



(571) 208-0428 • (888) 385-1005 • Fax (571) 208-0430

www.a-r-a.org

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"Solera Holdings, File No. 121 0165"

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

Over the past 20 years, the landscape of the professional automotive recycling industry has changed dramatically. Computers and software are now essential to automotive recyclers' inventory data management, sales and operations. Now, more than ever, dynamic inventory management systems are essential instruments required to conduct a professional automotive recycling business.

The Automotive Recyclers Association (ARA) commitment to its members' access to essential, forward-looking products and services is a fundamental belief of the organization. With this in mind, ARA cautions the U.S. Federal Trade Commission to ensure that there are safe guards in place to prevent a sale of Actual Systems to a single corporate entity that would utilize the inventory management system solely for its operations, thereby removing an essential facility from professional automotive recyclers. ARA believes that due to the limited number of viable inventory management systems currently in the automotive recycling marketplace, all providers must maintain the utmost commitment to steadily advancing and servicing the industry's inventory management system clients.

Thank you for this opportunity to comment.

Sincerely,


Michael E. Wilson
Chief Executive Officer

Association Background

Since 1943, ARA has represented an industry dedicated to the efficient removal and reuse of "green" automotive parts and the recycling of inoperable motor vehicles. Today, ARA represents over 4,500 automotive recycling facilities in the United States and fourteen other countries around the world. ARA members around the globe provide consumers with quality, low-cost alternatives for vehicle replacement parts, while preserving the environment for a "greener" tomorrow.