



NATIONAL AUTOMOBILE DEALERS ASSOCIATION
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Legal & Regulatory Group

December 31, 2014

SUBMITTED ELECTRONICALLY

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue, N.W.
Suite CC-5610 (Annex A)
Washington, D.C. 20580
Electronic address: <https://ftcpubliccommentworks.com/ftc/usedcarrulenprm>

Re: “Used Car Rule Regulatory Review, 16 CFR Part 455, Project No.P087604”

The National Automobile Dealers Association (“NADA”) hereby requests an extension of time to submit comments in response to the request for comments (“Request”) by the Federal Trade Commission (“FTC” or the “Commission”) in connection with its proposed further amendments to the Used Motor Vehicle Trade Regulation Rule (“Rule” or “Used Car Rule”) found in the supplemental notice of proposed rulemaking (“SNPRM”) issued Friday, November 28, 2014 (Fed. Reg. 70804).

The SNPRM is the latest in a multi-year effort by the Commission to review whether it is necessary to update and amend the Used Car Rule and the Rule’s Buyers Guide. It follows the Commission’s December 2012 NPRM and was issued with no prior public notice. It includes material changes from that NPRM that raise complicated issues under state and federal law, as well as a number of practical concerns which will require additional time to adequately investigate and formulate responsive comments. In order to provide the most accurate and informed comments, we need more time to meet with the affected parties and gather information. The SNPRM provides for only 60 days to respond which is inadequate, particularly given the timing near the Holiday season. While we recognize the need for clarity and prompt action with respect to these issues, we hope that these changes will be made only after reasonable time for public comment.

Accordingly, we respectfully request an additional 90 days to submit comments to the SNPRM, with a resulting deadline for comments of April 30, 2015.

Sincerely,

/s/

Bradley T. Miller

Associate Director, Legal and Regulatory Affairs