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March 11, 2013

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

Re: Regulatory Review of the Used Motor Vehicle Trade Regulation Rule, Project No. P087604

Dear Secretary Clark:

National Vehicle Service-Not for Profit Corporation (**NVS**) is a law enforcement support organization that is the official interface between the Federal Bureau of Investigation (**FBI**) stolen vehicle database and the U.S. Department of Justice (**DOJ**) National Motor Vehicle Title Information System (**NMVTIS**), for commercial companies accessing the System. We provide the FBI's National Crime Information Center (**NCIC**) stolen vehicle data for commercial consumption by vehicle lenders and dealers. We also are the lien data repository for lien vehicles, and provide this information to the law enforcement community at all levels nationwide.

In addition, as the repository and interface for the national private License Plate Reader (**LPR**) information we are the interface for the National Law Enforcement Telecommunications System (**NLETS**) so that law enforcement can access this data. In this role we are also the source of the LPR data that is used as part of the national Amber Alert System for use by the National Center for Missing and Exploited Children (**NCMEC**).

Subsequently NVS assists law enforcement, vehicle finance, insurance and rental car companies and the public in protecting vehicle assets. In our role as the single interface between the owners of lien, leased or rented vehicles we provide secure access to data that assist in combating vehicle related fraud and theft.

As a law enforcement support organization, NVS is fully aware of the many methods in which inconsistencies and limitations in federal and state branding and titling rules and regulations, in combination with often outright illegal avoidance of reporting and recording of titling information by the parties involved in the purchase and sale of used and salvage vehicles, provide opportunities to exploit this multi-billion dollar market for illicit ventures ranging from small-scale criminal activity, domestic organized crime to international organized crime. We are also fully aware of the fact that auto-related fraud issues plague American consumers. Vehicle related issues have historically been among the top ten of all consumer complaints, and that unfortunate trend continues in the FTC's 2012 annual report of complaints.

NVS is certain that the FTC can help protect American consumers who purchase up to 40 million used cars each year, from these systemic limitations and illegal actions by requiring used car sellers to disclose known prior history information on the vehicles they sell.

Additionally, to require dealers/sellers to check each vehicle's history with a vehicle history report that includes NMVTIS data and to provide a warning to consumers if NMVTIS data indicates the vehicle has been reported as a total loss by an insurance company, has been reported as acquired by a junk/salvage/insurance reporting entity, or if the title contains a brand.

NMVTIS is the only database available that contains crucial and timely information concerning total loss vehicles from insurers, salvage pools, junkyards and recyclers in all 50 states. NVS believes that this is vitally important data that should be provided to all potential used car purchasers, because these vehicles may be so severely damaged that they should be considered to be beyond repair.

More importantly, the Federal Anti-Car Theft Act (1992) mandated the creation of NMVTIS expressly for the purpose of protecting consumers from vehicles that are not roadworthy, while also aiming to help law enforcement fight vehicle theft by limiting the potential for title washing and other branding and titling crimes. Therefore, unlike other vehicle history databases, NMVTIS carries the force of the federal law that created it. By linking vehicle history disclosure to NMVTIS under the Used Car Rule, the FTC will likely open up avenues of recourse for defrauded consumers and for resellers who may be unaware of a vehicle's past history with entities in the supply chain who violated state and federal branding and disclosure laws resulting in inaccurately unbranded, catastrophically damaged vehicles reentering the used car marketplace.

Furthermore, by exposing segments of the vehicle supply chain – many of whom today break these laws without suffering the consequences of their actions while taking advantage of the public by reselling them badly damaged cars with clean or inaccurately branded titles – to potential liability due to the force of law carried by NMVTIS reporting requirements, the FTC could also make these activities more risky and therefore less common.

Thank you for your consideration of our views. Should you have any questions regarding our position on this matter, please do not hesitate to contact me directly.

Respectfully,

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