



# North American Export Committee

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January 29, 2013

Mr. Donald C. Clark, Secretary  
U.S. Federal Trade Commission  
Room H-113 (Annex T)  
600 Pennsylvania Avenue, N.W.  
Washington, DC 20580

**Re: Used Car Rule Regulatory Review, Project No. P087604**

Dear Secretary Clark:

This is a request for an extension of time to file comments regarding the above captioned matter. Additional time is necessary to fully respond to the proposal and to coordinate efforts among a number of organizations who wish to comment. It is imperative that the time period for filing comments be extended for at least two months, for the following reasons:

**Law Enforcement agencies and law enforcement support organizations have not had an opportunity to review the proposed recommendations, because they are not aware of the Proposal. Subsequently, the proposal which was issued on December 17, shortly before the holiday season, has received relatively little attention.**

Affected government agencies, law enforcement agencies, law enforcement support organizations and consumers have not yet had an opportunity to make their voices heard on this issue. This proposal will impact tens of millions of car buyers each year, and involves the second-largest purchase most consumers make, as well as the vehicle theft and safety of the motoring public. Therefore, time is needed for all concerned to become more aware of what the agency is proposing and make their voices heard.

In addition, many of these groups wish to be involved in researching and developing comments, and it will take time for these groups to perform research and coordinate those efforts, in order to bring hard data and a fresh perspective to the agency's attention.

Thank you for your consideration.

Respectfully,

*D.G. Frias*

On Behalf of the NAEC Board  
Dennis Frias, Co-Chair  
(Acting Chairman)  
NAEC