



December 8, 2010

Donald S. Clark
Secretary
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

LKQ, Corporation Comments on Federal Trade Commission Guides for the Use of Environmental Marketing Claims

Dear Secretary Clark:

LKQ Corporation, upon the acquisitions of Keystone Automotive Industries and Greenleaf Recyclers, LLC, is the nation's largest and leading provider of aftermarket, refurbished and recycled OEM parts. LKQ employs 11,000 people nationwide within a network of approximately 350 facilities in more than 43 states.

LKQ and Environmental Responsibility

At LKQ Corporation, we do not just create a better business environment for our customers in the automobile collision and mechanical repair industries – we are committed to helping make a better environment for the entire planet. That is why we lead the vehicle parts recycling industry in minimizing the impact of our activities by committing to:

- Meet or exceed all environmental regulatory requirements that apply to LKQ's activities
- Reduce and where possible eliminate waste by evaluating all operations and following the waste hierarchy of reduce, reuse and recycle
- Minimize the release of harmful substances into the environment through the selection and use of appropriate production materials and equipment, and maintenance of our motor vehicle fleet
- Actively promote recycling both within LKQ and among our customers and suppliers
- Reduce greenhouse gas emissions and the environmental footprint of LKQ in general
- Promote and produce range that minimizes the environmental impact of production and distribution

- Raise employee awareness of environmental issues and encourage their enthusiastic support of LKQ environmental initiatives
- Regularly evaluate our overall corporate environmental performance

Comments and Suggestions on Guide

We support the Guide as a useful tool for the automotive parts industry to promote themselves to the public responsibly. We also support the marketing cohesion the Guide advances to insure the consuming public is properly educated on the products they buy or the services they request.

As a leader in the vehicle recycling parts industry, we would like to suggest a two changes to the Guide's Example numbers 12 and 13. We find the use of the words "automotive dealer" in Ex. 12 and "automobile parts dealer" in Ex. 13 to be limiting in their scope. We would suggest expanding the terms of these example to prevent a misconception to the industry or public that these are the only two entities qualified to perform these functions.

Conclusion

LKQ, Corporation appreciates the opportunity to comment on the Guides for the Use of Environmental Marketing Claims. We continue to support the Guides and are optimistic that the Federal Trade Commission will note our suggested changes.

Respectfully,

Eileen A. Sottile
Vice President, Government Affairs
LKQ Corporation