

**FTC Magnuson-Moss Warranty Act Rule Review**  
**Key Comment Excerpts**

**Universal Standards in Automotive Products Coalition**

“[T]he Coalition urges the FTC to make two simple clarifications to Section 700.10 of its Interpretations to better provide consumers with the protections discussed in the Consumer Alert and to bring the [Magnuson-Moss Warranty] Act in line with the Clean Air Act:

- Amend Section 700.10(c) of Interpretations to include “indirect” conditioning practices, as is currently required under the Clean Air Act;
- Require automotive warranties to include a plain English anti-tying disclosure, similar to the disclosure already required of automotive warranties under the Clean Air Act, and modeled directly upon language approved by the FTC in its recent Consumer Alert on Automotive Warranties.

By making these modifications, the FTC will be providing consumers with more effective notice of their rights and the assurance that warranty coverage will not be denied improperly, in a manner consistent with the original intent of the [Magnuson-Moss Warranty] Act.”

**Hunton & Williams LLP**

“This submission is intended to make the Commission aware that, as currently written and enforced, the Interpretations and Rules fail to protect consumers from certain kinds of *de facto* tying conduct prohibited under the [Magnuson-Moss Warranty] Act: that is, conduct that may fall short of explicit “conditioning” conduct but that has the same effect on consumers.”

**International Imaging Technology Council**

“[T]he time has come for the FTC to update its Interpretations of the [Magnuson-Moss Warranty] Act to account for the evolution of warrantor practices. The recommendations set forth by the [USAP] Coalition would protect consumers from warrantors who seek to impose a *de facto* tying arrangement that would otherwise be impermissible under the Act as well as under similar federal law. The FTC should implement these suggested clarifications in order to remedy the inequality in bargaining power between consumers and warrantors that has re-emerged since the Interpretations were originally promulgated.”

**Automotive Oil Change Association**

“AOCA urges FTC to recognize the real world impact of automobile manufacturers’ semantic warfare on average consumers: individuals who are not legal experts and have no ability to stand toe-to-toe with giant corporations. America’s consumers need their warranty coverage for major repairs now more than ever, but they are being consistently subjected to marketing messages that create confusion over how to maintain it. FTC has the ability to clarify and otherwise promote via simple, cost-effective methods the ample consumer rights that already exist within the [Magnuson-Moss Warranty Act] and AOCA sincerely hopes that it will do so.”