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UNITED STATES OF AMERICA

FEDERAL TRADE COMMISSION 600 PENNSYL VANIA AVENUE, NW
WASHINGTON, D.C. 20580

November 28,2011

Environment, Energy & Safety Policy General Motors Company
300 Renaissance Center

Detroit, Michigan 48265-3000

Dear Mr. Babik:

This staff

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vehicle performance, energy security, and emissions. It also provides telephone numbers and website addresses for additional information.

To avoid potential consumer confusion and reduce compliance costs, GM seeks to use
only the EPA label on its dual-fueled vehicles. It asks that the Commission, or the FTC staff, forbear enforcement ofthe FTC label as long as GM uses the EPA label including tbe vehicle's driving range. In GM's view, use of both labels could cause confusion because tbe EPA and FTC labels present driving range information in different ways. The FTC requires two range numbers: a lower number based on city fuel economy and an upper number based on highway fuel economy (e.g., 246-378 miles on one tank). Conversely, tbe EPA rule requires a single range number (e.g., 300 miles on one tank) based on tbe combined city-highway fuel economy rating. Although the resulting numbers are similar and based on the same test procedures, GM is concerned that the differences could confuse consumers. GM also explains that a single label will save several hundred thousand dollars each model year in labeling-related costs.

GM argues tbat its request is consistent with the Commission's recent policy to forbear enforcement of current FTC labeling requirements for electric vehicles given inconsistencies
between tbe driving range on EPA and FTC labels for those vehicles.3 Because a similar
inconsistency exists between the EPA and FTC labels for 2013 dual-fueled models, GM requests
a similar approach.

In rcsponsc to your request, thc FTC staff will not recommend enforcement action ifGM
(or another manufacturer) uses the EPA fuel economy label, with driving range information, in
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