

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RE: Compliance with FTC Appliance Labeling Rule
DATE: 1/19/2012

Dear Mr. Wiener,

Thank you for bringing to our attention that [REDACTED] did not comply with FTC labeling requirements. It is [REDACTED] intention to not only always comply with federal regulations but also to provide information to customers that is helpful in making a purchase decision – and energy usage information is helpful.

We have corrected any units that did not have this information on our website [REDACTED]. It appears that although many did have this information, some were missed, and we have emphasized to our product merchandisers to ensure this information is included on any future units that they add to the site. If we ever slip up in the future, please do not hesitate to reach out to me and I will have it corrected.

Thank you for also bringing to our attention that some of the units as listed on Amazon.com do not meet labeling requirements. We have now taken the corrective action that is under our control – and are sending the necessary information to Amazon.com in our inventory feed for all of our window air conditioners.

In doing a quick review, it appears that many of the units now are displaying the correct labeling information. However not all of the units on Amazon.com are displaying the information we are sending. This is not under our control. At this point, for any units that are still not displaying the correct information – this would have to be taken up with Amazon.com.

You may already be aware of this but in case you are not, let me explain how Amazon.com handles product descriptions. Let's say 10 vendors sell the same product. Amazon.com will receive 10 different product descriptions from these vendors. Then Amazon will determine which description to show based upon their own internal logic. My guess is that Amazon is likely determining which description leads more people to buy the item in question. We have no control of what information Amazon ultimately decides to display for the product we are selling on Amazon.com. So on some listings, they are showing someone else's content under our name. If they choose our information that we provide with the required labeling requirements – great. But it appears that they are not always doing that.

Thank you again for bringing this matter to our attention as it has helped improve the information we provide to our customers. If there is anything else we can do, please do not hesitate to reach out.

Sincerely,

[REDACTED]
President
[REDACTED]