

**John Gordon comments on the Private Motor Insurance Market Inquiry  
Working Papers [Non-confidential version re-drafted by author]**

Dear Sir or Madam,

On reading through your working paper,

*Theory of Harm 3: Horizontal concentration in repair cost estimation systems*, I note that there is no mention of the link between Audatex, the MIATFR, and HPI. Audatex are the major provider of software for the motor repair industry, used in deciding the viability of repairs. The MIATFR is run by HPI. HPI provide a vehicle checking service based on information from insurers. Both HPI and Audatex are owned by Solara.

Might it be worth looking at the rate of write-offs in the various categories over the years to see whether there has been an increase in categories C and D, and whether, in addition to the inconvenience and stress those decisions might have in a no-fault case, there has been an increase in costs for motorists through the payment of fees in order to access this data when purchasing another car?

Regarding the investigation in general, I should like to say that motorists are not simply premium payers looking to cut costs, but, first and foremost, members of the public exposed to the risk of accident through no fault of their own which is reason for mandatory third party insurance for motorists, and that should be the baseline question on which any recommendations are made: in other words, while competition might reduce premiums, will this worsen the situation of the motorist harmed by another's actions?

Yours sincerely,  
John Gordon