



Via Email

The Honorable Robert S. Adler, Acting Chairman
The Honorable Elliot F. Kaye, Commissioner
The Honorable Dana Baiocco, Commissioner
The Honorable Peter A. Feldman, Commissioner
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, Maryland 20814

Subject: Proposed Recalls Pledge

Dear Acting Chairman Adler and Commissioners Kaye, Baiocco, and Feldman:

On behalf of Amazon.com, Inc. ("Amazon"), I write to you with a proposal to create a Recalls Pledge ("Pledge") calling on online marketplaces to execute recalls for products sold in their online stores by third party sellers. Amazon would be proud to be the first signatory and to assist in promoting the Pledge and encouraging others to join.

As you may be aware, Amazon has been in productive conversations with Consumer Product Safety Commission ("CPSC") staff to establish a new standard where Amazon will execute recalls for products sold by third party sellers in our store. The details of this new approach will be described in a Memorandum of Agreement. We believe this new approach goes beyond our legal obligations, but we believe executing recalls on behalf of third party sellers is the right thing to do for our customers and will result in a safer shopping experience. We have therefore begun to build the technology and processes to execute product recalls on behalf of third party sellers. Importantly, our new approach applies to products sold by third party sellers that fulfil orders through Amazon's Fulfilment by Amazon ("FBA") service and third party sellers who fulfil orders on their own through Amazon's Merchant Fulfilment Network ("MFN"). We are proud to be the first company to make this commitment on behalf of our customers.

Amazon shares CPSC's goal of making sure consumer products are safe, and consumers are notified quickly and appropriately when a recall is warranted, regardless of where they shop. While Amazon is a popular place to shop, we make up less than 4% of US retail, which means there are many more places where consumers are purchasing their products and, when a recall is issued, may not be receiving critical information. By establishing a Pledge, and calling on other online marketplaces to join, CPSC is able to expand its enforcement mandate in a way that would benefit all consumers, not just Amazon's customers.

Companies that sign this Pledge would, like Amazon, agree to:

- 1) Serve as the CPSC's point of contact for recalls of products manufactured or sold by third parties.
- 2) Send recall notifications directly to customers.
- 3) Issue refunds directly to customers.
- 4) When the company provides storage and delivery services like FBA, the company will facilitate returns and handle destruction of recalled third party products at no cost to customers.
- 5) Develop mechanisms to hold sellers accountable if they are unresponsive.

This Pledge would establish a new standard that raises the bar on safety and will provide all consumers a safer shopping experience. By joining this Pledge, companies are making a public commitment to the CPSC, and American consumers, that they will work with the CPSC to ensure effective communication of safety hazards and issue prompt recalls of defective products.

Given the productive conversations we've had to date, and the mutual agreement and commitment to protecting all consumers, regardless of where they shop, we hope you will consider this proposal. Amazon stands ready to support this Pledge. Aside from the Pledge, we look forward to issuing a joint public announcement of our Memorandum of Agreement. That can also serve as an opportunity to call on other stores to follow our lead, implement recall capabilities for products sold by third parties, and help provide all consumers a safer shopping experience.

I look forward to discussing this Pledge and our commitment at your convenience.

Kind Regards,



Carletta Ooton
Vice President,
Product Assurance, Risk & Security

CC: Robert Kaye, Director, Office of Compliance and Field Operations
Mary Murphy, Director, Division of Enforcement and Litigation
Jennifer Timian, Director, Division of Regulatory Enforcement
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