



Good afternoon,

I recently became aware of Proposed Rulemaking, Pennsylvania Regulation 6571 (37 PA Code Ch 301) (IRRC #3373). The changes that are trying to be made in this proposed legislation are far too broad and overreaching. The proposed legislation is redundant when it comes to salvage vehicles, as any vehicle sold on a salvage certificate in PA must go through and enhanced safety inspection before it can be titled. All the buyers of these units are aware that they may need significant repairs before they can be driven on the roads in PA again. To require a certified inspection of a salvage vehicle prior to being sold and then requiring an enhanced safety inspection to convert the salvage certificate to a reconstructed title is cumbersome, costly, time consuming, labor intensive and quite frankly, double dipping.

Should this legislation be approved, it will cause serious financial harm to Copart, Inc. the loss of my job with Copart, and other auto auctions in the Commonwealth. Copart, Inc., sells thousands of vehicles per year. A certified inspection to be completed on every vehicle will cause Copart, Inc. and other Auctions within the Commonwealth to incur exorbitant costs as related to the inspection, facilities needed to perform the inspection and the additional staff needed to do so.

I am asking that this proposed legislation be changed 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. An amendment to the legislation could go 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.

Thank you,  
Amy Nabors