

THOMAS J. MILLER
ATTORNEY GENERAL

CONSUMER PROTECTION DIVISION



Address Reply To:
Hoover Bldg., 1305 E. Walnut
Des Moines, Iowa 50319

Telephone: 515-281-5926
Toll Free: 888-777-4590 (In Iowa)
Fax: 515-281-6771
www.iowaAttorneyGeneral.gov

Department of Justice

January 25, 2013

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

Re: Used Motor Vehicle Trade Regulation Rule
16 C.F.R. Part 455
Request for Extension of Time Within Which to Comment

Dear Secretary:

I am writing on behalf of the office of the Attorney General of Iowa in order to respectfully request an extension of four weeks after the February 11, 2013 deadline in order to file comments to the Federal Trade Commission concerning the Proposed Amendments to the Used Motor Vehicle Trade Regulation Rule.

Please understand that, as Chair of the Automobiles Working Group of the National Association of Attorneys General, the comments drafted by this office will be routed to the offices of all other state Attorneys General for their consideration and possible joinder. The Iowa Attorney General's Office was the drafter of the comments submitted to the FTC by state Attorneys General in response to the request for comments made in 2008 as part of the FTC's regulatory review. It is our belief and understanding that the offices of other state Attorneys General are looking to this office to draft the comments, with input from all interested states.

We seek this extension for several reasons. First, the notice of proposed rulemaking was issued in early December, 2012. Having been published just prior to the December holiday season, the ability of state attorneys general to work together in considering and drafting comments has been limited. In addition, enforcing state unfair and deceptive acts and practices and other state statutes relating to used vehicle purchases is a top priority of the consumer protection divisions of most state Attorneys General. Because state Attorneys General consider this rule to be especially important to protecting used vehicle buyers, we want to ensure that we have adequate time to draft comments that express the views of as many of these state law enforcement officials as possible. With 56 different state and territorial jurisdictions, having an additional thirty days past February 11, 2013, will enable us to accomplish this.

Secretary, Federal Trade Commission
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Thank you very much for your consideration of this request. Please contact me if you have any questions or require further information. My telephone number is 515-281-5926. My e-mail address is: William.Brauch@Iowa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "William L. Brauch". The signature is fluid and cursive, with a long horizontal stroke at the end.

William L. Brauch
Special Assistant Attorney General
Director-Consumer Protection Division

cc:

John Hallerud
Attorney
Midwest Region
Federal Trade Commission
55 W. Monroe Street, Suite 1825
Chicago, IL 60603