

**Before the
FEDERAL TRADE COMMISSION**

In the Matter of)	
)	
The proposal to amend the rules of the)	
Disclosure of Written Consumer Product)	Matter No. P044403
Warranty Terms and Conditions and Pre-Sale)	
Availability of Written Warranty Terms to)	
comply with the stipulations in the E-Warranty)	
Act.)	

COMMENTS OF THE ALLIANCE OF AUTOMOBILE MANUFACTURERS

Jonathan Weinberger
Vice President, Innovation and Technology
Alliance of Automobile Manufacturers

June 17, 2016

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COMMENTS OF THE ALLIANCE OF AUTOMOBILE MANUFACTURERS

The Alliance of Automobile Manufacturers (Auto Alliance) welcomes this opportunity to respond to the Federal Trade Commission (FTC) request for public comment (RFC) on the proposal to amend the rules of the Disclosure of Written Consumer Product Warranty Terms and Conditions and Pre-Sale Availability of Written Warranty Terms to comply with the stipulations in the E-Warranty Act (the “Act”).

The Auto Alliance is the leading advocacy group for the auto industry. Its members include BMW Group, FCA US LLC, Ford Motor Company, General Motors Company, Jaguar Land Rover, Mazda, Mercedes-Benz USA, Mitsubishi Motors, Porsche, Toyota, Volkswagen Group of America, and Volvo Cars North America, representing 77 percent of all car and light truck sales in the United States.

The Auto Alliance believes that the proposed rule will expand consumer access to important product information in a flexible and environmentally friendly way, while reducing printing and

distribution costs to manufacturers. As others have noted, it is widely recognized that many consumers prefer having the option to provide or receive warranty information online. The Auto Alliance supports the E-Warranty Act of 2015, and the FTC's proposed implementation, and looks forward to ensuring a smooth transition to the introduction of online warranty information.

Thank you again for this opportunity to share the Alliance's views on the E-Warranty Act. We hope we can serve as constructive participants as this process moves forward.

Respectfully submitted,

Jonathan Weinberger
Vice President, Innovation and Technology
Alliance of Automobile Manufacturers

June 17, 2016