



RESPONSE LETTER TO ACCC LETTER DATED 11 OCTOBER 2017
YOUR REF: PRJ100210

1. Can Mazda please confirm whether it supports the introduction of a mandatory scheme to provide independent repairers with access to technical information, on commercially fair and reasonable terms?

Mazda currently provides independent repairers with access to technical information on commercially fair and reasonable terms. Mazda does not see any further need for legislation or further schemes.

2. Can Mazda please provide a detailed overview of the information contained on Mazda's Australian technical information sharing website regarding:
 - a. The price charged for each class of subscription (e.g. price per daily subscription, per weekly subscription, etc)
 - i. 24 Hours - \$19.95
 - ii. 7 Days - \$69
 - iii. 30 Days - \$199
 - iv. Annual - \$1,995
 - b. The software/internet browser required to access the website
Mazda recommends Microsoft Internet Explorer 11 to ensure correct functionality of all manual content. This is the same requirement for independent repairers, Dealers and a similar limitation to both US and EU portals due to the construction of the manual content itself.
 - c. The types of information available on Mazda's website for Australian independent repairers, and in particular, whether independent repairers can access the following technical information about Mazda's new cars:
 - i. Technical service bulletins
NO
 - ii. (re)initialisation codes
This information is provided through the M-MDS (Mazda Modular Diagnostic System) unit with an IDS (Integrated Diagnostic Software) subscription, which is available to any Dealer or independent repairer wishing to purchase a unit.
 - iii. Software updates or ECU calibration files
This information is provided through the M-MDS unit with an IDS subscription, which is available to any Dealer or independent repairer wishing to purchase a unit.
 - iv. New cars' environmental systems or standards and

Yes – this information is fully described within the workshop manual available through the portal, identical to the information provided to Dealers

v. The composition of engine oils

Yes – this information is fully described within the workshop manual available through the portal, identical to the information provided to Dealers. This information is also freely available in the owner manual of every vehicle, supplied in the glovebox at time of purchase to every customer.

d. The types of information not available on Mazda’s website for Australian independent repairers that are available to Dealers (through any means), and whether there is some process for independent repairers to access such information.

Technical Service Bulletins are unavailable through the Mazda Manuals portal. There is no requirement currently under to code to provide this information, however upon request, Mazda will assess each request for such information and provide where appropriate.

3. In relation to questions 2(d), can Mazda please detail whether the technical information (for example, safety and security information) that is not made available to independent repairers in Australia is made available to independent repairers in the European Union (EU) and/or the United States (US)? Security information (Key Code & Immobiliser Coding) is provided in the US under a National scheme through www.mazdaserviceinfo.com. This information is not currently provided through the EU solution. Safety information is globally available through access to Mazda information portals and use of relevant diagnostics tools.
4. Can Mazda please confirm to what extent Mazda’s new cars (released to the Australian market in the last 5 years) require (re) initialization codes to perform the following tasks:
 - a. Replacing the car’s battery **Not required**
 - b. Replacing engine oil **Not required**
 - c. Servicing the car’s air conditioning system **Not required**
 - d. Replacing the car radio **Not required**
 - e. Replacing the brake pads **Not required**
 - f. Resetting the service light and **Not required**
 - g. Any other process generally considered in the industry to be a routine service or a minor repair **Not required**
5. Can Mazda please provide the date of release for Mazda’s Australian, EU and US based independent repairer technical websites and a breakdown for at least the past three years of:
 - a. The total number of subscriptions, with a breakdown by subscription period in the relevant jurisdiction (e.g. daily, weekly, yearly) **Please see Tables below**
 - b. The frequency with which subscribers accessed the relevant service for subscriptions in excess of a day **Please see Tables below. Data is not tracked on any portal for individual pages hits/login behaviour**
 - c. The type of information subscribers predominantly accessed (e.g. technical service bulletins, reinitialisation codes, ECU / software updates, repair manuals, etc) **Please see Tables below. Data is not tracked on any portal for individual pages hits/login behaviour**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

In summary, you will note that the subscription uptake is consistently low globally across all categories of subscription.

6. In relation to developing and maintaining Mazda's technical website for Australian independent repairers, can Mazda please detail:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. Whether the cost of developing and maintaining the technical information website is passed on to the consumer, and if so, the average additional cost per passenger car that is passed on [Despite the website's incremental cost, this is not directly passed on to consumers per car. This is absorbed within operating expenses as a cost of doing business.](#)

d. Whether Mazda has or will conduct user testing with independent repairers of its technical information sharing website, and whether Mazda has or will include training for using the website (e.g. videos, walkthroughs etc) [No training is provided on use of the tool due to the simplicity of the content. This is not provided for any](#)

users, including Dealers. At this stage, there are no plans to conduct any further user testing or videos/walkthroughs for Dealers or Independents.

- e. Whether the framework or platform for the technical information sharing website for the Australian market (as distinct from the content) is the same or adapted from that used elsewhere by your brand (e.g. the in the EU or the US) The framework Mazda Corporation does not provide a consistent global workshop manual solution for all Mazda Markets or Dealers to use. The construction of the MESI (Mazda Electronic Service Information) manual content is similar in design and structure, however the applicable models for each market is specific to that region and each region locally manages the implementation of this information to their Dealers. The same browser limitation exists on all global Dealer and Independent MESI delivery platforms – i.e. Microsoft Internet Explorer must be use – due to the construction of the manual content using Active X.
 - f. If relevant, why the same technology to deliver the content/information is not used/adapted to Australia Mazda Australia does not use the same technology as ADR model information is not included in other market solutions.
7. The ACCC engaged a technical expert that found it was unable to purchase Mazda’s M-MDS unit from Mazda’s Dealer network (see pp. 11-12 and 14 of the Cartech initial report). Has Mazda now made this unit available to independent repairers? This unit was always available to independent operators and Dealers alike. We have reinforced the existence of this process through internal communications and training.

█ [REDACTED]

Consumer guarantees and warranties

9. Over the past three years, how many instances of fraudulent warranty claims by Mazda’s authorized Dealers in Australia were identified by Mazda? What proportion of overall claims made to Mazda in Australia do these represent? What action was taken? There have been no incidences of fraudulent warranty claim behaviour by Dealers to our knowledge in the past 3 years.

Dealership agreements, policies and procedures

[REDACTED]

[REDACTED]