



Electrical Rebuilder's Association
PO Box 906
Union, MO 63084

8/2/2012

VIA ELECTRONIC MAIL

<https://ftcpublic.commentswork.com/ftc/usedatuopartsguide>

Federal Trade Commission
Office of the Secretary
Room H – 113 (Annex B)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Used Auto Parts Guides Review
16 CFR Part 20
Project No. P127702

Dear Sir:

I am the President of the Electrical Rebuilders Association (ERA), a trade association which represents approximately 500 businesses which rebuild electrical components for motor vehicles. In the market for parts to service and repair motor vehicles many different types of used parts are available. These parts vary in quality from those to which no repair has been made to those which have been rebuilt/remanufactured to function as new. Unfortunately, the words used to describe the quality of these parts can sometimes be indefinite and misleading. While most vendors adhere to established descriptions for the quality of their parts, there are some who would either negligently or purposefully misrepresent the quality.

ERA and its members believe that FTC's Used Auto Parts Guides provide clear and

readily understandable rules for the marketing of used parts and the steps which must be taken before a used part can be sold as rebuilt or remanufactured. We strongly support the retention of these Guides and the comments filed by the Automotive Parts Remanufacturers Association. The rebuilding/remanufacturing industry needs these Guides to ensure that consumers are protected when purchasing motor vehicle parts.

Very truly yours,

Henry Henke, President