



September 23, 2019

Mr. Johnathan Morrison, Chief Counsel and  
Mr. David Sparks, Director, Office of Odometer Fraud  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue SE  
Washington D.C. 20590

Re: Comments on Docket No. NHTSA-2019-0092, Electronic Motor Vehicle Transactions Systems

Dear Mr. Morrison and Mr. Sparks:

Copart thanks you and the entire National Highway Traffic Safety Administration (NHTSA) leadership team for the request of stakeholder outreach and the opportunity to comment on the rules to modernize the vehicle title transfer process. Headquartered in Dallas, Texas, Copart is a global leader in online vehicle auctions, and a premier destination for the resale and remarketing of vehicles. Our company operates more than 200 locations in 11 countries, with 170 facilities in the United States and growing each year.

Copart supports these new rules and we believe they will help modernize the current vehicle sale process and reduce the expenses for our company and industry. Specifically, as a stakeholder from the auction industry these rule modifications will reduce transaction times and errors for our industry while allowing for Copart to increase efficiency and reduce internal costs currently realized while processing title work for our customers.

The increase of the exemption date for an odometer disclosure statement from ten to twenty years will not impact our company or industry significantly. We acknowledge that this extension of years will require some operational changes and the educating of our staff and customers. While this will be a minor inconvenience, we believe the overall good from this disclosure will outweigh any obstacles we will experience.

NHTSA can continue to count on Copart as a partner and a source for assistance in ensuring a fair, efficient, and most importantly secure vehicle marketplace. We stand ready to answer questions or serve as a resource as the rule making process continues.



**copart.com**

14185 Dallas Parkway, Suite 300

Dallas, Texas 75254

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Binder". The signature is fluid and cursive, with the first name "Mark" and last name "Binder" clearly distinguishable.

Mark Binder

Director of Government Affairs

214-534-6546

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CC:

Greg DePasquale – Copart

Sean Eldridge – Copart

**a bid** above the rest