



Public Affairs

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Federal Trade Commission
Office of the Secretary
Room H-113 (Annex B)
600 Pennsylvania Avenue, NW
Washington, DC 20589

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

To Whom It May Concern:

AAA appreciates the opportunity to offer feedback on the Federal Trade Commission (FTC) request for public comments regarding the “Guides for the Rebuilt, Reconditioned, and Other Used Automobile Parts Industry.” AAA clubs across the country provide over 47 million U.S. members with automotive, travel and other services, and we’re committed to providing the highest quality and most reliable automotive service through our Approved Auto Repair (AAR) program. Over 7900 automotive repair facilities in North America have successfully met AAA’s high automotive standards to gain the AAR seal of approval.

With the vehicle fleet age increasing there will be a greater need and demand for used parts. Also the growth in the number of sellers and resellers of used auto parts will necessitate more awareness for appropriate labeling and disclosure. As such, AAA believes that the current FTC guidelines are extremely important to ensure that vehicle equipment information is accurately identified and labeled to avoid any confusion by consumers and automotive service and repair technicians. Overall, AAA endorses the Commission’s Used Auto Parts Guides and believes they should be retained.

AAA recommends some changes/enhancements to the Guides as follows:

In the *Scope and Purpose of the Guides* section, several parts should be added to the list of items identified as rebuilt, etc:

- Hybrid drive systems (aka Integrated Motor Assist systems – IMA)
- Hybrid battery packs
- Instrument clusters/panels
- Diesel injection pumps
- Superchargers
- Navigation and audio systems
- Struts/shocks (both manual and electromechanical)
- Catalytic converters
- Airbags

Regarding question #12: [*Should the Guides be changed to specify when an installer of an Industry Product (e.g., mechanic or technician), as described by the Request for Comments, must disclose the use of the Product to a consumer? If so, when should the installer disclose the use of an Industry Product?*]

AAA Recommendation:

- Clear signage should be displayed at the locations indicating that certain parts may be installed that are Industry Products.
- When the consumer needs a repair that will consist of Industry Products, this should be clearly stated verbally at the time of verbal authorization.
- The final invoice should identify all Industry Products installed on the vehicle.

Regarding question #17: [*What acts or practices related to Industry Products do the Guides currently not address, but which they should address?*]

AAA Recommendation:

Engine, transmission and other assemblies are regularly advertised and sold with the designation of "low mileage." AAA recommends that:

- Proof of actual mileage must accompany any product designated as "low mileage."
- Proof can include photos of vehicle and engine vehicle identification number (VIN), vehicle exterior, odometer and Carfax or other industry reports showing date of and mileage at salvage.

Regarding question #18: [*Is there a need for efforts to educate consumers or businesses about the Used Auto Parts Guides? If so, what types of educational activities should the Commission undertake?*]

AAA Recommendation:

AAA clubs regularly communicate with their members about important automotive and consumer topics via various communication channels, including articles in member publications. AAA would be interested in exploring opportunities to collaborate with the Commission on future consumer education/outreach efforts to ensure consumers are well informed about the use of used auto parts.

Thank you for your consideration of AAA's views.

Respectfully,

Jill Ingrassia)
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AAA Government Relations and Traffic Safety Advocacy