

April 7, 2011

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation and Enforcement
US Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Re: AQ10-001: Rental Vehicle Audit Query
NVS-215jt

Dear Ms. Timian:

This will serve to acknowledge receipt of your letter seeking information from Avis Budget Group, Inc ("Avis Budget") regarding the manner and method by which we handle automobile manufacturer recall notices. At the outset, Avis Budget is extremely proud of its long record of accomplishment when it comes to putting customer safety first. We welcome the opportunity to provide feedback on the inaccurate data released to the public by the National Highway Transportation Administration (NHTSA) regarding our handling of vehicle recalls without any input from us. Moreover, we will take this opportunity to suggest and recommend alternative solutions that warrant serious consideration by NHTSA and other federal public policy makers to ensure the public clearly understands the steps needed to be taken when an automobile manufacturer issues a vehicle recall notice. These recommendations recognize that recall issues are not limited to any particular industry but affect all vehicle owners; and that the risks to the public are the same across the country and should be regulated on a national level, not through a patchwork of state regulations that could cause confusion and create new risks to the public. Regulations effecting policies and safety procedures related to recall notices must cover all owners of vehicles to truly protect the public. If the agency determines that some affected vehicle owners are not required to take NHTSA or a manufacturer's proscribed precautions, then it follows that there is no serious danger to the public. Does it matter if the vehicle, subject to a recall notice, that careens out of control and harms or kills a pedestrian or another motorist was driven by a rental car customer, limo driver, driver of a Federal or State Government fleet vehicle or private citizen?

We appreciate your reference to transparency when making files open to the public even if it means that documents may be "interpreted in ways others do not agree with." We would be remiss if we did not underscore when inaccurate information is provided in the first instance without seeking comment from the entity it relates to, it is not subject to any interpretation and viewed by all who see it as a recitation of fact. The information initially provided to you by the automobile manufacturers regarding

the efficiency of Avis Budget as well as other rental car companies in repairing vehicles subject to a recall was wholly inaccurate and belies the simple fact that we do a far better job than what was portrayed in the data submitted. This is highlighted by the supplemental response by Chrysler stating there is likely an overstatement of vehicles in rental fleets at the time of a recall launch date and hence an understatement of our actual response rate to repair such defects. Chrysler recognizes that rental car companies do not keep vehicles in their respective fleets for long periods of time and as such, the vehicles sold to us may not actually be in our fleet when the recall notice is issued. Therefore you can see our concern when inaccurate data is viewed by those making public policy decisions, the media and ultimately the general public. The truth becomes distorted, our company reputation harmed and the hard work of our employees who undertake to protect the safety of our customers and the general public is dismissed.

Like all automobile owners, Avis Budget's ability to appropriately respond to a recall notice is directly related to the actual content of the recall notices published by the manufacturers; who should provide specific and instructive information regarding the nature of the defect and the repair necessary to remedy the defect. More often, these notices generally state that the vehicle owner should bring the vehicle back to a dealer "at their earliest convenience." Such notices do not inform the owner of the urgency, if any, or the precise nature of the potential danger to the driver or others, and most importantly of the specific actions the owner must take to ensure his safety and that of innocent third parties. Nonetheless, Avis Budget works quickly to hold vehicles, query the manufacturers to better understand the risks and required repairs and complete such repairs. While Avis Budget has in place the necessary policies, procedures and personnel to take affirmative steps to assess and remedy defective conditions based on the manufacturers' vague and ambiguous recall notices, there is a large universe of vehicles operating on public roads that are subject to recall where the owners do not have the resources or skills to dig deeper or may knowingly never have the defect repaired. NHTSA's myopic approach to the subject of recalls allows this loophole to continue to exist.

As a first step, Avis Budget strongly recommends that NHTSA, and other public policy makers, take the appropriate steps to adopt changes to the rules, and require a more detailed recall notice from the manufacturer. In addition to identifying and describing the nature of the defect and the repair, the recall notice should include a statement clearly indicating: (a) the vehicle should not be driven, or (b) the vehicle can be driven if certain interim repairs or modifications are taken to remove the hazard, or (c) that the defect does not pose a risk of potential injury and the vehicle can be safely driven until repairs are effectuated. These simple modifications would ensure clear and direct guidance to the vehicle owner regarding what should be done under the circumstances to protect the public safety. We also urge that NHTSA support the notion that it and other Federal agencies should act quickly to take the lead on this issue, as some States have started to pass local laws to deal with a national public, interstate commerce concern.

Let me now take this opportunity to address your specific questions:

1. *Does Avis Budget have a policy or procedure on having repairs and other remedies pursuant to US vehicle recalls performed on vehicles within its fleet? If so, please describe in detail that policy or procedure and produce a copy of it. To the extent that the policy or procedure has changed over*

the past three (3) years, please identify and explain: (a) what changes were made? (b) why there made; and (c) when the changes were made?

It should first be noted that in 1990, the Federal Trade Commission ("FTC") provided guidance in its Consent Order C3316, stating that Budget had a reasonable period within which to inspect and repair affected vehicles and the FTC deemed 120 days as reasonable. We believe this Consent Order provides at the least, a baseline of direction to the rental car industry as a whole relating to acceptable expectations and practices.

Avis Budget has had policies in place for many years to address how to handle recall issues. (See, Exhibit 1 – Product Safety Recall Campaigns, August 5, 1983) We are including herewith, an Avis Budget bulletin from 2004 that provides as an example of how our policies and procedures are implemented. (See, Exhibit 2 - Avis Bulletin SB04-018 dated February 27, 2004) This bulletin provides notification of a Chrysler Safety Recall regarding the 2005 Chrysler Town & Country and Dodge Caravan/Grand Caravans to Avis Budget field management instructing them to "do not rent" vehicles subject to maintenance, inspection and or replacement. The reference to Wizard 003 01 (Safety Recall) indicates a hard hold in our system to prevent the vehicle from being rented. When a vehicle is coded as such within our computer system, it cannot be rented. Our computers will not allow the vehicle to be rented. (See, Exhibit 3 – Avis Bulletin SB10-001 dated January 6, 2010)

Over the past two decades, we have made only two substantive changes to the way in which we handle vehicle recalls:

- We eliminated a 3-day waiting period before vehicles are put onto 'Hard Hold' that was initially created to give locations the time necessary to obtain replacement parts. The initial period allowed for expeditious repair of actual defects stated within the recall notice. The elimination of the three days was made in order to eliminate the possibility of a vehicle subject to a recall becoming available for rental while parts were being obtained. This change was made on November 3, 2010.
- We are currently in the process of implementing updates to our policy to include a centralized process for customer contact and notification. We have long felt that contacting renters about serious conditions on a recall was extremely important. Historically such contacts occurred at the local operational level from where the car was rented. (See, Exhibit 4 – Draft Manufacturer Recall Policy) Centralizing this process is an improvement that grew out of the escalating number of vehicles in our fleet affected by recalls. In 2009, Avis Budget had approximately 5,000 vehicles subject to a recall; in 2010 that number jumped to approximately 55,000 vehicles. Making this shift from a field based notification system to a centralized process will provide a more efficient process to track our actions and better protect our customers. We would emphasize that the improvements being made relate primarily to methods of providing notice to customers who may be driving a recalled vehicle and not to the very basic premise that safety recalls will continue to be under a hard hold. These improvements were developed in early 2011 and are being tested prior to full implementation.

2. *Does Avis Budget draw distinctions between safety recalls in terms of severity, size of affected population, or other factors? If so, please describe how Avis Budget makes those distinctions and describe how, if at all, those factors influence or change whether, or how quickly, Avis Budget disseminates information to its rental facilities about a particular safety recall or requires application of the recall remedy to the vehicles affected in its fleet.*

Avis Budget is not in the position to draw a distinction between safety recalls in terms of severity, size of affected population, or other factors. The manufacturer issues the recall notice based on its findings. The manufacturer does not advise if the potential harm is severe or remote. Moreover, the manufacturer does not advise any owner to “not drive the vehicle”. This in and of itself creates significant ambiguity in the context of recalls.

To overcome this glaring problem with recall notices, it is our common practice, as is provided in our written policy, to contact the manufacturer to ascertain, in writing, whether the conditions involved in the recall notice render the vehicle inoperable or unsafe to drive, or if the vehicle can be driven safely until the repairs are made, or if some remedial measure can/should be taken to mitigate the defect until it can be repaired. In accordance with the additional information from the manufacturer regarding the safety of the vehicle we either; put the affected vehicles in a hard hold status or we put the affected vehicles in a soft hold status to effectuate the repairs during normal vehicle maintenance based on the manufacturer’s instructions.

By way of example, we received a recall notice from a manufacturer regarding a defect in a vehicle’s power assist motor that could be activated during a driver’s operation of the vehicle. We contacted the manufacturer of the vehicle to ascertain the risks posed by the defect. The manufacturer informed us that the defective condition, if it occurred, would provide warnings to the driver by making steering the vehicle slightly more difficult at speeds of less than 15 miles per hour. The manufacturer further advised us, in writing, that the vehicle was safe to drive prior to making the required repair. Based on this information we elected not to put these vehicles in a hard hold status. Regarding a recent recall notice that indicated a potential for door latches on a vehicle to become insecure in the event of a side impact; while the manufacturer indicated the vehicle was safe to operate, we elected to put these vehicles in a hard hold status. There can be little doubt that other vehicle owners did not make the same decision we made regarding the removal of these vehicles from traffic, and continued to drive their vehicles putting themselves and their passengers at risk. How much safer would the public be if manufacturers provided better information regarding an owner’s risks and options for fixing the defects?

The manufacturers identify vehicles subject to a recall by vehicle identification number (VIN), which we then cross-reference to our database. This process occurs within twenty-four hours of receiving a recall notice. The vehicles are then entered into hard hold in our system pending any further guidance from the manufacturers as outlined above. When this process occurs the rental systems display a message 01—SAFETY, DO NOT RENT. We then distribute notice via electronic broadcast to field operations.

3. *Does Avis Budget have a policy or procedure for ensuring that vehicles within its fleet have had safety recall remedies applied before Avis Budget sells or otherwise transfers ownership of those*

vehicles? If so, please describe that policy or procedure and produce a copy of it. To the extent that policy or procedure has changed over the past three (3) years, please identify and explain: (a) what changes were made; (b) why they were made; and (c) when the changes were made.

Avis Budget generally, but with some limited exceptions, does not sell vehicles directly to the public. In most cases, our vehicles are sold back to the manufacturer or a dealer under a repurchase program (a process by which we return the vehicle to the manufacturer for a preset residual amount), or are disposed of through wholesale auctions. When the vehicle is removed from our fleet on a repurchase program, if we have not made the repair due a variety of factors, including for example the unavailability of a part, then the manufacturer knows and the dealer who buys the vehicle knows based on a review of its own VIN database whether the necessary repair was made. If the repair was not made, the dealer incentive programs of the manufacturer provide a financial basis for the dealers to affect the repair prior to a resale. When a vehicle is acquired through a risk program, we assume the risk of the disposition of that vehicle after its useful life in our fleet, which generally is approximately fourteen months. When we dispose of a vehicle using this method, it is our understanding that the auction houses (who sell to dealers and other "wholesale" buyers, not to retail customers) note on their sale blocks that the vehicle is being transferred subject to an open recall item thus providing notice to the purchaser at auction.

4. *How does Avis Budget receive and manage safety recall notifications and information from vehicle manufacturers? For example, are those notifications received at one location and then distributed from there or are the notifications sent to multiple locations?*

The vehicle manufacturers notify us in a variety of ways. Most mail notification letters are sent to the address identified on the vehicle registration. Thus, notices communicated in this fashion are sent to the field operations address associated with the vehicle registration. As soon as the Avis Budget Warranty Department confirms whether we have any vehicles that are involved in the recall, we place them onto Hard Hold within 24 hours from receipt of the notice. Manufacturers provide notice in this fashion to all owners because the rules governing recall notices require that notice be sent to the registered owner. We would like to suggest that it would be more effective if the rules recognized that fleet owners such as Avis Budget could react faster if the notice were sent via email to a designated centralized mailbox that could be constantly monitored.

5. *How does Avis Budget inform and educate its rental locations and other involved Avis Budget parties concerning safety recalls to ensure that the affected vehicles are identified and the recall remedy performed on them? Does Avis Budget "flag" or otherwise note vehicles subject to safety recall and does Avis Budget have a policy for how quickly those vehicles are flagged?*

Avis Budget sends broadcast emails to all corporate locations. This broadcast notice contains not only our communication but also includes the manufacturer's recall bulletin as well as our company policy on completing the recall repairs prior to any further rentals.

As discussed above, we place vehicles subject to a manufacturer's safety recall into a Hard Hold status thereby preventing the vehicles from being rented.

Again, as previously noted, this process occurs within 24 hours from receipt of the manufacturer's recall notice.

6. *Please describe how Avis Budget enforces its policies or procedures on remedying of its vehicles subject to a safety recall. Please describe, for example, whether there are personnel at Avis Budget dedicated to reviewing Avis Budget's performance of safety recalls and identifying vulnerabilities or weaknesses within Avis Budget or its rental locations as to performance of safety recalls on its vehicles.*

The completion of repairs to vehicles subject to manufacturer safety recall is monitored by the Avis Budget Warranty Dept. A semi-monthly report shows the recall number, the number of vehicle repairs completed pursuant to the recall along with the outstanding units under the recall to be repaired. This report is disseminated to all Field locations and as well as the appropriate higher level managers. All recall repairs completed in Avis Budget shops are recorded in our Electronic Repair Order (ERO) system; records are retained electronically for 7 years.

7. *Does Avis Budget subscribe to the agency's recall notification service and have personnel dedicated to receive notifications from that service?*

Yes.

8. *NHTSA understands that Avis Budget has, or had a policy whereby it would not rent vehicles subject to a safety recall if NHTSA or the manufacturer had indicated those vehicles should not be driven, or should be "grounded". Please confirm whether this is current Avis Budget policy and, if the converse is true – that Avis Budget does not "ground" vehicles unless and until NHTSA or the manufacturer instructs that it is appropriate.*

If/when we receive information from NHTSA or a manufacturer that a vehicle should not be driven or "grounded" it is and always has been our policy and practice to not rent that vehicle. It would be put on immediate hard hold.

9. *Does Avis Budget report safety concerns to NHTSA when and if it learns of those concerns from its rental locations, its renters, or otherwise? If so, please state whether Avis Budget has personnel designated to do the reporting or whether the reporting is performed at the discretion of individual Avis Budget staff, describe how Avis Budget reports those concerns to NHTSA, (e.g., through an owner complaint form available online at www.safercar.gov, by calling NHTSA's toll-free hotline at 1-888-327-4236, or other means), and state whether it has a policy or procedure for reporting those concerns to NHTSA and, if so, provide a copy of that policy or procedure. In your description, to the extent they exist, identify and explain any minimum criteria or other factors Avis Budget may have for reporting a safety concern to NHTSA (e.g., a certain number of complaints on an issue, Avis Budget's assessment of the risk involved, etc.).*

While we have not typically reported safety concerns to NHTSA (nor are we aware of a general requirement to so report); Avis Budget does make timely reports to manufacturers regarding vehicle concerns related to safety and other matters, as appropriate, regardless of whether the

concern is received from rental locations, renters or otherwise. As a significant customer of the vehicle manufacturers who sell vehicles to us, we have the opportunity to have a direct dialog with manufacturers about their vehicles.

10. Please provide any additional information or documentation that would be helpful to NHTSA's understanding of how Avis Budget views, manages, and executes safety recalls affected its vehicles.

While we do not have additional documentation to include with this letter, we would like to take the opportunity to request the opportunity to work with NHTSA to develop policies and procedures to truly protect the public from the risks of having unsafe vehicles operated on this country's roads. We believe that when it comes to regulating the circumstances regarding recalled vehicles such regulations should (i) require that NHTSA or manufacturers provide standardized vehicle recall notices to all affected vehicle owners, not just to owners from one industry, (ii) provide detailed information to vehicle owners regarding the relative risks presented by the recall notification, and (iii) provide an accurate process for recording and reporting remedial actions taken by vehicle owners.

The current system fails to provide proper notice to the wider population of persons who could put themselves and others members of the public at risk; it fails to provide adequate warning of potential risks and instructions regarding operating affected vehicles to those to whom recall notices are directed; and it fails to provide adequate instructions to complete required repairs.

Avis Budget strongly supports reforming the rules that govern recalled vehicles. We welcome the opportunity to meet with you and Director Strickland to have a meaningful discussion of the issues involved in very important public safety matter.

Respectfully submitted,



Michael K Tucker
Executive Vice President,
General Counsel & Chief Compliance Officer

RENT A CAR ADMINISTRATION MANUAL

12.09

SUBJECT:**VEHICLE ACCOUNTING****SECTION:****Product Safety Recall Campaigns****GENERAL**

1. When it is determined that a product defect relating to vehicle safety exists, the National Traffic and Motor Vehicle Safety Act requires the manufacturer of the vehicle to initiate a Product Safety Recall Campaign.
2. The vehicle manufacturer is required to send a letter of notification to the vehicle owner (Avis) describing the product defect. Additionally, the manufacturer sends servicing instructions, including parts replacement and procurement procedures, vehicle labeling instructions, and warranty filing instructions to authorized repair locations (Product Safety Campaign Bulletins).
3. Once a letter of notification is received by Avis, vehicle repairs must be completed within 30 days of parts availability.
4. Upon written notification by the vehicle manufacturer, the Director of Maintenance and Damage is to notify the general counsel and each regional vice president, zone manager, city/district manager, and zone/city/district maintenance manager, advising them of the recall, giving a general description of the defect, and the VIN of the vehicles affected.

ADMINISTRATIVE RESPONSIBILITIES

1. The zone manager will appoint a Product Safety Recall Administrator for each fleet owner and advise the warranty manager at World Headquarters accordingly.
2. The Product Safety Recall Administrator will ensure that the repair of all vehicles subject to Manufacturer Product Safety Campaigns are completed within prescribed time frames. His/her specific duties include: accumulating manufacturer VIN information of affected vehicles, posting of continuously updated VIN runs with key personnel and/or at key locations, developing production schedules and comparing performance against plan, advising fleet owner and zone of same.
3. The zone maintenance manager must contact each Avis repair facility within the zone to verify that:
 - a Product Safety Campaign Bulletin was received
 - the facility has sufficient manpower and skill levels to complete the repairs.
 - an adequate supply of parts is in stock to complete the repairs within the 30 day time period. If an adequate supply of parts is not available, he/she is to contact the Division Director of Maintenance and Damage.

REPAIR PROCEDURES

1. An Avis Repair Order, F-56, is to be completed for each vehicle per manufacturer Product Campaign Bulletin instructions.
2. In cases where a special claim form is required, attach it to a completed Avis Repair Order and submit to the Warranty Department will initiate and complete the special claim form.
3. Each vehicle repaired is required to have a campaign identification label installed using a Product Safety Campaign form, F-417. The F-417 is to be affixed to a clean, dry surface on the radiator core support in an area where it will be visible when the car is being serviced.
4. The Warranty Department at World Headquarters will track and report compliance to the Director of Maintenance and Damage, to each zone and to each Avis repair facility.

EFFECTIVE DATE:**8/5/83****PAGE NO.:****1**

12.09**RENT A CAR ADMINISTRATION
MANUAL****SUBJECT:****VEHICLE ACCOUNTING****SECTION:****Product Safety Recall Campaigns****CORRESPONDENCE**

1. The Recall Campaign Envelope-Outgoing, F-425, is to be used by repairing locations when submitting recall campaign related repairs to the Warranty Department.
2. Dealer Product Campaign Bulletins, affected Fleet VIN lists, and status reports generated by the Warranty Department will be transmitted to the field via the Recall Campaign Envelope - Incoming, F-426.

ALL SALES

1. Prior to a vehicle being sold, the current vehicle listing of open campaigns must be checked to ensure that all outstanding Product Safety Recall Campaigns have been completed. A list containing those vehicles with open campaigns is available from the Product Safety Recall Administrator.
2. A copy of the Avis Repair Order, F-56, indicating completion of the defect is to be placed in the MVA file folder and available for inspection by a potential buyer.

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EFFECTIVE DATE:**8/5/83**

AVIS System Bulletin

DATE: 02/27/04

NO: SB04-018

TO: MANAGERS
 RENTAL SALES AGENTS
 CUSTOMER SERVICE REPRESENTATIVES
 PREFERRED SERVICE REPRESENTATIVES
 ROVING RAPID RETURN REPRESENTATIVES

AT: ALL U.S. LOCATIONS

SUBJECT: CHRYSLER SAFETY RECALL

There has been a Chrysler safety recall of certain 2005 Chrysler Town & Country and Dodge Caravan/Grand Caravans

The right (passenger side) front seat belt retractor assembly on about 3,200 of the above vehicles may have been improperly assembled. As a result, the seat belt may not properly restrain the occupant, which increases the risk of injury during certain crash conditions.

Any vehicle that is involved in this recall will come up on hold in Wizard.

All affected vehicles will display the following message in Wizard OOS 01 (Safety Recall) do not rent.

When the above message is displayed, **do not** rent this car. The car must be sidelined for maintenance, inspection and or replacement.

#



AVIS System Bulletin

DATE: 01/06/10

NO: SB10-001

TO: **MANAGERS
RENTAL SALES AGENTS
CUSTOMER SERVICE REPRESENTATIVES
PREFERRED SERVICE REPRESENTATIVES**

AT: **ALL U.S. LOCATIONS**

SUBJECT: **VEHICLE STATUS CODES**

The 301 FLEET INQUIRIES screen displays a Vehicle Status Code for every car displayed. With all the recent changes to the 301 FLEET INQUIRIES screen, there have been inquiries regarding the different Status Codes available.

Below is complete list of all current Vehicle Status Codes and their meaning. These codes have also been added to Wizard Help (F9) on the 301 FLEET INQUIRIES screen.

1. **ON HAND** The car is available for rental.
2. **ON-HAND IDLE** The car is available for rental and has not generated revenue for X days (X = time is set by the location).
3. **ON MOVE** (*On Movement*) The car is currently on movement in Wizard on a rental agreement or non-revenue document.
4. **RECALL HOLD** When adding through SAFETY RECALL ENTRY screen as bulk the message is:

06 Manuf Recall – Definition = Non-Safety repair, can be overridden, never cancel unless repair is completed.

01 Safety Recall – Definition = Safety repair, cannot rent, never cancel unless repair is completed.

NOTE: When adding an individual VIN on the 607 VEHICLE STATUS CHANGE or 608 BULK STATUS CHANGE screens for recall, the display is whatever message/detail the format allows.



INTEGRITY



RESPECT FOR
THE INDIVIDUAL



QUALITY



TEAMWORK



GROWTH AND
PROFITABILITY



COMMUNITY
RESPONSIBILITY

For questions regarding this bulletin, contact Avis Learning & Development at 1-877-263-6586.

5. **PM HARD HOLD** The car is overdue for preventative maintenance by 4500 miles with an average movement of fewer than 700 miles per day on the last 2 rentals. Wizard will NOT allow the car to be rented.
Message Display – PMHH = PM Hard Hold, cannot rent, cannot override, must be cleared at the area level.
Any vehicles on Hard Hold should not and are prevented from being rented systematically.
6. **PM or PM HOLD** The car's mileage has passed the mileage set for preventive maintenance by 500 miles. Wizard will allow the car to be rented.
7. **ALERT 1** Hard Hold car will not be available for rent (a reason will be indicated in the remarks field). This status can only be set, removed or overridden at the Area level or above.
8. **ALERT 2** Hard Hold car will not be available for rent (a reason will be indicated in the remarks field). This status can only be set, removed or overridden at the Fleet Owner level or above.
9. **RETN** (*Retention*) ABG has intentionally removed this vehicle from the manufacturer specified program in favor of a risk opportunity or determined to be a Reject.

Program Vehicle

Vehicles that are covered under a manufacturer repurchase program. At the end of their lifecycle, specified by the manufacturer, they will be returned to their respective manufacturer.

1. **NEW** Vehicle is new to the program and the fleet.
2. **ELIG** (*Eligible*) Vehicle has met its minimum program eligibility requirements as specified by the manufacturer.
3. **TRBK** (*Turnback*) Vehicle has been marked for disposal and is on a hard hold in Wizard and can only be released by the Fleet Owner level or above.
4. **PNLT** (*Penalty*) Vehicle has been marked for disposal and is at a point where it may be incurring penalty charges from the manufacturer. Vehicles in this status are on a hard hold in Wizard and must be tendered for turnback. This status can only be released by the Area level or above.
5. **REVV** (*Review*) Defines a Program vehicle that has reached its age or mile limitation at which point the manufacturer has determined it is no longer Program eligible. ABG personnel need to review the vehicle and its record to confirm its age and mileage before taking any further action relative to its disposition.

Risk Vehicle

Vehicles that ABG owns outright.

6. **NEW** Vehicle is new to the program and the fleet.
7. **AGED** Vehicle has met its minimum risk eligibility requirements as specified by ABG.
8. **WHSL** (*Wholesale*) Vehicle has been marked for disposal and is on a hard hold in Wizard and can only be released by the Fleet Owner level or above.
9. **SELL** Vehicle has been marked for disposal and is at a point where it must be sold now. Vehicles in this status are on a hard hold in Wizard and can only be released by the Area level or above.