

香港汽車商會的信頭

Letterhead of THE MOTOR TRADERS ASSOCIATION OF HONG KONG

Presentation to the Legislative Council

The general release of service data

The HKSAR Government advocates the release of service documents and technical data to unauthorized repairers and the motoring public.

It is the general consensus of members of the Motor Traders Association of Hong Kong (MTA) that if this should become compulsory, a series of important safeguards should be included and rigorously enforced.

While in principle the MTA is willing to make these service manuals available to all at a market price, our members believe it is beyond the scope of most unauthorized repairers to adequately service and maintain modern passenger vehicles.

The complexity of the vehicles and the need for specialized equipment to satisfactorily repair advanced low-emission engines, computer-controlled automatic transmissions and the sophisticated electronics which today make up virtually all passenger cars, make it impossible for a technician to adequately deal with a complaint or problem without intensive training and a high degree of skill. Furthermore, specially designed electronic equipment is required to accurately diagnose and efficiently repair the components contained in a modern motor vehicle.

The MTA believes that public safety may be compromised if the repair manuals are not used in conjunction with the expensive equipment with which our members are provided by their respective principals. This equipment is not generally available to unauthorized repairers and non-franchised dealers.

Furthermore, while our members install only genuine spare parts, which have been fully tested and approved by the manufacturer, unauthorized repairers are likely to use non-standard components which may again jeopardize public safety. While these parts may be less expensive, they may also be of an inferior quality.

Hong Kong does not operate a recognized, compulsory registration of motor mechanics and technicians other countries do, notably Germany, France and the United Kingdom. Members of the MTA, however, regularly conduct training courses and all qualified technicians receive factory training from our members' principals. No such training is available to unauthorized repairers or their employees and manufacturers are understandably concerned about the capabilities of these relatively untrained technicians.

While the MTA and its members will readily agree to make the service manuals and relevant technical data available, it must be stressed that the MTA, its members and members' principals cannot be held responsible for the safety of vehicles maintained by unauthorized personnel. Furthermore, in some cases it may invalidate the manufacturer's warranty if the vehicle receives attention from an unauthorized repairer.

To receive technical data an unauthorized repairer would have to demonstrate to the relevant manufacturer that its employees possess sufficient skills and technical knowledge to satisfactorily maintain the vehicle. While the technical data may be made available, confidential information relating to design and construction will not be released.

The MTA suggests that unauthorized repairers make contact directly with the manufacturer if they wish to avail themselves of this data. However, the MTA would urge the government to implement sufficient safeguards in order that public safety is not compromised.

The MTA further suggests that a code of practice be adopted by all unauthorized repairers to advise the public of their capabilities, the standard of their equipment and the level of their staff training.