

**JAMES P. MORAN**  
8TH DISTRICT OF VIRGINIA

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**Congress of the United States**  
**House of Representatives**

November 9, 2012

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Matthew Wilshire  
Federal Trade Commission  
600 Pennsylvania Ave. N.W.  
Washington, DC 20580

Re: Regulations Under the Fur Products Labeling Act (FTC Matter No. P074201)

Dear Mr. Wilshire:

As the lead sponsor of the Truth in Fur Labeling Act of 2010 (P.L. 111-313), I would like to thank the Federal Trade Commission for pursuing rulemaking to update the Fur Products Name Guide. I appreciate the agency's attention to this matter, and its continued work to enforce the fur labeling law. Unfortunately, I am concerned that the agency's proposed decision on the listing for the "raccoon dog" species is unsatisfactory, and will continue to lead to confusion in the marketplace, which is a serious concern of many of my constituents.

The FTC has proposed to continue the use of the term "Asiatic Raccoon" for fur from *Nyctereutes procyonoides*, a species known by other federal agencies, and the scientific community, by its common English name, "raccoon dog." This species from the Canidae family is unrelated to the raccoon and appears in Europe as well as Asia, making the term "Asiatic Raccoon" highly misleading. This is exactly the type of mislabeling that the statute was intended to address, in order to protect consumers who may wish to avoid buying fur from a particular species of animal.

The fur labeling law was enacted in order to give consumers important product information so they are able to make informed purchasing decisions in the marketplace. In order for consumers to have access to the most accurate information, the Name Guide should use the "true English name" of listed animals, as required by law and based on scientifically accepted information, not a misleading and inaccurate industry-coined name. I urge the FTC to reverse its current direction and finalize the Name Guide with *Nyctereutes procyonoides* listed with its "true English name" of raccoon dog.

Thank you for your attention to this matter and your consideration of this request.

Sincerely,

 James P. Moran