



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

Office of the Secretary

September 3, 2019

National Automobile Dealers Association
8484 Westpark Drive, Suite 500
Tysons, VA 22102

Re: In the Matter of LightYear Dealer Technologies, LLC, File No. 1723051

Thank you for your comment regarding the proposed consent agreement that the Federal Trade Commission (“Commission”) released for public comment in the above-entitled proceeding. The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission’s Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii).

Your July 17, 2019 comment expressed concern that this action, and any individual enforcement action, should not be used as a basis for amending the Standards for Safeguarding Customer Information, 16 C.F.R. § 314 (“Safeguards Rule”). The Commission has proposed amendments to the Safeguards Rule and, as staff described during a call with you on July 30, 2019, accepted comments on the proposed rule through August 2, 2019. *See* Notice of Proposed Rulemaking, 84 Fed. Reg. 13158 (April 4, 2019), available at

[customer-information](#). The Commission will consider all comments it has received, as well as its enforcement and regulatory experience, in deciding whether to adopt the proposed rule.

As your comment in the above-titled action is not a “comment[] on the merits of the proposed consent agreement between the FTC and the Respondent,” the Commission has now determined that the public interest would best be served by issuing the Complaint and the Decision and Order in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission’s website at <http://www.ftc.gov>.

By direction of the Commission.

April J. Tabor
Acting Secretary