

May 16, 2012

Hampton Newsome  
Attorney, Division of Enforcement  
Bureau of Consumer Protection  
Federal Trade Commission  
Room M-8102B  
600 Pennsylvania Ave., NW  
Washington, DC 20580

Submitted via <https://ftcpublic.commentworks.com/ftc/energylabelingamendmentsnprm>

**Re: Panasonic Comments on Appliance Labeling Amendments, Matter No. R611004**

Dear Mr. Newsome:

As a leading global leader in the development and manufacture of electronic products including televisions and home appliances, Panasonic Corporation is pleased to offer comments to the Federal Trade Commission on its Notice of Proposed Rulemaking on Appliance Labeling Amendments, Matter No. R611004, 77 Fed. Reg. 15298 published on March 15, 2012.

### **QR Codes on EnergyGuide Labels**

In the past year, the use of QR codes by Panasonic and other manufacturers has exponentially increased due to the codes' unique ability to convey important product specific information directly to smart phones and other hand-held consumer devices.

While the Commission's stated goal of providing detailed information on product energy impacts and greenhouse gas emissions is laudable, a requirement to provide this information via a dedicated QR code embedded on the EnergyGuide label is not workable and would likely create widespread consumer confusion. If the Commission were to adopt a requirement to place QR codes on EnergyGuide labels, the marketing benefits of manufacturer-created QR codes would be significantly diminished. Further, the current design of the EnergyGuide labels mandated for televisions would need to be substantially reworked and the overall size increased if the QR code were to be included.

The current EnergyGuide labels already provide a wealth of essential information to consumers about product energy use. Trying to place additional information on the label via a QR code would not provide meaningful consumer benefits beyond the current comparative and annual power consumption data. Panasonic's QR codes are designed to take consumers directly to our web pages for detailed product information, helping the consumer make better informed choices.

Offering a separate QR code would only serve to confuse consumers and would severely diminish the effectiveness of Panasonic-created and maintained web pages for our dedicated QR codes. In addition, the use of QR codes is evolving and placing prescriptive rules on their use through this proposed requirement is strongly discouraged.

Maintaining the required QR code would also pose an additional reporting data on Panasonic and other manufacturers who, as required by law, already submit information directly to the Department of Energy on its products on an annual basis. There is no reason for the FTC to expand this reporting burden through the QR code requirement in order to provide duplicative and possibly confusing information to consumers.

Panasonic appreciates the opportunity to provide comments on the FTC proposal and would be happy to further discuss our views at your request.

Sincerely,

Mark J. Sharp  
Group Manager, Corporate Environmental Department