

**Consumer Action • Consumers for Auto Reliability and Safety  
Consumer Federation of America  
National Association of Consumer Advocates  
National Consumer Law Center**

September 12, 2008

Mr. Donald C. Clark  
Secretary  
U.S. Federal Trade Commission  
Room H-135 (Annex G)  
600 Pennsylvania Avenue, N.W.  
Washington, DC 20580

Via Electronic Transmission and FedEx

**Re: Request for Extension of Time to File Comments In Reponse to Request for Public Comments, Used Car Rule Regulatory Review, Matter No. P087604**

Dear Mr. Clark:

On behalf of our organizations, which together represent more than 50 million members, we hereby formally request that the Federal Trade Commission (“Commission”) allow at least an additional sixty (60) days to respond to the Commission’s request for public comments regarding the Used Car Rule. The current deadline for comments is September 19.

We respectfully request the extension for the following reasons:

First, in the request for comments, the FTC asks fifteen (15) pages of detailed questions about complex issues. Many of those questions seek empirical data and assessments of costs and benefits. In order to provide detailed responses to those questions, additional time is needed to conduct research. Having the additional time will help assure that the responses we provide are more comprehensive and will assist the Commission’s deliberations.

Second, it has been more than thirteen (13) years since the last revisions to the rule. During that time, the automotive marketplace and information technologies have changed dramatically. Assessing those changes and making well-considered recommendations about how to meet the challenges of today's automotive marketplace will take some additional time.

Third, the U.S. Department of Justice is expected to soon issue a Notice of Proposed Rulemaking to require insurers, salvage pools, and junkyards to provide timely data to the National Motor Vehicle Title Information System regarding total loss vehicles. The new rule to be issued by the DOJ is now more than 12 years overdue. The DOJ has been acting in response to a lawsuit filed by Public Citizen, CARS, and Consumer Action. We believe it would make sense to take the DOJ's proposal into account in determining the most effective way to modify the Used Car Rule.

Fourth, as non-profits, we have limited resources and staff who have expertise in this area, adding to the time needed to obtain input from experts who are already stretched thin working on ongoing litigation and/or pending legislation in Congress or state legislatures.

We have been working diligently to develop comprehensive responses that will assist the FTC in deliberations over changes to the rule. An additional 60 days ultimately will benefit the Commission by encouraging more carefully considered comments focused on the issues the Commission has presented.

Thank you for your consideration of our petition for an extension. Should you or your staff have any questions regarding this request, please contact Rosemary Shahan, President, Consumers for Auto Reliability and Safety, whose contact information is provided below. Please also respond directly to her. We look forward to your response.

Sincerely,

Linda Sherry  
Director of National Priorities  
Consumer Action

Rosemary Shahan  
President  
Consumers for Auto Reliability and Safety

Jean Ann Fox  
Director of Financial Services  
Consumer Federation of America

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CC: John C. Hallerud, FTC Midwest Region, Chicago