



Travel Goods Association
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September XX, 2022

Lina Khan
Chair
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

SUBJECT: TGA Priorities for Conferee Consideration

Chair Khan:

On behalf of the U.S. travel goods industry, I am writing to urge the Federal Trade Commission (FTC) to address the growing number of false leather claims on Amazon. We further request a meeting with you and your staff to discuss our concerns.

The U.S. travel goods industry is comprised of small, mostly family-owned businesses that make, market, and sell travel goods – luggage, totes, backpacks, handbags, and other products for people who travel. Despite 99% of the travel goods sold in the United States being imported, we proudly employ 100,000 American workers today.

Our members proudly produce, distribute, and sell leather goods that are fully compliant with the *FTC Leather Guides*. However, even the most cursory search on Amazon reveals products that: 1) claim to be leather in their title but do not state until well into the description that it is not leather (Example - [Travelambo Rfid Wallet Women Leather Bifold Compact Small Wallet for Women](#)), products that claim to be leather, even in the description, but then state in the last bullet that it is not leather; 2) claim to be leather in the title, list the material as leather, but then state in the last bullet that it is not leather (Example – [Women's Leather Buckle Compact Bifold Zipper Pocket Wallet Rfid Blocking Card Case Purse with id Window](#)); or 3) claim to be genuine leather in the title but the price and information in the description imply otherwise (Example – [Gostwo Womens Rfid Blocking Small Compact Bifold Luxury Genuine Leather Pocket Wallet Ladies Mini Purse with ID Window](#)).

Please see numerous other examples in the Appendix to this letter.

The pandemic, its impact on travel, and now the worsening shipping crisis and surging inflation have devastated the travel goods industry. Just as our industry is attempting to recover, having to compete against a growing number of products that clearly mislead the consumer and violate U.S. law is hampering our industry's recovery efforts.

Therefore, we again urge the FTC to investigate whether Amazon is enabling the sale of products that clearly violate the *FTC Leather Guides*. Further, we request a meeting to discuss this important issue with you.

Thank you for your time and consideration in this matter. Please contact Nate Herman of my staff at 301-775-7633 or nate@travel-goods.org if you have any questions or would like additional information.

Sincerely,

Michele Marini Pittenger

Michele Marini Pittenger
President

- CC:
- Noah Joshua Phillips, Commissioner, Federal Trade Commission
 - Rebecca Kelly Slaughter, Commissioner, Federal Trade Commission
 - Christine S. Wilson, Commissioner, Federal Trade Commission
 - Alvaro Bedoya, Commissioner, Federal Trade Commission

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Appendix of Links to Specific Examples of False Leather Claims on Amazon's Marketplace

- 1) [Samsill 2 Pack Registration and Insurance Card Holder, 5.25" x 4.75" Black Glove Box Organizer, Perfect for Multiple Vehicles](#)
 - Product Details: "Material: Leather, Plastic"
 - Product Information, Technical Details: "Material: Leather, Plastic"
 - Product Description: "...This vehicle registration and insurance organizer protector **features a heat-sealed leather-like vinyl cover** with decorative perimeter stitch for a clean look."
- 2) [Car Registration and Insurance Holder, **Premium Leather** Registration and Insurance Card Holder, vehicle Glove Box Car Organizer with Magnetic Shut for Cards, Essential Document, Driver License \(Black\)](#)
 - Product Details: "Faux Leather"
 - Product Information, Technical Details: "Material: Faux Leather"
- 3) [Car Hooks for Purses and Bags, Car Back Seat Headrest Hanger Vehicle Beige **Leather** Storage Hook](#)
 - Product Details: "Leather"
 - Product Description: "...These are made of leather and has very nice craftsmanship stitching, very classy looking and much nicer than the plastic and metal ones. The leather will match the interior of your car perfectly."
 - Customer questions & answers, Answer to First Question "Hi Prospero, it is **microfiber leather**, the appearance and feel are the same as cow leather, but the performance is much better than cow leather, and it is environmentally friendly."
- 4) [Zitahli Slim RFID Wallets for Men, Money Clip Bifold **Leather** Wallet Minimalist Mens Wallet with ID Window and 12 Card Slots](#)
 - Product Details: "Leather"
 - Product Description: "Durable vegan leather"
- 5) [Migeec Passport Holder Cover Wallet **Leather** Card Case for Travel Document Organizer with Card Slot \(Black\)](#)
 - Product Details: "Leather"
 - About This Item: "Adopt premium **eco-friendly leather material**, hand made by experienced workers."
- 6) [Unisex Mens Womens **Premium Leather** Car Key Holder Bag Keychain Case Wallet with 6 Hooks Zipper Closure](#)
 - About this item: "Mens / Womens premium leather Key Holder Case. Material: Soft cowhide leather with high-quality silver metal buckle."
 - Product Description: "Unisex Premium Leather Car Key Holder Bag Wallet"
 - Product Description (at end): "Unisex **PU Leather** Car Key Holder"
- 7) [Genuine **Leather** Car Key Holder Bag Keychain Case Wallet with 8 Hooks Zipper Closure For Men And Women](#)
 - About this item: "This Leather key case holder is made of Genuine Leather, With Quality stitching and craftsmanship."
 - Description: "**Material: Cow Split Leather**"
- 8) [GDTK **Leather** Passport Holder Cover Case RFID Blocking Travel Wallet](#)
 - About this item: "Premium **synthetic leather** exterior and interior."
- 9) [Genuine **Leather** Passport and Vaccine Card Holder Combo, RFID Blocking Passport Holder Cover Case Wallet with CDC Vaccination Card Slot, Leather Travel Documents Organizer Protector for Women Men \(Coffee\)](#)
 - "Material: Leather"
 - About this item: "High-quality 100% Genuine leather Passport Holder and Vaccine Card Holder Combo..."
 - The two charts under product description say that many of the items are "faux leather" right next to claims that the manufacturer uses "genuine leather".
 - Last question in Customs Questions & Answers alleges that the product is PU leather.

- 10) [CLUCI **Leather** Backpack Purse for Women Convertible Large Travel Ladies Designer Fashion Casual College Shoulder Bag](#)
- About this item: "**Made of PU leather** with metal hardware..."
 - Product Description: "CLUCI Leather Backpack Purse for Women"
 - Friendly notes for you: "PU material has natural leather smell, but it will disappear in a few days exposed to outside."
- 11) [Girls Bowknot Cute **Leather** Backpack Mini Backpack Purse for Women](#)
- Product Details: "**Outer Material Faux Leather**"
 - About this item: "Material: **High Quality PU Leather.**"
- 12) [Women Mini Backpack Purse Small Cute Retro **Leather** Daypacks Convertible Casual Shoulder Bag](#)
- Product Details: "**Outer Material Faux Leather**"
 - About this item: "It's **made of soft and waterproof PU leather...**"
- 13) [Travelambo Rfid Wallet Women **Leather** Bifold Compact Small Wallet for Women](#)
- Product Details: "**Faux Leather**"
 - About this item: "LEATHER MATERIAL: The wallet is crafted using waxed genuine leather, a durable material tough enough for daily use."
 - Chart in Product Description claims the product is leather.
- 14) [Women's **Leather** Buckle Compact Bifold Zipper Pocket Wallet Rfid Blocking Card Case Purse with id Window](#)
- Product Details: "Material Leather"
 - About this item: "**PU Leather** with Elegant and Beautiful Zipper Closure Style Handmade by the Finest Craftsmanship."
- 15) [Gostwo Womens Rfid Blocking Small Compact Bifold Luxury **Genuine Leather** Pocket Wallet Ladies Mini Purse with ID Window](#)
- About this item: "LUXUARY GENUINE **WAX LEATHER**"
 - Product Description: "**Crosshatchr Leather**"