

April 9, 2024

**Re: Support for the Federal Trade Commission's Combating Auto Retail Scams (CARS) Trade Regulation Rule**

Dear Senators and Members of Congress:

The undersigned 104 national, state, and local consumer, civil rights, legal services, community, public interest organizations, and consumer law firms who represent victims of auto fraud write to express our support for the FTC CARS Rule (89 F.R. 590).

Consumers spend an average of 15 hours on a car purchase, due in large part to opaque and deceptive pricing structures employed by dishonest dealers. Financing a vehicle is expensive and complex, and many consumers are confused by the process. Unfair and deceptive practices in auto sales have disproportionately harmed Black, Hispanic and Native American consumers, who are charged higher prices for add-ons and other worthless junk fees. Unethical dealers also target military servicemembers, who are an unfortunate target of packing financing contracts with worthless products and fees and other deceptive practices.

Despite over a decade of the FTC's enforcement actions, consumer education, and business guidance, it is clear that unfair and deceptive dealer practices persist. Without a rule to curb some of these abuses, consumers will continue to lose valuable time and money in the process of buying a car simply to participate in the economy. The CARS Rule will require dealers to provide their full cash price up front, it will require clarity about aspects of the financing, it will prohibit dealers from scamming servicemembers, and it will allow the FTC to return money to defrauded consumers.

We welcome the FTC's efforts to bring transparency and accountability to the process of buying and financing vehicles for Americans through the CARS Rule and through future rulemakings that rein in unfair and deceptive dealer practices.

Sincerely,

***National Organizations***

20/20 Vision DC  
Accountable US  
American Economic Liberties Project  
Americans for Financial Reform Education Fund  
Center for Auto Safety  
Consumer Federation of America  
Center for Digital Democracy  
Center for Economic Justice

Center for LGBTQ Economic Advancement & Research (CLEAR)  
Center for Responsible Lending  
Consumer Action  
Consumer Reports  
Consumers for Auto Reliability and Safety  
Disability Rights Advocates  
National Association of Consumer Advocates  
National Consumer Law Center  
National Coalition for Asian Pacific American Community Development  
National Consumers League  
Public Citizen  
Revolving Door Project  
truthinadvertising.org (TINA.org)  
U.S. PIRG  
UnidosUS

### ***State and Local Organizations and Law Firms***

#### **Alaska**

Alaska PIRG

#### **Arizona**

Arizona PIRG

Wildfire: Igniting Community Action to End Poverty in Arizona

#### **Arkansas**

Arkansans Against Abusive Payday Lending

#### **California**

CA Alliance for Consumer Education

CalPIRG

Consumer Federation of California

The Katharine & George Alexander Community Law Center

Public Counsel

Public Good Law Center

#### **Colorado**

CoPIRG

THE ONE LESS FOUNDATION

#### **Connecticut**

ConnPIRG

#### **Delaware**

Delaware Community Reinvestment Action Council, Inc.

#### **District of Columbia**

DC Consumer Rights Coalition

Tzedek DC

20/20 Vision DC

**Florida**

Florida Consumer Action Network  
Florida PIRG  
Florida Silver Haired Legislature, Inc.  
Jacksonville Area Legal Aid  
Rinald Law, P.A.

**Georgia**

Georgia PIRG  
Georgia Watch

**Illinois**

Illinois PIRG

**Indiana**

Citizens Action Coalition of IN  
Indiana Community Action Poverty Institute  
Prosperity Indiana

**Iowa**

Iowa PIRG

**Maryland**

CASH Campaign of Maryland  
Economic Action Maryland  
Maryland Consumer Rights Coalition  
Maryland PIRG  
Montgomery County, Maryland Office of Consumer Protection  
Public Justice Center

**Massachusetts**

MassPIRG

**Michigan**

PIRGIM

**Missouri**

MoPIRG

**Nevada**

Progressive Leadership Alliance of Nevada

**New Hampshire**

NHPIRG

**New Jersey**

County and Municipal Consumer Affairs Agencies of New Jersey  
Law Office of David Ricci, LLC  
New Jersey Citizen Action  
NJCFE  
NJPIRG

Union County Consumer Affairs

**New Mexico**

New Mexico Center on Law and Poverty  
New Mexico PIRG  
Prosperity Works

**New York**

Consumer Justice for the Elderly: Litigation Clinic of St. John's University School of Law  
Dombrow Law Firm  
Empire Justice Center  
New Yorkers for Responsible Lending

**North Carolina**

NCPIRG  
North Carolina Justice Center

**Ohio**

Community Legal Aid  
Ohio PIRG  
Ohio Poverty Law Center  
The Pride Through Empowerment Foundation, Inc.

**Oklahoma**

VOICE (Voices Organized in Civic Engagement)

**Oregon**

Oregon Consumer Justice  
OSPIRG

**Pennsylvania**

Roseman Law Firm, PLLC  
PennPIRG

**Rhode Island**

RIPIRG

**South Carolina**

Columbia Consumer Education Council  
South Carolina Appleseed Legal Justice Center

**Texas**

RAISE Texas  
Texas Appleseed  
TexPIRG

**Virginia**

Legal Aid Justice Center  
Virginia Organizing  
Virginia Citizens Consumer Council  
Virginia Poverty Law Center

The Consumer Law Group, P.C.  
Laura R. Pyle, LLC  
Kelly Guzzo, PLC

**Washington**

WashPIRG

**West Virginia**

Mountain State Justice  
The Grubb Law Group, PLLC

**Wisconsin**

WISPIRG