

FINAL STATEMENT OF REASONS

UPDATE OF INITIAL STATEMENT OF REASONS

The following sentences were added to the reasons why proposed regulatory amendments removing “residence,” “business,” and “office” before references to “addresses” in Sections 551.14, 555, and 595 are necessary:

The Board is also seeking to remove references to “residence address” or “business” address in its regulations as one address is sufficient for any of its filings. Collection of residence addresses may also include personally identifiable information that the Board does not wish to collect.

The entire text of the Initial Statement of Reasons is incorporated herein by reference.

TECHNICAL, THEORETICAL, AND/OR EMPIRICAL STUDY, REPORTS, OR DOCUMENTS

In the Initial Statement of Reasons, the Board relied on the following documents in drafting and proposing the adoption of the proposed regulation:

- (1) Memorandum dated April 3, 2023, from Timothy M. Corcoran and Robin P. Parker to the Policy and Procedure Committee regarding Proposed Regulatory Amendments to Eliminate References to Facsimile and Residence Addresses in Section 595 of Title 13 of the California Code of Regulations (Format of First Page; Format and Filing of Papers) and make Gender Neutral.
- (2) Memorandum dated April 3, 2023, from Timothy M. Corcoran and Robin P. Parker to the Policy and Procedure Committee regarding Proposed Regulatory Amendments.
- (3) Memorandum dated August 30, 2023, from Timothy M. Corcoran and Robin P. Parker to the Policy and Procedure Committee reporting on Non-Substantive Changes Suggested by the Office of Administrative Law to specified regulations including Sections 551.14, 555, and 595 of Title 13 of the California Code of Regulations.

LOCAL MANDATE DETERMINATION

The proposed regulation does not impose any mandate on local agencies or school districts.

SUMMARY AND RESPONSE TO COMMENTS

The text was made available to the public from December 6, 2024, through January 21, 2025. The Board did not receive any comments on the text prior to the close of the comment period.

ALTERNATIVES THAT WOULD LESSEN ADVERSE ECONOMIC IMPACT ON SMALL BUSINESS

No alternatives were proposed to the Board that would lessen any adverse economic impact on small business.

The agency is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

ALTERNATIVES DETERMINATION

The Board has determined that no alternative it considered would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

The amendments adopted by the Board are the only regulatory provisions identified by the Board that accomplish the goal of removing outdated requirements and extraneous terms in the regulations for franchised new motor vehicle dealers and their franchisors (new vehicle manufacturers or distributors) who choose to file a protest or petition with the Board. No other alternative has been proposed or otherwise brought to the Board's attention.