

August 16, 2012

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

Re: Alternative Fuels Labeling (16 CFR Part 309) (Matter No. R311002)  
(Submitted Electronically)

Dear Sir of Madam,

The Association of Global Automakers, Inc. (Global Automakers)<sup>1</sup> appreciates the opportunity to provide comments to the Federal Trade Commission (FTC) on its notice of proposed rulemaking “Labeling Requirements for Alternative Fuels and Alternative Fueled Vehicles” [77 FR 36423, June 19, 2012]. FTC proposes to consolidate its alternative fueled vehicle (AFV) labels with the Fuel Economy and Environment Label required by the Environmental Protection Agency (EPA) and National Highway Traffic Safety Administration (NHTSA). FTC also proposes to require on the label a flexible fuel vehicle’s (FFV) driving range while operating on the alternative fuel and to eliminate the requirement for used AFV labels.

Global Automakers strongly supports the need for a single label for new motor vehicles to provide clear and consistent information to the consumer. Global Automakers previously commented on the importance of a single label to FTC, EPA, NHTSA, and the California Air Resources Board. As stated in Global Automakers’ (formerly the Association of International Automobile Manufacturers, Inc.) comment to EPA and NHTSA on the proposed fuel economy label amendments in 2010:<sup>2</sup>

All of the federal and state labeling requirements share a common goal – to provide consumers with the best available information to inform new vehicle purchase decisions. This goal is not achieved with competing and conflicting labels. To inform consumers without confusing and frustrating them, it is essential to have one nationwide new vehicle label.

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<sup>1</sup> The Association of Global Automakers, Inc. (Global Automakers) represents international motor vehicle manufacturers, original equipment suppliers, and other automotive-related trade associations. Our members’ market share of both U.S. sales and production is 40 percent and growing. We work with industry leaders, legislators, regulators, and other stakeholders in the United States to create public policy that improves motor vehicle safety, encourages technological innovation and protects our planet. Our goal is to foster an open and competitive automotive marketplace that encourages investment, job growth, and development of vehicles that can enhance Americans’ quality of life. For more information, please visit [www.globalautomakers.org](http://www.globalautomakers.org).

<sup>2</sup> Comment submitted by Michael J. Stanton, President and Chief Executive Officer (CEO), Association of International Automobile Manufacturers, Inc. (AIAM), EPA-HQ-OAR-2009-0865-7134, November 22 2010.

FTC's proposal is consistent with our call for "one nationwide new vehicle label" and "to provide consumers with the best available information." We believe that this allowance will also reduce burden on industry, and therefore this action meets the goals of President Obama's Executive Order 13563 (Improving Regulation and Regulatory Review, January 18, 2011) and Executive Order (Identifying and Reducing Regulatory Burdens, May 10, 2012), which seek to reduce unnecessary regulatory burdens.

While we continue to support a single, harmonized label, Global Automakers believes that the FTC should clarify that if, for some reason, a manufacturer does not apply the Fuel Economy and Environment Label to a new motor vehicle, then the FTC's label must be applied. Although we believe this scenario will rarely (if ever) occur, such clarification is necessary to ensure consumer information on all new motor vehicles.

FTC is also proposing to require that the manufacturer include the alternative fuel, as well as the gasoline, driving range for FFVs on the Fuel Economy and Environment Label; the EPA and NHTSA requirements provide an option (not a requirement) to include this information on the label. We understand that in order to meet FTC's labeling requirements that this information must be included and that such information would serve the purpose of informing the consumer. Although not implicit in FTC's discussion, it appears that a manufacturer would maintain discretion to optionally apply the FTC label to an FFV if the manufacturer chooses not to include such information on the Fuel Economy and Environment Label, and we recommend that FTC clarify this point.

Global Automakers also supports FTC's proposal to eliminate the labeling requirements for used AFV labels. The elimination of this label would greatly reduce the burden on automobile dealers. Such labeling provides little benefit to consumers, since the used AFV label does not provide specific information about the vehicle, such as driving range; vehicle-specific information for a used AFV, including driving range, is available at [www.fueleconomy.gov](http://www.fueleconomy.gov) should the consumer want this information.

Finally, Global Automakers encourages the FTC to move forward to finalize these regulations as soon as possible. In order to provide the benefits of this rulemaking before the 2014 model year, which can begin as early as January 2, 2013, Global Automakers recommends that the FTC release a final rule by October, and no later than November, 2012, which coincides with the lead time needed to develop and pre-print labels for the upcoming model year.

Thank you for your consideration of our comments. If you have any questions regarding the comments, I can be contacted at (202) 650-5559 or [jrege@globalautomakers.org](mailto:jrege@globalautomakers.org).

Sincerely,

Julia Rege  
Senior Manager, Environment & Energy