



Consumers for Auto Reliability and Safety

January 23, 2013

Mr. Donald C. Clark, Secretary
U.S. Federal Trade Commission
Room H-113 (Annex T)
600 Pennsylvania Avenue, N.W.
Washington, DC 20580

Re: Used Car Rule Regulatory Review, Project No. P087604

Dear Secretary Clark:

This is a request for an extension of time to file comments regarding the above-referenced matter. More time is necessary in order to fully respond to the proposal and to coordinate efforts among a number of organizations who wish to comment. It would be most helpful if the time period for filing comments could be extended for at least two months, for the following reasons:

Auto sales complaints perennially top the charts of complaints received by state and local consumer agencies, and used car dealers rank among the top-ten most-complained about businesses in terms of consumer complaints to the Better Business Bureau. Yet the proposal, which was issued on December 17, shortly before the holiday season, has received relatively little attention.

Affected consumers have not yet had an opportunity to make their voices heard on this issue, which will impact tens of millions of car buyers each year, and involves the second-largest purchase most consumers make, as well as the safety of the motoring public. Time is needed in order for the public to become more aware of what the agency is proposing and make their voices heard.

In addition, many consumer groups wish to be involved in researching and developing comments, and it will take time for the groups to perform research and coordinate those efforts, in order to bring hard data and fresh input to the agency's attention.

Thank you for your consideration of this request.

Sincerely,

Rosemary Shahan

Rosemary Shahan
President