



November 1, 2012

The Honorable Jon Leibowitz  
Chairman  
U.S. Federal Trade Commission  
600 Pennsylvania Ave., NW  
Washington, DC 20580

Re: Fur Rules Review, Matter No. P074201

Dear Chairman Leibowitz:

Pursuant to the request by the U.S. Federal Trade Commission (“FTC”) published in the Federal Register (77 Fed. Reg. 57,051) on September 17, 2012, the National Retail Federation (“NRF”) is submitting the following comments on behalf of its member companies in the U.S. retail industry on the FTC’s proposed amended regulations to implement the Truth in Fur Labeling Act (TFLA) of 2010,<sup>1</sup> update its Fur Products Name Guide,<sup>2</sup> and amend the labeling requirements under the Fur Products Labeling Act.<sup>3</sup>

As the world’s largest retail trade association and the voice of retail worldwide, NRF represents retailers of all types and sizes, including chain restaurants and industry partners, from the United States and more than 45 countries abroad. Retailers operate more than 3.6 million U.S. establishments that support one in four U.S. jobs – 42 million working Americans. Contributing \$2.5 trillion to annual GDP, retail is a daily barometer for the nation’s economy.

NRF and its member companies that sell fur products at retail strongly support the FTC’s decision to reject changes or alternatives in the Fur Products Name Guide for *nyctereutes procyonoides*, which will continue to be identified as the “Asiatic Raccoon” on fur product labels. For reasons stated in our previous comments submitted to the FTC on May 16, 2011, and in our statement during the FTC’s public hearing on December 6, 2011, we believe the FTC’s proposed rules under the Fur Products Labeling Act for this animal are proper and correct.

NRF and its member companies also strongly support the FTC’s proposal to simplify the fur labeling rules by deleting label size and text requirements and allowing a single label for products “marketed or handled in pairs or ensembles,” such as shoes and gloves. We agree that these sensible

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<sup>1</sup> Pub. L. no. 111–113, 124 Stat. 3326.

<sup>2</sup> 76 FR 13550 (Mar. 14, 2011).

<sup>3</sup> 15 U.S.C. § 69 et seq.

changes will facilitate compliance by retailers and consumer brand companies while providing effective disclosure information to consumers as to the content of the fur products they purchase.

NRF appreciates the opportunity to comment on the FTC's proposed rules under the Fur Products Labeling Act. Any questions should be directed to me at (202) 626-8104 or by email at [autore@nrf.com](mailto:autore@nrf.com).

Respectfully submitted,



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National Retail Federation