



## NATIONAL ASSOCIATION OF CONSUMER ADVOCATES

January 29, 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:

The National Association of Consumer Advocates (NACA), a national non-profit organization of consumer protection attorneys and other consumer advocates committed to promoting justice to consumers, respectfully requests an extension of time to file comments regarding the FTC Used Car Rule Regulatory Review, Project No. P087604. We need more time to respond to the proposal and to coordinate efforts among a number of organizations who are interested in commenting. We ask that the deadline be extended for at least two months (April 11, 2013), for the following reasons:

The proposal was issued in late December right before the busy holiday season and has received relatively little media attention. We believe consumers and consumer advocates have not been given an appropriate amount of time to comment on this important issue that impact tens of millions of car buyers each year, and involves the second-largest purchase most consumers make, as well as greatly affecting the safety of the motoring public. More time is needed in order for outreach to be done to the public about the comment opportunity. Also, many consumer advocacy groups need more time to work together to coordinate data and develop collaborative comments to the FTC.

Thank you for your consideration of this request. If you have any questions, please contact Ellen Taverna at (202) 452-1989 ext 109 or at [ellen@naca.net](mailto:ellen@naca.net).

Sincerely,

Ellen Taverna  
NACA Legislative Director

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