



Office of the Secretary

UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

June 13, 2016

Mr. Bradley T. Miller  
Director, Legal and Regulatory Affairs  
National Automobile Dealers Association  
8400 Westpark Drive  
McLean, Virginia 22102

Re: *In the Matter of Progressive Chevrolet Company  
and Progressive Motors, Inc.*  
*FTC File No. 142 3133 and Docket No. C-4578*

referenced proceeding. The Commission has placed your comment on the public record pursuant to Rule 4.2(d)(6) of the Commission's Rules of Practice, as to why the proposed respondents' disclosures regarding credit score requirements in this matter were inadequate. Finally, your comment argues that a twenty-year consent order may be unduly burdensome or unwarranted.

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We believe the allegations in the complaint and provisions of the proposed order are set forth clearly. The complaint alleges that respondents disseminated an advertisement for vehicle

complaint alleges that this re  
consumers would qualify. F  
disclaimer regarding this res

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<sup>1</sup> Your comment also poses a number of additional hypothetical examples of potential conduct and asks whether they would violate Section 5 of the FTC Act or the terms of the proposed order. In the inst



With respect to the duration of the proposed order, in 1995 the Commission issued a *Statement of Policy* establishing and explaining the basis for a twenty-year sunset for its administrative orders in consumer protection matters. *See* 60 Fed. Reg. 42569 (Aug. 16, 1995). Further, the Commission