Federal Trade Commission
Attn.: Section 515

Office of the General Counsel
600 Pennsylvania Avenue N.W.
Washington, DC 20580

May 30, 2017

Subject: Correction of Information Disseminated by the FTC

Section 515 Administrators:

After reviewing the FTC's Consumer Information website, particularly the Used Vehicle section
(URL: https://www.ftc.gov/usedcars), it became apparent that there is an active omission of a popular
vehicle history provider – VinAudit.com, Inc.

VinAudit.com, Inc. provides vehicle history reports for consumers and businesses. VinAudit is an
official Consumer Access Provider for the National Motor Vehicle Title Information System (NMVTIS),
a featured partner of the National Insurance Crime Bureau (NICB), and a major aggregator of all types
of critical vehicle data. In partnership with 1,000+ car dealerships and industry partners over the past
5 years, VinAudit has provided millions of vehicle history reports with over 5% of our reports
indicating at least one critical issue in the vehicle's history.

Currently, the FTC links to the NMVTIS program for a vehicle history report with the basic title, insurance
loss, and salvage information. Additionally, Carfax and AutoCheck are listed as providers with additional
information. On this page, the FTC has failed to mention VinAudit as a vehicle history provider with
additional information. In addition to NMVTIS data and various supplemental resources, VinAudit
provides access to accident, theft, recall, lien, impound, export, and prior-sale records.

In connection with the goal of ensuring and maximizing the quality, objectivity, utility, and integrity
of information disseminated by the FTC, we respectfully engage the Section 515 Administrative function.

VinAudit is seeking to obtain correction of the published content located on the Used Cars page. We recommend this correction as a way for the FTC to better comply with the information quality guidelines issued by OMB and/or the FTC.

With the "burden of proof" being placed upon VinAudit to justify this correction, please review the following items:

1. Recognizing VinAudit as a source of additional information would be consistent with the philosophy of maximizing the quality of information disseminated by the FTC. VinAudit offers an alternative perspective on vehicle history, including over 500 million vehicle records in our independent database that are not currently available through Carfax, AutoCheck, or NMVTIS.

2. Where objectivity is concerned, the webpage states that "The FTC doesn't endorse any specific services". However, the webpage only lists Carfax and AutoCheck as sources for additional information. While we do not seek endorsement, we believe it would be objective to include VinAudit as a vehicle history provider offering "additional information" on the FTC webpage.

3. Linking to VinAudit as a supplier of additional information would be consistent with the goal of improving the utility of information disseminated by the FTC. VinAudit charges a fraction of the cost to offer a more affordable alternative to other vehicle history providers. VinAudit offers $9.99 for a VinAudit report as an alternative to $39.99 for a Carfax report or $24.99 for an AutoCheck report.

In summary, we believe that linking to VinAudit.com on the vehicle history page, in-line with AutoCheck.com and Carfax.com, would better align the FTC with complying with the information quality guidelines issued by the OMB and/or the FTC. VinAudit does not seek correction of any other information disseminated by the FTC.

Please see Exhibit 1 for an illustrated example of the proposed correction.

Thank you for your time and attention to this matter.

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VinAudit.com, Inc.

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VinAudit.com, Inc.

Exhibit 1

Current Content

Get the Vehicle's History

How can I learn a vehicle's history?

Visit the National Motor Vehicle Title Information System (NMVTIS) website, vehiclehistory.gov, to get a vehicle history report with title, insurance loss, and salvage information. This site lists NMVTIS-approved providers of vehicle history reports. Choose one, enter the VIN (vehicle identification number, which is listed on the front of the Buyers Guide), and pay the provider's fee to learn the car's history.

NMVTIS-approved providers offer vehicle history reports to consumers, car dealerships, and financial institutions. But not all vehicle history reports are available through the NMVTIS website. Reports from other providers sometimes have additional information, like accident and repair history:

- AutoCheck.com
- Carfax.com

(Note: The FTC doesn't endorse any specific services.)

A vehicle history report is not a substitute for an independent vehicle inspection. Before you buy a vehicle, it's a good idea to get an independent vehicle inspection to ensure it does not have hidden damage.

Section: Consumer Information
Category: Used Cars
URL: https://www.ftc.gov/usedcars

Proposed Content

Get the Vehicle's History

How can I learn a vehicle's history?

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- AutoCheck.com
- Carfax.com
- VinAudit.com

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