



NATIONAL AUTOMOBILE DEALERS ASSOCIATION
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Legal & Regulatory Group

November 19, 2008

SUBMITTED ELECTRONICALLY

Federal Trade Commission
Office of the Secretary
Room H-135 (Annex H)
600 Pennsylvania Avenue, N.W., Washington, D.C. 20580
Electronic address: <https://secure.commentworks.com/ftc-UsedCarRuleReview> (CRT Docket No. 106)

Re: “Used Car Rule Regulatory Review, Matter No. P087604”

The National Automobile Dealers Association (“NADA”) submits the following comments to the Federal Trade Commission (“FTC” or the “Commission”) regarding its notice of request for public comment (“Notice”) on its Used Motor Vehicle Trade Regulation Rule (“Used Car Rule” or “Rule”).

I) INTRODUCTION

NADA represents over 19,000 franchised automobile and truck dealers who sell new and used motor vehicles, and engage in service, repair, and parts sales. Together our members employ in excess of 1.1 million people nationwide. Most of our members sell both new and used vehicles and therefore use the Used Car Rule Buyers Guide every day.

Dealers nationwide share the goal of accurate disclosure of used vehicle warranty information to consumers. The accurate disclosure of warranty coverage avoids confusion and results in more informed customers. The Used Car Rule Buyers Guide has for many years achieved this purpose. Both dealers and consumers rely on the Buyers Guide and any changes to the Guide should be approached with caution. However, as discussed below, the FTC should consider the adoption of a few minor modifications to the Buyers Guide that would enhance its status as a useful and accurate warranty coverage notice for prospective used vehicle purchasers.

