

**Madison Brame**

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**From:** TLD <tdambra1@gmail.com>  
**Sent:** Wednesday, May 31, 2023 2:15 PM  
**To:** IRRRC  
**Subject:** Opposition to Proposed Rulemaking, Pennsylvania Regulation 6571 ( 37 PA Code Ch 301) (IRRC #3373)

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Good afternoon,  
Reasons for opposition:

I believe the "Dealer" in this regulation is defined too broadly. This may include auctions, regardless of whether the auctioneer is selling for insurance, dealer, an estate, or if selling the vehicle to a junkyard or selling a salvaged totaled vehicle. Even though vehicles they auction are available for inspection by buyers ahead of the auction, an auctioneer would be required to inspect all or nearly all vehicles we offer prior to advertising, adding a lot of cost and lost time.

Suggest changing:

So that any business licensed as an auction pursuant to Pennsylvania Law---63 P.S. § 818.303 whose primary business is the auction of vehicles on behalf of third parties shall not be subject to this certified inspection requirement. Our thoughts are something like:

(5.1)(iii) Any business licensed as an auction pursuant to 63 P.S. § 818.303 whose primary business is the auction of vehicles on behalf of third parties shall not be subject to this certified inspection requirement.

Kind regards,  
Terri Dambra