



August 15, 2022

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue, NW,
Suite CC-5610 (Annex C)
Washington, DC 20580

Re: Request for Extension for Comment on Notice of Proposed Rulemaking Motor Vehicle Dealers Trade Regulation Rule No. P204800

Dear Secretary Tabor:

The Marine Retailers Association of the Americas (MRAA)¹ hereby joins the RV Dealers Association, National Automobile Dealers Association (NADA), the American International Automobile Dealers Association (AIADA), the National Independent Automobile Dealers Association (NIADA), the National Association of Minority Automobile Dealers (NAMAD), and the American Financial Services Association (AFSA) in requesting that the Federal Trade Commission extend by a minimum of 120 days the 60-day period that the Commission has provided for the public to comment on the proposed motor vehicle trade regulation rule.

The MRAA respectfully requests this comment due to the large scope and nature of the proposed Rule. This much needed extension will allow our industry to fully evaluate the impact of the rule and generate input from our members. In order to provide the most accurate information and answers to the included Questions for Comment, we need input from our dealers.

The Proposed Rule was released on June 23rd, 2022, just a week and a half before the Fourth of July Holiday—one of the busiest weeks of the year for Marine Dealers. Furthermore, the proposed comment period, from July 13th to September 12th, is during one of the busiest times of the year for Marine Dealers, which makes soliciting them to provide input as well as commenting near impossible. In short, the overall timing of the NPRM, between both the initial release and the comment period, is not conducive to generating significant or meaningful comments from Marine Dealers.

Thank you for considering this request and please reach out if you have any questions.

Sincerely,

Chad Tokowicz
Government Relations Manager
Marine Retailers Association of the Americas

¹ MRAA, The Marine Retailers Association of the Americas, is the leading trade association of North American small businesses that sell and service new and pre-owned recreational boats and operate marinas, boatyards, and accessory stores. MRAA represents more than 1,300 individual member retail locations nationwide.

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