

# **FINAL STATEMENT OF REASONS**

## **UPDATE OF INITIAL STATEMENT OF REASONS**

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 March 1, 2019, from Timothy M. Corcoran and Robin P. Parker to the Policy and Procedure Committee regarding consideration of proposed regulations
- (2) California Government Code section 11425.40

## **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 September 13, 2019, through October 28, 2019. 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.

## **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 clarifying case management for franchised new

motor vehicle dealers and their franchisors (new vehicle manufacturers or distributors) who choose to file a protest, petition or appeal with the Board. No other alternative has been proposed or otherwise brought to the Board's attention.