

RetireSafe

Standing Up For America's Seniors!

Donald S. Clark
Secretary
Federal Trade Commission
Room H-113 (Annex G)
600 Pennsylvania Avenue, NW.
Washington, DC 20580

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

Dear Mr. Clark:

Representing 400,000 senior citizen supporters across America, RetireSafe applauds the Federal Trade Commission for the important role it plays in protecting older consumers. We believe that the "Guides for the Rebuilt, Reconditioned and Other Used Automobile Parts Industry" have greatly benefitted consumers over the past three decades and that the Guides continue to be a critical factor "to prevent unfair or deceptive acts or practices in the advertisement and sale of previously used motor vehicle parts and assemblies of parts containing previously used parts."

Strong consumer protection is of utmost importance. RetireSafe believes the existing Guides are well-crafted to protect consumers and urges the FTC to avoid imposing any new regulatory burdens that may lead to additional costs being passed along to consumers.

According to a 2011 survey by AAA, one in four American drivers could not pay for a car repair of \$2,000. One-quarter of drivers are neglecting to conduct recommended maintenance and make important repairs due to the current economic climate.

Rebuilt, reconditioned and other used automobile parts provide competition in the automotive parts market, especially against more expensive, new replacement parts made by the car companies, and help to keep parts prices down. This is particularly important in these tough economic times, especially for older Americans.

Most seniors live on fixed incomes and any increase in costs is a significant hardship. Those who cannot afford to pay increased costs may be forced to forgo repairing their vehicles, either resulting in a loss of important personal

freedom or incurring the personal and a public safety risks that come with operating a severely damaged vehicle.

On behalf of the hundreds of thousands of older Americans RetireSafe represents, and millions of their peers nationwide, we strongly urge the FTC to consider the importance of ensuring that the prices of alternative auto parts can remain competitive as it reviews the Used Auto Parts Guides. Affordability must be a priority.

Sincerely,

—

Thair Phillips
President
RetireSafe

RetireSafe is a grassroots organization representing more than 400,000 older Americans nationwide. Its mission is to preserve, protect and enhance the options and benefits of seniors and near-seniors.