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PENNSYLVANIA AUTOMOTIVE ASSOCIATION

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March 31, 2003

DOS LEGAL COUNSEL

Thomas A. Blackburn, Counsel
State Board of Vehicle Manufacturers,
Dealers and Salespersons
Commonwealth of Pennsylvania
116 Pine Street, 4th Floor
Harrisburg, PA 17101

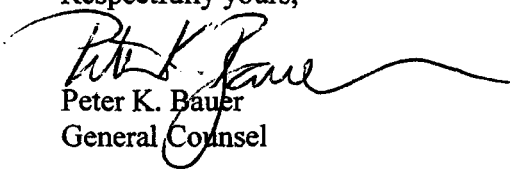
RE: Proposed Regulations on Branch Lots 16A-605

Dear Mr. Blackburn:

PAA has reviewed the proposed regulations of the Board regarding branch lots under proposed regulation 16A-605. PAA is in agreement with the proposed regulations as presented. The storage of vehicles subsection fairly addresses the storage lot issue. Also, the single vehicle display proposal adequately addresses the concerns surrounding this issue.

PAA appreciates the Board's interest in clarifying these issues for the vehicle sales industry. If you have any questions regarding these comments, please do not hesitate to contact me.

Respectfully yours,


Peter K. Bauer
General Counsel

PENNSYLVANIA
CHIROPRACTIC
ASSOCIATION

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INDEPENDENT REGULATORY
REVIEW COMMISSION

May 27, 2003

The Honorable Robert E. Nyce
Executive Director
Independent Regulatory Review Commission
14th Floor, Harrisstown 2
333 Market Street
Harrisburg, PA 17101

Re: Regulation PT 16A-605

Dear Mr. Nyce:

As the President of the Pennsylvania Chiropractic Association, I bring to your attention some language in the above referenced draft regulation that is in need of amendment. Specifically, Section 40.53 proposes a definition of "mobilization" that is inconsistent with existing law and, therefore, should be changed.

Act No. 26 of 2002 and Act No. 27 of 2002 amended both the Physical Therapy Practice Act and the Chiropractic Practice Act. These companion bills were the result of extensive discussion and negotiation between these two professions and clearly define the terms "mobilization/manual therapy" and "manipulation/adjustment." The new laws enable both professions to proceed collegially.

My counterpart, the President of the Physical Therapy Association, Paul Rocker, joins me in requesting that the language in the regulation should be identical to the definition that appears in Act 27 of 2002 with regard to mobilization. That language should read:

Section 40.53 – Mobilization/Manual therapy shall mean a group of techniques comprising a continuum of skilled passive movements to the joints and/or related soft tissues throughout the normal physiological range of motion that are applied at varying speeds and amplitudes, without limitation.

Thank you for your assistance in correcting this language.

Sincerely,



Dr. David J. Madeira
President

DJM/mab

Cc: Paul Rockar, President, PPTA
PCA Executive Committee

HBGM15111.1

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