

August 3, 2012

Federal Trade Commission
Office of the Secretary Room H-135 (Annex F)
600 Pennsylvania Avenue, NW
Washington, DC 20580

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

The Association of Global Automakers, Inc. (Global Automakers) is pleased to provide our comments regarding the Federal Trade Commission Used Auto Parts Guides Review (“Guides”). The Guides provide important safeguards for consumers and should be retained.

Global Automakers represents international motor vehicle manufacturers, original equipment suppliers, and other automotive-related trade associations. Our members’ market share of both U.S. sales and production is around 40 percent and growing. We work with industry leaders, legislators, regulators, and other stakeholders in the United States to create public policy that improves motor vehicle safety, encourages technological innovation and protects our planet. Our goal is to foster an open and competitive automotive marketplace that encourages investment, job growth, and development of vehicles that can enhance Americans’ quality of life. For more information, visit www.globalautomakers.org.

Global Automakers believes that the Guides are still necessary and provide clear benefits. The conditions that resulted in the Commission's decision to retain the Guides in 2002 still exist. Consumers need to know what kinds of parts are being used when they bring their vehicles in for service (and before parts are installed on their vehicles) and what kind of parts are being sold to them when they seek to purchase over-the-counter replacement parts.

The terminology can be very confusing. There are (1) original equipment manufacturer (OEM) parts, (2) OEM replacement parts, (3) OEM or factory or aftermarket rebuilt or remanufactured parts and (4) recycled, salvaged or used parts. The Guides help prevent misrepresentations by requiring clear and conspicuous disclosures in advertisements, packaging and labeling regarding the type of used part being offered. Given the growing emphasis on recycling, it is likely that more and more used parts will be marketed to consumers in the future. Due to the marked cost differences between the various used parts categories, the risk of deceptive practices continues. Without guidelines, such as those provided in the Guides under review today, consumers may not have the information they need to make informed purchase decisions.

For these reasons, Global Automakers urges the Commission to continue with the Guides. We appreciate the opportunity to provide our views.

Sincerely,

Ellen Gleberman
Vice President & General Counsel