS)** are now embedded in the vast majority of entry-level vehicles. In addition, lane departure warning systems, adaptive cruise control, collision avoidance systems, parking sensors, and reversing camera and detection systems have become increasingly common (Ardebili, Zhang, & Pecht, 2018). Further to this, vehicles fitted with ADAS technologies require re-calibration following a repair. This has increased the difficulty of conducting routine maintenance and repair tasks, as multi-brand repairers require access to a greater volume of RMI to conduct the additional procedural steps needed to check that the ADAS technologies are functioning. In addition, the emergence of ADAS has also resulted in the need to replace components, such as sensors, which are typically located in areas of the vehicle that are susceptible to damage in accidents. Consequently, independent data publishers need to be able to provide multi-brand repairers with RMI relating to these systems.

The **deployment of hybrid and electric vehicle technologies** has also contributed towards an increase in the volume of RMI. For example, some hybrid-electric vehicle models require multi-brand repairers to manually disable the electric motor, to be able to conduct exhaust emissions tests. This task requires model-specific information, which independent data publishers are often unable to share with multi-brand repairers, as original equipment manufacturers (OEMs) restrict the ease of access to this information, or do not provide it at all (see Section 4.2.1 for further detail on access to technical information).

In addition, the **complexity of model-specific vehicle safety information has also increased** as a result of the emergence of electric vehicle models. Although safety warnings are often provided by OEMs, there tends to be a lack of detail in regard to the specific safety concern in question. For example, although OEMs often indicate long predicted maintenance times are associated with particular vehicle models, the reason for this (e.g. the need to undertake additional safety procedures to disconnect a high-voltage battery) is not always communicated to independent data publishers. **As a result, the increasing volume and complexity of RMI is resulting in a less user-friendly presentation of simple safety warnings.** As electric vehicle models continue to emerge, and technology develops further, this issue will become more prevalent, and therefore, more crucial to address.

Looking ahead, **emerging trends in the automotive aftermarket sector** are likely to enhance the volume and complexity of RMI further. By 2030, as connected and autonomous vehicle (CAV) technologies develop further, they are likely to increase the complexity of RMI, as well as leading to shorter maintenance intervals (McKinsey, 2018; SMMT, 2017). In regard to digitalisation more broadly, the independent aftermarket will also need to adapt to the increasing use of big data, and the Mobility as a Service (MaaS) concept will also drive an increase in the complexity of RMI (DENSO, 2019). Furthermore, ADAS technologies will become even more commonplace in vehicles, as the Commission's requirements for mandatory ADAS technologies³ come into effect in 2022 to help improve road safety (European Commission, 2019). **Therefore, independent data publishers will face an increasing volume and complexity of RMI in the coming years, as technological developments continue to emerge.**

2.2 The role of independent data publishers in the aftermarket value chain

Independent data publishers play a critical role in the aftermarket value chain, through ensuring the provision of **standardised RMI databases** (in an increasing volume and complexity) to multi-brand repairers. The **standardisation of technical information** ensures that the disparate procedural and component terminology used by over 40 key OEMs is presented to multi-brand repairers in a uniform manner. In the absence of this, repairers would face the time-consuming challenge of interpreting the different terms used by OEMs to refer to the same components or procedures. As internal combustion

³ This includes advanced emergency braking, lane departure warning systems, and reversing camera and detection systems for passenger cars and vans.

engine (ICE) vehicles are typically comprised of over 30,000 components, the standardisation provided by independent data publishers is invaluable for multi-brand repairers.

In addition, OEMs adopt different techniques for presenting data, such as wiring diagrams, which makes it very difficult for multi-brand repairers to handle the intricacies of all variants (see example in Appendix A1). The standardisation of RMI by independent data publishers ultimately saves multi-brand repairers from having to navigate through proprietary OEM RMI databases and dedicate time to attend costly proprietary OEM training courses, solely for the purpose of understanding the RMI terminology used by each OEM operating in the market. Due to the standardisation provided by independent data publishers, **multi-brand repairers only need to understand the terminology used by one RMI multi-brand platform provided by a single independent data publisher.** In the absence of independent data publishers, multi-brand repairers would not be able to realistically handle the necessary technical information in a structured and comprehensive way, and as a result, would likely draw upon inconsistent sources for information. As such, independent data publishers **facilitate the capacity of multi-brand repairers to perform every-day repair and maintenance tasks efficiently, rapidly and affordably.**

Independent data publishers tend to offer a subscription service, which **allows multi-brand repairers to gain access to technical information for all vehicle models.** Through offering an annual subscription to their multi-brand software, independent data publishers allow multi-brand repairers to offer competitively-priced services to their customers. Without access to multi-brand software and technical information from independent data publishers, multi-brand repairers would be forced to purchase the required data directly from OEMs. It would cost approximately €2,000 per year for multi-brand repairers to subscribe to **a single OEM portal**, which only provides access to the technical information **relating to 1 out of 40 key OEMs operating in the market.** In contrast, annual subscription to a multi-brand solution provided by independent data publishers costs **approximately €1,000 – €5,000⁴**, which provides access to technical information **for all OEM vehicle makes and models.** Given the high costs associated with subscription to multiple OEM portals on an annual basis, multi-brand repairers would be more likely to engage in ad-hoc offers, such as purchasing daily or weekly access to specific OEM portals.

In addition to this, multi-brand repairers would be faced with additional costs associated with training their technicians to use individual OEM portals, which would require an average of 1.5 days' worth of training for each OEM portal, per technician. Furthermore, multi-brand repairers would face an **administrative burden and additional resource costs** associated with the need to source the location of the OEM technical portals and the associated technical information, as well as completing the necessary payment steps. Therefore, the multi-brand portals provided by independent data publishers offer cost-effective and reliable services, which allow multi-brand repairers to make use of the same software for all vehicle brands.

The provision of affordable and reliable technical information by independent data publishers ensures that multi-brand repairers do not have to pass significant costs onto their customers. This allows multi-brand repairers to remain competitive relative to OEM contracted networks. Without the provision of technical information by independent data publishers, multi-brand repairers would struggle to remain commercially viable. The existence of independent data publishers, and their standardised multi-brand RMI databases, limits the capacity for OEMs to monopolise the aftermarket, and supports competitive behaviour. This helps to ensure that **aftermarket customers are presented with choice**, and are able to access high-quality and affordable repair and maintenance work.

In addition, independent data publishers have also developed **innovative solutions**, which add value to the technical information provided by OEMs. For example, some independent data publishers have built upon the incomplete diagnostic trouble code information provided by OEMs to develop specialised tools, which suggest potential solutions to multi-brand repairers.

As indicated, independent data publishers are a key component of the aftermarket sector, and ensure that multi-brand repairers can remain in operation. **Multi-brand repairers have built a wealth of repair and maintenance expertise and knowledge**, through working across multiple vehicle makes and models, and it is essential that this sectoral expertise is retained and supported, through allowing the

⁴ This represents the range of annual subscription fees charged by ADPA members.

cohesive relationship between independent data publishers and multi-brand repairers to continue to thrive.

3 Policy context

The European Union's competition law prohibits anti-competitive agreements or practices (Article 101 of the Treaty on the Functioning of the European Union (TFEU)), yet offers exemptions from the application of competition law, where certain benefits arise. The MVBER was implemented in June 2010, following the expiry of Block Exemption Regulation (EC) 1400/2002. **The MVBER represents a key pillar of the European Union's legislative framework for competition in the automotive aftermarket sector**, and is supported by sector-specific Supplementary Guidelines. The MVBER and its Supplementary Guidelines aim to address competition in the automotive aftermarket, through recognising that the independent aftermarket increases choice for potential customers, and ensures that the price of repair and maintenance work remains competitive (European Commission, 2010). Of most significance, OEMs are required to provide access to RMI, in alignment with provisions 62 – 68 in the Supplementary Guidelines.

The revised Type-approval Regulation (EU) 2018/858, which applied from September 2020, provides harmonised rules and principles for the type-approval of motor vehicles. **The Type-approval Regulation complements the MVBER through its provisions relating to technical information provision.** For example, the Type-approval Regulation legislates requirements for electronic data processing, which is of particular relevance in light of the need to process RMI as mass and bulk data. The Type-approval Regulation intends to ensure that OEMs provide large datasets in a structured format, which would enable independent data publishers to identify updates to technical information more easily, and therefore, to trust that multi-brand repairers are being provided with the most up-to-date technical information. In this respect, the Type-approval Regulation and the MVBER complement one another.

Despite the positive impact of the Type-approval Regulation on the aftermarket, this piece of legislation is not sufficient alone to guarantee effective competition in the sector. The description of RMI in the Supplementary Guidelines is **more fluid and dynamic to potential developments in technology**. In addition, due to the duration of the legislative process, there is potential for the Type Approval Regulation to lag behind technological developments. For instance, as Regulation (EU) 2018/858 was adopted in May 2018 (and applied from September 2020) after several years of preparatory work, a reference to ISO 18541, a 2014 standard on standardised access to vehicle manufacturers' websites for RMI, has only now been included. Due to the delay in referencing caused by the duration of the legislative process, ISO 18541 is no longer fully compatible with Regulation (EU) 2018/858. Therefore, the Supplementary Guidelines should be maintained, to ensure that independent data publishers, multi-brand repairers and parts suppliers have access to all forms of technical information.

Through the MVBER and its Supplementary Guidelines, the European Union represents an **international lighthouse for effective competition legislation in the automotive aftermarket**. In order to tackle anti-competitive behaviour (e.g. monopolistic practices and higher costs for consumers), other countries have seen the value of establishing a comparable regulatory framework to the European Union. In particular, access to RMI is considered crucial to guaranteeing fair competition in the automotive aftermarket, through enabling independent operators to offer high-quality repair and maintenance services to consumers.

For example, in December 2020, the Federal Government in Australia announced its intentions to introduce the Motor Vehicle Service and Information Sharing Scheme to Parliament in early 2021 (Australian Automotive Aftermarket Association, 2020). The Federal Government has stated that a joint industry-led organisation is expected to manage mediation services and report on the scheme's operation (Australian Government, 2020). As part of the consultation process supporting the development of the Scheme, the potential to follow the successful data sharing agreements in place in Europe was noted. In line with the MVBER, the Scheme aims to ensure that access to RMI by the independent aftermarket is a pre-requisite to fair competition.

Similarly, South Africa's Competition Commission has issued guidelines for competition in the South African automotive aftermarket (South Africa Competition Commission, 2020). These Guidelines aim to lower barriers to entry, increase transparency and facilitate consumer choice for repair and maintenance tasks. The Guidelines contain important provisions on the access to technical information, and note that a review of European Union legislation helped to inform the development of the Guidelines. As such, the MVBBER and its Supplementary Guidelines have been a **direct source of good practice for policy-makers**. Therefore, the modernisation of the MVBBER post-2023 has the potential to inform international policy, enhancing consumer choice both at the EU-level, and through its influence, further afield.

4 Evaluation of the MVBBER

4.1 Effective provisions of the MVBBER

Since the introduction of the MVBBER in 2010, ADPA members have relied upon the provisions set out in the Regulation, and its Supplementary Guidelines, to guarantee access to technical information from OEMs. The MVBBER provided the basis for allowing the aftermarket ecosystem to offer competitive options to customers. Without provisions relating to the access to technical information in the Supplementary Guidelines, independent data publishers would be unable to rely on the receipt of essential technical information from OEMs.

Given the increasing relevance of RMI and other forms of technical information for competition in the automotive aftermarket, it is essential that the supporting legislation offers clarity and facilitates compliance. The definitions of 'independent operators' and 'technical information' in the Supplementary Guidelines have offered useful guidance over the past decade, and these references should be maintained post-2023.

As an overall assessment, some OEMs provide timely access to key forms of technical information upon request, through PDFs or their OEM portals. This technical information includes wiring diagrams, component information, service handbooks and access to OEM parts catalogues, despite some items still missing (e.g. electrical components).

However, independent data publishers are still facing issues regarding the **completeness of technical information**, and in a number of cases, updates to technical information are slow to filter through from OEMs (see Section 4.2.1 for more detail).

4.2 Key issues with the MVBBER

4.2.1 Issues with access to technical information

The persistence of issues relating to the access to technical information from OEMs **hinders the capacity of independent data publishers to compete on a level playing field** with contracted dealers.

Firstly, in spite of requirements, OEMs do not always provide access to technical information in a **timely manner**. **Delays are often caused by lengthy contractual negotiations** between the OEMs and independent data publishers, or slow response rates to specific data requests on the part of OEMs. This issue is compounded by the fact that some forms of technical information are provided in a partial or incomplete state. For example, although OEMs are mandated to provide all RMI for a given vehicle model within six months after the respective type-approval had been granted, many OEMs only provide some of the technical information within this time period, offering no additional support to independent data publishers during the interim.

OEMs increasingly embed technical information into their proprietary diagnostic tools, including wiring diagrams and diagnostic trouble codes. Diagnostics values, such as battery voltages measured by the repairer to determine if the battery is failing, are no longer provided to independent data publishers (in some cases, from one month to another). **Only the diagnostics result is provided** without explicit indication of the diagnostics value, which is made available via OEM proprietary

diagnostic tools. As such, the RMI is not any longer made available via OEM databases, but instead requires purchase or use of OEM-specific diagnostic tools. These are costly and difficult to access, resulting in an additional information gap between the contracted network and the independent aftermarket.

Independent data publishers are not notified when updates are made to technical information. Although the Supplementary Guidelines outline that updates must be shared, OEMs do not provide these in a manner that is **useable** for independent data publishers who must establish entire RMI databases (e.g. independent data publishers are required to search for minor changes to wording in very lengthy documents). OEM updates are simply embedded in the respective RMI system, which suits the needs of *repairers*, which require simple 1:1 access to technical information for a given vehicle and a given job at hand, but not the needs of independent data publishers. **This lack of accessible technical information provision is one of the most significant obstacles facing independent data publishers.**

The issue regarding **the absence of update notifications** is compounded by the fact that OEMs do not provide RMI in an “electronically processable form”. This requires independent data publishers to conduct regular, **manual searches of OEM databases**, to identify potential changes, and to update their databases accordingly. It is essential that independent data publishers undertake these checks, to ensure that the technical information being provided to multi-brand repairers is as accurate as possible, and to allow repairs to be completed safely. However, this presents a challenge. For an average ICE vehicle, comprising between 10,000 and 15,000 spare parts, a potential RMI database comprises an average of 200 different repair instructions, 700 setting/adjustment/calibration values and 800 units indicating labour times. This information must be made available for the 310 million vehicles operating on European Union roads. The use of incorrect technical information by independent repairers (due to the lack of communication of updates by OEMs), can have a significant impact on the warranty of a given customer’s vehicle warranty and the ability to evoke claims, which subsequently tarnishes the reputation of both multi-brand repairers and independent data publishers.

Over the past decade, **the affordability of technical information has become a pressing issue** facing independent data publishers. ADPA members have experienced significant fee increases for the access to technical information, reporting increases in the range of 600% – 2,000% over the past couple of years. The magnitude of this price increase has the potential to severely limit access to technical information, as the small and medium-sized enterprises (SMEs) in the independent aftermarket will either **not be able to afford these price increases, or will have to demand higher prices from their customers**, limiting the competitiveness of the independent aftermarket.

These OEM pricing strategies could contradict general principles established in the case-law of the Court of Justice of the European Union, which has highlighted in the comparable situation of access to telecommunication data, that only the costs related to the technical and organisational provision of access shall be accounted for (Court of Justice of the European Union, 2004). In line with this, the fees should be restricted to the actual costs for making the data available to independent data publishers (costs for the technical-organisational provision of access), and should not compensate any efforts which the OEM has already undertaken for its contracted network (e.g. costs for collecting, structuring and storing data). This should be clarified in the Supplementary Guidelines.

4.2.2 Lack of provision of specific forms of technical information

Although some OEMs provide technical information to independent data publishers in a timely and complete manner (e.g. wiring diagrams, service handbooks and parts catalogues), there is a long-standing issue regarding the provision of some forms of technical information in terms of **completeness and usability**. The capacity to provide entirely accurate technical information for all vehicle makes and models determines the competitiveness of a multi-brand RMI database. As such, multi-brand repairers are forced to additionally use OEM RMI databases or test equipment, if independent data publishers cannot provide complete RMI databases as a result of the lack of provision of specific forms of technical information by OEMs.

Of particular note, in most cases **diagnostic trouble codes are not provided by OEMs in a usable format**. Rather than providing a complete dataset, OEMs often provide independent data publishers with a search function via the OEM portal, which requires the data publishers to conduct a manual search of a given diagnostic trouble code in order to gain more information about the specific issue. **The search on the OEM portal can require the entry of the vehicle identification number (VIN) to start and execute the search, which is simply unavailable to independent data publishers and independent operators working upstream in the supply chain.** Only the workshops, with access to the vehicle in their premises for the repair job at hand, have access to the VIN.

These search functions are designed for OEM contracted dealers and repairers to use when a car is present. For independent data publishers, whose role is to provide multi-brand repairers with access to all diagnostic trouble codes in advance of maintenance work, this is not a feasible search model. In addition, **some OEMs require independent data publishers to sign additional contracts in order to obtain diagnostic trouble codes**, which come at an additional cost. Under the current model of information provision, accessing diagnostic trouble codes in a comprehensive manner is extremely resource-intensive for independent data publishers.

In recent years, the **VIN has become a fundamental tool in the repair and service of vehicles**. In some cases, particular repair information is only made available through a VIN search as a prerequisite to start and execute the search. However, as mentioned above, VINs are *not* available to independent operators working upstream in the supply chain, and under the current system, manufacturers do not provide a VIN list to independent data publishers. VIN-based search functions are designed for OEM contracted dealers to use when a car is present. Without the physical vehicle in their presence, independent data publishers are required to conduct a manual search to access technical information, which is a lengthy procedure.

VINs are becoming an integral element for accessing service schedules, as well as for correctly identifying vehicle equipment and spare parts for a specific vehicle. Some OEMs only provide maintenance data if independent data publishers can provide the VIN. Without the VIN, independent data publishers need to purchase additional packages, at an additional cost. In addition, several OEMs link wiring diagrams to VINs, or to internal reference numbers (which are only identifiable through VINs), and service bulletins and silent recalls are generally only available via VINs. Without access to VINs and the associated vehicle features and specifications, the independent aftermarket will face a significant competitive disadvantage.

ADPA members also **experience issues with the provision of technical information relating to 'silent recalls', campaigns and other bulletins**. Through the use of 'silent recalls', OEMs directly notify their contracted network that there is a need to address a specific issue with their vehicle. Although dealers in the contracted network have access to this information, it is generally not provided to independent data publishers, or it is incomplete. Due to this, independent data publishers cannot share this technical information with multi-brand repairers, which consequently impacts their offering to potential customers.

As a result, independent repairers are required to conduct several hours' worth of diagnostic work, to locate the source of the fault associated with the 'silent recall' or campaign, or in some cases, the lack of information can also cause errors. In these cases, potential customers are likely to seek out a contracted dealer, which would be able to fix the issue over a much shorter time period. The lack of information provision in this case restricts fair competition, giving the impression that the independent aftermarket cannot rely on the information supply from OEMs to be able to compete directly with the OEM contracted network.

The **emergence of remote diagnostics poses a similar issue for independent data publishers**, as independent data publishers (and hence multi-brand repairers) are excluded from these updates. As soon as a vehicle recognises the need for a repair, the OEM-contracted network is informed and the customer receives a repair schedule. As independent data publishers are not aware of remote diagnostics updates, they are unable to provide multi-brand repairers with this information.

Independent data publishers also play a key role in **spare parts identification and the provision of multi-brand spare parts databases**. Due to the large spectrum of available vehicle models, multi-brand repairers need to be able to unequivocally identify the parts required for repair and maintenance. Without accurate spare parts identification, multi-brand repairers could incur additional operational costs associated with identifying the parts, which could also cause delays for the end-consumer. Therefore, it is essential that multi-brand repairers receive the same spare parts identification as contracted dealers and repairers, which benefit from the accuracy of OEM parts catalogues. Independent data publishers serve a pivotal role in ensuring spare parts identification for multi-brand repairers, indicating the need for access to OEM spare parts identification (Osborne Clarke, 2009).

The lack of provision of some forms of technical information forces independent data publishers to **purchase extra packages of technical information at an additional cost**, to ensure that they can provide multi-brand repairers with a more complete dataset. The inability to provide some layers of RMI results in a loss of confidence from multi-brand repairers in the quality of service which independent data publishers offer, **affecting the relationship of ADPA members with multi-brand repairers**. This has the potential to cause long-lasting adverse impacts on the competitiveness of independent data publishers in the aftermarket, as the same repair job is likely to take multi-brand repairers longer than their contracted dealer counterparts, due to the lack of complete information.

4.2.3 Difficulties with enforcement

Due to the aforementioned concerns regarding the increasingly unaffordable fees for access to technical information, independent data publishers have faced the challenge of holding OEMs to account for potential abuses of power. Due to the nature of independent data publishers, they function with very limited legal and financial resources to defend themselves against larger market players, such as OEMs. As access to technical information is essential for effective competition, it is key that enforcement is prioritised going forwards.

The potential **legal costs associated with these cases are not feasible for independent data publishers to maintain in the long-term**. As a result, many independent data publishers cannot afford to push for compliance by OEMs with all facets of the MVBER. ADPA members have experienced the drawn-out nature of litigation and feel that a more appropriate enforcement mechanism is required, which avoids the necessity for legal action and the associated financial burden. Independent data publishers cannot risk being disconnected from OEM portals for the entirety of time-consuming legal cases, or risk tarnishing their relationship with OEMs, as their sole data providers.

In addition, it is essential that large OEMs are not provided with the opportunity to abuse their dominant position in the market during contract negotiations. As SMEs are at the core of the automotive aftermarket, and the European economy more broadly, it is vital that the provisions of the MVBER are enforced effectively, to ensure the continuation of SME participation in the aftermarket, and the associated competitive offering that they bring to customers.

Given the inefficient and costly nature of the legal cases, an alternative enforcement mechanism, which would allow independent data publishers to alert OEMs to MVBER compliance issues, would be very beneficial. ADPA members would **support the introduction of a Europe-wide impartial body** which brings together the different segments of the automotive aftermarket, **under the auspices of the European Commission who should take a proactive role**, to manage complaints regarding the provision of technical information by OEMs. This would help to avoid lengthy and costly court cases, through providing a simple, more mediated environment, where the relationship between OEMs and independent data publishers can continue untarnished.

4.2.4 Servicing of vehicles under warranty

The final issue regarding the effectiveness of the MVBER relates to the **awareness of customers regarding the ability to service vehicles under warranty at multi-brand repair workshops**. For ADPA members, the majority of repairs are linked to vehicles which are outside the statutory warranty (e.g. over three years old), with some ADPA members only servicing 20% of vehicles under warranty. In line with this, Boston Consulting Group (BCG) (2014) found that contracted dealers were performing

the overwhelming majority of repairs for vehicles under four years old (89% for accident repairs, 90% for wear-and-tear repairs, 91% for mechanical and electronics repairs). For these newer vehicles, per repair case, the highest profit margins also lie.

Although it is possible that consumers lack awareness of their ability to use multi-brand repairers for servicing under warranty, it is also likely that consumers choose to service their vehicles with OEM-contracted dealers, as OEMs often offer 'goodwill' payments to customers that have serviced their vehicles with the contracted dealer throughout the lifetime of the vehicle. These 'goodwill' payments tend only to be offered to vehicles which are just outside of the warranty period, contributing towards the cost of non-warranty repair work.

There is also potential that the relatively low proportion of vehicles serviced by multi-brand repairers whilst under warranty is linked to concerns regarding the professional nature of multi-brand repair workshops. The MVBBER has been **successful in eroding the assumption that multi-brand repairers do not have the same level of experience and knowledge as dealerships**, which was very prevalent 10 years ago. Despite this, further information provision is required to ensure that customers are made more aware of the ability to use multi-brand repairers for work on their vehicles, even if they are still under warranty.

Although for the majority of independent data publishers, work on more recent vehicles still under warranty is a relatively small segment of their existing customer base, it is a key avenue into a new segment of work. This is an essential element to improve, as vehicles under warranty are newer, and therefore, there is potential for more added value. In addition, due to the increasing complexity of some newer vehicles, with sensors located in many areas of the vehicle which require initialisation and calibration (e.g. windscreens, bumpers, bulbs, tyres), multi-brand repairers are starting to see vehicles much earlier, and in turn, the share of vehicles that are under warranty for which independent data publishers receive requests for RMI is growing.

However, there are some **uncertainties in place for the independent aftermarket trying to attract customers with vehicles under warranty**. Firstly, issues can arise if a customer visits a multi-brand repairer for a minor non-warranty repair or maintenance job, before returning to an OEM contracted dealer for their next service six months later. These issues occur in cases where a contracted dealer, reviewing the given vehicle's service history, insinuates that it would no longer warrant the work on the specific vehicle, should the multi-brand repairer have used a part which is not authorised by OEMs. These cases can emerge where OEMs have not alerted independent data publishers to changes in technical specifications (e.g. a change in oil specification grade, where oil is considered a spare part), and the regular checks undertaken by the independent data publishers have missed the update. This gives a harmful and unfair image to the independent aftermarket, suggesting that multi-brand repairers conduct low-quality repair work.

Similarly, the existence of localised service schedules, which are adapted by vehicle importers, create regional disparities in RMI. These local adaptations to service regimes also act as a constraint, as these tend not to be shared with independent data publishers and multi-brand repairers. This allows the contracted dealer to void the warranty, if the localised service regime has not been followed by the multi-brand repairer.

In addition, a segment of vehicles is effectively removed from competitive remit. For example, if a customer purchases a car on finance, it is mandatory to service the car within the OEM contracted dealer network, arguably to ensure that the value of the car is maintained. If a customer were to service their car elsewhere, their warranty would still be valid, but they would lose out on their finance deal. As 80% of new cars are sold through finance, this leaves a small segment for the independent aftermarket to tap into.

5 MVBBER revision and modernisation

As indicated in Section 4.2, there are a series of issues in the aftermarket sector that have persisted in spite of the MVBBER. Therefore, it is essential that the revision of the MVBBER accounts for these issues,

and aims to include provisions to better protect independent data publishers and multi-brand repairers from anti-competitive behaviour.

Currently, there is some **lack of clarity relating to the specific forms of technical information which independent data publishers are entitled to**. Although ADPA appreciates the need for the Regulation to remain coherent and concise, **more detailed definitions of RMI** would help to limit the scope for debate regarding the forms of technical information which OEMs are required to share. As such, it should be clear that OEMs are required to provide access to RMI upon request. The revision of the MVBBER should aim to better ensure that data is provided in its complete form, rather than requiring significant resource to retrieve technical information which is made inaccessible. In particular, this includes maintenance procedures, safety warnings and other key data for conducting safe and effective maintenance and repairs.

It is essential that OEMs **supply frequently-updated datasets to independent data publishers, which include VINs**. Moving away from embedding updates in large datasets, towards informing independent data publishers of updates proactively, is required for the provision of accurate information to multi-brand repairers, and hence, is vital to the broader competitive offer which the independent aftermarket can bring to customers. Furthermore, up-to-date technical information will ensure that vehicles are repaired accurately, and therefore, that vehicles are safe to drive on the road.

The revised MVBBER could also benefit from **greater clarification on the required timings for OEMs to provide independent data publishers with technical information**. As OEMs become more directly involved in remote diagnostics and remote repair and maintenance operations, information should be made available, and communicated to independent data publishers, as soon as it is made available in OEM systems. In the event of an unavoidable delay in the provision of technical information, additional support should be provided to independent data publishers, to ensure that any issues or queries which may arise are managed. To support this timely provision of technical information, it is vital that online platforms are well-maintained.

Further clarification is also required to **ensure that the technical information is provided in a suitable format for both independent data publishers and multi-brand repairers**. Currently, OEMs provide technical information to their contracted networks in the same form that they provide information to independent data publishers. However, independent data publishers need to consolidate the data, conduct analysis and put procedures in place before being able to use the data. OEMs need to provide technical information in a form which can be processed by both mechanics and computers. However, it is worth noting that a minority of OEMs are starting to use open application programming interfaces (APIs), to connect their systems with the systems of independent data publishers to share data in bulk. Through the use of the API, independent data publishers can extract information automatically, removing the need for an employee to conduct a slow retrieval process. A greater shift towards this approach would allow independent data publishers to benefit from significant time and resource savings.

In addition to the need to respond to the issues covered in Section 4.2, **it is also essential that the MVBBER is modernised in line with emerging trends in the automotive aftermarket sector**. Over the past decade, digitalisation has becoming increasingly relevant, especially with the emergence of mass and bulk data. As digitalisation continues to feed into many areas of the aftermarket, both in terms of the format of the technical information, and in terms of the rise of digital software in vehicles, it will be necessary for the MVBBER to account for its impacts.

Mass and bulk datasets should be provided in a format that is comparable and easy to process, to support the efficient operation of independent data publishers. The revised MVBBER could follow the approach of the Type-approval Regulation, to require that data should be made available to independent data publishers in an electronic format. Including a provision within the revised MVBBER, to ensure the sharing of digital technical information, would represent an important step in making the distribution of data more efficient, practical and fair for all market players.

The above clarifications would allow independent data publishers to **compare datasets more easily**, enabling updates to technical information to be identified in a more efficient and accurate manner. This would limit the potential for running into warranty issues, and more generally would ensure that the

information provided to multi-brand repairers is up-to-date and accurate. Ultimately, it would help to overcome many of the barriers facing independent data publishers, and would serve to enhance the inclusivity of the aftermarket.

With respect to fair pricing, the Commission should include a reference to Article 63 of the Type-approval Regulation, to ensure alignment regarding the pricing model adopted and the prices charged⁵. It should also be clarified in the Supplementary Guidelines that any fees imposed by an OEM should be restricted to the costs associated with the provision of access to technical information, and should not include costs associated with the efforts which OEMs already undertake for their own networks.

The increasing sophistication of vehicle technologies, including remote diagnostics, has also impacted the competitiveness of the independent aftermarket. **Remote diagnostics directly alert customers to the need to service their vehicle.** Upon receipt of these updates, customers tend to visit OEM contracted dealers. Typically, multi-brand repairers would only update their existing customers once a year, when a service is due.

This is exacerbated by **the lack of provision of technical information to independent data publishers regarding campaigns, diagnostic trouble codes, 'silent recalls' and bulletins.** Should no further provisions be put in place in the revised MVBBER to support independent data publishers and multi-brand repairers, they will not be able to compete with OEMs, due to significant information gaps. Therefore, the revised MVBBER should account for the lack of provision of particular forms of technical information, to ensure that the negative impact on the independent aftermarket is lessened. In addition to the impact on competitiveness, addressing information gaps will help to ensure that the lack of up-to-date technical information does not impact road safety.

The inclusive provision that 'technological progress implies that the notion of technical information is fluid' should be maintained in the Supplementary Guidelines, to ensure that the scope of technical information remains broad. However, a **complementary list of mandatory technical information terms**, which are not subject to interpretation, should also be included, to clarify the types of technical information which OEMs have to provide to independent data publishers under any circumstance.

It is essential to the efficient functioning of the independent aftermarket, and the effectiveness of the provisions under the MVBBER, that the revised Regulation addresses the aforementioned enforcement issues. The potential **implementation of a Europe-wide impartial body** which brings together the different segments of the automotive aftermarket (i.e. OEMs, independent aftermarket), and bypasses the need to engage in lengthy, costly and unsustainable legal cases, would allow the independent aftermarket to maintain a cohesive relationship with OEMs. This would help to ensure that the independent aftermarket can continue to offer competitive prices to consumers, rather than having to dedicate significant resource to unproductive legal battles.

6 Conclusion

Independent data publishers play an essential role in the aftermarket value chain, through allowing multi-brand repairers to offer competitive prices and high-quality services to their customers. **Independent data publishers provide an essential service for multi-brand repair workshops**, through standardising technical information in a clear manner, which allows the multitude of terminologies adopted by OEMs to be translated into a single standardised RMI database with consistent, easy to use terminology for components and procedures. Through providing this essential service and ensuring thereby the survival of multi-brand repairers, independent data publishers prevent OEMs from monopolising the industry, in accordance with the objectives of European Union's competition law.

Over the past decade, **the complexity of vehicles has increased significantly**, due to the development of electronic systems and software (e.g. ADAS), the emergence of new propulsion systems (e.g. hybrid and electric vehicles) and the increasing number of components in ICE vehicles

⁵ For example, the revised MVBBER could include a reference noting that 'It should be assumed that a vehicle manufacturer is in breach of its obligations under competition law if its pricing model and/or the prices charged do not comply with Article 63 of Regulation (EU) 2018/858'.

more generally. In addition, vehicle parts have also become more specialised and customised to specific vehicle models. In line with the increasing complexity of vehicles, the volume of RMI has increased significantly. Although this has created a challenge for the independent aftermarket, it has also allowed independent data publishers to develop comprehensive RMI databases, which allow multi-brand repairers to access detailed technical information on all vehicle makes and models.

The MVBER has supported independent data publishers and multi-brand repairers, through **facilitating a landscape for the independent aftermarket to offer affordable and efficient services to customers**. As such, the independent aftermarket would face significant challenges, should the provisions outlined in the MVBER no longer exist post-2023. In addition to this, the MVBER has served as an influential good practice example for other countries, such as Australia and South Africa.

However, a series of key issues have emerged over the past decade. Firstly, although access to technical information is generally provided within the required six-month timeframe, **technical information is often partial or incomplete**. Access is also granted to independent data publishers much later than the OEMs (who are becoming more directly involved in remote diagnostics and remote repair and maintenance operations) and contracted dealers, putting independent data publishers at a disadvantage. Furthermore, independent data publishers are not notified when updates are made to the technical information, resulting in resource-intensive manual searches of OEM databases, to ensure that updates are successfully captured.

In addition, ADPA members have faced **significant increases in the fees for access to technical information** over the past couple of years, reporting fee increases in the range of 600% – 2,000% in some cases. Given that the independent aftermarket is primarily comprised of SMEs, these price increases cannot feasibly be maintained in the long-term, if independent data publishers are to remain competitive.

In reference to the provision of specific forms of technical information, ADPA members have faced particular **issues with receiving technical information relating to diagnostic trouble codes, ‘silent recalls’ and OEM-specific (“hidden”) campaigns**. Moreover, independent data publishers do not receive RMI in a useable format and are often required to conduct a manual search of diagnostic trouble codes, rather than being provided with a complete dataset. The diagnostic trouble codes should also be accompanied with test values for the correct components. The provision of incomplete information, or information which is not readily available, acts to disadvantage the independent aftermarket. In contrast, the OEM contracted dealers have access to complete technical information.

Another key issue which has arisen over the past decade is the **practical inability of independent data publishers to effectively make use of the enforcement mechanisms** in place. In cases where OEMs have not provided the required technical information, lengthy legal battles are too costly to maintain for SMEs. Not only are the MVBER enforcement mechanisms not practically effective for the independent aftermarket, but the legal battles also cause conflicts between independent data publishers and OEMs (the sole provider of technical information), tarnishing an essential relationship which needs to be maintained to ensure the provision of technical information. In light of this, ADPA members express their **support for the implementation of a Europe-wide impartial body**, to manage disputes regarding the provision of technical information, and any other claims of anti-competitive behaviour on the part of OEMs. Alternatively, ADPA members also support the development of other forms of new, more agile and practical enforcement mechanisms for market operators which are dependent on dominant market players.

To address the issues which have emerged during the past decade, it is essential that the MVBER is maintained, and modernised. The revised MVBER should make it clear that **OEMs must provide access to all RMI upon request**. The revision of the MVBER should aim to better ensure that data is provided in its complete form, rather than requiring independent data publishers to dedicate significant resource to retrieving inaccessible technical information. In particular, this includes maintenance procedures, safety warnings and other layers of RMI, which are considered essential for conducting safe and effective maintenance and repairs.

In the revised MVBER, clarification is also required, to **ensure that technical information is provided in a format that is useable** for operators upstream in the supply chain needing to synthesise this

information, at the hand of independent data publishers. Currently, OEMs tend to provide technical information to independent data publishers, which assumes that there is a vehicle and a VIN present (as would be the case at a contracted dealer or multi-brand repair workshop). As this is not the case, this often creates significant issues for independent data publishers resulting in incomplete RMI.

In addition to addressing the issues regarding access and provision of technical information, as well as enforcement, **ADPA acknowledges that it is also essential to modernise the MVBER in light of emerging trends.** There has been a significant shift in the market over the past decade towards digitalisation, both in terms of the forms of technical information provided, and in terms of vehicle technologies themselves. In regard to technical information, the emergence of mass and bulk data is playing a key role in information sharing. As such, the revised MVBER could follow the approach of the Type-approval Regulation, to indicate that data should be made available to independent data publishers in an electronic format. This would represent an important step in making the distribution of data more efficient, practical and fair, and in acknowledging the crucial role of fair competition in the automotive aftermarket sector.

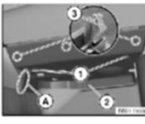

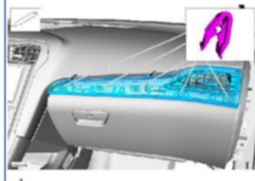
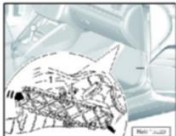
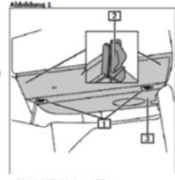
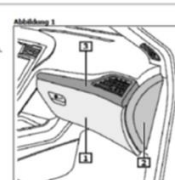
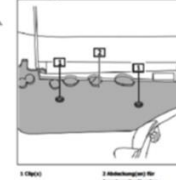
The MVBER is an essential piece of legislation, which **ensures that the automotive aftermarket remains fair and competitive.** It is clear that while the MVBER has allowed independent data publishers to remain competitive over the past decade, there is also the need for revision and modernisation, to account for the key issues surrounding access and provision of technical information, and to ensure that the impact of digitalisation on the automotive aftermarket is considered.

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A1 RMI portal layouts

Figure 1: An example of the varying layouts and terminologies used by different OEM portals relative to a single independent data publisher portal (TecAlliance, 2021)

Vehicle manufacturer		
<p>BMW Group - AIR: 2020-06-07 16:13</p> <p>Modell: 320d Entwicklungsbezeichnung: F30 Spezifikation: 6C31 Letzttyp: 6C31</p> <p>Motoren für Innenraumluftfilter ersetzen</p> <p>Verkleidung für Instrumententafel unten rechts ab- und anbauen (ersetzen)</p> <p>51 45 195 Verkleidung für Instrumententafel unten rechts ab- und anbauen (ersetzen)</p>  <p>Verschraubung (1) lösen. Hinweis: Bei Ausführung mit Knieballg Muttern (1) lösen.</p> <p>Anzahlmoment 51 45 9AZ. Verkleidung (2) an Klammern (3) lösen. Verkleidung (2) im Bereich (A) nach unten ausbilden.</p> <p>Verkleidung (2) stoes abtrennen und dahinter liegende Steckverbindung trennen.</p> <p>Einbaufahrweis: Verkleidung (2) im Bereich (A) korrekt hinter Metallrinne einfallen. Klammern (3) dürfen nicht beschädigt sein.</p> <p>Einbaufahrweis: Führungen (1) dürfen nicht beschädigt sein oder fehlen. Führungen (1) korrekt in entsprechende Halter am Fahrzeug einfallen.</p> <p>Bei Ersatz je nach Ausführung: Fußraumleuchte (2) ummontieren. Steckdose ummontieren.</p>	<p>Innenraumluft- und Kanalschneidwerkzeuge</p> <p>Ausbau und Einbau</p> <p>Ausbau</p> <p>BEACHTUNG: Austauschritte in dieser Arbeitsanweisung können Einbaudetails beinhalten.</p>  	<p>Georgien 100 42</p> <p>Reparaturleitfaden</p> <p>FA: Mercedes-Benz 180000 Mercedes GLA Air-Systeme Betriebsname: Mercedes-Benz</p> <p>Werkstattnr: 010 Mercedes-Benz Service 112 010000 Service Code Plus Arbeitsnummer Betriebsname: Mercedes-Benz</p> <p>Staub- und Pollenfilter aus- und einbauen, Linksklenker</p> <p>Benötigte Spezialwerkzeuge, Prüf- und Messgeräte sowie Werkzeuge</p> <ul style="list-style-type: none"> Handelsüblicher Staubsauger <p>Ausbau</p> <ul style="list-style-type: none"> Abdeckung einbauen -> Kippt. Abdeckung -> in Pfeilrichtung entriegeln. Staub- und Pollenfilter aus dem Haltergut nach unten herausheben.  <p>Einbau</p> <p>Der Einbau erfolgt in umgekehrter Reihenfolge, wie im Folgenden beschrieben.</p> <p>Hinweis</p> <p>Bei der Montage die Einbauebene des Staub- und Pollenfilters beachten.</p> <p>Staub- und Pollenfilter mit Abblaskanlage</p> <p>Der Staub- und Pollenfilter mit Abblaskanlage ist nur bei Fahrzeugen mit Sensor für Luftgüte (L2) einbaufähig.</p> <p>Der Filter mit Abblaskanlage übernimmt weiterhin die Aufgabe eines Staub- und Pollenfilters, er kann aber zusätzlich auch geringfügige Schadstoffe wie z. B. Ozon, Benzol, Stickstoffdioxid aus der Außenluft abblasken. Die wesentliche Aufgabe des Abblasksystems ist Staub- und Pollenfilter zu entfernen, nicht aber, Schadstoffe aus dem Fahrzeug zu verschleppen.</p> <p>Eine Aufgabe der Abblaskanlage ist es aber auch, Schadstoffe aus dem Innenraum abblasken zu können.</p>
Independent data publisher		
<p>Reparaturanleitung</p> <p>Innenraumfilter(-Satz)</p> <p>Standard</p> <p>BMW; 3 (F30, F80); 320 d; kW: 140</p> <p>Hinweis(e):</p> <p>Über den Innenraumfilter darf die Klimaanlage nicht eingeschaltet werden. Der Innenraumfilter befindet sich im Fahrzeuginnenraum, rechts unter dem Handschuhfach. Fahrzeuginnenraum mit Schutzfolie auslegen. Fahrzeuginnenraum reinigen. Fahrzeuginnenraumverschleiß beachten!</p> <p>Benötigte Zeiten</p> <p>Achtung</p> <p>Innenraumfilter erneuern. 0,35 h; mit Klimaanlage ca. 0,75 h</p> <p>Ausbau</p> <p>Der Innenraumfilter befindet sich im Fahrzeuginnenraum, rechts unter dem Handschuhfach.</p> <p>Schraub(e)n für Abdeckung unten auserschrauben. (1) Abdeckung(en) abschrauben. (2) Abdeckung für Handschuhkasten leicht abtrennen. (3) Steckverbindung des Fußraumleuchte trennen. Abdeckung(en) für Handschuhkasten unten auslösen. (3) (siehe Abbildung 1)</p>  <p>1 Schraub(e)n für Abdeckung 2 Oberseite 3 Abdeckung(en) für Handschuhkasten unten</p> <p>Schraub(e)n auserschrauben. (1) Halterung(en) lösen. (2) Abdeckung(en) für Innenraumfilter abtrennen. (3) (siehe Abbildung 2)</p>	<p>Reparaturanleitung</p> <p>Innenraumfilter(-Satz)</p> <p>Standard</p> <p>FORD; MONDEO V Schräglack (CE); 2.0 EcoBlue; kW: 110</p> <p>Hinweis(e):</p> <p>Der Innenraumfilter befindet sich im Fahrzeuginnenraum, in Fahrtrichtung rechts. Wälder dem Handschuhfach. Fahrzeuginnenraum mit Schutzfolie auslegen. Fahrzeuginnenraum reinigen. Fahrzeuginnenraumverschleiß beachten!</p> <p>Benötigte Zeiten</p> <p>Achtung</p> <p>Innenraumfilter erneuern. 0,40 h</p> <p>Ausbau</p> <p>Handschuhkasten öffnen. (1) Abdeckung(en) für Armaturenbrett weglassen. (2) Zwick(e)n(e)n vom Armaturenbrett abheben. (3) (siehe Abbildung 1)</p>  <p>1 Handschuhkasten 2 Abdeckung(en) für Armaturenbrett weglassen 3 Zwick(e)n(e)n</p> <p>Schraub(e)n für Handschuhkasten auserschrauben. (1) (siehe Abbildung 2)</p> <p>Stütze; Steckverbindung trennen. Handschuhkasten auslösen. (1) (siehe Abbildung 3)</p>	<p>Reparaturanleitung</p> <p>Innenraumfilter(-Satz)</p> <p>Standard</p> <p>VW; SCIROCCO (137, 138); 2.0 TSI; kW: 132</p> <p>Hinweis(e):</p> <p>Der Innenraumfilter befindet sich im Fahrzeuginnenraum, in Fahrtrichtung rechts. Unterhalb des Handschuhfaches. Fahrzeuginnenraum mit Schutzfolie auslegen. Fahrzeuginnenraumverschleiß beachten!</p> <p>Benötigte Zeiten</p> <p>Achtung</p> <p>Innenraumfilter erneuern. 0,20 h</p> <p>Ausbau</p> <p>Ob(e)n entfernen. (1) Abdeckung(en) für Armaturenbrett unten ausbauen. (2) (siehe Abbildung 1)</p>  <p>1 Ob(e)n 2 Abdeckung(en) für Armaturenbrett unten</p> <p>Fahrzeuginnenraum mit Schutzfolie auslegen. Abdeckung(en) für Innenraumfilter abtrennen. (2) (siehe Abbildung 2)</p>



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