



Recycled Materials
Association

Commenter:

Recycled Materials Association
1250 H Street NW Suite 400
Washington, DC 20005

Contact:

Kristen Hildreth
Vice President of Government Relations
and Public Policy
khildreth@recycledmaterials.org

Support for Renewal of the Class 7 Exemption for the Circumvention of Technology Measures that Control Access to Computer Programs in Vehicles to Allow Access to Operational Data

On behalf of the Recycled Materials Association (ReMA) – the leading organization dedicated to promoting safe, economically sustainable, and environmentally responsible recycling through education, networking, and advocacy – we write to support the renewal of the exemption that allows for the circumvention of technological measures that control access to computer programs contained in and controlling the functioning of lawfully acquired motorized land vehicles, marine vessels, commercial vehicles or vessels, or mechanized agricultural vehicles or vessels, to allow vehicle or vessel owners and lessees, or those acting on their behalf, to access, store, and share operational data, including diagnostic and telematics data, as set forth at 37 C.F.R. § 201.40(b)(14).

ReMA represents more than 1,700 companies engaged in recycling and related activities. In 2025 alone, the recycled materials industry had an over \$183 billion economic impact and supported over 600,000 direct and indirect jobs across the nation.¹ Through continuous innovation and efficiency improvements, in 2024, the industry processed 135 million metric tons of recycled material.

End-of-life vehicles are an important source of reusable parts and recyclable materials. Automobiles lead the recovery of steel from obsolete consumer products, with a near-100% recycling rate annually. Each year, more than 15 million tons of steel are recovered from approximately 12 million cars each year through a North American network of over 7,000 vehicle dismantlers and 350 shredders.

As part of their automobile recycling process, dismantlers and recyclers may recover parts that are controlled by electronic control units (ECUs). Access to the software associated with these parts may be necessary to evaluate their functionality and determine if they can be effectively re-used. Without this exemption, potentially reusable parts could go right into the recycling sector rather than returned to the market to continue their usable life. If not eligible for reuse, this software may also contain vital information about battery chemistry, hazardous materials, component specifications, and more, all of which are important information for recyclers as they handle the materials at end of life. As the automotive industry sees continued electrification, the ability to track the life cycle of

¹ https://www.recycledmaterials.org/wp-content/uploads/9850-ReMA-Executive-Summary-2026_v5-1.pdf

batteries and components will become increasingly important, both for the reuse of automobile parts and for the role that critical minerals contained in these batteries play in the domestic supply chain.

Renewal of this exemption should help ensure that technological access restrictions do not unnecessarily prevent the safe reuse, repair, or recycling of vehicle components. Providing those with access to operational data supports a more circular automotive supply chain and improves the safe handling of end-of-life vehicles and batteries, and strengthens the recovery of critical materials for domestic manufacturing.

For these reasons, ReMA respectfully urges a renewal of these exemptions. Should you have any questions or wish to discuss further, please contact ReMA's Vice President of Government Relations and Public Policy, Kristen Hildreth at khildreth@recycledmaterials.org.

Sincerely,

A handwritten signature in black ink that reads "Kristen Hildreth". The signature is written in a cursive, flowing style.

Kristen Hildreth
VP, Government Relations and Public Policy
Recycled Materials Association