



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

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

On behalf of Volvo Cars USA, thank you for the opportunity to provide written comments in opposition to SB 2347.

Volvo Cars is a global car company committed to safety, sustainability, and people. Volvo has operated in the U.S. for over 70 years and is deeply invested in the American market through manufacturing, employment, and safety leadership. We are members of the Alliance for Automotive Innovation, and we share their concerns with this legislation.

Volvo Cars is fully committed to delivering an exceptional customer experience. Unfortunately, we believe that SB 2347 will ultimately harm consumers by allowing retailers to be compensated beyond actual labor hours worked, significantly increasing automaker costs.

The crux of the issue within this legislation is labor time allowance. Currently, when calculating the labor time that retailers are compensated for warranty repairs, our retailers use our warranty time guides which are carefully considered to account for different workshops across our retailer network.

Our guides include standard times for the most frequently occurring repair work and cover all existing models. They are developed at our in-house service shop with experienced workshop technicians who conduct careful and repeated physical time studies, taking the exact same cars and tools that our retailers have access to and timing out the repairs as they complete them in a repair shop setting. The standard times represent the total time the retailers have to complete the repairs and is broken up into three parts:

- **Work time** – This is the actual time required for the execution of work as well as collection and return of tools.
- **Distribution of time** – This accounts for typical non-repair time (washing hands, waiting for tools, talking to colleagues, bathroom breaks, etc.)

- **BI-times** – This varies based on the type of work and can include collecting special tools, transporting tools, or other things that one may need to do for unique or more complex repairs.

So, the total time Volvo Cars provides for our retailers to complete the repair is not just the time for the repair itself but includes extra time for complexity and other parts of the job that occur in a workshop scenario.

For specialty jobs or difficult problems that arise during repairs, we provide the flexibility for our retailers to manually enter a job value, instead of using a pre-prescribed one, to ensure all time needed is properly accounted for.

Our time guides are regularly updated with new information and continuous feedback from retailers and their technicians. Volvo Cars communicates with retailers regarding changes for all cars and operations – including any increased repair times that would compensate retailers at a higher rate.

No system is foolproof, so our retailers have the ability to inform us through a dedicated channel if an individual repair may need extra time. Our team will carefully review retailer requests and re-analyze or redo the time study to ensure that the proper time is allotted. This is not a drawn-out process; our team normally responds within a week.

Our time guide development process considers retailer feedback and is backed by rigorous in-shop data. We do our best to account for the full time a technician may need. Under this legislation, however, this process would not be considered. Instead, we would have to use aftermarket time guides, which do not consider the experience, skills, tooling, or training we provide to our retailers, and are not backed by the in-shop studies and data that we use to develop our guides. These aftermarket guides will result in significant overbilling of labor hours, raising the costs of vehicle ownership.

Our retailers are our partners. We could not be successful without them, and they are key to our customers' repair and maintenance needs. We believe they deserve to be fairly compensated for their labor, and that's why we have such a robust and detailed process in place for the development of our time guides, along with a clear process for updating those times if needed.

For these reasons, we feel that SB 2347 is unnecessary and respectfully ask that you oppose this legislation, and the significant added costs it would incur.

Thank you again for the opportunity to comment on this important matter.

Respectfully,

Elizabeth Sila
Manager, State Affairs
Volvo Cars USA