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August 6, 2012

Federal Trade Commission
Office of the Secretary
Room H—113 (Annex N)
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

FE-6344

Re: FTC-2012-0056

Proposed Amendments to the Alternative Fuels and Alternative Fueled Vehicles (16 CFR part 309), (Matter No. R311002)

General Motors Company (GM) appreciates the opportunity to offer comments on the Federal Trade Commission's (FTC's) Notice of Proposed Rulemaking to amend the alternative fuels rule regarding the consolidation of the FTC label with the Environmental Protection Agency (EPA) labels for all alternative fuel vehicles (AFV) and elimination of FTC labeling requirements for used AFVs. See 77 Fed. Reg. 36,423 (June 19, 2012).

If you have any questions regarding this response, please contact me or Barbara Kiss of my staff at (313) 665-2964.

Sincerely yours,

Robert Babik
Director – Environment, Energy and Safety Policy
General Motors Public Policy Center

Attachments

General Motors Comments
On
Proposed Amendments to the Alternative Fuels and Alternative Fueled Vehicles

General Motors (GM) supports the proposal from the FTC to address the incongruent and burdensome nature of the FTC, EPA, and National Highway and Transportation Safety Administration (NHTSA) labeling requirements. Further, GM supports the FTC's proposed elimination of the required label for used AFV vehicles and the use of fuelconomy.gov in lieu of current labeling system. The recommended amendments to 16 CFR part 309 are consistent with the submitted suggestions from the industry and we commend the FTC for taking steps forward to resolve these important issues.

GM also supports the FTC's proposal to eliminate the requirement for a separate AFV label for used vehicles. In addition to GM's previously submitted comments highlighting the nonexistent consumer benefit, GM echoes industry concerns noting the disproportionate burden placed on dealers under the proposed rule.

GM especially supports the coordinated harmonization of the disparate FTC, EPA and NHTSA labels to create a comprehensive, single fuel economy label to reduce consumer confusion and industry burden. In addition, GM encourages the adoption of the FTC's proposed required use of the EPA FFV label containing the vehicle's alternative fuel and gasoline driving range, specifically citing the difference between driving range performance GM, both individually and as a member of the Alliance of Automobile Manufacturers, reiterates both of the previous comment submissions explaining that the EPA fuel economy labels offer the information consistent with the FTC label with no additional benefit. The FTC's proposed elimination of the duplicate labeling system will allow the appropriate information to be clearly communicated to the consumer.

GM, as a member of the Alliance of Automobile Manufacturers, also supports the comments submitted by the Alliance. The comments from both GM and the Alliance are directed toward making these regulatory programs more workable and effective in achieving the agencies' overarching public policy goals.