

**Consumers for Auto Reliability and Safety  
Consumers Union  
National Consumer Law Center (on behalf of its low-income clients)**

June 22, 2009

Mr. Donald C. Clark  
Secretary  
U.S. Federal Trade Commission  
Room H-135 (Annex G)  
600 Pennsylvania Avenue, N.W.  
Washington, DC 20580

Via Electronic Transmission

**Re:** Request for Extension of Time to File Comments In Response to Request for Public Comments, Cooling-Off Rule Regulatory Review, 16 CFR 429, Comment, Project No. P087109

Dear Mr. Clark:

Our organizations, respectfully request that the Federal Trade Commission extend the time within which to respond to the Commission's request for public comments on the cooling-off rule by an additional sixty (60) days.

We request the extension for the following reasons:

First, in the request for comments, the FTC asks numerous detailed questions about complex issues. Many of those questions seek assessments of costs and benefits of both the existing rule and any proposed changes and evidence supporting the assessment. In order to provide detailed responses to those questions, additional time is needed to thoroughly research the impact of both the existing rule and proposed improvements. Having the additional time will help assure that the responses we provide are more comprehensive and will assist the Commission's deliberations.

Second, the rule was last revised in 1995. Since that time, the marketplace has changed dramatically. Assessing those changes and making well-considered recommendations about how to meet the challenges of today's marketplace will take additional time.

Third, as non-profits, we have limited resources and staff who have expertise in this area.

Fourth, an additional 60 days ultimately will benefit the Commission by encouraging more carefully considered comments focused on the issues the Commission has presented.

Thank you for your consideration of our petition for an extension. Should you or your staff have any questions regarding this request, please contact John W. Van Alst, Staff Attorney, National Consumer Law Center, whose contact information is provided below. We look forward to your response.

Sincerely,

Rosemary Shahan  
President  
Consumers for Auto Reliability and Safety

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CC: Sana Coleman Chris, FTC Atlanta Office