



April 14, 2026

Senator Robert Britto  
Chair, Senate Commerce Committee  
Rhode Island State House  
82 Smith Street  
Providence, RI 02903

## Re: Senate Bill 2347, Oppose

Dear Chair Britto, Vice Chair Sosnowski, and Members of the Committee:

On behalf of Ford Motor Company, I write to respectfully express our strong opposition to Senate Bill 2347.

To begin, Ford is committed to ensuring our dealers are fairly and accurately paid for warranty repairs. By contrast, SB 2347 improperly ties the amount of compensation manufacturers pay dealers for warranty repairs to aftermarket, or “third-party,” labor time guides that are not intended or appropriate for warranty repairs performed at franchised dealerships, as opposed to manufacturer time studies that are methodically developed for that very purpose.

Specifically, Ford commissions detailed time studies on every warranty repair to document the actual completion time required for each repair. We do not use expert technicians or specialists that would be more efficient at the repair than an average technician, and there are no practice runs to reduce the time required. Everything is aimed at approximating actual Ford dealer service shop conditions. When the technician has completed the study time, it undergoes a technical review to confirm its accuracy. When everything is confirmed, the time study is published. Additionally, Ford dealers are able to use a reporting tool to have a published time allowance reviewed, which can result in a restudy. Ford dealers can also seek additional time from Ford for warranty repairs if the circumstances support such a request.

Unfortunately, SB 2347 would allow dealers to bypass manufacturer time studies, and the result will be excessive and undue costs for automakers and **higher vehicle and repair prices for Rhode Island consumers**. In fact, the Alliance for Automotive Innovation estimates that if all 50 states passed similar legislation, the combined **cost would be more than \$6 billion in warranty overpayments every year**.

While proponents of SB 2347 may claim the resulting windfall will benefit auto technicians, the fact is manufacturers are not responsible for paying dealership employees and have no control over how much dealers pay their technicians—and nothing in the bill guarantees higher wages.

In conclusion, Ford strongly opposes SB 2347 and respectfully asks this Committee not to advance such controversial and costly legislation that would make Rhode Island an outlier. I welcome the opportunity to further discuss Ford’s position with you and will gladly make myself available at your convenience.

Thank you for your consideration.

Sincerely,

Michelle Elder  
Regional Director, U.S. State & Local Government Affairs  
Ford Motor Company