



NEWS BULLETIN

September 2011

**Montana Automobile
Dealers Association**

501 North Sanders Helena, MT 59601 406-442-1233



Don Kaltschmidt

PRESIDENT'S MESSAGE

Your Montana dealers association Washington delegation stormed Capitol Hill September 19th – 20th. I would like to thank Bill Under-riner and Marilyn Olsen for their leadership and Robbie Dee our next generation dealer for getting involved and Ken Fichtner. It is amazing to me the dedication we have at the state and national lev-

els demonstrated to us every time we go. As your DEAC chairman, I would again ask you to dig in your pockets just a little deeper and support our auto dealer PAC. We have such a great staff at NADA that carries on great work for all of us as we work on what we do best sell and service cars and trucks. Our calendar year is winding down and if you haven't given to DEAC yet, I would ask you to do so now. That said here is my report...we saw Max Baucus for quite some time and got a lot of inside baseball ideas on what's going on in Washington from him and his staff. We talked to him about the pertinent dealer issues such as EPA requirements, LIFO, estate tax and other business and tax issues. Max always gives us a fair hearing and listens, a quality I find many politicians don't have (maybe that is why he continues to get reelected)... We also saw Denny Rehberg and a staff member from Jon Tester's office. Both visits were cordial and I think they are all concerned for our country and our state. I find that most politicians are good Americans and care deeply; they just have different ideas how to accomplish the task. Please get involved with pro dealer and pro business candidates. It IS worth the time and effort. Thank you again for allowing me to represent you this year. Your association will continue to do the heavy lifting but we need all the support you can give us. At this time our country and our businesses are going through a tough economy which equates to your friends and neighbors needing your leadership. Until next time, God bless and GOOD SELLING.

Don "K"
President 2011



Craig Tilleman

TILLEMAN ACCEPTS SENATE SEAT

Craig Tilleman, Vice President of Tilleman Motors in Havre has accepted the appointment to fill a state senate seat vacated by Rowlie Hutton.

Tilleman will fill the seat until the 2012 general election and plans to start campaigning for that election immediately.

Tilleman is a past president of MTADA and is currently serving on the MTADA Board of Directors. He is also Chairman of the MADA Insurance Trust.

MTADA wishes to congratulate Senator Tilleman!

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INSERTS:

ZURICH AFAS MONTHLY PROMOTION



Bill Underriner

THE ECONOMY MIGHT BE GOING CRAZY, BUT AMERICANS STILL NEED CARS AND TRUCKS

If you've been paying attention to the news lately you have every reason to be more than a little

confused. One day the headlines tell us our economic recovery has hit a rough patch, causing consumers to pull back on "big ticket" purchases like cars and trucks. And the next we're hearing the auto industry is driving our nation's economic revival, as manufacturers ramp up production and dealers start reinvesting in their facilities and hiring more employees. President Obama is even looking to the auto industry for advice on how to spur hiring in other industries. He recently called Ford CEO Alan Mulally to discuss supply chain disruptions caused by the earthquake and tsunami in Japan and ways to stimulate exports and create jobs. And just when we thought the stock market's roller coaster ride was going to rattle consumer confidence even more, the Commerce Department reported that orders for autos and auto parts jumped 11.5 percent in July, the most in eight years.

In other words, the economy might be sputtering along, but Americans still need cars and trucks to get to work. And with the average age of cars and light trucks at 10.6 years, manufacturer incentives increasing this fall and more available inventory, new-car sales should only increase in the last four months of the year, says NADA Chief Economist Paul Taylor. "When consumers discover that the economy is still growing in the U.S. and Europe, although slowly, consumer confidence will improve," Dr. Taylor says.

Unlike several analysts who reduced their sales forecasts for 2011 as a result of economic conditions, NADA is sticking to its projection of 12.9 million light-vehicle sales nationally by year end, which would put us about 12 percent above the 11.5 million units we sold in 2010. Taylor expects new-vehicle inventory to return to reasonable levels in September, which will provide car shoppers with more choices. "Auto loan rates for new cars will remain attractive this fall as a result of meager economic growth," he said. And depending on what happens on Wall Street, luxury car sales will either increase or decrease in the coming months.

In times of economic uncertainty, it's best to take the longer view. That's what NADA does with its sales forecasts despite the "sky-is-falling" headlines.

In legislative and regulatory news...

FTC Issues Auto Warranty 'Consumer Alert'

The Federal Trade Commission recently issued an "Alert" reminding consumers of several issues in connection with automobile warranties. The Alert explains what a warranty is and provides guidelines to consumers about warranty repairs, including a reminder that a consumer is not required to "use the dealer" for warranty repairs. The Alert also provides links for consumers to obtain further information. To read the FTC Consumer Alert, visit www.nada.org/regulations.

Now Playing on NADA-TV ...

"**AutoFocus with David Hyatt**" — Brad Miller, NADA assistant director of Legal and Regulatory Affairs, discusses the recent changes to Adverse Action Notice Requirements.



"**Benefits of Indirect Lending**" — NADA and the American Financial Services Association (AFSA) meet in Washington to discuss educating regulators about the indirect financing model and other current issues.



In other NADA news...

Texas Auto Dealers Association Launches Program to Prepare Future Dealers for Success

The Texas Automobile Dealers Association has launched a program to help the next generation of auto dealers succeed when it's their time to run the business. The Texas Dealer Academy taps the online resources of NADA University to provide future dealers in the state with 24/7 access to the industry's most comprehensive online professional development training programs. It also offers young and upcoming dealership professionals new networking opportunities and active engagement in its grassroots legislative and regulatory activities on issues impacting the industry.

Stay Connected with the NADA and ATD Convention on Facebook and Twitter

There are now more ways than ever to "connect" with the 2012 NADA/ATD Convention and Expo, Feb. 3-6 in Las Vegas. "**Like**" the convention's Facebook page and "**follow us on Twitter**" to receive instant updates on speakers, registration, exhibitors, hotels and more. Plus, stay tuned for NADA's new smart phone app coming this fall, putting the entire convention at your fingertips. And don't forget to check out MyNADAPlanner, the tool that allows you to select workshops, note times of franchise meetings, schedule meetings with exhibitors and create a road map for the

convention before even leaving your dealership. Convention registration is now open online at

www.nadaconventionandexpo.org.

IT Committee Highlights Importance of Online Reputation Management

NADA's Information Technology Committee has shed some light on the importance of monitoring social media sites for comments about dealerships' services and how to monitor these sites without overwhelming dealership staff. The committee gathered information on several online reputation management vendors and summarized the important features each provides. To learn more, [visit NADA's Technology page](#) and look under "Online Reputation Management Vendors."

NADA U Launches Drive to Help Members Sign In and Sign Up

Not all NADA and ATD members have activated their free NADA University accounts to access membership benefits like *Driven* management guides, online courses and MarketINSIGHT webinars. So NADA U is initiating a campaign to help members sign in, sign up all your employees and take a quick personal tour. The effort includes a calling campaign, direct mail and a new how-to video. NADA U also is offering a special incentive: members who call 800.557.6232 to participate in a telephone demo will receive a NADA online course of their choice free (a \$199 value).

20 Group Sees Uptick in Requests for In-Dealership Consulting

NADA 20 Group reports an increase in requests for in-dealership consulting, with many dealers targeting specific areas of operations, such as sales training and service and parts sales. Dealers who've taken advantage of this 20 group service report marked improvement in their operations. "There's nothing as effective as having an expert come to your dealership, examine your operations and talk to your people," says Dave Allen, senior director of NADA 20 Group. For more information, call Allen at 703.821.7214 or Diane Carnovsky, 20 Group sales manager, at 703.749.4744.

NADA 20 Groups for Fixed Ops Managers Meeting this Fall; Controllers/CFO Groups Now Forming

NADA 20 Groups for Fixed Ops Managers focus on service, parts, and body shops issues. Dedicated fixed operations professionals from similar volume, non-competing dealerships use their combined experience, the best-in-class financial composite and knowledgeable consultants to tackle the issues that are most important to fixed operations. Here are the up-

coming meetings. Call Diane Carnovsky, 20 Group sales manager, at 703.749.4744 to reserve a spot.

- Chrysler: Nov. 13-15 (Chicago)
- Ford: Jan. 11-13 (Scottsdale)
- Mercedes: Nov. 16-18 (San Antonio)
- Nissan: Nov. 9-11 (Las Vegas)
- Toyota: Dec. 14-16 (Las Vegas)
- All Import: Nov. 9-11 (New Orleans)

Please stay involved and in touch.
Bill Underriner, NADA Director
(406) 255-2350





BRUCE M. SPENCER
MTADA General Counsel

Bruce Spencer

Dealer Only Article.



SAVE THE DATE CONVENTION 2012

The 2012 MTADA State Convention will take place September 20 – 22 in Billings at the Billings Hotel and Convention Center. MTADA is busy working on an exciting line up of Speakers and Seminars. There will be a golf tournament as well as shopping and tours available for those who do not golf.

Be sure to read your MTADA Newsletter each month for more updates. See you in Billings in 2012.





Bill Underriner

UNDERRINER TO LEAD AUTO DEALER GROUP IN 2012

WASHINGTON (Sept. 21, 2011) – The board of directors of the National Automobile Dealers Association (NADA) has elected William P. Underriner as chairman and David W. Westcott as vice chairman for 2012

Underriner, 59, president and co-owner of Underriner Motors in Billings, Montana operates Honda, Hyundai, Buick and Volvo franchises. Underriner, NADA’s current vice chairman, has served three terms as NADA treasurer and represents Montana’s new-car dealers on the association’s board of directors.

“I’m honored that my peers have elected me for this position,” said Underriner, who’s been in the automobile business since 1984. “I’m looking forward t the challenges ahead and the unknown because you never know what can happen in the auto industry.”

Westcott, 64, president of David Westcott Buick GMC Suzuki in Burlington, N.C., has been a new-car dealer since 1981. He currently represents North Carolina’s new-car dealers on NADA’s board of directors.

The election was held September 20 at an NADA conference in Washington, D.C. Underriner and Westcott will take office at the 2012 NADA-ATD Convention and Expo in Las Vegas, which runs February 3 – 6.

Underriner is a past member of the association’s Executive, Industry Relations, Dealership Operations and Membership committees. He’s also served as chairman of NADA’s Finance and Convention committees.

Westcott currently serves as chairman of the association’s Dealership Operations Committee. He’s also a member of the Industry Relations Committee and the Dealers Election Action Committee (DEAC) board of trustees. He’s past chairman of NADA’s Government Relations and Regulatory Affairs committees and DEAC.

Source: NADA Newsroom

MONTANA DEALERS PARTICIPATE IN NADA’S ANNUAL WASHINGTON CONFERENCE

Montana dealers took part in NADA’s annual Washington Conference last week where they heard from several prominent members of Congress and learned about federal policy impacting dealers. Conference speakers included U.S. Speaker of the House John Boehner, R-Ohio; Sen. Lisa Murkowski, R-Alaska, a leader on energy policy’ and political pundit Charlie Cook. Dealers discussed numerous timely issues, including changes to health car policy, national fuel economy standards and federal taxes. A “Next Gen” reception for members representing the future of car and truck retailing was held. Robbie Dee, Dee Motors attended as Montana’s “Next Gen” dealer. Aaron Schock (R-Ill.), the youngest member currently serving in Congress, was the keynote speaker for the reception and gave a dynamic speech on importance of grassroots legislative engagement. Dealers made Capitol Hill visits with members of Congress to discuss issues. Montana attendees were Don Kaltschmidt, Ken Fichtner, Bill Underriner, Robbie Dee and Marilyn Olsen.



From Left to Right: Fichtner, Dee, Kaltschmidt, Olsen & Underriner.





Britani P. Laughery

From SafetySmart Online

BE A SAFETY LEADER

WHAT'S AT STAKE

An employer or supervisor can't stand by you every second to see that safety rules are followed. You must take charge of your safety because you have the most to gain - and the most to lose.

WHAT'S THE DANGER

Injuries result when a worker fails to take responsibility for safety - by ignoring safety procedures or consuming drugs or alcohol at work, for example. You could suffer burns, broken bones, electrocution, crushing, chemical injuries, concussion or other injuries if you don't take safety precautions.

EXAMPLE

Joe is an experienced construction worker, but he suffered a painful knee injury after he fell from a ladder. Although he knew better, he had leaned too far to retrieve a hammer.

HOW TO PROTECT YOURSELF

Break your own unsafe habits

Don't rush a job. Take time to maintain tools and equipment according to the manufacturer's instructions and follow all safety procedures and policies.

Train and participate

Take safety training and learn the health and safety standards that apply to your work. Before operating equipment, get trained for it. Support or join workplace safety and health committees.

Gear up

Take personal protective equipment (PPE) and other safeguards seriously. When other employees understand you really believe in these things, they are more likely to become believers, too.

Don't be the fall guy

If you spill liquid on the floor, mop it up immediately. If you find a piece of equipment leaking fluid, report or repair it. Regularly check around your work area and look for material which could cause someone to trip.

Clean up

Remind yourself about cleaning up the work area regularly

and removing debris continually, or at least as each task ends. Don't wait for the boss to point out fire hazards.

Take responsibility

Report any hazardous conditions. Ensure that emergency equipment is readily available, ventilation equipment is working properly, cords and cables are routed away from traffic areas, light fixtures are maintained and hazardous materials are correctly labeled and stored where they cannot ignite or contact workers.

You're not Superman or Wonder Woman

Refuse unsafe work. Lift correctly and don't lift something heavier than your capacity. Get enough rest before you come to work.

FINAL WORD

If you have a positive attitude toward safety measures, your co-workers are more likely to do the same. A good role model maintains a safety leader viewpoint at all times, because workers need to depend on themselves and each other.

Submitted by:

By Britani P. Laughery,
CIC, CWCP, AU



CALCULATING NET PROFIT AND FIXED ABSORPTION

The first step to reaching your service potential is knowing where you stand, and where you should stand. Bottom line, you'll want to earn the best net profit you can. This means ascertaining that expenses are in proportion and under control. Use your financial statement to subtract total expenses from total gross; the result is your net. As a rule of thumb, personnel expenses (which may appear on your statement as personnel, variable, or selling expense) should amount to 45-50 percent of the gross. All other expenses should run 25-30 percent of the gross. In general, successful service departments should net 20 percent after absorbing their share of administrative or indirect expenses. If your expenses are greater than 80 percent, and the culprit is not gross retention, concentrate on lowering expenses—common costs to rein in include shop supplies, policy work, uniforms, and parts washers. You *can* achieve a 20 percent net; like a small increase in gross, a small decrease in expenses can have a big impact on sales needed to make your best net.

Fixed absorption is yet another area to scrutinize. Fixed absorption is the extent to which the fixed departments (service, parts, and body shop) can cover the entire dealership's adjusted overhead expense (i.e., total dealership expense less expenses directly attributable to vehicle sales—commission, delivery, and policy). Absorption, important in any sales climate, becomes critical when vehicle sales slide. Variable income flow goes down, but expenses increase. The more of the debt load you can take off variable operations, the easier it is for them to sell vehicles. Aim for as close to full (100 percent) absorption as possible. NADA 20 Group guidelines, which include used-vehicle gross in the formula below, recommend 100 percent absorption. NADA Academy, basing its guidelines on the experience of the top 20 percent of dealers who are successful in all departments, recommends 75 percent absorption, with or without a body shop. If your absorption is low, look at your grossing patterns. Service should be holding 70 percent, parts should be holding 38 percent, and body shop should be holding 65 percent on labor, 30 percent on paint and materials. If you're holding gross in all these areas, examine expenses. Advise the general manager or sales manager if you find that the service department is in the position of absorbing costs it cannot control, i.e., floor plan interest on and advertising of aged inventory.

Calculate your fixed absorption using the numbers from your financial statement in this formula:

Gross profit (parts dept + service dept + body shop) ÷ dealership overhead expense = absorption percentage

This article is adapted from *Service Department Performance Analysis*. Please sign in to www.nadauniversity.com and visit Resource Toolbox to access this and other *Driven* guides.

UPDATE 1-DEADLINE FOR US AUTO FUEL ECONOMY PROPOSAL TO SLIP

By [John Crawley](#) (Reuters)

WASHINGTON, Sept 27 (Reuters) - The Obama administration will push back the release of the most ambitious proposal ever for automakers to improve fuel efficiency of their passenger cars, sport utility vehicles and pickups.

It was recently determined that more time is needed to complete the plan, so the deadline was extended. Regulators said they now hope to finish the work and publish the proposal by mid November.

Industry and environmental groups are eager to see how the administration plans to fill out a baseline agreement it struck in July with automakers and the state of California requiring the fleet to average 54.5 miles per gallon by 2025. That is equivalent to a 5 percent increase in annual efficiency.

The [deal](#) softens the impact for production of light trucks, such as pickups and SUVs -- a mainstay of U.S. auto manufacturers General Motors Co , Ford Motor Co and Chrysler.

The administration would, with a short delay, remain on track to meet its deadline for issuing final rules next July, five years before they take effect. That timeline gives the industry room to plan its vehicle mix and make any production or technology changes.

The National Highway Traffic Safety Administration (NHTSA) and the EPA are jointly writing the [regulation](#) with California, which has important influence because of its huge market, its political standing with the Democratic administration and its environmental leadership role.

NHTSA did not say why the proposal timeline was changed other than to note in a statement that it was necessary "given the historic nature" of the plan and the coordination necessary between two federal agencies and California authorities.

But sources familiar with the matter said the work is complex and time consuming. Regulators, they said, are purposely moving slower than anticipated to ensure that industry, environmental and consumer issues likely to be raised during a lengthy public comment period are addressed ahead of time.

Committee Chairman Darrell Issa, a California Republican, has raised concerns about the secrecy of the meetings and the agreement's impact on consumers. He has asked companies to preserve all documents from their discussions with administration officials.

Loss Prevention

Please route to:

- Owner
- General manager
- Sales manager
- Service manager
- Office manager

Catalytic Converter Theft - Gone in 90 Seconds

Due to the continued high price of precious metals, catalytic converter thefts continue to be a common crime that can be very costly to auto dealers and automotive service businesses if not addressed.

In addition, many insurance policies are carrying higher per vehicle deductibles and higher per occurrence deductible aggregates, which require the insured to reimburse the insurer up to an agreed upon amount annually before losses are paid by the insurer. Therefore, customers may end up paying the full cost of replacement until they meet their aggregate amount.

The good news is there are steps you can take to protect your business against this type of theft, which will be discussed later. First, let's talk about why these crimes occur and who is committing them.

Why catalytic converters?

Thieves are attracted to catalytic converters for two reasons: low risk and high reward. The ease in which a converter can be stolen presents few risks to thieves. Converters can be removed quickly, often in less than two minutes, with only a wrench (for converters that are bolted on) or a reciprocating saw (for converters that are welded in). And because thieves can "work" undetected under the vehicle, converters can be stolen in broad daylight.

In addition, thieves no longer have to steal an entire car for a nice payday. The theft of catalytic converters can be linked to sharply rising precious metal prices, specifically three found in

the majority of converters manufactured today – platinum, palladium, and rhodium. Depending on which metal was used, thieves can sell converters to metal recyclers for \$20-\$200 per converter¹. Recyclers then extract the metal and resell it for thousands of dollars per ounce.

Targeted vehicles may include just about any pick-up truck or sport utility vehicle that sits high enough off the ground to allow an individual to slide under it without a jack. Particularly attractive to thieves are newer vehicles that have two converters.

Theft rings

While small scale thefts are usually committed by individual thieves, most of the larger thefts targeting multiple vehicles at a single business appear to be committed by theft rings.

Theft rings often stake out businesses for security, guards, fences, location of vehicles, and lighting. Once thieves decide where and when to strike, they move in and may work in teams as small as two to as large as seven or more. A typical large team of thieves would consist of a couple individuals under vehicles removing converters, a couple more waiting nearby to carry stolen converters to a waiting van or truck, and two or more waiting to load them onto the get away vehicle.

Catalytic converters are an easy and valuable target to thieves. However, by following sound loss prevention practices, businesses can minimize risk and save thousands of dollars in potential losses.

Loss Prevention Tips

Catalytic converters are an easy and valuable target to thieves. However, by following sound loss prevention practices, businesses can minimize risk and save thousands of dollars in potential losses.

- Park vehicles in a well-lit area with a high volume of after hours traffic
- Eliminate use of off-premise lots to park vehicles unless security is present
- Implement detailed lock-up procedures for securing doors, gates and fences
- Hire security guards – be sure to research security companies and select reliable companies with good references and a proven track record
- Install a video surveillance system
- Conduct thorough background checks of employees

References

- ¹ www.edmunds.com/auto-insurance/in-under-two-minutes-catalytic-converter-theft.html

Loss prevention information

For questions about this loss prevention topic, contact the Zurich Risk Engineering Department at 800-821-7803.

Not a customer?

For more information about Zurich's products and Risk Engineering services, visit www.zurichna.com/zdu or call us at 800-842-8842 ext. 7449.

Already a customer?

Contact your Zurich Account Executive or agent for information about additional Zurich's products and Risk Engineering services.

The information in this publication was compiled from sources believed to be reliable for informational purposes only. All sample policies and procedures herein should serve as a guideline, which you can use to create your own policies and procedures. We trust that you will customize these samples to reflect your own operations and believe that these samples may serve as a helpful platform for this endeavor. Any and all information contained herein is not intended to constitute legal advice and accordingly, you should consult with your own attorneys when developing programs and policies. We do not guarantee the accuracy of this information or any results and further assume no liability in connection with this publication and sample policies and procedures, including any information, methods or safety suggestions contained herein. Moreover, Zurich reminds you that this cannot be assumed to contain every acceptable safety and compliance procedure or that additional procedures might not be appropriate under the circumstances. The subject matter of this publication is not tied to any specific insurance product nor will adopting these policies and procedures ensure coverage under any insurance policy.

Drive new profit in your dealership.



New profit center • Increase CSI • Maximize customer loyalty





**Montana Automobile
Dealers Association**



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Available in Red, Silver, Blue, White, Gold and Green
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Blue and Silver
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**Contact Dan Dallas
Field Services Director
406-442-1233**



Montana Auto Dealers Association
 501 N. Sanders * Helena, MT 59601
 Call 442-1233 Fax 449-0119

Dealership _____ Attn / PO # _____
 City _____ Date _____

PRICES EFFECTIVE SEPTEMBER 2011

<u>Quantity</u>	<u>Description</u>	<u>Quantity Per Package</u>	<u>Price</u>	<u>Amount</u>
_____	Bar Magnet	1	\$ 8.00	_____
_____	Damage Disclosure Statement	100	\$ 10.00	_____
_____	Day Bright Numbers (<i>Fluorescent Green</i>)	12	\$ 3.25	_____
_____	Dealer Jackets	100	\$30.00	_____
_____	Dealer Price Label	100	\$ 9.00	_____
_____	Dealer Directory	1	\$ 5.00	_____
_____	EPA Dealer Certification Statement	100	\$ 15.00	_____
_____	Econo ID Tag (<i>Yellow, White</i>)	1,000	\$ 23.00	_____
_____	Paint Marker			
	<i>(White, Yellow, Red, Pink)</i>	1	\$ 10.00	
_____	Key Rings	250	\$ 5.00	_____
_____	Lease Odometer Form	250	\$ 14.00	_____
_____	MV1 - Certificate of Title (<i>Revised 03/01/08</i>)	100	\$ 6.50	_____
_____	Mirror Tag (<i>Was/Now, Blank, Orange, Yellow</i>)	50	\$ 17.00	_____
_____	Odometer Disclosure Statement	250	\$ 27.00	_____
_____	Odometer Repair Label	50	\$ 5.00	_____
_____	Poly Stock Key Tag (<i>Yellow only</i>)	250	\$ 24.00	_____
_____	Poly Stock Windshield Tag (<i>Yellow only</i>)	250	\$ 30.00	_____
_____	Purchase Order Form	100	\$ 30.00	_____
_____	Secure Power-of-Attorney (<i>MV65A</i>)	100	\$ 35.00	_____
_____	Seller's Disclosure Affidavit	100	\$ 20.00	_____
_____	Sno-Rake	1	\$ 22.00	_____
_____	Statement of Purchase of Used Car	100	\$ 15.00	_____
_____	Stock Key Tag (<i>Yellow, Green, Blue, Red, White</i>)	250	\$ 24.00	_____
_____	Stock Windshield Tag			
	<i>(Yellow, Green, Blue, Red, White)</i>	100	\$ 9.00	_____
_____	Supplemental Price Label			
	4.5" x 11" (<i>Red, Blue</i>)	100	\$ 27.00	_____
_____	3" x 11" (<i>Red, Blue</i>)	100	\$ 27.00	_____
_____	Temporary Registration Pouch	100	\$ 22.00	_____
_____	Used Car Buyers Guide (<i>Required by FTC</i>)	100	\$ 16.00	_____
_____	Seal 4 Used Car Buyers Guide (<i>Required by FTC</i>)	100	\$ 38.00	_____

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