

R&CO WEBINAR SERIES FOR AUTO DEALERS



Beyond Clear Pricing: Turning FTC Compliance Into Operational Advantage



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01

PRICING TRANSPARENCY

FROM COMPLIANCE TO A BETTER CUSTOMER EXPERIENCE

- The goal is bigger than simply meeting a rule. It is making the buying experience easier to understand.
- Customers should see the same pricing story online, in advertising and inside the dealership.
- When the process is clear, the conversation shifts from defending the price to building value.

Transparency works when it becomes part of the operating model, not a disclaimer added at the end.



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A HIGHER STANDARD

WHY THIS MATTERS TO OUR BRAND

- Clarity is part of the customer experience.
- Surprise charges or inconsistent messaging erode trust quickly.
- The standard has to be consistent from the first digital impression through delivery.

The customer should never have to work harder than we do to understand the transaction.



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WHY PRICING TRANSPARENCY MATTERS

TRUST IS BUILT BEFORE THE CUSTOMER ARRIVES

- Most customers have researched, compared prices and formed an expectation before contacting us.
- Clear pricing reduces objections, shortens explanations and creates a more productive sales conversation.
- Customers leave feeling informed rather than surprised.

Clarity does not weaken gross. Done correctly, it strengthens confidence in the value being presented.



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THE CURRENT LANDSCAPE

MORE INFORMATION. HIGHER EXPECTATIONS.

- Customers move between dealer websites, third-party marketplaces, search results and digital retail tools.
- Each platform can display pricing, incentives and fees differently.
- The dealership has to actively manage that fragmented digital footprint.

If the customer can find a discrepancy in two minutes, our process needs to find it first.



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REAL CHALLENGES. REAL IMPACT.

WHERE FRICTION ACTUALLY STARTS

- A price can be technically disclosed and still be confusing if conditions are buried or inconsistent.
- Third-party listings can lag behind the dealer website or interpret incentives differently.
- Even small inconsistencies create larger credibility problems after the customer arrives.

Confusion creates resets, longer transactions, lost trust and unnecessary management involvement.



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OUR APPROACH

PEOPLE. PROCESS. TECHNOLOGY.

- People: train every customer-facing employee to explain pricing and fees in the same clear language.
- Process: establish one pricing logic and one escalation path when an exception is identified.
- Technology: use reporting to identify mismatches before they become customer problems.

One customer. One price story. One consistent experience.



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WEBSITE & DIGITAL PRICING

THE DEALER WEBSITE SETS THE EXPECTATION

- Vehicle pricing should be current, easy to locate and consistent with the in-store offer.
- Conditional incentives need to be clearly identified so customers understand what applies.
- Review pricing, payment claims and disclosures from the customer's point of view.

Mystery-shop your own website on a phone. If the offer is difficult to understand, simplify it.



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ADVERTISING & THIRD-PARTY SITES

OUR NAME IS STILL ON THE LISTING

- Customers generally do not distinguish between a dealer-controlled page and a marketplace.
- Monitor feed accuracy, incentives, pricing presentation and required disclosures.
- When a discrepancy appears, ownership and response time matter.

A vendor feed issue may not be our fault, but the customer still experiences it as our problem.



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FEE DISCLOSURES THAT MAKE SENSE

CLEAR, CONSISTENT AND EASY TO EXPLAIN

- Required dealer charges should be presented consistently and early enough for an informed decision.
- Government fees should remain distinct from dealer charges.
- Optional products should clearly remain optional.

If a salesperson cannot explain a fee confidently in one sentence, the process needs work.



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THE SALES PROCESS

TRANSPARENCY HAS TO SURVIVE THE HANDOFF

- The salesperson should reinforce the same price and conditions the customer saw online.
- Managers should coach to clarity: what applies, what does not apply and what happens next.
- A consistent first presentation reduces negotiation friction and feels more premium.

The best sales process removes uncertainty without removing the opportunity to sell value.



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F&I BEST PRACTICES

KEEP THE EXPERIENCE CONSISTENT THROUGH DELIVERY

- F&I should continue the transparency established by sales, not introduce a different tone at the end.
- Products should be presented with clear value, clear pricing and a clear customer choice.
- The final agreement should match the conversation.

A strong F&I process can be both highly productive and highly transparent.



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EMPLOYEE COMMUNICATIONS

ONE TEAM. ONE MESSAGE.

- Train with real customer questions so employees know how to respond.
- Sales, management, BDC and F&I need the same definitions and the same language.
- Reinforce expectations through coaching, mystery shopping and real interaction reviews.

Consistency is not created by a memo. It is created by repetition, inspection and accountability.



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REAL RESULTS

TRANSPARENCY CREATES OPERATIONAL BENEFITS

- Fewer pricing resets mean less time spent rebuilding trust after the customer arrives.
- Cleaner handoffs allow sales and F&I to focus on value and closing the transaction.
- The larger benefit is a more consistent experience that supports satisfaction and retention.

We stopped viewing transparency only as compliance and started viewing it as process improvement.



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KEY TAKEAWAYS

WHAT OTHER DEALERS CAN APPLY NOW

- Audit the entire customer journey, not just the dealer website.
- Standardize the language used for pricing, incentives, fees and optional products.
- Assign ownership for exceptions and review them routinely.

Transparency is not one department's responsibility. It is an operating discipline.



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WHAT'S NEXT

KEEP RAISING THE STANDARD

- Continue auditing digital channels as platforms, pricing tools and customer expectations evolve.
- Use technology to surface exceptions faster, while keeping human accountability for resolution.
- Keep listening to customers; their questions reveal where the process creates friction.

Make the experience simpler every month, not just when a regulation changes.



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THANK YOU

QUESTIONS?

- Make the price clear.
- Make the process consistent.
- Make the experience easier.

Jason Kopp | General Manager | Autobahn BMW Fort Worth



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TECH WITH TRUTH

The Auditable Dealership

Compliance as Data Architecture, Not Policy

The FTC stopped asking whether you have a policy. It started asking dealers to prove it works.



Yuriy Demidko

Chief Technology & Product Officer, Clarivoy

Rosenfield & Co. Webinar Series | September 9, 2026

I Have Sat in Both Chairs

Most FTC guidance is written by people who have only sat in one of them.

THE DEALER CHAIR



CIO, large dealer group

- Built and ran the Safeguards program
- MFA in every store, vendor due diligence, incident response
- Owned IT and marketing, so the data lived on my side

THE VENDOR CHAIR



CTO & CPO, Clarivoy

- SOC 2 Type II underway from day one
- PII boundaries enforced in the architecture, not in a prompt
- Building what I used to demand from vendors



Different chairs. Same answer: proof lives in the data, not in the binder.

What Changed: From Policy to Proof

The rules did not move much. The posture did.



2023

**Safeguards Rule
deadline**

Written program, MFA,
vendor oversight.



2024

Breach notification

Notify the FTC within 30
days. 500 or more
consumers.



2025

CARS Rule vacated

Procedural grounds.
The expectations
stayed.



2026

Enforcement posture

Warning letters to 97
dealer groups.
Dealerships a priority.



The question moved from "Do you have a policy?" to "Show me it works."



The Compliance Binder Pattern

Every dealer knows these five steps. The fifth one is where it hurts.

1 The Consultant

A policy gets drafted.

2 The Binder

It looks complete.

3 The Signature

Budget spent. Box checked.

4 The Shelf

Nothing operational changes.

5 The Inquiry

A regulator asks for evidence. The binder cannot answer.



The policy was never the problem. The proof was.



Compliance you cannot query is compliance you cannot prove.

Every question a regulator asks is a systems question in disguise.



**Who touched this
consumer's data?**

Access logs by user, record, and time.



**Did they consent, and
when?**

A consent history, not a checkbox.



**Which vendors had it,
and who checked?**

A living inventory with owners and
review dates.

The Auditable Dealership

Five things a regulator can ask for and you can actually hand over.

1



Identity

One customer,
one record

2



Consent Ledger

Tracked, dated,
honored
everywhere

3



Data Flow Map

Every system,
every vendor, one
owner

4



Exportable Logs

Evidence, not a
binder

5



Human in the Loop

AI with disclosure
and handoffs



Every pillar answers a regulator and improves a marketing outcome.

The Safeguards Rule, Translated Into Systems

Eight things the rule requires, and where the evidence actually comes from.

WHAT THE RULE REQUIRES		WHAT PRODUCES THE EVIDENCE	PILLAR
Qualified individual accountable for the program	↔	An owner named on every system and vendor	3
Written risk assessment	↔	Data flow map with sensitivity classification	3
Data and system inventory	↔	Every integration, export, and login listed	3
Access controls and MFA	↔	Access logs by user, record, and time	4
Activity monitoring and logging	↔	Exportable logs, on your schedule	4
Service provider oversight	↔	Vendor inventory plus the six asks	3
Incident response and 30-day breach notice	↔	Logs that tell you what happened, fast	4
Annual written report to the board	↔	Evidence produced by query, not by binder	All



Every line on the left is a document. Every line on the right is a query.



Identity: One Customer, One Record



One consumer, four records: DMS, CRM, website form, service visit. You honored the opt-out on one. Marketing continued on three.

To the store, a data problem. To a regulator, a compliance failure with a name attached.

The Move

Resolve identity across DMS, CRM, and website on a clean key. Make deduplication a compliance control with a named owner.

THE REGULATOR'S QUESTION

"Did you honor this consumer's opt-out?"



Performance return: clean identity is also the foundation of attribution and suppression lists.



Consent as a Ledger, Not a Checkbox



Consent is a data object: who said yes, to what, through which channel, on what date, and when they changed their mind.

If it does not travel with the identity into every system that sends, it is not consent. It is a memory.

The Move

Build a consent ledger keyed to the identity: source, scope, timestamp, revocation. Every outbound system reads it before it sends.

THE REGULATOR'S QUESTION

"Show me this consumer said yes, and when."



Performance return: consent-clean lists deliver better and cost less per send.



Data Flow Map and Vendor Inventory



The Safeguards Rule requires you to oversee every service provider touching customer information. Most dealers cannot name every system that does.

The average store has dozens. Every one is a door.

The Move

Inventory every system. Map where data flows. Assign each vendor an owner and a review date.

THE REGULATOR'S QUESTION

"Who has your customers' data, and how do you know it is protected?"



Performance return: the same map shows which vendors earn their budget and which pilots never ended.

The Vendor Conversation

Six things to demand from every name on the inventory.



Event exports

My logs, on my schedule, readable without you.



Access controls

MFA on every seat and a quarterly access review.



Sub-processor list

Who else touches my data, and do I hear first?



Breach notification

A notice window in hours, not "promptly."



Deletion on termination

Contract ends, data ends, in writing.



SOC 2 Type II

The report, not the badge on the website.



A questionnaire is a vendor describing itself. Evidence is a vendor proving itself.

Where the Store and the Systems Meet

Three questions I would ask any dealership compliance officer.

1

When was your vendor inventory last reviewed, and who signed it?



2

How long would it take to produce one consumer's consent history, and who would do it?



3

What is the first thing you would want from a vendor after a breach notice?



None of these are legal questions. They are about time, ownership, and evidence.



Exportable Logs: The Binder vs. The Evidence

THE BINDER

What most stores can produce

- ⊗ A policy PDF
- ⊗ An annual training certificate
- ⊗ A self-reported vendor questionnaire
- ⊗ A screenshot of a dashboard

THE REGULATOR'S QUESTION

"Prove it."

THE EVIDENCE

What an auditable store can produce

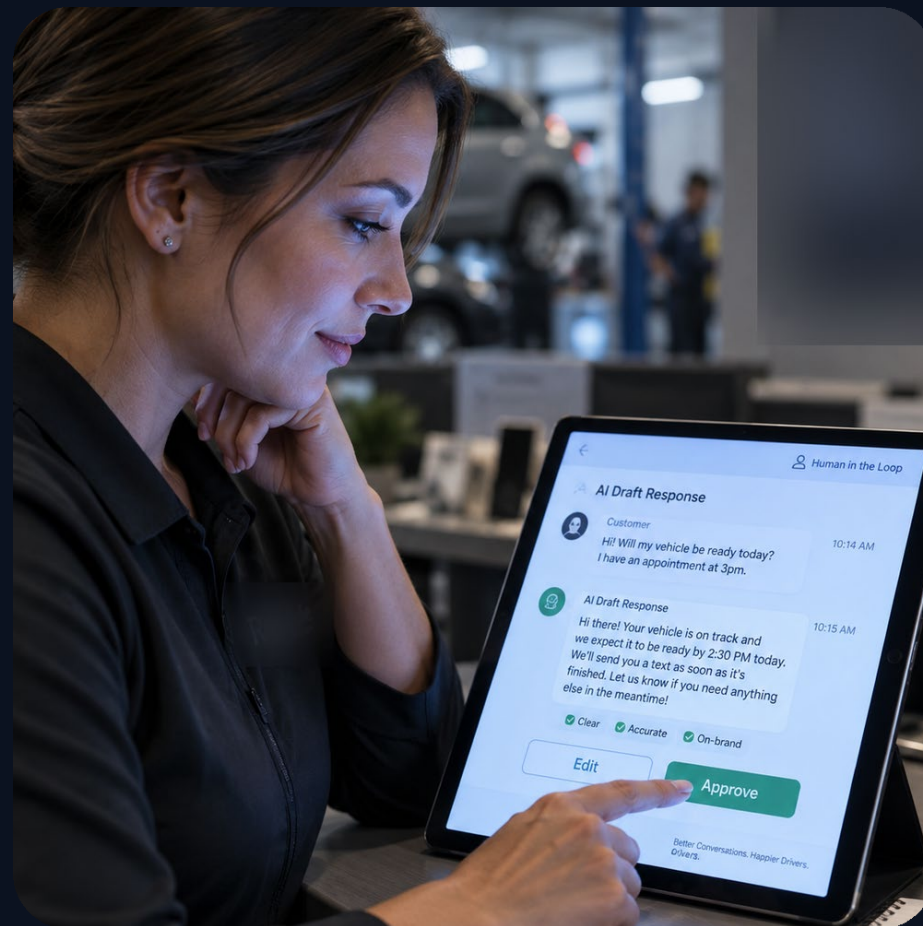
- ✓ Access logs by user, record, and time
- ✓ Consent history per consumer
- ✓ Vendor data pulls with timestamps
- ✓ AI transcripts with handoff points

If you cannot audit it, you cannot trust it. If you cannot export it, you do not own it.



Human in the Loop for Customer-Facing AI

BDC bots and first-touch AI answer in seconds, at scale. Every word is a statement your dealership made to a consumer.



Disclose

Customers know when a machine is answering.



Log everything

Every prompt, response, and override exportable.



Handoff rules

Pricing, financing, complaints go to a human.



Set end dates

Every pilot has a decision meeting scheduled.

THE REGULATOR'S QUESTION

"What did your AI tell this consumer, and who was accountable?"



Performance return: AI you can audit is AI you can trust with customers.

Same Foundation, Two Returns

The regulator's list and the CFO's list are the same list.

WHAT THE REGULATOR ASKS FOR

WHAT THE CFO ASKS FOR

One record per consumer	↔	Attribution you can trust
Consent history	↔	Better deliverability, lower cost per send
Vendor inventory	↔	Vendor accountability, pilots that end
Access and event logs	↔	Reports that reconcile to the DMS
Accountable AI	↔	AI you can put in front of customers



Compliance and performance are the same discipline, built on the same data.

Putting It Together: Trace One Customer

Pick one real consumer. Follow them through every system. Write down what you cannot answer.



Website form

Consent captured?
Identity created?



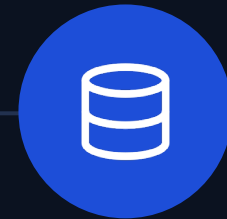
CRM lead

Same person, or a
duplicate?



Marketing sends

Did every tool read
consent first?



DMS deal

Tied to the lead?
Adverse action
logged?



Service visit

A fourth record, or
the same one?



Vendor feeds

Who received this
person's data, and
when?

WHAT USUALLY BREAKS



Duplicate records



Consent living in
one tool



A vendor nobody
listed



A log you cannot
export



The gaps you find are the roadmap. That is week two.



Your Next 30 Days

One customer. Four weeks. Real evidence. That is the whole play.



Week 1

Inventory

Every system touching customer data. One owner each.



Week 2

Trace a customer

One real consumer, end to end. The gaps are your roadmap.



Week 3

Ask the vendors

Six asks to your top five vendors. Evidence or brochure?



Week 4

Write the rules

The AI handoff rule, and a decision date for every pilot.



One traced customer beats one hundred pages of policy.

Where Are You Right Now?

Sixty seconds. Be honest. The first "no" is your starting line.

- ☐ Can I pull every record for one consumer, across every system, in under an hour?
- ☐ Can I show when a consumer consented, and when they opted out?
- ☐ Can I name every vendor touching customer data, and when it was last reviewed?
- ☐ Can I export access logs without asking a vendor for a favor?
- ☐ Does every customer-facing AI have a handoff rule and an end date?

Five yes answers is an auditable dealership. Anything less is a plan.



Yuriy Demidko

Chief Technology & Product Officer
Clarivoy

Thank You

The conversation is more useful than the slides. Stay in touch.

Compliance you cannot query is compliance you cannot prove. Start with one customer. Build the evidence one step at a time.



Scan to connect on LinkedIn

linkedin.com/in/yuriydemidko

Q&A

Ask our panelists your questions on pricing, compliance and dealership operations.



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THANK YOU!

Let's continue the conversation



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