



To the Independent Regulatory Review Commission:

My name is Ryan Russell, General Manager of Greater Erie Auto Auction in Fairview, PA. We are a wholesale auto auction company that currently employs 30+ full-time employees, and 80+ part time employees. We have just finished a \$500,000+ renovation of our reconditioning facilities, and are currently in the planning stages of an expansion of our main facility that will allow us to grow into one of the largest auctions in PA. We currently have a weekly average of 500-600 cars on the grounds of our facility, and were hoping that number would grow to 800-1000 by 2024.

However, we are hesitant to invest in our community, our employees and our customer needs without first addressing the Proposed Rulemaking we have been made aware of that renames Part V of Title 37 of the Pa. Code from "BUREAU OF CONSUMER PROTECTION" to "UNFAIR TRADE PRACTICES" without a corresponding explanation in the summary.

Wholesale, dealer-to-dealer auto auctions, like what Greater Erie Auto Auction is, see our primary interest as being an impartial, third party facilitator between two licensed dealers. We currently run anywhere from 250-350 weekly at our auction, and we are a smaller auction than many others in the state of PA. Being potentially included in with retail dealerships in these proposed changes would fundamentally alter how we do business, and could in fact, lead to the closure of our business, as we do not have the manpower, or time weekly, to comply with the requirements of 301.2(5)(vii) and conduct such a resource-intensive inspection of each vehicle at our facility.

Greater Erie Auto Auction would like to suggest the following exemption be added to the Proposed Rulemaking to recognize the distinction between wholesale, dealer-only auto auction transactions and those between retail dealer and consumer:

This Chapter does not apply to sales of motor vehicles by or through any auction whose primary business is the auction of vehicles on behalf of third parties.

Thank you,

Ryan Russell

General Manager

Greater Erie Auto Auction