



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

Re: Notice of Proposed Rulemaking on Energy Labeling Amendments (16 CFR Part 305)
(Project No. R611004)

January 11, 2016

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 proposed amendments to the Energy Labeling Rule.

Amazon strongly supports the proposal by the Federal Trade Commission (the "Commission") to require manufacturers and private labelers to submit links to their EnergyGuide and Lighting Facts labels through their routine reporting to the Department of Energy's Compliance and Certification Management System ("CCMS"). By giving easy access to a comprehensive, up-to-date collection of EnergyGuide labels in a single location, we believe the database would allow consumers to easily research the comparative efficiency of covered products using the already existing Compliance Certification Database or other similar functionality.

We also would expect allowing retailers to copy EnergyGuide labels from a single database to help increase 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. In order to maximize the benefit to both consumers and retailers, we would encourage the Commission to require that submitted links correspond to the EnergyGuide or Lighting Facts label for the specific product as a stand-alone image in a standardized format, and to provide a method by which retailers can search by UPC and by the date the label was most recently updated (in addition to the current attributes that the CCMS database already tracks). As stated in our previous comment letter dated August 11, 2014, 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. Accordingly, we encourage the Commission to adopt this common-sense proposal.

Sincerely,



Brian Huseman
Director, Public Policy
Amazon