

JEROME R. SCHINDLER
REGULATORY CONSULTANT

March 6, 2015



Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue NW
Suite CC-5610 (Annex G)
Washington, DC 20580

Re: FPLA RULES, 16 CFR Parts 500-503, Project No. R411015

Dear Sir/Madame:

In addition to the changes the FTC has proposed for 16 CFR 500.5(c) to reflect the current reality that printed telephone and other direct response numbers have been largely rendered obsolete by internet access to information, I also suggest that the FTC amend 16 CFR 500.5(b) to read as follows:

(b) The requirement for declaration of the manufacturer, packer or distributor shall be deemed to be satisfied either by the actual corporate name, which may be preceded or followed by the name of a particular division of the corporation, or by the name under which such business is conducted. In the case of an individual, partnership, association or limited liability company either the name of the individual, association or limited liability company or the name under which the business is conducted, shall be used.

This change would merely treat all business entities the same and in fact would legitimize what has already been the practice of many consumer product companies. The lack of enforcement of the "actual corporate name" requirement for either domestic or international corporations indicates that this change is consistent with the current practice of the relevant regulatory authorities.

The addition to 16 CFR 500.3(d) of language that cautions businesses that they also must consider the laws and regulations of the various states that may be more inclusive is certainly warranted. The FTC should also including a warning that the Food and Drug Administration FPLA regulations governing labeling of the net quantity of contents for human food, animal food, drugs and cosmetics have never been amended to reflect the metric labeling requirement and other changes that were part of the 1992 amendments to the federal Fair Packaging and Labeling Act passed by the U.S. Congress over 23 years ago, and therefore compliance with the applicable FDA regulations found in the current federal Code of Federal Regulations without more could result in a misbranded consumer product. As Edith Ann said on "Laugh-In", "and that's the truth". If this embarrasses the FDA, well, they should be embarrassed.

Respectfully submitted,

Jerome R. Schindler