

**Madison Brame**

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**From:** Anita Eckenrode <Anita.Eckenrode@Copart.Com>  
**Sent:** Wednesday, June 7, 2023 2:23 PM  
**To:** IRRC  
**Subject:** IRRC #3373

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Good afternoon,

I am reaching out on the above topic.

RE: Proposed Rulemaking, Pennsylvania Regulation 6571 (37 PA Code Ch 301) (IRRC #3373).

Please realize this is a rule that Copart should be exempt from due to the following reasons.

Here at Copart most of our business deals with third party vehicles and most of those vehicles are salvage titled vehicles for Insurance companies. The new law wants all vehicles to be inspected by the auctioneer prior to advertising the lot for sale, this would not only cost a lot but would also cause lost time on every vehicle. The auctioneer is not an inspection mechanic and is not qualified to do this inspection.

With most of our sales being for the Insurance companies total loss vehicles the open-ended disclosures about material conditions would be a major and cumbersome task.

The change would also cause a redo of the "as-is" statement already in use.

Private parties may use these regulations in private lawsuits, so enforcement is most likely to come from the plaintiff's bar.

- Please consider the suggestion of change to be 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.

Thank you for your time and consideration.

Anita Eckenrode  
General Manager  
Copart Inc.  
4007 Admiral Peary Hwy  
Ebensburg, PA 15931  
(814) 472-5392

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