



**Subaru of America, Inc.**  
One Subaru Drive  
Camden, NJ 08103  
856-488-8500  
www.subaru.com

April 14, 2026

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

**RE: Oppose – Senate Bill 2347**

Dear Chair Britton, Vice-Chair Sosnowski, and Members of the Committee:

On behalf of Subaru of America, Inc. (Subaru), thank you for the opportunity to provide testimony in opposition to Senate Bill 2347. Subaru is firmly committed to the automotive franchise system and the success of Rhode Island's Subaru retailers. The legislation under consideration to amend section 31-5.1-6 of the General Laws, which relates to labor time guides used by retailers to perform warranty repairs, will have a negative impact on Rhode Island consumers by increasing the costs of buying and owning a vehicle.

Today, when Subaru retailers perform warranty repairs, they use a labor time guide created by Subaru to determine how much time it should take to perform the repair. Subaru's time guide relies on objective methods to calculate how much time is needed to complete a repair by the well-trained and well-equipped technicians employed by our retailers.

Subaru's labor time guide provides real-world, accurate estimates for how long it takes to perform a repair. Subaru provides extensive, on-going training and educational resources to ensure its retailer service technicians have the necessary skills to service Subaru vehicles.

If a retailer technician believes more time is needed for a warranty repair than what is provided in Subaru's time guide, Subaru has a simple process in place that allows a retailer to provide feedback to Subaru and request additional compensation for that type of repair.

Subaru allows retailers to request up to two hours of additional time without any authorization if a retailer claims more time is needed for a warranty repair due to unusual circumstances. To be clear, *no authorization by Subaru is required if a retailer claims more time, up to two hours, is needed to perform a warranty repair than the time that is provided in Subaru's time guide.* If Subaru retailers request extra time for a particular repair, Subaru

reviews its labor time guide for that particular repair and increases the labor time in the time guide if a change is warranted.

No Rhode Island retailer has informed Subaru that (1) our labor time guide does not provide adequate time for warranty repairs; (2) they are unable to fairly compensate technicians due to our labor time guide; or (3) the policy and ability to address potential time guide deficiencies and adjust times is unfair or difficult to use.

SB 2347 would gut this well-established method of warranty reimbursement by allowing retailers to use generic time guides not written by an auto manufacturer and not intended for warranty repairs by Subaru authorized retailers. Third-party labor time guides are meant for independent repair shops that work on a variety of makes and models of older, out-of-warranty vehicles by technicians who may not have training or tools provided by the auto manufacturer. Furthermore, SB 2347 does not require retailers to increase the pay of their technicians if third-party labor time guides are used.

SB 2347 is unnecessary. Subaru retailers have all the tools, training, and resources to complete warranty repairs in the time allotted in its labor time guide. Subaru does extensive work to ensure its labor time guides are fair and a well-established process is already in place for retailers who believe more time is necessary for repairs to be completed and technicians to be properly compensated for their time.

Moreover, SB 2347 will significantly and unnecessarily increase warranty reimbursement costs. Allowing retailers to use generic, non-automaker time guides to calculate labor times could increase warranty costs by 50 percent. This increase in costs inevitably will be passed on to Rhode Island consumers.

Subaru has demonstrated a long-term commitment to its Rhode Island retailers and urges the Legislature to reject SB2347 that ultimately harms Rhode Island consumers.

If I can answer any questions or provide any further information, please do not hesitate to contact me at [mforma@subaru.com](mailto:mforma@subaru.com).

Respectfully submitted,

*Matthew Forman*

Matthew Forman  
Director, Government and Regulatory Affairs  
North American Subaru, Inc.