

February 9, 2026

Via Email and USPS

The Honorable Tim Grayson
California State Senate, State Capitol
1021 O Street, Suite #7250
Sacramento, CA 95814

Dear Senator Grayson,

On behalf of the Independent Glass Association (IGA) and the thousands of independent auto glass repair and replacement businesses we represent nationwide, I am writing to formally express our opposition to SB 988 as currently drafted.

At the outset, we want to be clear: the IGA supports reasonable, evidence-based efforts to improve consumer transparency, safety, and informed decision-making, particularly with respect to advanced driver assistance systems (ADAS). However, SB 988 relies heavily on a National Council of Insurance Legislators (NCOIL)-derived legislative template that is being actively promoted by Safelite AutoGlass and its aligned insurance partners. This same template has been introduced repeatedly across the country and has consistently drawn opposition from independent businesses, consumers, and regulators once its real-world impacts become clear.

National Pattern and Prior Outcomes

IGA has been deeply engaged in opposing or amending **substantially identical legislation** in multiple states. In those jurisdictions, once lawmakers examined the actual market effects, reduced consumer choice, increased steering, and consolidation of claims control—bills were either **withdrawn, substantially amended, or stalled** to ensure a fair and competitive auto glass market.

California is not an outlier. The language and structure of SB 988 closely mirrors bills we have already addressed elsewhere, and the outcomes have been clear: when consumers and small businesses are heard, this model does not stand as drafted.

FTC and DOJ Engagement

Importantly, the concerns raised by IGA are not theoretical. We are actively engaged with both the Federal Trade Commission and the Department of Justice regarding insurer-driven steering, vertical integration, and anticompetitive conduct in the auto glass claims market.

These federal discussions focus specifically on:

- The concentration of claims administration and repair services within vertically integrated entities,
- The use of administrative barriers to divert consumers away from independent providers,
- The suppression of fair market pricing through insurer-controlled “network” benchmarks, and
- The cumulative harm to consumers, competition, and small businesses.

Legislation that removes post-loss assignment of benefits and forces insurer-first claim routing, while preserving insurer “recommendation” authority, directly intersects with these federal antitrust and consumer-protection concerns.

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Harm to Consumers and Independent Businesses

As written, SB 988 would:

- **Eliminate assignment of benefits (AOB)** entirely, stripping consumers of a lawful, post-loss mechanism that allows their chosen repair facility to assist with billing and claims resolution.
- **Increase steering risk** by requiring a claim or referral number before a shop may contract for service, effectively pushing consumers into insurer-controlled workflows at the moment of first contact.
- **Impose undefined “reasonable and customary” pricing limits**, which historically default to insurer- or network-controlled rates rather than transparent, market-based standards.
- **Provide no meaningful enforcement mechanism or private remedy**, leaving consumers with theoretical choice but little practical protection when misled.

These provisions disproportionately harm small, independent, and often family-owned businesses while consolidating market power in favor of insurer-affiliated repair networks.

Fraud Claims Lack Supporting Evidence

Proponents of SB 988 have asserted that widespread fraud justifies the elimination of AOB. In California, **no credible data has been presented to support this claim**. Existing fraud statutes, regulatory authority, and enforcement mechanisms already address bad actors without penalizing consumers or dismantling lawful post-loss rights.

Broad structural changes to the claims process should be driven by evidence—not by unsubstantiated allegations advanced by market participants who stand to benefit from reduced competition.

Path Forward

The IGA can support elements of SB 988 related to:

- Accurate ADAS and calibration disclosures,
- Transparency in estimates and invoicing, and
- Targeted, evidence-based anti-fraud measures.

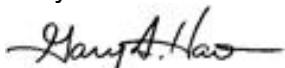
However, **without substantive amendments** that preserve consumer choice, prevent insurer-driven steering, and maintain a fair competitive landscape, we must oppose SB 988 in its current form.

We respectfully urge you to engage with independent repairers, consumer advocates, and competition stakeholders before advancing this legislation further. California should not adopt a model that has already proven problematic elsewhere.

Thank you for your time and consideration. We would welcome the opportunity to meet with you or your staff to discuss constructive, balanced alternatives.

Respectfully submitted,

Gary Hart



Gary Hart, Executive Director
Independent Glass Association