



January 27, 2026

Hon. John Hunt, Chairman
House Committee on Commerce and Consumer Affairs
Legislative Office Building
107 North Main Street
Concord, NH 03301

RE: Oppose – House Bill 1146 – Vehicle Features On-Demand

Dear Chairman Hunt and Members of the Committee:

On behalf of the Alliance for Automotive Innovation¹, I am writing to express our strong opposition to House Bill 1146, legislation that could unnecessarily limit consumer options on future vehicle technologies.

As we understand the impetus behind the filing of House Bill 1146, it appears to have been drafted in reaction to media coverage in 2022 of an automaker's plan to offer a specific vehicle feature – heated seats – on an on-demand basis in the Republic of Korea, a market where subscriptions, customization, and new mobility options are much more commonplace. To the best of our knowledge, no company – including the company highlighted in that news coverage – has any stated plans to offer heated seats in the U.S. on a subscription basis. That is not to say, however, that some innovation on existing or future vehicle technologies would not be preferred by a consumer on a subscription basis, which therefore forces our opposition to the legislation presently under consideration.

The reality is that the auto industry is among the most highly competitive sectors of our entire economy. The purchase of a new vehicle today requires a significant financial commitment and is usually accompanied by considerable research by consumers pre-sale. Additionally, common lease and financing terms naturally set up opportunities for consumers to vote with their wallet every few years if they are unsatisfied with offerings by a particular company. For all of these reasons, it would be completely illogical for any automaker to consider offering any feature on a subscription basis, if it was not something that the automaker was confident would be welcomed by U.S. consumers, as doing so would simply drive vehicle sales to a competitor.

¹ From the manufacturers producing most vehicles sold in the U.S. to autonomous vehicle innovators to equipment suppliers, battery producers, and semiconductor makers – Alliance for Automotive Innovation represents the full auto industry, a sector supporting 10 million American jobs and five percent of the overall economy. Active in Washington, D.C. and all 50 states, the association is committed to a cleaner, safer, and smarter personal transportation future. www.autosinnovate.org.

While heated seats may not present an ideal example, the idea of offering vehicle features on an on-demand basis does present a pathway to a more efficient manufacturing process. Instead of automakers guessing what features would be desired by each individual consumer many months and years ahead of vehicle production given long product development cycles, a subscription-based model could allow every vehicle that rolls down the assembly line to be equipped with the same hardware. A more efficient manufacturing process allows companies to offer all products to consumers at a lower price point than otherwise would be permissible. But an automaker still needs to recoup the costs associated with the hardware and software of a particular feature. A subscription-based model allows all consumers to benefit from the more efficient manufacturing process, and then only those consumers who want particular features would pay on a subscription basis.

A subscription model also allows for customization that is not currently allowed in the “feature bundles” that automakers are forced to offer today, wherein automakers are left to speculate what combination of features each consumer may want. Understanding as well that automakers today often build “global cars,” capable of being sold in many different countries (with vastly different climates, road-types, use models) in largely the same design. This creates a highly inefficient model for matching true consumer desires with products produced. Automakers have heard consumer frustrations with this practice for many years, where a prospective owner may be forced to purchase a collection of features they do not want, so that they can get one specific feature that they do desire. A subscription-based model would allow each consumer to pick and choose how to personalize their car to their individual preferences. When talking about car ownership, most attention is paid to the initial buyer, but cars today can be on the road for multiple decades. Through a feature on-demand model each subsequent owner could turn on or off the features that are most important to their enjoyment and use of a used vehicle.

Finally, it is important to remember that with each new model year, vehicles are becoming more and more software focused. The question is less about the hardware equipped on a vehicle, but the quality of the software developed to manage it. As drafted, this bill would prohibit current vehicle owners from benefiting from new software features developed after their vehicle was manufactured, advancements that could utilize the hardware on their vehicle in a new and compelling manner – think of an iPhone if you did not have access to a continuous stream of new applications to run. A subscription model would allow consumers to still have access to new features without being forced to go buy a whole new vehicle as would be necessitated today.

The idea of providing heated seats to consumers on a subscription basis in this country may never meet with consumer approval, but HB 1146 goes too far in prohibiting all possible future innovations on other vehicle features that may be welcomed by consumers in the future, and therefore we must respectfully ask for your opposition to the proposed legislation.

Thank you in advance for the consideration of these views. Should you have any questions, or if I can provide any additional information, please do not hesitate to contact me at wweikel@autosinnovate.org.

Sincerely,



Wayne Weikel
Vice President, State Affairs

cc: Members, House Committee on Commerce and Consumer Affairs