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March 16, 2015

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue, NW
Suite CC-5610 (Annex A)
Washington, D.C. 20580

Used Car Rule Regulatory Review, 16 C.F.R. part 455, Project No. P087604

Sent via <https://ftcpublishcommentworks.com/ftc/usedcarrulesnprm>

Dear Sir or Madam:

In response to the supplemental notice of proposed rulemaking (SNPRM), as published in the November 28, 2014, *Federal Register* (79 Fed. Reg. 70,804) and the extension of comment period to March 17, 2015, as published in the January 28, 2015, *Federal Register* (80 Fed. Reg. 4519), please accept these comments on behalf of the Texas Automobile Dealers Association (TADA), an association comprised of the franchised new motor vehicle dealers in Texas.

Vehicle History Report Proposal

The proposal adds a new subsection (g) to § 455.2:

(g) *Vehicle History Reports*. If you have obtained a vehicle history report regarding a used vehicle, mark the applicable box on the Buyers Guide adjacent to the statement, **IF THE DEALER CHECKED THIS BOX, THE DEALER HAS A VEHICLE HISTORY REPORT AND WILL PROVIDE A COPY TO YOU UPON REQUEST**. If you have obtained a vehicle history report, you must provide a copy of the report upon request to persons who request a copy. If you have not obtained a vehicle history report, leave the box blank.

The Appendix to Part 455–Illustrations, [See Figure 1 and Figure 2 (79 Fed. Reg. 70,818-70,819 (Nov. 28, 2014))]¹ adds the following with respect to a vehicle history report:

IF THE DEALER CHECKED THIS BOX, THE DEALER HAS A VEHICLE HISTORY REPORT AND WILL PROVIDE A COPY TO YOU UPON REQUEST. The Vehicle History Report may contain information from title records, salvage yards, and insurance companies. It may also include salvage, repair, accident, and prior ownership history.

Regardless of whether the box is checked, the FTC recommends that you obtain a Vehicle History Report. For information on how to obtain a vehicle history report, how to search for safety recalls, and other topics, visit the Federal Trade Commission at ftc.gov/usedcars. You will need the vehicle identification number (VIN) shown above to make the best use of the resources on this site.

A CARFAX Vehicle History Report and a NMVTIS Multi-State Vehicle History Report are oftentimes multiple pages as well as a state report. Recently reviewed vehicle history reports are 8 and 9 pages, respectively (*See attached*).

The cost to re-produce a vehicle history report (VHR) to a potential or a contracted buyer, should not be required to be borne by the seller of the motor vehicle. The labor to reproduce and redact a VHR, the paper, and the ink to reproduce such reports is significant. For example, one vehicle may be test driven or asked about many times and if a seller must re-produce a VHR for each potential buyer, the expense may cause a seller not to obtain a report.

Although perhaps an unlikely occurrence, a consumer under today’s proposal could request a VHR on every used vehicle on a seller’s lot in which the seller has a vehicle history report. To reproduce a VHR for each vehicle that a consumer or consumers may have an interest in purchasing and make a request regarding is not minimal.

TADA agrees that informing a potential purchaser that a VHR may be available on a used motor vehicle may be useful for that potential purchaser; however, obtaining a vehicle history report is a responsibility of the potential buyer. TADA recommends the following in lieu of the proposal:

(g) *Vehicle History Reports*. A vehicle history report may be available on this vehicle. A disclosure regarding a vehicle history report is included on the Buyers Guide.

In place of the proposed language and box on the front of the Buyers Guide form, TADA

¹Figures 4 and 5 include the Spanish disclosure (79 Fed. Reg. 70,821 - 70,822 (Nov. 28, 2014)).

recommends the following statement:

A vehicle history report may be available on this vehicle. A vehicle history report may contain information from title records, salvage yards, and insurance companies.

If you obtain a vehicle history report, please review it carefully and read all disclosures as to its reliability and accuracy. A vehicle history report is not a warranty or a representation from the seller as it is prepared by a third party. A vehicle history report may change from time-to-time as new information is added or incorrect information is deleted.

For information on how to obtain a vehicle history report, how to search for safety recalls, and other topics, visit the Federal Trade Commission at ftc.gov/usedcars. You will need the vehicle identification number (VIN) shown above to make the best use of the resources on this site.

The TADA suggested statement to include on a Buyers Guide tracks much of the FTC's language without the requirement to provide a copy of a VHR. It also reminds an individual to review the disclosures as well as stating that it is not a warranty or a representation from the seller. It also informs the consumer that information on the VHR may change from time-to-time—a fact that may not be known to a consumer but which is a continuous problem for sellers.

Concerns regarding a seller providing a vehicle history report include not only the cost and reliability factor of a VHR but the very real worry that personal confidential information may be unwittingly or unintentionally given to a potential purchaser. Although perhaps not an issue for the NMVTIS report, it is an issue with respect to a CARFAX or a state report, which then requires the timely responsibility of reviewing and redacting information before providing a copy—an additional expense and potential exposure for the seller as anyone who has the responsibility for redacting can attest. Please see the attached CARFAX and NMVTIS examples showing the length of a report as well as the potential amount of redacting.

As the FTC is aware, a VHR may not be accurate and may also evolve when new information is incorporated. Giving a vehicle history report credence by requiring a dealer to provide a copy may cause a consumer to rely too much on information that may not be accurate or complete—even with the product disclaimers.

Another area of concern is whether a VHR must be available in Spanish since the Buyers Guide must be available in Spanish if a sale is conducted in Spanish (16 C.F.R. § 455.5(a)).

If a consumer wants a vehicle history report, CARFAX advertises its availability to the public and a consumer can discern which vehicle or vehicles they are most interested in purchasing and obtain their own CARFAX report without adding another expense and responsibility on to the seller. In addition, NMVTIS is becoming more well-known by the buying community and a consumer may

readily obtain this report. Whether to obtain a vehicle history report and which vehicle history report to obtain is a decision best left to the purchaser.

Optional Disclosure Line

TADA requests the FTC to provide guidance on the Spanish language translation for the disclosure regarding the optional signature line (16 C.F.R. § 455.2(f)) which is allowed to be included in the space provided for the name of the individual to be contacted in the event of complaints after the sale. The optional signature line is allowed with the required English disclosure: "I hereby acknowledge receipt of the Buyers Guide at the closing of this sale." Providing a Spanish translation for this disclosure is appreciated.

Effective Date

If the FTC determines that changes to the Buyers Guide are necessary, TADA requests that ample time be given for a seller to use its current inventory of forms as well as sufficient time to obtain the new form.

In summary, TADA requests that a motor vehicle seller not be required to provide a vehicle history report. Giving the potential purchaser information as to the availability of a vehicle history report allows a consumer to make the decision about whether to obtain a report, which vehicle history report to obtain, and on which vehicles without the additional cost and potential exposure to a seller.

If the FTC has any question or if I can provide any additional information, please do not hesitate to contact me at 512-476-2686.

Sincerely,



Karen Phillips
General Counsel/EVP

Attachments: 1. CARFAX Vehicle History Report
2. NMVTIS Multi-State Vehicle History Report

ATTACHMENTS:

- 1. CARFAX Vehicle History Report**
- 2. NMVTIS Multi-State Vehicle History Report**

This CARFAX Vehicle History Report provided free of charge by:



SHOW ME THE CARFAX

CARFAX Vehicle History Report™

An independent company established in 1986

Vehicle Information:

[REDACTED]

REAR WHEEL DRIVE

Standard Equipment | Safety Options

CARFAX Report Provided By:

[REDACTED]

- Total loss vehicle
- 3 Previous owners
- 21 Service records available
- Personal vehicle
- 125,175 Last reported odometer reading
- \$1,040 Above retail book value

CAR FOX

This CARFAX Vehicle History Report is based only on information supplied to CARFAX and available as [REDACTED]. Other information about this vehicle, including problems, may not have been reported to CARFAX. Use this report as one important tool, along with a vehicle inspection and test drive, to make a better decision about your next used car.

Price Calculator™

Adjust the value [REDACTED] based on the information available in this report

<p>1) Retail Book Value</p> <div style="border: 1px solid black; padding: 5px; display: flex; align-items: center;"> \$ <input style="width: 80%; text-align: center;" type="text" value="0"/> </div> <p style="font-size: 10px;">Enter retail book value here</p>	<p>2) CARFAX Price Adjustment™</p> <div style="font-size: 24px; margin: 10px 0;">+</div> <p style="font-size: 24px; margin: 0;">+ \$1,040</p> <p style="font-size: 10px;">Above retail book value</p>	<p>3) Adjusted Retail Value</p> <p style="font-size: 12px; margin-top: 20px;">Begin by entering the retail book value</p>
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Start by entering the retail book value from a pricing guide website.

This vehicle is worth more than average, based on information in this report.

Compare adjusted retail value to seller's asking price when making your decision.

CARFAX Ownership History <small>The number of owners is estimated</small>	Owner 1	Owner 2	Owner 3
Year purchased	2007	2009	2011
Type of owner	Personal	Personal	Personal



Estimated length of ownership	1 yr. 10 mo.	2 yrs. 1 mo.	3 yrs. 2 mo.
Owned in the following states/provinces	Texas	Texas	Texas
Estimated miles driven per year	15,872/yr	12,731/yr	20,804/yr
Last reported odometer reading	31,839	59,905	125,175

CARFAX Title History	Owner 1	Owner 2	Owner 3
CARFAX guarantees the information in this section			
Salvage Junk Rebuilt Fire Flood Hail Lemon	No Problem	No Problem	No Problem
Not Actual Mileage Exceeds Mechanical Limits	No Problem	No Problem	No Problem

CARFAX Additional History	Owner 1	Owner 2	Owner 3
Not all accidents / issues are reported to CARFAX			
Total Loss Total loss reported on 11/24/2008.	Total Loss Reported	No New Issues Reported	No New Issues Reported
Structural Damage No structural damage reported to CARFAX.	No Issues Reported	No Issues Reported	No Issues Reported
Airbag Deployment No airbag deployment reported to CARFAX.	No Issues Reported	No Issues Reported	No Issues Reported
Odometer Check No indication of an odometer rollback.	No Issues Indicated	No Issues Indicated	No Issues Indicated
Accident / Damage Accident reported on 07/09/2011.	No Issues Reported	No Issues Reported	Accident Reported
Manufacturer Recall A current list of recalls is available	No Recalls Reported	No Recalls Reported	No Recalls Reported
Basic Warranty Original warranty estimated to have expired.	Warranty Expired	Warranty Expired	Warranty Expired

Tell us what you know about this vehicle

CARFAX Detailed History	Glossary			
Owner 1 Purchased: [Redacted] Type: Personal Where: [Redacted] Est. miles/year: 15,872/yr Est. length owned: 3/27/07 - 2/8/09 (1 yr. 10 mo.)	Date:	Mileage:	Source:	Comments:
	02/01/2007		NICB	Vehicle manufactured and shipped to original dealer
	02/14/2007	6	[Redacted]	Pre-delivery inspection completed Safety inspection completed
	03/02/2007	65	[Redacted]	Vehicle sold
	03/27/2007		Motor Vehicle Dept.	Title issued or updated First owner reported

		[REDACTED]	Titled or registered as personal vehicle Loan or lien reported
05/08/2007		[REDACTED] Motor Vehicle Dept.	Title issued or updated Correction to record Loan or lien reported
05/10/2007	4,926	[REDACTED]	Maintenance inspection completed Tire condition and pressure checked Battery/charging system checked Brakes checked Washed/detailed
09/10/2007	9,44	[REDACTED]	Maintenance inspection completed Recommended maintenance performed Battery/charging system checked Brakes checked Tire(s) balanced Key(s)/remote(s) reprogrammed Tire condition and pressure checked Electrical system checked Washed/detailed
12/13/2007	14,340	[REDACTED]	Maintenance inspection completed Tire condition and pressure checked Fuel filter replaced Air filter replaced Oil and filter changed Brakes checked Battery/charging system checked Body lubricated Washed/detailed
04/07/2008	19,19	[REDACTED]	Maintenance inspection completed Interior trim checked Tires rotated and balanced Oil and filter changed Four wheel alignment performed Drivability/performance checked Battery/charging system checked Tire condition and pressure checked Brakes checked Washed/detailed
05/14/2008	21,212	[REDACTED]	Maintenance inspection completed Interior trim checked Fuel injection system flushed/serviced Emission system checked Washed/detailed Throttle body cleaned/serviced Engine checked
06/18/2008	22,32	[REDACTED]	Maintenance inspection completed Washed/detailed Interior trim checked Electrical system checked
07/25/2008	24,351	[REDACTED]	Maintenance inspection completed Battery/charging system checked Tire condition and pressure checked Brakes checked Oil and filter changed Washed/detailed Drivability/performance checked
11/04/2008	30,346	[REDACTED]	Maintenance inspection completed Air filter replaced Drivability/performance checked Brakes checked Battery/charging system checked

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Vertical text on the right margin, likely a document ID or tracking number.



		Power steering fluid flushed/changed Tire condition and pressure checked Brake fluid flushed/changed Throttle body cleaned/serviced Fuel filter replaced Washed/detailed Oil and filter changed Body lubricated Steering/suspension checked
11/24/2008	31,283	Damage Report TOTAL LOSS VEHICLE Vehicle declared a total loss by an insurance company Collision damage reported CARFAX began reporting this information on 01/07/2013.
 <div style="border: 1px solid black; padding: 5px; display: inline-block;"> There are many reasons an insurance company will declare a vehicle a total loss. Have this vehicle inspected by a qualified technician before you buy. Learn more </div>		
11/25/2009		Motor Vehicle Dept. Registration updated when owner moved the vehicle to a new location
02/08/2009		Online Listing Vehicle offered for sale
02/23/2009	31,483	Motor Vehicle Dept. Title issued or updated Dealer took title of this vehicle while it was in inventory
02/24/2009	31,839	Vehicle sold

Owner 2		Date:	Mileage:	Source:	Comments:
Purchased: 2009 Type: Personal Where: [Redacted] Est. miles/year: [Redacted] Est. length owned: 3/26/09 - 5/20/11 (2 yrs. 1 mo.)		03/26/2009	[Redacted]	[Redacted] Dept.	Title issued or updated New owner reported Loan or lien reported
		04/10/2009	32,143	[Redacted]	Rear spring(s) replaced Rear shock absorber(s) replaced Paint sealant applied/reapplied Door weatherstrip replaced Front seat track replaced
		08/31/2009	38,693	[Redacted]	Maintenance inspection completed Transmission checked Transmission replaced Rear spring(s) replaced Air suspension checked Light bulb(s) replaced
		03/01/2010	[Redacted]	Motor Vehicle Dept.	Registration issued or renewed Loan or lien reported Passed safety inspection
		03/04/2010	42,893	[Redacted]	

05/20/2010	47,236	[REDACTED]	Maintenance inspection completed Engine/powertrain computer/module checked Intake manifold gasket(s) replaced
07/23/2010	49,726	[REDACTED]	Maintenance inspection completed Transmission checked Coolant temperature sensor replaced
10/05/2010	49,729	[REDACTED]	Maintenance inspection completed Battery/charging system checked Brakes checked Oil and filter changed Tire condition and pressure checked
03/11/2011		Motor Vehicle Dept [REDACTED]	Registration issued or renewed Loan or lien reported Passed safety inspection
05/20/2011	59,000	Dealer Inventory	Vehicle offered for sale
06/14/2011	59,887	Online Listing	Vehicle offered for sale
06/16/2011	59,905	[REDACTED]	Vehicle sold

Owner 3
 Purchased: 2011
 Type: [REDACTED]
 Where: [REDACTED]
 Est. miles/year: 20,804/yr
 Est. length owned: 6/27/11 - present
 (3 yrs 2 mo)

Date:	Mileage:	Source:	Comments:
06/27/2011	[REDACTED]	Motor Vehicle Dept	Title issued or updated New owner reported Loan or lien reported Vehicle color noted as White
07/09/2011	[REDACTED]	Damage Report	Accident reported with another motor vehicle Vehicle functional Click here to get this accident report
03/12/2012	77,467	[REDACTED]	Maintenance inspection completed Battery/charging system checked Oil and filter changed Tire condition and pressure checked
03/12/2012		Motor Vehicle Dept [REDACTED]	Registration issued or renewed Loan or lien reported Passed safety inspection Vehicle color noted as White
05/29/2012	80,34	[REDACTED]	Maintenance inspection completed Front window regulator(s) replaced Front door trim panel replaced/repared Battery/charging system checked Brakes checked Oil and filter changed Tires rotated and balanced Tire condition and pressure checked
11/03/2012	88,940		



		[REDACTED]	Maintenance inspection completed Battery/charging system checked Brakes checked Oil and filter changed Tire repaired Tire condition and pressure checked
03/04/2013		[REDACTED] Motor Vehicle Dept. [REDACTED]	Registration issued or renewed Loan or lien reported Passed safety inspection Vehicle color noted as White
07/12/2013	104,226	[REDACTED]	Maintenance inspection completed Battery/charging system checked Oil and filter changed Tire condition and pressure checked
03/01/2014		[REDACTED] Motor Vehicle Dept. [REDACTED]	Registration issued or renewed Loan or lien reported Passed safety inspection Vehicle color noted as White
			 <div style="border: 1px solid black; padding: 5px; display: inline-block;"> <p>Avoid financial headaches. Make sure the loan has been paid off if you're buying from a private seller.</p> </div>
03/08/2014	115,177	[REDACTED]	Maintenance inspection completed Battery/charging system checked Oil and filter changed Tire condition and pressure checked
06/27/2014	125,175	[REDACTED]	Maintenance inspection completed Battery/charging system checked Oil and filter changed Tire condition and pressure checked Washed/detailed

Tell us what you know about this vehicle

Have Questions? Consumers, please visit our Help Center at www.carfax.com. Dealers or Subscribers, please visit our Help Center at www.carfaxonline.com.



Glossary

[View Full Glossary](#)

Accident / Damage Indicator

CARFAX receives information about accidents in all 50 states, the District of Columbia and Canada. Different information in a vehicle's history can indicate an accident or damage, such as: salvage auction, fire damage, police-reported accident, crash test vehicle, damage disclosure, collision repair facility and automotive recycler records. Not every accident or damage event is reported and not all reported are provided to CARFAX. Details about the accident or damage event when reported to CARFAX (e.g. severity, impact location, airbag deployment) are included on the Vehicle History Report. CARFAX recommends you obtain a vehicle inspection from your dealer or an independent mechanic.

- According to the National Safety Council, Injury Facts, 2007 edition, 7% of the 245 million registered vehicles in the U.S. were involved in an accident in 2005. Over 75% of these were considered minor or moderate.
- CARFAX depends on many sources for its accident / damage data. CARFAX can only report what is in our database on 9/19/14 at 4:11:30 PM (EDT). New data will result in a change to this report.

Florida Damage Reports:

- Provide an estimate of the extent of damage in its accident reports for the following:



- **SEVERE/TOTALED:** The vehicle cannot be driven from the accident scene due to severe damage or an injury. This level of damage often results in a Salvage or Junk title.
- **D ISABLED:** The vehicle had to be towed or hauled away from the accident location.
- **FUNCTIONAL:** The vehicle could be driven from the accident location.
- **MODERATE:** The accident damage affects the operation of the vehicle and/or its parts. Examples include broken windows, trunk lids, doors, bumpers and tires.
- **MINOR:** The accident damage does not affect the operation of the vehicle. Examples include dented bumpers, fenders, grills and body panels. This level of accident should not compromise vehicle safety.
- **NO DAMAGE:** The vehicle was not damaged.

- Are required if the estimated damage exceeds \$500

CARFAX Price Adjustment™

Accidents, service records, number of owners and many other history factors can affect a vehicle's value. The CARFAX Price Adjustment is a tool that analyzes millions of used car transactions to measure how the combination of all the information reported to CARFAX affects the value of a particular vehicle. The vehicle's retail book value plus the CARFAX Price Adjustment will give you a more accurate measure of the vehicle's value. Use this tool, along with a vehicle inspection and test drive, to make a better decision about your next used car.

First Owner

When the first owner(s) obtains a title from a Department of Motor Vehicles as proof of ownership.

Ford or Lincoln Mercury Recall

The Ford Motor Company provides Carfax with recall information regarding safety, compliance and emissions programs announced since 2000 for a specific vehicle. For complete information regarding programs or concerns about this vehicle, please contact a local Ford or Lincoln Mercury Dealer.

New Owner Reported

When a vehicle is sold to a new owner, the Title must be transferred to the new owner(s) at a Department of Motor Vehicles.

Ownership History

CARFAX defines an owner as an individual or business that possesses and uses a vehicle. Not all title transactions represent changes in ownership. To provide estimated number of owners, CARFAX proprietary technology analyzes all the events in a vehicle history. Estimated ownership is available for vehicles manufactured after 1991 and titled solely in the US including Puerto Rico. Dealers sometimes opt to take ownership of a vehicle and are required to in the following states: Maine, Massachusetts, New Jersey, Ohio, Oklahoma, Pennsylvania and South Dakota. Please consider this as you review a vehicle's estimated ownership history.

Title Issued

A state issues a title to provide a vehicle owner with proof of ownership. Each title has a unique number. Each title or registration record on a CARFAX report does not necessarily indicate a change in ownership. In Canada, a registration and bill of sale are used as proof of ownership.

Total Loss Vehicle

An insurance or fleet company declares a vehicle a total loss when a claim exceeds approximately 75% of its pre-damage value or if the vehicle is stolen and not recovered. This damage threshold varies by company. These companies typically take possession and obtain the title. Not all total loss vehicles result in a DMV-reported branded title. This may occur when an insurance company's definition of a total loss is different than the state DMV's definition for a branded title or when the owner of the vehicle is a self-insured company, like a fleet or rental company.

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Covered by United States Patent Nos. 7,113,853; 7,778,841; 7,596,512; 8,600,823; 8,595,079; 8,606,648; 7,505,838.
9/19/14 4:11:30 PM (EDT)

I have reviewed and received a copy of the CARFAX Vehicle History Report for [REDACTED]
[REDACTED] which is based on information supplied to CARFAX and
available at [REDACTED]

Customer Signature	Date	Dealer Signature	Date
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[REDACTED]

[REDACTED]

CARFAX CARFAX Warranty Check™

Print Report

CARFAX has estimated the remaining original manufacturer warranty coverage based on information reported to us on [REDACTED]

VIN: [REDACTED]

Estimated start date of warranty: [REDACTED]

03/02/2007

Last CARFAX reading reported on 06/27/2014:

125,175 miles

Today's Date: [REDACTED]

Enter the current mileage and click 'Recalculate Warranty' to update the remaining warranty coverage.

Enter current mileage:

Type of Coverage:	Original Warranty:	Estimated Remaining Coverage:
Basic	48 months or 50,000 miles	Coverage expired
Drivetrain	72 months or 70,000 miles	Coverage expired
Emissions	96 months or 80,000 miles	Coverage expired
Corrosion	60 months or unlimited mileage	Coverage expired
Transferable	No cost, unlimited owners covered	Same
Roadside Assistance	No data reported to CARFAX	
Safety belt & inflatable restraint	No data reported to CARFAX	
Specific Components	96 months or 80,000 miles	Coverage expired

Notes:

Emissions: Manufacturer covers emissions components under basic warranty. Emissions coverage may vary by state. Refer to owners manual for specific details.
 Transferable: No cost, unlimited owners covered. Roadside Assistance: Administered by Ford Roadside Assistance. Specific Components: Tire defect coverage prorated during new vehicle warranty period. Maintenance: Alignment and wheel balance covered 1/12,000. Two free manufacturer regular scheduled maintenance. Notes: Free scheduled maintenance 2010-2011 vehicles purchased or leased between 6-7-2010 and 9-6-2010 for 3/45,000. 2010-2011 model year 4/50,000 free scheduled maintenance purchased or leased on or after 9-7-2010.

► CARFAX Warranty Check provides an estimate of this vehicle's remaining warranty coverage. It does not take into account some vehicle history events such as some title brands that may void the original manufacturer warranty or ownership transfers that may decrease warranty coverage. This warranty information is only valid for vehicles manufactured for the United States. Complete warranty coverage information is available for this vehicle at the LINCOLN web site.



NMVTIS MULTI-STATE VEHICLE HISTORY REPORT

WA
YEA
This data was originally accessed on [REDACTED] at the time it was current with the National Motor Vehicle Title Information System (NMVTIS)



A "Brand" defines the status of a vehicle, such as Theft, Flood, Salvage or Rebuilt. A brand is carried with the title as the vehicle travels from state to state. There are over 250 brands recognized by NMVTIS that can be categorized by type.

BRAND CATEGORY	NMVTIS SEARCH RESULT
Total Loss	No Brand Reported
Salvage	No Brand Reported
Disclosed Damage	No Brand Reported
Bond	No Brand Reported
Flood	No Brand Reported
CARS/Cash for Clunkers	No Brand Reported
Gray Market	No Brand Reported
Junk	No Brand Reported
Manufacturer Brand	No Brand Reported
New/Re-Issued VIN	No Brand Reported
Odometer	No Brand Reported
Rebuilt/Repaired/Reconstructed	No Brand Reported
Dismantled	No Brand Reported
Rental/Taxi/Police	No Brand Reported



Agricultural/Logging Vehicle

 No Brand Reported

Title Copy

 No Brand Reported

Antique/Classic

 No Brand Reported

Undisclosed Lien

 No Brand Reported





Current Title Information

State	VIN	Issue Date	Odometer
[REDACTED]	[REDACTED]	06/27/2011	000059905 Miles

Historical Title Information

State	VIN	Issue Date	Odometer
No historical title records for this vehicle.			



If you need more information, please contact the State of Texas by

1. Complete and sign the form
2. Certify by initialing their intended use of the information on the back of the form
3. Submit the form by mail along with a copy of the consumer's photo identification and the appropriate fee (\$5.75 title history or \$6.75 for a certified title history).

If the requested information will be used in legal purposes, we recommend that a certified title history be ordered. To ensure the most current request form is used, please use the appropriate form from the site http://www.dot.state.tx.us/drivers_vehicles/consumer_protection/personal.htm.



Reporting Occurrence	Reporting Entity Information	Date Obtained	Vehicle Intended for Export?	Vehicle Disposition
No Junk/Salvage Reportings Found				



Reporting Occurrence	Reporting Entity Information	Date of Total Loss Declaration or Date Total Loss Claim Paid
No Total Loss Reportings Found		




There are no liens reported for this vehicle.

Lien data does not include information on all motor vehicles in the United States because not all lien holders provide lien information to ADD's data provider.



Standard Data			
Body Type	4D Utility	Manufactured	United States
Drive Line	Rear Wheel	Engine Type	5.4L V8 EFI SOHC 3V
Fuel Type	Gas	Make	Lincoln
Model	Navigator L	Corporation	Ford
Model Year	2007	Production Seq. No.	J13631
Vehicle Class	4D Utility		
Dimensions			
Turning dia (curb - curb) (ft)	43.9	Head Room - Rear (in)	38.0
Towing Capacity (lbs)	8,850	Payload Capacity (lbs)	1,650
Base Curb Weight (lbs)	5,963	GVWR (lbs)	7,700
Head Room - Front (in)	39.5	Track - Rear (in)	67.0
Track - Front (in)	66.9	Ground Clearance (in)	9.1
Height (in)	78.1	Head Room - Middle (in)	39.7
Leg Room - Rear (in)	37.7	Est Fuel Economy (city miles)	14
Seating Capacity	7	Fuel Capacity (gal)	33.5
Leg Room - Front (in)	41.2	Wheelbase (in)	131.0
Est Fuel Economy (hwy miles)	20	Leg Room - Middle (in)	39.1
Length (in)	223.3	Width (in)	78.8
Drivetrain - Axle			
Ratio	3.73		
Drivetrain - Engine			
Cylinder Configuration	V	Fuel Delivery	SMPI
Displacement	5.4	Cylinders	8

Torque @ RPM	365 @ 3750	Throttle	Electronically controlled
Horsepower @ RPM	300 @ 5000	Valves	24
Oil Capacity (qts)	7.0	Cam Configuration	SOHC
Drivetrain - Transmission			
# of Gears	6	Overdrive	Included
Manual/Automatic	A		
Interior			
Seats - 3rd Row	Fold flat; 60/40 split-folding	Floor Mats	Color-keyed
Storage	Bin(s); Under floor; Glovebox; Rear	Defoggers	Rear
Accents	Color-keyed	Audio - Brand	Audiophile
Clock	Analog	Air Conditioning	Control(s), auxiliary; CFC-Free; Electronic Automatic Temperature Control (EATC)
Seats - 2nd Row	Buckets, low-back; Fold flat	Garage Door Opener	Universal
Power Locks	Door	Visors	Mirror, illuminated
Lighter	Included	Power Outlet(s)	12-volt, 3
Audio - CD/MP3	MP3, 6-disc CD changer, dash	Audio	Controls, rear; Volume, speed sensing
Consoles	1st row; Floor; 2nd row; Overhead	Ash Tray	Front; Rear
Seats - Front	Lumbar support, power; 10-way adjuster, power; Buckets, low-back	Steering Wheel	Controls, audio; Controls, climate; Controls, cruise; Leather w/wood; Memory-activated
Windows	Power; Power, rear quarter	Audio - Speakers	9; Subwoofer(s)
Carpet	Color-keyed	Upholstery	Vinyl, 3rd row; Leather
Instrument Panels	Driver Information Center; Speedometer; Tachometer; Trip	Audio - Radio	AM/FM

	odometer(s); Odometer		
Theft Deterrent Systems	SecuriLock	Steering Column	Tilt
Safety			
Child Safety Features	Locks, rear doors	Airbag - Front Passenger	Dual-stage, 2nd Generation
Airbag - Fr Head Curtain	Included	Monitors	Tire pressure
Head Restraints	Adjustable	Child Seat Anchors	2nd row; LATCH; 3rd row; Center
Remote Keyless Entry	Illuminated	Side-Impact Protection	Door Beams
Airbag - Rr Head Curtain	Included	Airbag - Driver	Dual-stage, 2nd Generation
Parking Features	Reverse Sensing System	3-Pt Seat Belts - All Pos	Included
Traction Control	Roll Stability Control (RSC); Advance Trac		
Suspension			
Stabilizer Bar	Front & rear	Type	4-wheel independent, Coil over shock
Warranty			
Basic	4-year/50,000-mile, Limited	Powertrain	6-year/70,000-mile

NOTE: Detailed Vehicle Information is obtained by decoding the Vehicle Identification Number (VIN). The equipment currently installed in the vehicle may differ from the equipment listed in the report (i.e. the possibility exists that the vehicle may have been modified or rebuilt)

NMVTIS CONSUMER ACCESS PRODUCT DISCLAIMER

NMVTIS Consumer Access Product Disclaimer



The National Motor Vehicle Title Information System (NMVTIS) is an electronic system that contains information on certain automobiles titled in the United States. NMVTIS is intended to serve as a reliable source of title and brand history for automobiles, but it does not contain detailed information regarding a vehicle's repair history.

All states, insurance companies, and junk and salvage yards are required by federal law to regularly report information to NMVTIS. However, NMVTIS does not contain information on all motor vehicles in the United States because some states are not yet providing their vehicle data to the system. Currently, the data provided to NMVTIS by states is provided in a variety of time frames, while some states report and update NMVTIS data in "real-time" (as title transactions occur), other states send updates less frequently, such as once every 24 hours or within a period of days.

Information on previous, significant vehicle damage may not be included in the system if the vehicle was never determined by an insurance company (or other appropriate entity) to be a "total loss" or branded by a state titling agency. Conversely, an insurance carrier may be required to report a "total loss" even if the vehicle's titling-state has not determined the vehicle

to be "salvage" or "junk."

A vehicle history report is NOT a substitute for an independent vehicle inspection. Before making a decision to purchase a vehicle, consumers are strongly encouraged to also obtain an independent vehicle inspection to ensure the vehicle does not have hidden damage. The Approved NMVTIS Data Providers (look for the NMVTIS logo) can include vehicle condition data from sources other than NMVTIS.

NMVTIS data INCLUDES (as available by those entities required to report to the System).

- o Information from participating state motor vehicle titling agencies.
- o Information on automobiles, buses, trucks, motorcycles, recreational vehicles, motor homes, and tractors. NMVTIS may not currently include commercial vehicles if those vehicles are not included in a state's primary database for title records (in some states, those vehicles are managed by a separate state agency), although these records may be added at a later time.
- o Information on "brands" applied to vehicles provided by participating state motor vehicle titling agencies. Brand types and definitions vary by state, but may provide useful information about the condition or prior use of the vehicle.
- o Most recent odometer reading in the state's title record.
- o Information from insurance companies, and auto recyclers, including junk and salvage yards, that is required by law to be reported to the system, beginning March 31, 2009. This information will include if the vehicle was determined to be a "total loss" by an insurance carrier.
- o Information from junk and salvage yards receiving a "cash for clunker" vehicle traded-in under the Consumer Assistance to Recycle and Save Act of 2009 (CARS) Program.

Consumers are advised to visit <http://www.vehiclehistory.gov/> for details on how to interpret the information in the system and understand the meaning of various labels applied to vehicles by the participating state motor vehicle titling agencies.

ADD Consumer Access Disclaimer

Auto Data Direct, Inc. is a "read-only portal" of data stored in the NMVTIS databases. Data is passed directly from AAMVA to the client through the ADD interface, which has been tested and approved by AAMVA. ADD does not enter the information found on a NMVTIS record, nor is it responsible for the accuracy or verification of the information found therein. The motor vehicle records accessed by ADD clients are recorded by participating states and are current with those entities at the time of access through the ADD portal.

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