

**Madison Brame**

From: Melissa Marsh <Melissa.Marsh@Copart.Com>
Sent: Thursday, June 8, 2023 3:56 PM
To: IRRC
Subject: Re: Proposed Rulemaking, Pennsylvania Regulation 6571 (37 PA Code Ch 301) (IRRC # 3373)

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Good Afternoon;

I am a 15-year employee of Copart, Inc; a worldwide auction company with a number of locations across Pennsylvania.

I have recently been made aware of Proposed Rulemaking, Pennsylvania Regulation 6571 (37PA Code Ch 301) (IRRC #3373).

Should this legislation be approved, it would have a serious negative financial impact on my company, as well as other auctions within the Commonwealth. Copart, Inc sells over thousands of vehicles per year. If certified inspections must be completed on every vehicle, it would require massive costs to alter our facilities to meet this requirement, including additional equipment, building modifications, and additional staff to implement these changes.

I have additional concerns with this proposed legislation, as follows:

1. Our buyers are permitted to inspect vehicles prior to the auction or secure an inspection by a third party. An additional inspection by an auctioneer or mechanic would add additional costs and time.
2. The requirement to make additional disclosures of "material" conditions is unnecessary. Most of our business is vehicles sold on salvage titles; which require repairs and inspections anyway, so there is no need for a secondary inspection. It is time-consuming and double work for the same result.

My suggestion is that this proposed legislation be amended so that any licensed auction business, pursuant to Pennsylvania Law---63 P.S. § 818.303, whose primary business is the auction of vehicles on behalf of third parties, should be exempt from this certified inspection requirement. The amendment could read something like this:

(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.

I appreciate your consideration of this important matter.

Respectfully,

Melissa Marsh
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