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From: Oregon VDA [<mailto:ovda@oregonvda.com>]  
Sent: Friday, April 27, 2007 10:23 AM  
To: Ebersole Eugene  
Subject: FTC Buyer's Guide Comment for the record.

For the record:

All Auto Dealers should abide by the federal law about Buyer's Guides being placed in (specified) vehicles.

There is no excuse for non-compliance.

Not only is it the law, but it is about informing the customer about the type of sale they are involved in.

For Compliance, we would request the Department of Justice start with a warning type of visit, if the DOJ is thinking about visitations, to a selection of dealer lots, both new car dealer and independent. Once that has had time to filter out to the dealer community, then a limited penalty be issued, certainly not the maximum allowed under federal law.

To outline our understanding of how the 'Buyer's Guide' is to be displayed, under the federal laws we put forward the following.

On a driver or passenger side window, hanging from a review mirror, inside or outside of a vehicle, lying on the driver's seat.

Not: in a front or rear window, lying on a passenger seat in the front or rear.  
Back must be visible when displayed, except when lying on a driver's seat.

Guides lying on a driver's seat, when picked up, must not have anything obscuring the back from being read.

The guides must be of a size and color that follows FTC guidelines.

Attached is an educational guide from the FTC Website that we use in our educational programs.

Monty King  
OVDA