

1992 SUNRISE REVIEW

OF

CONSUMER ELECTRONICS SERVICE TECHNICIANS

Submitted by

The Colorado Department of Regulatory Agencies

June 1992

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June 5, 1992

The Honorable Bob Schaffer
Joint Sunrise/Sunset Review Committee Chairman
Room 348, State Capitol Building
Denver, Colorado 80203

Dear Senator Schaffer:

We have completed our evaluation of the sunrise application for licensure of consumer electronics service technicians and are pleased to submit this written report which will be the basis for my office's oral testimony before the Sunrise and Sunset Review Committee. The report is submitted pursuant to section 24-34-104.1, Colorado Revised Statutes, the "Sunrise Act", which provides that the Department of Regulatory Agencies shall conduct an analysis and evaluation of proposed regulation to determine whether the public needs and would benefit from the regulation.

The report discusses the question of whether there is a need for the regulation in order to protect the public from potential harm, whether regulation would serve to mitigate the potential harm and, whether the public can be adequately protected by other means in a more cost effective manner.

Sincerely,

Steven V. Berson
Executive Director

I. INTRODUCTION

SUNRISE PROCESS

The Department of Regulatory Agencies received an application for regulation of Consumer Electronics Service Technicians (CESTs), submitted on November 20, 1992.

A review of the laws now in existence in other states was performed and representatives of the FCC, the District Attorney's Office, the Better Business Bureau, and the applicants were interviewed, all of which will be summarized in this report.

Pursuant to the Colorado Sunrise Act, C.R.S. 24-34-104.1, the applicant must prove the benefit to the public of its proposal for regulation according to the following criteria:

1. Whether the unregulated practice of the occupation or profession clearly harms or endangers the health, safety or welfare of the public, and whether the potential for harm is easily recognizable and not remote or dependent on tenuous argument;
2. Whether the public needs and can reasonably be expected to benefit from an assurance of initial and continuing professional or occupational competence; and
3. Whether the public can be adequately protected by other means in a more cost-effective manner.

SUMMARY OF FINDINGS AND RECOMMENDATIONS

The Department has reviewed the application for licensure of Consumer Electronics Service Technicians and recommends against regulation of this industry. The Department found some degree of fraud in this area, particularly in the Denver-metro area. Most often these cases were ones in which the equipment was not repaired and the customer was charged for the repair. In fact, a recent electronics service "sting operation" by a local news team consumer specialist disclosed numerous instances in which repair shops charged for repairs that were not necessary. A typical state licensing board would have no legal authority to require restitution by the repair technician in cases such as these.

Several District Attorneys suggested that what is needed is a statutory requirement that electronics repair technicians provide an estimate of repair costs to the customer. A copy of the proposed wording for this requirement is included as Appendix B of this report for the consideration of the Sunrise/Sunset Committee.

PROFILE OF THE OCCUPATION

The consumer electronics service industry is a large, diverse industry. Home entertainment and other electronic appliance technologies are rapidly changing, with significant effects on the servicing industry. The introduction of new products and increased complexity of all products has led to much market specialization.

Consumer electronics service technicians install and repair electronic equipment including televisions, radios, stereo equipment, video cassette recorders and master antennas. They may also install and service CB radios, home satellite receivers, and mobile telephones. Repair services are usually provided by shops generally employing from one to forty people. These repair shops render services directly to the consumer or on contract with a retail sales organization for their respective customers.

The applicant was unable to provide numbers of electronics technicians in Colorado. To be sure, it is a difficult population to count. A review of the Denver phone directory revealed that there are over 200 businesses advertising to repair VCRs or televisions. Many of these shops have multiple locations, with some having as many as ten. Generally, these shops will employ a number of technicians.

The Colorado Department of Labor and Employment reported that there were 8,300 "electrical and electronics technicians" employed in 1989, with projected growth to 9,412 by 1994.

Not all these technicians may be employed as CESTs, of course. But, with the broad scope of the proposed regulation, approximately 9,000 technicians would require a Colorado license to continue their livelihood.

PRIVATE CREDENTIAL AVAILABLE

The International Society of Certified Electronics Technicians offers a private credential that meets or exceeds the proficiency requirement envisioned under the proposed regulatory program.

The Certified Electronics Technician Program (CET) offers two levels of certification: associate and journeyman. The CET covers basic electronics and offers several specialty areas such as consumer electronics, industrial electronics, FCC issues, audio, video, and radar.

The CET exam is administered throughout Colorado including the Denver area, Cortez, Grand Junction, Colorado Springs, and Pueblo. The fee for the CET exam is \$25.

II. PROPOSAL FOR REGULATION

This sunrise application proposes licensure of Consumer Electronics Service Technicians (CEST). This term includes TV Technicians, VCR Technicians, Audio Technicians, Antenna Installers, CB Radio Technicians, Satellite and MATV Technicians, Mobile Telephone Technicians.

The applicant argues that the state should license CESTs as a necessary measure "to assure competent technician services; to alert the public to the fact that there are competent and incompetent technicians; and to give the public power to revoke or suspend offenders' licenses for fraudulent practices."

The applicant further argues that lack of licensing contributes to:

- incompetent repair work resulting in higher costs to the consumer;
- the consumer's lack of adequate knowledge to assess the competency of individuals offering repair services; and,
- fraudulent practices potentially resulting in a lack of public confidence in the entire consumer electronics service industry.

The regulatory scheme is envisioned as follows:

- Licensing program administered by the Division of Registrations located within the Department of Regulatory Agencies.
- A licensing board will be established consisting of a combination of professional members and representation by the general public.
- At least two, and possibly more, licensing examinations will be required for all occupations falling within the definition of Consumer Electronics Technicians.
- The establishment of minimum educational standards including approved apprentice training.
- A "grandfather" clause allowing practitioners with three years experience to receive a license without meeting either educational or examination requirements.

III. REGULATION IN OTHER STATES

Only six states have regulated consumer electronics service technicians. The following chart identifies those states and provides basic information about the programs.

STATE	TYPE	SCOPE	EDUCATION/EXPERIENCE REQUIREMENTS
California	Registration	Any person who maintains, repairs, services, installs televisions, radio, audio video recorders, home computer systems, antennas and all major home appliances.	None.
Connecticut	License	Electronics technician, Service Dealer, or specialized, limited licenses.	Four years experience or combination of training and experience equal to three years.
Indiana	License	Antenna installer, TV-Radio Service technician	Two years apprentice and completion of electronics course. Out of state applicants must show four years experience.
Louisiana	License	Satellite dish technicians and radio-television technicians or radio technicians (only).	Two years apprentice or two years experience or two year electronics course.
Massachusetts	License	Radio-television receivers technicians.	2000 hours of study and/or work experience for a master technician license.
Oregon	License	Service Dealers and technicians servicing television, radio, audio, antenna, VCRs, and video camera. All encompassing or specific licenses available	Three years experience or two years experience and completion of course work.

Three states have repealed regulation of this profession. Florida, Utah, and Vermont examined their regulation of this industry and concluded that regulation was not necessary. In particular, the state of Vermont repealed its consumer electronics technician regulations, in 1979, due to the fact that the extra costs of regulating were not reciprocated by an increased benefit to the public. That state also considered the consumer electronics repair industry to be in no way a greater problem for the public than the improper repair of any of a multitude of other commonly used appliances.

In addition, a sunset review of Oregon's licensure program reiterated the above and maintained that, even with licensing, the public still had to contact the District Attorney's Office to seek redress. The licensure of CESTs was unable to assure competency or honesty of the service providers. However, the Oregon regulatory scheme remains in place today.

The licensing program in Massachusetts has undergone tremendous changes since its inception in 1963. The program originally had five investigators who actively inspected electronics shops. In 1982, the force was reduced to one investigator, who today is an electrician. During the 1960's, 1970's and part of the 1980's, there were 8,000 - 9,000 licensed technicians. Today, there are only 3,500 licensed technicians and the number of complaints has dropped from approximately 50 a year to only 12.

The Massachusetts State Licensing Board attributes the decline in licensed technicians and number of complaints to the changing nature of the consumer electronics industry. It is now more economically feasible to discard a broken machine than to have it repaired. Therefore, the demand for repair technicians is less.

IV. COLORADO'S COMPLAINT HISTORY AND EXPERIENCE WITH CONSUMER ELECTRONICS SERVICE TECHNICIANS

As this sunrise report has previously stated, no state occupational regulation exists for consumer electronics service technicians. However, avenues of redress do exist for citizens of Colorado who have been harmed by these technicians. Complaints may be filed and resolutions reached through Colorado District Attorneys, the Better Business Bureau, or the Attorney General's Office.

If the complaint cannot be resolved, District Attorneys may seek to prosecute in certain cases. Typically, the District Attorney will file charges under one or more of the following three Colorado statutes.

- * fraudulent and deceptive sales and business practices, Section 18-5-301, C.R.S. et seq.
- * theft, Section 18-4-401, C.R.S.
- * Colorado Consumer Protection Act, Article I of title 6

Several front range District Attorneys suggested that legislation be introduced which would require that anyone offering to repair VCRs or other electronic equipment would be required to provide the customer with a written estimate of repair costs. The District Attorneys base their recommendation on the Motor Vehicle Act, 42-11-103, C.R.S. District Attorneys state that such a provision would make it easier for them to file charges under the statutes cited above. This report offers an alternative to occupational licensing based on this input of District Attorneys. (Please see page 10 and Appendix B of this report.)

The Department conducted telephone interviews with District Attorneys, Denver's Better Business Bureau, and the Governor's Citizens Advocacy Office. The findings of these interviews are summarized below in three broad divisions.

Denver and the Front Range Area. This group accounted for the largest source of complaints. Information is sketchy, partially because some District Attorneys keep records by business name and not by type of business.

District Attorneys in the urban areas of Colorado report that their complaint history often reflects a small number of shops. For instance, one District Attorney reported that out of a total of 157 complaints received since 1988, one company accounted for 48 complaints and another company accounted for 13 complaints.

Complaints from citizens of Denver and Jefferson counties are high. The District Attorney has received 157 complaints since 1988 although approximately 25% of these are attributed to sales problems.

Arapahoe, Douglas, Elbert, and Lincoln counties' electronics service complaints are less than 10% of all consumer complaints taken by the District Attorney in that district.

El Paso county reported 28 complaints since 1991. Most of these complaints were regarding television repair. The District Attorney resolved most of these complaints.

Other front range judicial districts reported little or no activity in this area.

Western Slope and Rural Colorado. The Department contacted a broad segment of rural District Attorneys including the counties of Summit, Gunnison, Eagle, Fremont, Morgan, Washington, Logan and Grand. Virtually no consumer complaints are received against consumer electronics service technicians.

Rural District Attorneys reported that information of poor repair service passed among friends and neighbors will often drive incompetent technicians out of business quickly. Also, service in rural areas tends to be performed by the shop that sold the appliance. There is a real attempt on the part of these businesses to establish and foster goodwill with their customers.

The Denver Better Business Bureau has received eight complaints during the period January - March, 1992. The Governor's Citizens Advocacy Office reported that it had received approximately 80 complaints concerning electronics technicians in the past year. The Citizens Advocacy Office forwards these complaints to the Better Business Bureau or to the appropriate District Attorney.

This complaint data shows that the issue of complaints against consumer electronics technicians is strongly focused in the metro Denver area.

V. CONCLUSION

Harm to the public by consumer electronics service technicians does not meet the burden of proof required by Colorado's Sunrise Law. Experience with this type of regulation in other states has been disappointing. Only a handful of other states have implemented similar regulation. An almost equal number have repealed regulation in this industry.

Private national certification programs exist. One such group is the International Society of Certified Electronic Technicians (ISCET), a National Electronic Sales and Service Association (NESSDA) subsidiary, to which a number of Colorado consumer electronics technicians belong.

Prevention of violation of FCC rules does not argue for state regulation. The FCC maintains that the abuses in the consumer electronics repair industry do not pose any anticipated danger to the FCC controlled airwaves. But, if such danger of interference were perceived, the FCC would notify the equipment owner. If the owner did not respond, the FCC would impose administrative sanctions in the form of fines. Recently, the FCC confiscated personal computers from a retail business in Arapahoe County. The computers lacked official FCC certification and were being sold to consumers. This incident demonstrates the enforcement capability of the FCC.

Similar repair/service industries are not regulated in Colorado. Is the danger from an improperly repaired television or VCR any greater or more common than the danger from an improperly repaired automobile? Other household appliances such as microwaves, refrigerators, washing machines and dryers fall into the same category of consumer risk, but repair technicians are not regulated.

In particular, the lack of regulation of automobile mechanics offers a stark contrast to the regulation of electronics service technicians. The dangers inherent in faulty automobile repair pose a serious threat to drivers and occupants. Faulty automobile repair may result in injury or death not only to the owner or operator but to others as well. If these occupations are not strictly regulated by the state, does it really make sense to set up an elaborate licensing scheme for technicians who repair VCRs?

The Department of Regulatory Agencies recommends against any regulation in this area. The primary goal of the proposed regulation is to prevent fraud by consumer electronics technicians. The purpose of occupational licensing by the state is to establish a minimum acceptable level of competence of persons who wish to practice the regulated occupation. A competent practitioner may still commit fraud. If that is the case, civil remedies, or perhaps most appropriately, consumer awareness, is the best response. There is no appropriate place for state occupational regulation in this market place.

RECOMMENDATION: THE GENERAL ASSEMBLY SHOULD NOT LICENSE OR OTHERWISE REGULATE CONSUMER ELECTRONICS SERVICE TECHNICIANS.

Previously, this report discussed the suggestion by several District Attorneys in the greater Denver metropolitan area which would require a consent and an estimate statement for consumer electronics repair, as is required for motor vehicle repairs. In 1991, an attempt was made to introduce legislation that would require consumer electronics repair shops to provide a written statement to their client. Legislation was never introduced.

Implementation of the proposed Appliance Repair Act (please see Appendix B) would avoid a more costly occupational regulation system. At the same time, it would require shops to provide consumers with necessary information about their service. Law enforcement agencies would benefit since it would establish clear requirements that could be enforced.

Appendix A

Sunrise Criteria

Pursuant to the Colorado Sunrise Act, C.R.S. 24-4-104.1, the applicants must prove the benefit to the public of their proposal for regulation according to the following criteria:

1. Whether the unregulated practice of the occupation or profession clearly harms or endangers the health, safety or welfare of the public, whether the potential for harm is easily recognizable and not remote or dependent on tenuous argument;
2. Whether the public needs, and can be reasonably expected to benefit from, an assurance of initial and continuing professional or occupational competence;
3. Whether the public can be adequately protected by other means in a more cost-effective manner.

Appendix B

Appliance Repair Act

6-1-301. Short title. This part shall be known and may be cited as the "Appliance Repair Act".

6-1-302. Definitions. As used in this part 3, unless the context otherwise requires:

- (1) "Customer" means the owner of an appliance, or any agent, family member, employee, or other representative of the owner, or any other person whose use of the appliance is authorized by the owner.
- (2) "Appliance" means any electrical, mechanical, or thermal device or machine.
- (3) "Repair shop" means any natural person, partnership, corporation, trust, association, or group of persons associated in fact although not a legal entity, which, with intent to make a profit or gain of money or other thing of value, participates or engages in the business or occupation of performing repairs on an appliance.
- (4) "Necessary" means essential to a desired or projected end as stated by the customer, or indispensable to avoid loss or damage.
- (5) "Repairs" means work offered or performed for: maintenance; overhauling; adjusting; service; parts replacement; restoration of a malfunctioning, defective, or worn appliance; or problem diagnosis on an appliance, including costs of disassembly or reassembly; where the appliance involved is being used or is capable of being used primarily for personal, family, or household purposes.
- (6) "Written estimate" means a writing which includes:
 - (a) The name, address, and telephone number of the repair shop;
 - (b) A description of the problem to be repaired as described by the customer and any specific repairs requested by the customer, together with a description of any problem identified by the repair shop;

- (c) The charges for parts or materials, and labor itemized with reasonable particularity; or the flat rate charge for repairs. The shop shall indicate, if the parts to be used may not be new, original equipment parts, that the said parts will or may be used, rebuilt, reconditioned, replated, or aftermarket;
- (d) Any delivery charge;
- (e) Any storage charge which will or may be assessed;
- (f) Any other charge;
- (g) Tax;
- (h) The total estimated price;
- (i) The approximate time when the repairs will be completed and the appliance will be ready to be returned to the customer; and
- (j) A statement that the customer has the right to return of replaced parts, if requested, and a record of whether the customer has so requested.

6-1-303. Disclosure of charge for service call and written estimate required. (1) A repair shop shall not charge a customer for a service call unless the amount of the charge is disclosed to the customer and the customer then consents to incur the charge prior to the service call.

- (2) A repair shop shall not commence or perform any repairs unless the shop first provides a written estimate for and then obtains consent from the customer for such repairs, which consent shall be deemed consent to perform the repairs in accordance with the estimate. Consent shall be in writing and the customer shall be furnished a copy of the written estimate prior to any repairs unless subject to the provisions of subsection (3) below.

- (3) The repair shop may comply with the provisions of subsection (2) of this section by preparing the written estimates and orally communicating the content of the written estimate by telephone, if the customer is not present at the time when the estimate is prepared (paragraph (a) of subsection 6-1-302(6) may be omitted from such communication). A record of such communication and consent shall be made on the written estimate by the repair shop and shall include the date, time, manner of consent, telephone number called, if any, and the names of the persons giving and receiving such consent.
- (4) A customer may waive his right to receive an estimate and to consent to repairs by signing his name and the date below the following statement, which shall be in bold type:

"I WISH TO AUTHORIZE REPAIRS WITHOUT RECEIVING ANY ESTIMATE, EITHER WRITTEN OR BY TELEPHONE, TO WHICH I AM ENTITLED BY LAW."

- (5) If repairs are not authorized by a customer after receiving an estimate, or a repair shop refuses to undertake the requesting repairs, the repair shop shall inform the customer of how long the customer has to recover the appliance before it will be disposed of, which time period shall not be less than thirty days.
- (6) No storage charge shall be made by a repair shop if the customer retrieves the appliance within three business days of either the completion of repairs or the customer declining to authorize repairs.
- (7) If a repair shop finds that repairs other than those included in a previous estimate are necessary, a subsequent estimate in compliance with this section shall be prepared and communicated to the customer, provided that the previous estimate was a good faith assessment of the repairs known to be necessary at the time the previous estimate was made.
- (8) A repair shop shall not charge the customer an amount in excess of an estimate, plus ten percent thereof or twenty-five dollars, whichever is less.
- (9) The provisions of this section shall not apply where the total charge for the repairs is less than fifty dollars or where repairs are performed under a service contract where no charge is made for the specific repairs performed.

- (10) Nothing in this section shall be construed to require a repair shop to provide an estimate, if, after a description of the problem by the customer, the shop declines to perform the requested repairs.

6-1-304. Completion date. If the repairs are not completed within three business days of the estimated completion date in the original estimate, or any subsequent estimate, the contract for repairs may be canceled at the option of the customer, and the repair shop shall be required to reassemble the appliance in substantially the same condition in which it was received by the repair shop without charge to the customer; except that the customer may be charged for any portion of the repairs already completed in accordance with the original estimate and able to be separately itemized.

6-1-305. Payment not construed as consent. Payment by a customer of a charge or any portion thereof, which is not in compliance with this part 3 or for unauthorized repairs shall not be construed as a waiver of any of the rights granted by this part 3, nor shall such payment be construed as a consent to repairs or excess charges.

6-1-306. Lien rights. A repair shop shall not be entitled to any kind of lien for performance of repairs not in compliance with this part 3.

6-1-307. Invoice. (1) All repairs done by a repair shop shall be recorded on a customer's invoice. A legible copy of the customer's invoice shall be given to the customer when the appliance is returned to the customer. The original or a legible copy of the customer's invoice shall be retained for at least three years by the repair shop.

- (2) The customer's invoice shall include the following:
- (a) The name, address, and telephone number of the customer and the repair shop;
 - (b) The year, make, model number, and serial number of the appliance;
 - (c) The date the appliance was received for repairs;
 - (d) An itemization of each part added to or replaced in this appliance; a description of each part by name and identifying number if applicable; clear identification of which parts are used, reconditioned, aftermarket, or rebuilt, and the charges levied for each part added or replaced;

- (e) The time, hourly rate, and amount charged for labor, the full name or employee number of each person who in whole or in part performed repairs, and the identification of the specific stage of repair for which each person identified was partially or wholly responsible, if more than one person repaired the appliance;
 - (f) An itemized statement of all additional charges, including storage, service and handling, and taxes;
 - (g) An identification of any repairs subcontracted to another repair shop; and
 - (h) The name of the person primarily responsible for filling out the invoice, and the legible initials of any person filling out any portion of the invoice.
- (3) Itemization of a particular part is not required on the customer's invoice if no charge is levied for that part.
- (4) Miscellaneous designations such as "shop supplies", and "shop materials" may be used on the customer's invoice, so long as these designations are not applied to more than ten percent or twenty-five dollars of the total charges, whichever is less.
- (5) Designation of persons who performed repairs, parts, or labor is not required on the customer's invoice if the customer has been given a flat-rate price, if such repairs are customarily done and billed on a flat-rate price basis and agreed upon by the customer, and if such flat-rates are conspicuously posted by the repair shop or otherwise made available to the customer prior to or at the time of rendering the estimate.

6-1-308. Return of replaced parts. The repair shop shall return replaced parts to the customer at the time of completion of the repairs if the customer has so requested at the time of consenting to or authorizing the repairs.

6-1-309. Prohibited acts. (1) No repair shop or any employee or contract laborer of such shop shall knowingly:

- (a) Charge or attempt to charge for repairs which have not been consented to by the customer or charge for repairs in excess of amounts allowed by this part 3;
- (b) Represent that repairs are necessary when such is not the fact;

- (c) Represent that repairs have been performed when such is not the fact;
 - (d) Represent that an appliance or appliance part being diagnosed is in dangerous condition when such is not the fact; and
 - (e) Fail to return an appliance to a customer when the customer has paid or offered to pay all charges assessed by the repair shop which are in compliance with this part 3.
- (2) Any repair shop or employee of such shop who violates section 6-1-309 commits a class 2 misdemeanor and, upon conviction thereof, shall be punished as provided in section 18-1-106, C.R.S.
- (3) In any civil action for the enforcement of this article, the court may award reasonable attorney fees and costs to the prevailing party, and a customer shall be entitled to three times his damages for failure of any repair shop or any employee of such repair shop to comply with this article, except for clerical errors or omissions; but in no event shall such damages be less than one hundred fifty dollars. The customer shall first demand his damages from the repair shop at least ten days prior to the filing of such action, exclusive of Saturday, Sunday, and any legal holiday. Such section shall be brought within the time period prescribed in section 13-80-103. C.R.S.
- (4) Any repair shop which violates any of the provision of this part 3 in transactions with three or more customers in any one-year period shall be deemed a Class 2 Public Nuisance subject to the provisions of part 3 of article 13, title 16, C.R.S.

1992 Sunrise Review of Consumer Electronics Service Technicians

Testimony of Bruce Harrelson, Department of Regulatory Agencies

Before the Sunrise/Sunset Committee

June 18, 1992

The Department of Regulatory Agencies has reviewed the application for licensure of Consumer Electronics Service Technicians and recommends against occupational licensing of this industry. Consumer electronics service technicians install and repair electronic equipment including televisions, radios, stereo equipment, video cassette recorders and master antennas. They may also install and service CB radios, home satellite receivers, and mobile telephones. The Department found some degree of fraud, particularly in the Denver metropolitan area. Telephone interviews with district attorneys throughout rural Colorado did not reveal significant problems like those found in the metro area. I would like to bring three main points of the report to your attention. *

District attorneys throughout the state reported that their complaint history often reflects repeated complaints against only a small number of shops. DORA learned through interviews and research that most often the problem encountered by the consumer was that the equipment was not properly repaired or not repaired at all and they were charged for the repair. A typical state licensing board would have no legal authority to require restitution by the repair technician in cases such as these.

*** There does exist a private national certification program to which**

several Colorado consumer electronics technicians belong. This program includes a competency examination and is administered throughout Colorado.

*** Similar repair/service industries are not regulated in Colorado. We do not believe that the danger from an improperly repaired television or VCR is any greater or more common than the danger from an improperly repaired automobile. Other household appliances such as refrigerators, microwaves, and electric dryers fall into the same category of consumer risk. If these occupations are not strictly regulated by the state, it is not reasonable to set up an elaborate occupational licensing system for VCR repair technicians.**

In conclusion, substantial harm to the public does not meet the burden of proof required by Colorado's Sunrise Law. However, as mentioned, any problem that exists is mainly found in the Denver metro area. Several district attorneys throughout the state of Colorado suggested the implementation of an Appliance Repair Act which would require a consent and an estimate statement for consumer electronics repair. This act is similar to the one required for motor vehicle repairs. The Denver District Attorneys office could not be here today, however they support the implementation of an Appliance Repair Act.