



1919 S. Eads St.
Arlington, VA 22202
703-907-7600
CTA.tech

April 11, 2025

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

Subject: Support for the American Apparel & Footwear Association's Petition for Digital Labeling in Apparel

To the Federal Trade Commission:

The Consumer Technology Association (CTA) writes in support of the American Apparel & Footwear Association's (AAFA) petition to the Federal Trade Commission (FTC), submitted on February 28, 2025, which seeks to amend the Care Labeling Rule (16 C.F.R. Part 423) to permit digital labeling for apparel products.¹

CTA's membership includes over 1200 companies from every facet of the consumer technology industry, including manufacturers, distributors, developers, retailers, and integrators, with startups or small and mid-sized companies comprising 80 percent of CTA's members. CTA also owns and produces CES®—the most powerful tech event in the world.

In today's digital era, consumers increasingly rely on electronic means to access product information. Digital labeling or e-labeling, utilizing tools such as QR codes or URLs, offers manufacturers a dynamic platform to convey comprehensive and up-to-date information to consumers. This approach, which CTA has encouraged regulators to embrace across all product categories for more than a decade, not only enhances transparency but empowers consumers to make informed product purchasing decisions.

Broad Precedent for Utilizing Digital Labeling

In recent years, CTA has engaged in several proceedings, including at the FTC, in support of a move towards digital labeling.

¹ Petition for Rulemaking of American Apparel & Footwear Association, 90 Fed. Reg. 12,693 (Mar. 19, 2025).

As early as 2014, CTA, then known as the Consumer Electronics Association (CEA), endorsed the bipartisan E-LABEL Act, legislation that required the Federal Communications Commission (FCC) to allow devices with a screen to display information required by the agency digitally instead of through a label affixed to the device.² That legislation was signed into law and by all accounts has been implemented, without any major issues.³

More recently, in 2024, CTA urged the FTC to amend its Energy Labeling Rule to permit, but not require, digital display of the EnergyGuide label, including by display of a QR code that consumers could use to access the label or display of the label itself.⁴ CTA argued that televisions allow the unique opportunity for consumers to access information in a digital manner on a screen, in a way that is not necessarily present for other kinds of appliances.⁵

Similarly, at the Federal Communications Commission (FCC), CTA has advocated for the use of digital labeling in the recently established U.S. Cyber Trust Mark program.⁶ The voluntary program, which is based on the use of a common mark, accompanied by a QR code, will allow consumers to scan for access to detailed security information about the connected devices they buy.⁷ Such a program enhances consumer awareness and fosters trust in product security standards, using a format that would otherwise be impossible to communicate on product packaging or the product itself.

Conclusion

By adopting a digital approach to labeling, manufacturers, whether of apparel or other product categories, can provide consumers with accessible, detailed, and current product information while promoting environmental sustainability and reducing industry costs.

We urge the FTC to consider AAFA's petition favorably and embrace digital labeling as a means of more effectively communicating information to consumers.

² "E-Label Act," 47 U.S.C. § 621; see Press Release, "Fischer, Rockefeller Introduce Bipartisan E-LABEL Act," (Jul. 10, 2014), <https://www.fischer.senate.gov/public/index.cfm/news?ID=b05cd6b6-0980-4b2a-ac25-056ebee84655>.

³ "E-Label Act," 47 U.S.C. § 621.

⁴ See Consumer Technology Association, Comment on Energy Labeling Rule (April 19, 2024), <https://www.regulations.gov/comment/FTC-2024-0008-0031>.

⁵ *Id.*

⁶ Consumer Technology Association, CTIA, Information Technology Industry Council, National Electrical Manufacturers Association, Comment on Implementation of the Cybersecurity Labeling for Internet of Things Program (Sep. 9, 2024), <https://www.fcc.gov/ecfs/search/search-filings/filing/10909169380805>; Consumer Technology Association, Comment on Implementation of the Cybersecurity Labeling for Internet of Things Program (Aug. 19, 2024), <https://www.fcc.gov/ecfs/search/search-filings/filing/10819119488751>.

⁷ 47 C.F.R. Part 8.

Thank you for your attention to this matter. We look forward to the positive advancements this change can bring to both consumers and industry.

Sincerely,

CONSUMER TECHNOLOGY ASSOCIATION

/s/ J. David Grossman

J. David Grossman
Vice President, Policy & Regulatory Affairs

/s/ Ally Peck

Ally Peck
Director, Environmental Policy & Sustainability