



February 1, 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:

The National Salvage Vehicle Reporting Program (NSVRP), a leading not-for-profit law enforcement support organization dedicated to reducing auto theft, title fraud and abuse. NSVRP works closely with the Department of Justice, the FBI, Customs and Border Protection and other parties to help further these objectives. In addition, NSVRP is recognized by the US Department of Justice as an independent third party standards body for NMVTIS, the National Motor Vehicle Title Information System (NMVTIS) created as a result of the Anti-Car Theft Acts of 1992 and 1996. NSVRP's board is comprised of representatives of local and national law enforcement organizations.

NSVRP submits this letter as a request for an extension of time to file comments regarding the Used Car Regulatory Review, Project No. P087604.

Even with the current Used Car Rule in effect, auto-related issues are among the top ten on nearly every consumer complaint list, including the FTC's. Each year, an estimated 40 to 50 million used cars are sold to consumers in transactions exceeding \$300 billion, providing an immense pool for relatively easy and extremely lucrative ways to exploit consumers.

At the present time we are actively monitoring the status of Hurricane Sandy flood damaged vehicles, and see many abuses taking place where major corporations integral to the total-loss and salvage disposal process are violating state and federal branding and disclosure laws resulting in unbranded flood damaged vehicles reentering the used car marketplace for resale without any ability for consumers to be aware of the total-loss flood damaged history on these vehicles. This situation is intolerable, and we must better protect consumers from being defrauded. We are presently working with DOJ, NHTSA, several states and the National White Collar Crime Center on monitoring and tracking these abuses. We request this delay in order to continue to track the activity on these vehicles and to provide a report to the Commission on our findings and recommendations.

NSVRP will join many consumer groups to submit comments supporting our belief that providing vehicle history information at the point of sale will go far toward helping consumers assess the true condition of used vehicles they are considering purchasing. Since the FTC has clearly stated that new evidence would be required for the Agency to consider changing its position on this issue, we request that you allow the consumer protection groups that so strongly recommended prior damage disclosure some additional time of at least two months so that they may perform research and provide additional input for the Agency's consideration.

Thank you for your consideration.

Sincerely,

Howard Nusbaum
Administrator, NSVRP

The National Salvage Vehicle Reporting Program (NSVRP) is a not-for-profit 501 (C) (3). The organization was founded to support law enforcement and to promote and support efforts to advance the National Motor Vehicle Title Information System (NMVTIS). NSVRP's mission is to support initiatives to control auto-theft and title abuse. NSVRP's Board of Directors consists of representatives of major law enforcement groups, and is an independent third party standards provider for NMVTIS. NSVRP has been recognized both by the Department of Justice and the FBI for 'Exceptional Service in the Public Interest' for its public policy efforts.

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