

"Your Massachusetts Auto Body Association"



March 25, 2020

Chairman Donovan and Members of the ADALB,

This is regarding the emergency ADALB meeting being held on March 26th, 2020 for a *temporary* advisory ruling resulting from the Governor's issuance of a state of emergency due to the COVID 19 outbreak. We understand the need for such a *temporary* ruling to be issued.

On behalf of the AASP-MA's membership, its associated industry partners and collision repairers across the state, I am voicing the following concerns with the proposed language and request the Board make changes reflecting our concerns for the protection of all consumers, repairers and insurance industry personnel. Please consider the following:

- 1) A stipulation be added that reflects, "a motion has been passed agreeing that an appraisal conducted by a licensed appraiser via review of quality photographic, video or digital images with documentation...." that the "agreement" be solely for the purpose of this *temporary* advisory ruling only.
- 2) That the limit proposal of \$5,000 plus applicable deductible be lowered to \$2,500 plus applicable deductible. Any amount higher than a potential of \$3,500 risks leaving consumers in vehicles which may not be roadworthy and therefore unsafe to the rest of the motoring public.
- 3) Language which emphasizes the 24 hour time frame specified from the time a vehicle has been viewed and submission of supplemental paperwork **MUST** be strictly adhered to.
- 4) Either issue a concurrent *temporary* advisory ruling or add language to the proposed *temporary* advisory ruling, with regards to the handling of "expedited supplements". There are far too many abuses reported of appraisers, staff or independent, who refusing to agree to the "expedited

supplement” process and then make demands that vehicles be moved outside of a shop and only want to review the paperwork with NO negotiation, for their personal protection. It MUST be stipulated that refusal to accept the “expedited supplement” process demands that the vehicle MUST still be seen within 48 hours of the request and paperwork be submitted within a day of viewing to the body shop, as per 212 CMR 2.04 (i), with NO demands of vehicles being moved to the street or outside of the building.

Based on the language in the *temporary* advisory ruling you are discussing and voting on during this meeting, appraisers, staff and independent, should have ample time available to adhere to the current language in 212 CMR 2.0 without the effects of extenuating or “intervening circumstances” being a factor causing any delays.

I will be on the teleconference should you have any questions or require any clarification of the concerns and requests raised in this letter.

Thank you all for your attention in this matter.

Sincerely,

A handwritten signature in black ink that reads "Lucky". The signature is written in a cursive, flowing style with a large initial 'L'.

Evangelos “Lucky” Papageorg,

Executive Director, AASP-MA

617.574.0741

Email: lucky@aaspma.org

MA appraiser #012157