



Federal Trade Commission,
Donald S. Clark
Office of the Secretary,
600 Pennsylvania Avenue N.W.,
Suite CC-5610 (Annex B)
Washington, DC 20580

Re: Supplementary Notice of Proposed Rulemaking on Energy Labeling Rule Regulatory Review (16 CFR Part 305) (Project No. R611004)

August 11, 2014

Dear Mr. Clark:

Amazon's mission is to be Earth's most customer-centric company, where people can find and discover anything they want to buy online. In furtherance of that mission, we sell millions of different products in a wide variety of categories. This comment responds to one aspect of the Commission's proposal on the Energy Labeling Rule.

Amazon strongly supports the proposal by the Federal Trade Commission (the "Commission") to establish a centralized public database with easy access to EnergyGuide labels by requiring that manufacturers submit URL links for covered products to the Department of Energy's Compliance and Certification Management System ("CCMS"). By giving easy access to an up-to-date collection of EnergyGuide labels in a single location, we believe the database would increase overall industry efficiency by decreasing the time required of retailers to identify and obtain the correct EnergyGuide labels for covered products. This should allow retailers to make new products available to consumers and complete internal compliance audits of their catalogues faster and with less human resources than is possible today.

We would also expect the database to encourage general compliance with the Energy Labeling Rule, decrease instances of mislabeling and free up valuable internal resources for retailers to focus on other important compliance matters. We agree with the Commission that adopting the proposal would not place an undue burden on manufacturers who already are required to publish EnergyGuide labels on publicly accessible websites and have open lines of electronic communication with CCMS. Adding URL links to CCMS seems like an intuitive next step that should require very little additional effort on the part of manufacturers given their existing EnergyGuide label processes. Accordingly, we encourage the Commission to adopt this common sense proposal.

Sincerely,

Brian Huseman
Director, Public Policy
Amazon