



August 5, 2022

Assemblymember Brian Maienschein  
1021 O Street, Suite 5640  
P.O. Box 942849  
Sacramento, CA 94249-0077

**RE: Assembly Bill 2311 – Neutral**  
Motor Vehicle Conditional Sale Contracts: Guaranteed Asset Protection Waivers

Honorable Assemblymember Maienschein:

The undersigned organizations represent the majority of stakeholders providing or administering consumer “Guaranteed Asset Protection” (GAP) products to California consumers. We write to express appreciation to your office and assert our **neutrality** of Assembly Bill 2311 as amended in the Senate on June 30, 2022.

As originally drafted, AB 2311 would have impacted the availability of this important consumer protection in California, potentially leaving residents owing on a loan for which they no longer have a vehicle.

Fortunately, working in conjunction with the Attorney General’s staff and your office, the bill has been improved to benefit California consumers and industry alike, by providing appropriate consumer protections while assuring a healthy, competitive industry of providers and sellers. We appreciated the candid dialogue, openness to industry views, and the focus on feasible solutions.

As we’ve written previously, we share the author’s goal to ensure that GAP products meet the needs of consumers. We believe the amended bill represents a fair compromise for consumers and industry. We are happy to share our position of **neutrality** on AB 2311.

Respectfully submitted by the following organizations:

- American Property Casualty Insurance Association (APCIA)
- California New Car Dealers Association (CNCDA)
- Consumer Credit Industry Association (CCIA)
- Guaranteed Asset Protection Alliance (GAPA)
- Independent Auto Dealers Association of California (IADAC)
- National Independent Auto Dealers Association (NIADA)

Cc:  
California Attorney General and Chief of Staff  
Governor’s Legislative Unit  
Republican Caucus  
Senate Judiciary Staff