



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

April 14, 2026

Re: Opposition to Senate Bill 2347

The Honorable Chairman Britto and Committee Members:

Stellantis, a leading global automaker and mobility provider, was formed in January 2021 with the merger of Fiat Chrysler Automobiles and PSA Group. Our product portfolio features 14 vehicle brands, including iconic names such as Chrysler, Dodge, Jeep, and Ram. In North America, Stellantis has 26 manufacturing facilities, 21 parts distribution and packaging centers, and approximately 75,000 employees. Specifically in Rhode Island, in 2024, Stellantis had approximately \$3,067,261 of business with 8 suppliers and Rhode Islanders registered 3,916 Stellantis brand vehicles.

With so many Stellantis brand vehicles on the road in Rhode Island, Stellantis is very concerned about the impact that Senate Bill 2347 would have on our company and Rhode Islanders. When Rhode Islanders need a vehicle repair covered under the manufacturer's warranty, the law requires the repair to be performed by a franchised dealer. Stellantis is committed to a beneficial relationship with all our Rhode Island dealers that is based on fair and reasonable compensation for warranty repair work.

With that in mind, Stellantis time guides containing the labor time allowances that dealers use for warranty repair work are created using technicians performing the repairs numerous times in an environment similar to a dealership service bay. Our process includes time for vehicle pre-conditioning, diagnostics, and regularly scheduled break times. Stellantis pays the full labor operation time even when the qualified technician in the dealership beats the labor time allowances in the Stellantis repair time guide. Furthermore, if the dealer has any concerns with the labor time allowances, Stellantis makes it very easy for the dealer to cover the "actual time" by including a tab for feedback on our electronic claim system so their concern can be reviewed.

Unfortunately, SB 2347 allows dealers to bypass our process and to use an aftermarket, third-party time guide that was developed for independent repair shops to provide labor hour estimates to retail customers. They were not intended for warranty work. The aftermarket third-party time guides



contain more labor hours than the Stellantis time guides because at independent repair facilities, the technicians may not have the specialized tools that our dealers have and typically service vehicles of different makes, models, ages and conditions which may take more time to repair because of rusty and worn parts. When dealers use aftermarket third-party time guides, it results in retail customers paying more labor hours, which increases the cost of vehicle repairs. It is estimated this bill could increase the time allowances for warranty repair by 50%. These are costs that ultimately will be passed on to the consumer.

While Stellantis believes in fair and reasonable compensation for the time a dealer spends on warranty repairs, this bill would allow the dealer to be paid for hours not spent working. It will significantly increase the expenses incurred by manufacturers in complying with their consumer warranty obligations. While many think of warranty repair as "free", it is a Stellantis expense that eventually must be passed on to customers for new vehicles. Thus, this bill is not consumer friendly and ultimately not good for the dealers.

Stellantis appreciates the opportunity to comment on this important issue and respectfully requests that you oppose Senate Bill 2347. Thank you for your consideration. Please do not hesitate to contact me with any questions that you or your team may have on this matter.

Sincerely,

A handwritten signature in blue ink that reads "Valerie Knol".

Valerie Knol
Stellantis Public Affairs