

Regulatory Analysis Form

This space for use by IRRC

(1) Agency
Department of State, Bureau of Professional and Occupational Affairs, State Board of Vehicle Manufacturers, Dealers and Salespersons

(2) I.D. Number (Governor's Office Use)

16A-607

IRRC Number: 2317

(3) Short Title
Consignment Sales

(4) PA Code Cite
49 Pa. Code § 19.18a

(5) Agency Contacts & Telephone Numbers
Primary Contact: Teresa Lazo-Miller, Counsel
State Board of Vehicle Manufacturers, Dealers and Salespersons (717)783-7200
Secondary Contact: Joyce McKeever, Deputy Chief Counsel (717)783-7200

(6) Type of Rulemaking (check one)
 Proposed Rulemaking
 Final Order Adopting Regulation
 Final, Proposed Omitted

(7) Is a 120-Day Emergency Certification Attached?
 No
Yes: By the Attorney General
Yes: By the Governor

(8) Briefly explain the regulation in clear and nontechnical language.

The regulation would set forth consumer-protection oriented requirements for licensed dealers who engage in consignment sales without holding a vehicle auction license.

(9) State the statutory authority for the regulation and any relevant state or federal court decisions.

The proposed regulatory amendments are adopted under Section 4(9) of the Board of Vehicles Act (Act), Act of December 22, 1983 (P.L. 306, No. 84) as amended, 63 P.S. § 818. 4(a)(9).

Regulatory Analysis Form

(10) Is the regulation mandated by any federal or state law or court order, or federal regulation? If yes, cite the specific law, case or regulation, and any deadlines for action.

The Act of April 19, 1996, P.L. 104, No. 27 (Act 27) amended the definition of broker in the Board of Vehicles Act and added subsection 5(f)(3) to permit a licensed vehicle dealer to sell vehicles on consignment without possessing a wholesale vehicle auction or public or retail vehicle auction license. See 63 P.S. §§818.2 and 818.5(f)(3).

The proposed regulation effectuates these statutory changes by setting forth the requirements that a licensed vehicle dealer must meet when making consignment sales.

(11) Explain the compelling public interest that justifies the regulation. What is the problem it addresses?

The proposed regulatory amendment protects persons selling and buying previously owned vehicles by requiring a written consignment agreement between the seller and the dealer be maintained by the dealer at the location where the vehicle is displayed. The consignment agreement must contain information of which a potential buyer should be aware, including the identification of the vehicle, terms of the consignment agreement, insurance coverage information, warranty information, identification of lien holders and facts relevant to the vehicle's condition. In addition, the proposed amendment sets forth requirements regarding possession of the title to the vehicle.

Finally, the proposed amendment requires that the dealer disclose to potential buyers that the vehicle is held on consignment. Dealers are required to disclose material information about a vehicle's condition to potential buyers. The proposed amendment would provide a means to assure that dealers are aware of such material information.

(12) State the public health, safety, environmental or general welfare risks associated with nonregulation.

Nonregulation could create a risk that sellers and dealers do not enter into written consignment sales agreements setting forth important terms such as the terms of the sale and insurance coverage, which, in turn, could harm sellers who are generally less sophisticated than licensed dealers regarding such agreements. In addition, nonregulation could create a risk that buyers are not adequately informed about the condition of the vehicle.

(13) Describe who will benefit from the regulation. (Quantify the benefits as completely as possible and approximate the number of people who will benefit.)

Consumers will benefit from the regulation. By assuring that licensed vehicle dealers selling vehicles on consignment enter into written consignment agreements with sellers, sellers are protected. By requiring sellers to disclose material information regarding the vehicle's condition to the dealer, buyers are protected because the dealer is under an obligation to disclose such information to the buyer.

Regulatory Analysis Form

(14) Describe who will be adversely affected by the regulation. (Quantify the adverse effects as completely as possible and approximate the number of people who will be adversely affected.)

The Board has identified no individuals or groups who will be adversely affected by the regulation.

(15) List the persons, groups or entities that will be required to comply with the regulation. (Approximate the number of people who will be required to comply.)

All vehicle dealers who sell vehicles on consignment will be required to comply with the regulation. In addition, all persons who wish to sell a vehicle through a licensed dealer will be required to disclose any material facts relative to the vehicle, to express any warranties extended, and to disclose the name, address and telephone number of the seller's insurance agent.

(16) Describe the communications with and input from the public in the development and drafting of the regulation. List the persons and/or groups who were involved, if applicable.

Pursuant to Executive Order 1996-1, the Board sent out a draft of the proposed amendment to dealer and industry groups for comment. Only the Pennsylvania Automotive Association commented on the proposed amendment, expressing that the amendment was consistent with discussions PAA had with various state agencies and the Board in 1994.

(17) Provide a specific estimate of the costs and/or savings to the regulated community associated with compliance, including any legal, accounting or consulting procedures which may be required.

The only cost associated with compliance would be the cost to prepare a written consignment agreement between the seller and the dealer.

Regulatory Analysis Form

(18) Provide a specific estimate of the costs and/or savings to local governments associated with compliance, including any legal, accounting or consulting procedures which may be required.

Local governments would not be affected by the regulation.

(19) Provide a specific estimate of the costs and/or savings to state government associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required.

The Board will not incur an increase in administrative costs by implementing the regulation.

Regulatory Analysis Form

(20) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

| | Current FY Year | FY +1 Year | FY +2 Year | FY +3 Year | FY +4 Year | FY +5 Year |
|------------------------|-----------------|------------|------------|------------|------------|------------|
| SAVINGS: | N/A | N/A | N/A | N/A | N/A | N/A |
| Regulated | | | | | | |
| Local Government | | | | | | |
| State Government | | | | | | |
| Total Savings | | | | | | |
| COSTS: | N/A | | | | | |
| Regulated Community | | minimal | minimal | minimal | minimal | minimal |
| Local Government | | N/A | N/A | N/A | N/A | N/A |
| State Government | | N/A | N/A | N/A | N/A | N/A |
| Total Costs | | | | | | |
| REVENUE LOSSES: | N/A | N/A | N/A | N/A | N/A | N/A |
| Regulated | | | | | | |
| Local Government | | | | | | |
| State Government | | | | | | |
| Total Revenue Losses | | | | | | |

(20a) Explain how the cost estimates listed above were derived.

The Board estimates that there will be a minimal cost incurred by dealers associated with the requirement that they enter into written consignment agreements with sellers of vehicles. Consignment sales between licensed dealers are already subject to consignment agreements that substantially meet many of the Board's requirements and the Board's proposed regulation will affect them minimally. Incidental sales may or may not be subject to consignment agreements, but there are fewer such sales.

Regulatory Analysis Form

(20b) Provide the past three year expenditure history for programs affected by the regulation.

| Program | FY -3 | FY -2 | FY -1 | Current FY |
|---------------------------|-----------------------------|-----------------------------|------------------------------------------|------------------------------------------|
| Board expenditures | 1997-1998 \$1,069,418.64 | 1998-1999 \$1,191,000.00 | 2000-2001 projected \$1,272,000.00 | 2001-2002 projected \$1,379,000.00 |
| | | | | |
| Board revenues | 1997-1998 \$444,252.98 | 1998-1999 \$1,978,228.43 | 2000-2001 \$621,293.28 | 2001-2002 \$1,530,923.54 |
| | | | | |

(21) Using the cost-benefit information provided above, explain how the benefits of the regulation outweigh the adverse effects and costs.

The consumer protection benefits of the regulation, while not quantifiable, outweigh the minimal cost to dealers who may need to revise the forms they use for consignment sales agreements.

(22) Describe the nonregulatory alternatives considered and the costs associated with those alternatives. Provide the reasons for their dismissal.

No nonregulatory alternatives were considered.

(23) Describe alternative regulatory schemes considered and the costs associated with those schemes. Provide the reasons for their dismissal.

No alternative regulatory schemes were considered.

Regulatory Analysis Form

(24) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulation.

No federal licensure standards apply.

(25) How does this regulation compare with those of other states? Will the regulation put Pennsylvania at a competitive disadvantage with other states?

The regulation is similar to the regulations in other states regarding consignment sales. The regulation will not put Pennsylvania at a competitive disadvantage compared with surrounding states. For example:

In Delaware, licensed vehicle dealers may engage in consignment sales if they have a contract that specifies the name and address of the owner of the vehicle dealer; name address and dealer identification number of the selling dealer; description of the vehicle on consignment; beginning and termination dates of the contract; net amount owner is to receive if vehicle is sold; and disclosure of unsatisfied liens on the vehicle. 21 Del. Code § 6306.

Licensed dealers in New York may engage in consignment sales. New York requires a letter of consignment and proof of ownership. N.Y. Comp. Codes R. & Regs. tit. 78, § 78.40(a). The letter of consignment must identify the vehicle by make, model and VIN number, indicate the terms of the sale, and authorize the dealer to sell the vehicle. N.Y. Comp. Codes R. & Regs. tit. 78, § 78.40(b). In addition, under the New York rules, the consignor must sign the title to the dealer when the dealer tenders the contract price to the owner. N.Y. Comp. Codes R. & Regs. tit.78, § 78.40(e).

In Ohio, a licensed vehicle dealer may engage in consignment sales, subject to regulations that require the dealer to post a bond and provide a written contract to the buyer prior to sale. Ohio Rev. Code Ann. § 4517.20, .26; Ohio Admin. Code Ann. § 4501:1-3-10.

In West Virginia, a licensed vehicle dealer may not display or offer for sale any vehicle not owned by the dealer. W. Va. Code State R. tit. 91, § 91-6-2(2.2.4(a)). A licensed auction may sell on consignment subject to rules similar to those proposed by this regulation, including posting a bond, providing for insurance coverage, and disclosing the consignment to potential purchasers. W.Va. Code State R. tit. 91, § 91-6-5.

(26) Will the regulation affect existing or proposed regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

This regulation will have no effect on other regulations of the Board or other state agencies.

(27) Will any public hearings or informational meetings be scheduled? Please provide the dates, times, and locations, if available.

The Board reviews regulatory proposals at regularly scheduled public meetings each month. Meeting dates for 2002 November 14 and December 12. The Board will determine its 2003 meeting dates at its November meeting.

Regulatory Analysis Form

(28) Will the regulation change existing reporting, record keeping, or other paperwork requirements? Describe the changes and attach copies of forms or reports which will be required as a result of implementation, if available.

No changes to reporting, recordkeeping or other paperwork are required by this regulation.

(29) Please list any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, elderly, small businesses, and farmers.

The Board has perceived no special needs of any subset of its applicants or licensees for whom special accommodations should be made.

(30) What is the anticipated effective date of the regulation; the date by which compliance with the regulation will be required; and the date by which any required permits, licenses or other approvals must be obtained?

The regulation will be effective upon publication in the Pennsylvania Bulletin.

(31) Provide the schedule for continual review of the regulation.

The Board continuously monitors the effectiveness of its regulations through its enforcement procedures.

FACE SHEET
FOR FILING DOCUMENTS
WITH THE LEGISLATIVE REFERENCE BUREAU

(Pursuant to Commonwealth Documents Law)

RECEIVED
LEGISLATIVE REFERENCE BUREAU
REVIEW COMMISSION

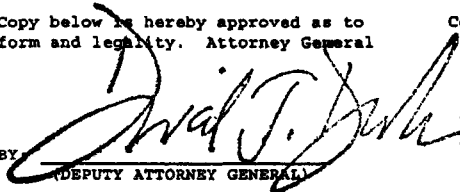
2317

DO NOT WRITE IN THIS SPACE

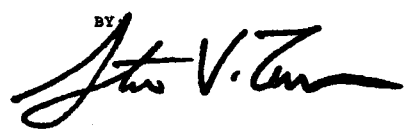
Copy below is hereby approved as to form and legality. Attorney General

Copy below is hereby certified to be a true and correct copy of a document issued, prescribed or promulgated by: Executive or Independent Agencies.

Copy below is approved as to form and legality.

BY: 
(DEPUTY ATTORNEY GENERAL)

State Board of Vehicle Manufacturers,
Dealers and Salespersons
(AGENCY)

BY: 

OCT 31 2002

DOCUMENT/FISCAL NOTE NO. 16A-609

10/10/02
DATE OF APPROVAL

DATE OF APPROVAL

DATE OF ADOPTION: _____

BY: 
Edward J. Cernic, Jr.

(Deputy General Counsel
~~Chief Counsel,~~
~~Independent Agency~~
~~(Strike inapplicable title)~~)

TITLE: Chairperson
(EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)

[] Check if applicable
Copy not approved.
Objections attached.

[] Check if applicable. No Attorney General approval or objection within 30 day after submission.

PROPOSED RULEMAKING

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE BOARD OF VEHICLE MANUFACTURERS,
DEALERS AND SALESPERSONS
49 Pa. Code, Chapter 19
Consignment Sales

The State Board of Vehicle Manufacturers, Dealers and Salespersons (Board) proposes to amend its regulations by adding a new section at 49 Pa. Code § 19.18a, titled Consignment Sales, as set forth in Annex A. The Board previously published as proposed rulemaking an amendment to the Board's regulations at §19.19 related to consignment sales. 31 Pa. B. 822 (February 10, 2001). After further consideration, the Board determined that its prior proposed rulemaking did not adequately address consumer concerns with consignment sales. Therefore, the Board determined that it should re-publish its rulemaking in proposed form, as set forth in Annex A.

The proposed regulation would establish requirements for licensed vehicle dealers who wish to sell vehicles on a consignment basis without holding a vehicle auction license, as authorized by section 5(f)(3) of the Board of Vehicles Act (Act), Act of December 22, 1983 (P.L. 306, No. 84), as amended, 63 P.S. § 818.5(f)(3).

Effective Date

The amendments will be effective upon final publication in the Pennsylvania Bulletin.

Statutory Authority

The amendments are authorized under section 4(a)(9) of the Act, 63 P.S. § 818.4(a)(9), which authorizes the Board to promulgate regulations necessary to the effective administration of the Act.

Background and Need for the Amendment

By the Act of April 19, 1996 (P.L. 104, No. 27)(Act 27), the General Assembly made substantial amendments to the Board of Vehicles Act. Among the changes, the General Assembly eliminated licensure for brokers and created a new class of licensure for public or retail auctions and wholesale auctions. In addition, the activities of brokering – selling at auction and selling on consignment – were divided between dealers and the new auction licensees. Specifically, section 5(f)(3) of the Act now provides that “[a] dealer licensed under this act without possessing a wholesale vehicle auction or public or retail vehicle auction license shall be permitted to sell vehicles on consignment.” 63 P.S. § 818.5(f)(3). The General Assembly did not specify any consumer protection provisions that would apply to the new classes of licensure.

Dealers did not previously sell vehicles on consignment. Thus, consumers may be unaware that vehicles on display at a dealer's lot are not owned by the dealer and do not have the same protections in title and warranty as vehicles owned by the dealer. The proposed rulemaking is necessary to address important consumer protection issues. The regulation will require an exchange

of information between dealers and consignors, which in turn will require an exchange of information between dealers and potential buyers, obviating title and warranty problems post purchase.

The Board proposed amendments to its regulations published at 31 Pa. B. 822 (February 10, 2001). The February 10, 2001, proposal provided that “[t]he dealer need not possess the title while displaying the vehicle, but shall provide the executed title by the time of delivery of the vehicle to the buyer.” (Proposed rulemaking at §19.19(a)(2)). The Board determined that this provision would not adequately protect the public because it did not ensure that the dealer could obtain clear title to the consigned vehicle. Therefore, the Board decided to amend this provision in a new proposed rulemaking to provide that the dealer must have either an unexecuted title if the title to the consigned vehicle is unencumbered or a title release from each lien holder if the title to the consigned vehicle is encumbered. In addition, the Board made several other changes to the prior proposed rulemaking. The Board followed the suggestions of the Independent Regulatory Review Commission (“IRRC”) related to the wording “vehicle auction.” The Board added the provision that the dealer has a separate consignment agreement for each vehicle on consignment. The Board added the requirement that the consignment agreement specify the length of the consignment period. The Board added the provision that the dealer maintain an executed power of attorney authorizing the dealer to sell the vehicle on behalf of the consignor. Finally, at IRRC’s suggestion, the Board deleted the provision requiring dealers to comply with applicable Federal and State law regarding consignment sales, as dealers are already required to abide by these laws.

Description of Proposed Amendments

The proposed amendment requires a dealer who engages in consignment sales to enter into and keep a copy of the written consignment agreement between the dealer and the consignor covering the consigned vehicles. The agreements must be kept at the location where the vehicle is displayed for sale. The consignment agreement must contain the name and signature of the consignor in order to be legally binding. The consignment agreement must contain information that identifies the vehicle, to avoid fraud. The consignment agreement must set forth the length of the consignment period, so it is clear at any time whether the dealer has the right to negotiate the sale of the vehicle. The consignment agreement must include the terms of sale, to protect the consignor from unauthorized actions by the dealer. The consignment agreement must contain the terms of insurance coverage to forestall any arguments between the dealer and consignor if the vehicle is damaged or destroyed while on the dealer’s lot. The consignment agreement must contain information regarding any lien holders, which the dealer is, in turn, already required to disclose to potential buyers. This will protect the lien holders and potential buyers by assuring payment of the lien and assisting buyers in obtaining clear title. The consignment agreement must include a copy of the current registration card or title in order to alleviate concerns about the ability to later obtain clear title. Finally, the

consignment agreement must include any warranties extended by the consignor and any material facts relative to the vehicle. This last provision helps protect the potential buyer by ensuring that the dealer will have the information necessary to properly represent the vehicle.

The proposed amendment also requires a dealer who engages in consignment sales to keep an executed power of attorney from the consignor to the dealer and either an unexecuted title, if the title is not encumbered, or a title release from each lien holder to pay off all liens, if the title is encumbered. These provisions are designed to ensure that the buyer will be able to obtain title to the vehicle. Section (c), the requirement that the dealer take title from the consignor prior to applying for title in the name of the buyer, also helps ensure that the buyer can obtain title to the vehicle. Finally, the requirement in subsection (d), that the dealer display consigned vehicles clearly marked as such, puts potential buyers on alert that the vehicle is not owned by the dealer and may have other than the usual warranties.

Compliance with Executive Order 1996-1

The Board sent this proposed amendment to dealer organizations as required under the directives of Executive Order 1996-1. In addition, the Board considered the impact the regulation would have on the regulated community and on public safety and welfare. The Board finds that the proposed amendment addresses a compelling public interest as described in this Preamble and otherwise complies with Executive Order 1996-1.

Fiscal Impact and Paperwork Requirements

The amendments will have no adverse fiscal impact on the Commonwealth or its political subdivisions. The amendments will impose no additional paperwork requirements upon the Commonwealth or political subdivisions. Dealers will be required to comply with additional paperwork requests of § 19.18 related to a written consignment agreement.

Sunset Date

The Board continuously monitors the cost effectiveness of its regulations. Therefore, no sunset date has been assigned.

Regulatory Review

Pursuant to section 5(a) of the Regulatory Review Act (71 P.S. § 745.5(a)), the Board submitted a copy of this proposed regulation on November 14, 2002, to the Independent Regulatory Review Commission (IRRC), the Senate Consumer Protection and Professional Licensure Committee (SCP/PLC), and the House Professional Licensure Committee (HPLC). In addition to submitting the proposed rulemaking, the Board has provided IRRC, SCP/PLC, and HPLC with a copy of a detailed Regulatory Analysis Form prepared by the Board in compliance with Executive Order 1996-1, "Regulatory Review and Promulgation." A copy of this material is available to the public upon request.

Under section 5(g) of the Regulatory Review Act (71 P.S. § 745.5(g)), if IRRC has objections to any portion of the proposed rulemaking, it will notify the Board within 10 days of the close of the SCP/PLC and HPLC review period. The notification shall specify the regulatory review criteria which have not been met. The Regulatory Review Act specifies detailed procedures for review of objections by the Board, the General Assembly, and the Governor prior to publication of the regulations.

Public Comment

Interested persons are invited to submit written comments, suggestions, or objections regarding this proposed rulemaking to Teresa Woodall, State Board of Vehicle Dealers, Manufacturers and Salespersons, P.O. Box 2649, Harrisburg, PA 17105, www.dos.state.pa.us, within 30 days following publication of this proposed rulemaking in the *Pennsylvania Bulletin*.

Edward J. Cernic, Jr.
Chairman, State Board of Vehicle
Dealers, Manufacturers and
Salespersons

ANNEX A

**TITLE 49. PROFESSIONAL AND VOCATIONAL STANDARDS
PART I. DEPARTMENT OF STATE
SUBPART A. PROFESSIONAL AND OCCUPATIONAL AFFAIRS
CHAPTER 19. STATE BOARD OF VEHICLE MANUFACTURERS,
DEALERS AND SALESPERSONS**

§19.18a. Consignment Sales.

- (a) A licensed dealer is permitted to engage in consignment sales without being licensed as a wholesale vehicle auction or public or retail vehicle auction, as defined in section 2 of the Act, 63 P.S. § 818.2, if the dealer meets the requirements of this section.
- (b) The dealer shall maintain the following documents at the lot where the vehicle is displayed:
- (1) A copy of a separate written consignment agreement with the consignor for each vehicle. The written consignment agreement shall contain the following information:
 - (i) The name and signature of the consignor.
 - (ii) The make, model, year, vehicle identification number, and license plate number of the vehicle.
 - (iii) The length of the consignment period.
 - (iv) The terms of sale, including the minimum selling price, if any, and the amount of or formula for determining the dealer's commission.
 - (v) The terms of insurance coverage during the period of consignment, including the name, address and telephone number of the consignor's insurance agent, if any.
 - (vi) The express identification of any warranties extended by the consignor.
 - (vii) The name and address or telephone number of all current lien holders, together with the account number for each lien.
 - (viii) Any material facts relative to the vehicle, including accident history, vehicle condition, and odometer disclosure.
 - (2) A copy of the current registration card or title.
 - (3) An executed power of attorney from the consignor to the dealer which authorizes the dealer to assign title of the vehicle.
 - (4) Either an unexecuted title, if the title is unencumbered, or a title release from each lien holder to pay off all liens, if the title is encumbered.

(c) The dealer shall have the title of the vehicle assigned from the consignor to the dealer prior to applying for title in the name of the buyer.

(d) Whenever a vehicle is displayed for sale on consignment, the dealer shall disclose in writing on or attached to the vehicle that the vehicle is held on consignment and is not owned by the dealer.



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
**STATE BOARD OF VEHICLE MANUFACTURERS, DEALERS
AND SALESPERSONS**
Post Office Box 2649
Harrisburg, Pennsylvania 17105-2649
(717) 783-1697

November 14, 2002

The Honorable John R. McGinley, Jr., Chairman
INDEPENDENT REGULATORY REVIEW COMMISSION
14th Floor, Harristown 2, 333 Market Street
Harrisburg, Pennsylvania 17101

Re: Proposed Regulation
State Board of Vehicle Manufacturers, Dealers and Salespersons
16A-607: Consignment Sales

Dear Chairman McGinley:

Enclosed is a copy of a proposed rulemaking package of the State Board of Vehicle Manufacturers, Dealers and Salespersons pertaining to consignment sales.

The Board will be pleased to provide whatever information the Commission may require during the course of its review of the rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward J. Cornic, Jr.", written in a cursive style.

Edward J. Cornic, Jr., Chairperson
State Board of Vehicle Manufacturers,
Dealers and Salespersons

EJC/TLM:kmh

Enclosure

cc: David M. Williams, Acting Commissioner
Bureau of Professional and Occupational Affairs
John T. Henderson, Jr., Chief Counsel
Department of State
Joyce McKeever, Deputy Chief Counsel
Department of State
Cynthia Montgomery, Regulatory Counsel
Department of State
Herbert Abramson, Senior Counsel in Charge
Department of State
Teresa Lazo-Miller, Counsel
State Board of Vehicle Manufacturers, Dealers and Salespersons
State Board of Vehicle Manufacturers, Dealers and Salespersons

**TRANSMITTAL SHEET FOR REGULATIONS SUBJECT TO THE
REGULATORY REVIEW ACT**

I.D. NUMBER: 16A-607
SUBJECT: Consignment Sales
AGENCY: DEPARTMENT OF STATE

TYPE OF REGULATION

- X Proposed Regulation
- Final Regulation
- Final Regulation with Notice of Proposed Rulemaking Omitted
- 120-day Emergency Certification of the Attorney General
- 120-day Emergency Certification of the Governor
- Delivery of Tolled Regulation
 - a. With Revisions
 - b. Without Revisions

NOVEMBER 14, 2002
RECEIVED

FILING OF REGULATION

| DATE | SIGNATURE | DESIGNATION |
|-----------|---------------------|------------------------------------------------------------------|
| 11/14/02 | <i>Lou A. Clark</i> | HOUSE COMMITTEE ON PROFESSIONAL LICENSURE |
| 11/4/2002 | <i>A. Zubry</i> | SENATE COMMITTEE ON CONSUMER PROTECTION & PROFESSIONAL LICENSURE |
| 11/14/02 | <i>Elena Pagan</i> | INDEPENDENT REGULATORY REVIEW COMMISSION |
| | | ATTORNEY GENERAL |
| 11/14/02 | <i>C. DeLeon</i> | LEGISLATIVE REFERENCE BUREAU |

NOV

November 4, 2002