

y. To disclose information to the Merit Systems Protection Board or the Office of Special Counsel in connection with appeals, special studies of the civil service and other merit systems, review of Office rules and regulations, investigation of alleged practices, and such other functions promulgated in 5 U.S.C. chapter 12, or as may be authorized by law.

DISCLOSURE TO CONSUMER REPORTING AGENCIES:

Not applicable.

POLICIES AND PRACTICES FOR STORING, RETRIEVING, ACCESSING, RETAINING, AND DISPOSING OF RECORDS IN THE SYSTEM:

STORAGE:

Records are maintained in file folders, microfiche, and in computer processable storage media.

RETRIEVABILITY:

Records are indexed by name, Social Security number, or identification number. Electronically maintained records may be sorted and retrieved by other variables, such as date of birth, division in which an employee works, or date of hire.

SAFEGUARDS:

Paper or microfiche records are located in locked metal file cabinets or in metal file cabinets in secured rooms with access limited to those whose official duties require it. Access to computerized records is limited, through use of access codes, to those whose official duties require it. In addition, access to computerized records can be tracked through an automatically-generated audit trail.

RETENTION AND DISPOSAL:

The general employment records are retained indefinitely. An individual's benefits records are maintained until the death of the last surviving beneficiary.

SYSTEM MANAGER(S) AND ADDRESS:

Associate Director, Human Resources Function, Management Division, Board of Governors of the Federal Reserve System, 20th & Constitution, NW, Washington, DC 20551.

NOTIFICATION PROCEDURE:

Inquiries should be sent to the Secretary of the Board, Board of Governors of the Federal Reserve System, 20th and Constitution Avenue, NW, Washington, DC 20551. The request should contain the individual's name, date of birth, Social Security number, identification number (if known), approximate date of record, and type of position.

RECORD ACCESS PROCEDURES:

Current Board employees who wish to gain access to or contest their records should contact the system manager, address above. Former Board employees should direct such a request in writing to the Secretary of the Board, Board of Governors of the Federal Reserve System, 20th and Constitution Avenue, NW, Washington, DC 20551. The request should contain the individual's name, date of birth, Social Security number, identification number (if known), approximate date of record, and type of position.

CONTESTING RECORD PROCEDURES:

Same as "Notification procedure" above.

RECORD SOURCE CATEGORIES:

Information in this system of records comes from the individual to whom it applies or is derived from the information the individual supplied, except information provided by Board officials. Information is also obtained from the following sources: OPM Personnel Management Records System; personnel records of other Government agencies; personnel records of Federal Reserve Banks; and official transcripts from schools when authorized by the employee.

SYSTEMS EXEMPTED FROM CERTAIN PROVISIONS OF THE ACT:

Pursuant to subsections (k)(2) and (k)(5) of the Privacy Act and the Board's regulation relating thereto (12 CFR part 261a), certain portions of this system of records may be exempted from certain provisions of the Act where: (1) Such portions represent investigatory material compiled for law enforcement purposes, or (2) such portions represent investigatory material compiled solely for the purpose of determining suitability, eligibility, or qualifications for Board employment to extent that disclosure of such portions would reveal the identity of a source who furnished information under a promise of confidentiality.

By order of the Board of Governors of the Federal Reserve System, September 30, 1999.

Jennifer J. Johnson,

Secretary of the Board.

[FR Doc. 99-25923 Filed 10-5-99; 8:45 am]

BILLING CODE 6210-01-P

ACTION: Notice.

SUMMARY: The proposed information collection requirements described below will be submitted to the Office of Management and Budget (OMB) for review, as required by the Paperwork Reduction Act. The Federal Trade Commission (FTC) is soliciting public comments on proposed extensions of Paperwork Reduction Act (PRA) clearance for information collection requirements associated with six current rules enforced by the Commission. These clearances expire on December 31, 1999. The FTC has requested that OMB extend the paperwork clearances through December 31, 2002.

DATES: Comments must be filed by December 6, 1999.

ADDRESSES: Send written comments to Gary M. Greenfield, Attorney, Office of the General Counsel, Federal Trade Commission, Washington, DC 20580, 202-326-2753. All comments should be identified as responding to this notice.

FOR FURTHER INFORMATION CONTACT: Requests for additional information or copies of the proposed information requirements should be addressed to Gary M. Greenfield at the address listed above.

SUPPLEMENTARY INFORMATION: Under the Paperwork Reduction Act of 1995 (PRA) (44 U.S.C. 3501-3520), Federal agencies must obtain approval from OMB for each collection of information they conduct or sponsor. "Collection of information" means agency requests or requirements that members of the public submit reports, keep records, or provide information to a third party. 44 U.S.C. 3502(3), 5 CFR 1320.3(c). As required by section 3506(c)(2)(A) of the PRA, the FTC is providing this opportunity for public comment before requesting that OMB extend the existing paperwork clearance for the regulations noted herein.

The FTC invites comments on: (1) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility; (2) the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used; (3) ways to enhance the quality, utility, and clarity of the information to be collected; and (4) ways to minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information

FEDERAL TRADE COMMISSION

Agency Information Collection Activities; Proposed Collection; Comment Request; Extension

AGENCY: Federal Trade Commission.

technology, e.g., permitting electronic submission of responses.

The relevant information collection requirements are as follows:

1. The Fuel Rating Rule, 16 CFR part 306 (Control Number: 3084-0068)

The Fuel Rating Rule establishes standard procedures for determining, certifying, and disclosing the octane rating of automotive gasoline and the automotive fuel rating of alternative liquid automotive fuel, as required by the Petroleum Marketing Practices Act, 15 U.S.C. 2822(a)-(c). The Rule also requires refiners, producers, importers, distributors, and retailers to retain records showing how the ratings were determined, including delivery tickets or letters of certification.

Estimated annual hours burden: 46,500 total burden hours (20,500 recordkeeping hours + 26,000 disclosure hours).

Recordkeeping: Based on industry sources, staff estimates that 205,000 fuel industry members incur an average annual burden of approximately one-tenth of an hour to ensure retention of relevant business records for the period required by the rule, resulting in a total of 20,500 hours.

Disclosure: Staff estimates that affected industry members incur an average burden of approximately one hour to produce, distribute, and post octane rating labels. Because the labels are durable, only about one of every eight industry members (i.e., approximately 26,000 of 205,000 industry members) incur this burden each year, resulting in a total annual burden of 26,000 hours.

Estimated annual cost burden: \$749,000, rounded (\$697,500 in labor costs and \$51,300 in non-labor costs).

Labor costs: Staff estimates that the work associated with the Rule's recordkeeping and disclosure requirement is performed by skilled clerical employees at an average rate of \$15.00 per hour. Thus, the annual labor cost to respondents of complying with the recordkeeping and disclosure requirements of the Fuel Rating Rule is estimated to be \$697,500 ((20,500 hours + 26,000 hours) × \$15.00 per hour).

Capital or other non-labor costs: Staff believes that there are no current start-up costs associated with the Rule.

Because the Rule has been effective since 1979 for gasoline, and since 1993 for liquid alternative automotive fuels, industry members should already have in place the capital equipment and other means necessary to comply with the Rule. Industry members do, however, incur the cost of procuring fuel dispenser labels to comply with the Rule. Based on estimates of 1,080,000 fuel dispensers (180,000 retailers × an average of six dispensers per retailer) and a cost of thirty-eight cents each (per industry sources) for labels that last for eight years, the total annual labeling cost is estimated to be \$51,300.

2. Regulations Under the Fur Products Labeling Act, 15 U.S.C. 69 et seq. ("Fur Act") (Control Number: 3084-0099)

The Fur Act prohibits misbranding and false advertising of fur products. The Fur Products Regulations, 16 CFR 301 ("Fur Regulations"), establish disclosure requirements that assist consumers in making informed purchasing decisions, and recordkeeping requirements that assist the Commission in enforcing these regulations. The Fur Regulations also provide a procedure for exemption from certain disclosure provisions under the Act.

Estimated annual hours burden: 150,000 hours, rounded (70,200 hours for recordkeeping + 79,450 hours for disclosure).

Recordkeeping: The Fur Regulations require that retailers, manufacturers and processors, and importers keep records in addition to those they may keep in the ordinary course of business. Staff estimates that 1,500 retailers incur an average recordkeeping burden of about 13 hours per year (19,500 hours total); 225 manufacturers and fur processors incur an average recordkeeping burden of about 52 hours per year (11,700 total); and 1,500 importers of furs and fur products incur an average recordkeeping burden of 26 hours per year (39,000 hours total).¹ The combined recordkeeping burden for the

industry is approximately 70,200 hours annually.

Disclosure: Staff estimates that 1,710 respondents (210 manufacturers + 1,500 retail sellers of fur garments) each require an average of 20 hours per year to determine label content (34,200 hours total), and an average of five hours per year to draft and order labels (8,550 hours total). Staff estimates that manually attaching a label to an estimated 785,000 fur garments requires approximately two minutes per garment for an approximate total of 26,200 hours annually. Thus, the total burden for labeling garments is 68,950 hours per year.

Staff estimates that the incremental burden associated with the Fur Regulations' invoice disclosure requirement, beyond the time that would be devoted to preparing invoices in the absence of the Fur Regulations, is approximately 30 seconds per invoice.² The invoice disclosure requirement applies to fur garments, which are generally sold individually, and fur pelts, which are generally sold in groups of at least 50, on average. Assuming invoices are prepared for sales of 785,000 garments, 150,000 groups of imported pelts (7.5 million pelts ÷ 50) and 150,000 groups of domestic pelts, the invoice disclosure requirement entails a total burden of approximately 9,000 hours, rounded.

Staff estimates that the Fur Regulations' advertising disclosure requirements impose an average burden of one hour per year for each of the approximately 1,500 domestic fur retailers, or a total of 1,500 hours.

Thus, staff estimates the total disclosure burden to be approximately 79,450 hours (68,950 hours for labeling + 9,000 hours for invoices + 1,500 hours for advertising).

Estimated annual cost burden: \$1,611,000, rounded (solely relating to labor costs).

Staff estimates the annual labor cost burden based on the following computations using labor cost rates based on information from the Department of Labor and the American Apparel Manufacturers Association:

Task	Hourly rate	Burden hours	Labor cost
Determine label content	\$15.00	34,200	\$513,000
Draft and order labels	9.00	8,550	76,950
Attach labels	8.00	26,200	209,600
Invoice disclosures	10.00	9,000	90,000
Prepare advertising disclosures	15.00	1,500	22,500

¹ For many of these importers, fur products probably would constitute only a small portion of their import business.

² The invoicing burden for PRA purposes excludes the time that, absent the Fur Act regulations, respondents would still spend for

invoicing in the ordinary course of business. See 5 CFR § 1320.3(b)(2).

Task	Hourly rate	Burden hours	Labor cost
Recordkeeping	10.00	70,200	702,000
Total	1,610,850

Staff believes that there are no current start-up costs or other capital costs associated with the Fur Regulations. Because the labeling of fur products has been an integral part of the manufacturing process for decades, manufacturers have in place the capital equipment necessary to comply with the Fur Regulations. Industry sources indicate that much of the information required by the Fur Act and its implementing rules would be included on the product label even absent the Fur Regulations. Similarly, invoicing, recordkeeping, and advertising disclosures are tasks performed in the ordinary course of business so that covered firms would incur no additional capital or other non-labor costs as a result of the Act.

3. Regulations Under the Wool Products Labeling Act, 5 U.S.C. 68 et seq. ("Wool Act") (Control Number: 3084-0100)

The Wool Act prohibits misbranding of wool products. The Wool Act

Regulations, 16 CFR 300 ("Wool Regulations"), establish disclosure requirements that assist consumers in making informed purchasing decisions and recordkeeping requirements that assist the Commission in enforcing the Regulations.

Estimated annual hours burden: 1,236,000 hours (375,000 recordkeeping hours + 861,000 disclosure hours).

Recordkeeping: Based on Bureau of Census data and other information, staff estimates that approximately 15,000 wool firms are subject to the Wool Regulations' recordkeeping requirements. Based on an average burden of 25 hours per firm, the total recordkeeping burden is 375,000 hours.

Disclosure: Approximately 20,000 wool firms, producing or importing about one billion wool products annually, are subject to the Wool Regulations' disclosure requirements. Staff estimates the burden of determining label content to be 20 hours per year per respondent, or a total of

400,000 hours, and the burden of drafting and ordering labels to be 5 hours per respondent per year, or a total of 100,000 hours. Staff estimates that the process of attaching labels is now fully automated and integrated into other production steps for about 35 percent of all affected garments. For the remaining 650,000,000 items (65 percent of one billion), the process is semi-automated and requires an average of approximately two seconds per item, for a total of 361,111 hours per year. Thus, the total estimated annual burden for all respondents is 861,000 hours, rounded.

Estimated annual cost burden: \$13,539,000, rounded (solely relating to labor costs).

Staff estimates the annual labor cost burden based on the following computations using labor cost rates based on information from the Department of Labor and the American Apparel Manufacturers Association:

Task	Hourly rate	Burden hours	Labor cost
Determine label content	\$15.00	400,000	\$6,000,000
Draft and order labels	9.00	100,000	900,000
Attach labels	8.00	361,111	2,888,888
Recordkeeping	10.00	375,000	3,750,000
Total	13,538,888

Staff believes that there are no current start-up costs or other capital costs associated with the Wool Regulations. Because the labeling of wool products has been an integral part of the manufacturing process for decades, manufacturers have in place the capital equipment necessary to comply with the Wool Regulations. Based on knowledge of the industry, staff believes that much of the information required by the Wool Act and its implementing rules would be included on the product label even absent the Wool Regulations. Similarly, recordkeeping and advertising disclosures are tasks performed in the ordinary course of business so that covered firms would incur no additional capital or other non-labor costs as a result of the Wool Regulations.

4. Regulations Under the Textile Fiber Products Identification Act, 15 U.S.C. 70 et seq. ("Textile Act") (Control Number: 3084-0101)

The Textile Act prohibits misbranding and false advertising of textile fiber products. The Textile Act Regulations, 16 CFR part 303 ("Textile Regulations"), establish disclosure requirements that assist consumers in making informed purchasing decisions, and recordkeeping requirements that assist the Commission in enforcing the Regulations. The Regulations also contain a petition procedure for requesting the establishment of generic names for textile fibers.

Estimated annual hours burden: approximately 6,433,000 hours (725,000 recordkeeping hours + 5,708,000 disclosure hours).

Recordkeeping: Based on Bureau of Census data and other information, staff

estimates that approximately 29,000 textile firms are subject to the Textile Regulations' recordkeeping requirements. Based on an average burden of 25 hours per firm, the total recordkeeping burden is 725,000 hours.

Disclosure: Approximately 39,000 textile firms, producing or importing about 13.1 billion textile fiber products annually, are subject to the Textile Regulations' disclosure requirements. Staff estimates the burden of determining label content to be 20 hours per year per respondent, or a total of 780,000 hours and the burden of drafting and ordering labels to be 5 hours per respondent per year, or a total of 195,000 hours. Staff estimates that the process of attaching labels is now fully automated and integrated into other production steps for about 35 percent of all affected garments. For the remaining 8.52 billion items (65 percent of 13.1

billion), the process is semi-automated and requires an average of approximately two seconds per item, for a total of 4,732,860 hours per year. Thus, the total estimated annual burden

for all respondents is 5,708,000 hours, rounded.
Estimated annual cost burden: \$58,568,000, rounded (solely relating to labor costs).

Staff estimates the annual labor cost burden based on the following computations using labor cost rates based on information from the Department of Labor and the American Apparel Manufacturers Association:

Task	Hourly rate	Burden hours	Labor cost
Determine label content	\$15.00	780,000	\$11,700,000
Draft and order labels	9.00	195,000	1,755,000
Attach labels	8.00	4,732,860	37,862,880
Recordkeeping	10.00	725,000	7,250,000
Total			58,567,880

Staff believes that there are no current start-up costs or other capital costs associated with the Textile Regulations. Because the labeling of textile products has been an integral part of the manufacturing process for decades, manufacturers have in place the capital equipment necessary to comply with the Textile Regulations. Industry sources indicate that much of the information required by the Textile Act and its implementing rules would be included on the product label even absent the Textile Regulations. Similarly, invoicing, recordkeeping, and advertising disclosures are tasks performed in the ordinary course of business so that covered firms would incur no additional capital or other non-labor costs as a result of the Textile Regulations.

5. The Care Labeling Rule, 16 CFR Part 423 (Control Number: 3084-0103)

The Care Labeling Rule, 16 CFR part 423, requires manufacturers and

importers to attach a permanent care label to all covered textile clothing in order to assist consumers in making purchase decisions and in determining what method to use to clean their apparel. Also, manufacturers and importers of piece goods used to make textile clothing must provide the same care information on the end of each bolt or roll of fabric.

Estimated annual hours burden: 5,449,000 hours, rounded (solely relating to disclosure).³

Based on Bureau of Census data and other information, staff estimates that approximately 24,000 manufacturers of textile apparel, producing about 12.1 billion textile garments annually, are subject to the Care Labeling Rule disclosure requirements. The burden of developing proper care instructions may vary greatly among firms, primarily based on the number of different lines of textile garments introduced per year that require new or revised care instructions. Staff estimates the burden

of determining label content to be 43 hours per year per respondent, or a total of 1,032,000 hours and the burden of drafting and ordering labels to be 2 hours per respondent per year, or a total of 48,000 hours. Staff estimates that the process of attaching labels is now fully automated and integrated into other production steps for about 35 percent of all affected garments. For the remaining 7,865 billion items (65 percent of 12.1 billion), the process is semi-automated and requires an average of approximately two seconds per item, for a total of 4,369,444 hours per year. Thus, the total estimated annual burden for all respondents is 5,449,000 hours, rounded.

Estimated annual cost burden: \$51,000,000 (solely relating to labor costs). Staff estimates the annual labor cost burden based on the following computations using labor cost rates based on information from the Department of Labor and the American Apparel Manufacturers Association:

Task	Hourly rate	Burden hours	Labor cost
Determine label content	\$15.00	1,032,000	\$15,480,000
Draft and order labels	9.00	48,000	432,000
Attach labels	8.00	4,369,444	34,955,552
Total			50,867,552

Staff believes that there are no current start-up costs or other capital costs associated with the Care Labeling Rule. Because the labeling of textile products has been an integral part of the manufacturing process for decades, manufacturers have in place the capital equipment necessary to comply with the Care Labeling Rule. Based on knowledge of the industry, staff believes that much of the information required by the Care

Labeling Rule would be included on the product label even absent those requirements. Similarly, invoicing recordkeeping, and advertising disclosures are tasks performed in the ordinary course of business so that covered firms would incur no additional capital or other non-labor costs as a result of the Care Labeling Rule.

6. Regulations Under The Fair Packaging and Labeling Act, 15 U.S.C. 1450 ("FPLA") (Control Number: 3084-0110)

The FPLA was enacted to eliminate consumer deception concerning product size representations and package content information. The Regulations that implement the FPLA, 16 CFR part 500, establish requirements for the manner and form of labeling applicable

³The Care Labeling Rule imposes no specific recordkeeping requirements. Although the Rule requires manufacturers and importers to have

reliable evidence that their products were successfully tested, companies may provide as

support current technical literature or rely on past experience.

to manufacturers, packagers, and distributors of consumer commodities. Section 4 of the FPLA specifically requires packages or labels to be marked with: (1) A statement of identity; (2) a net quantity of contents disclosure; and (3) the name and place of business of a company that is responsible for the product.

Estimated annual hours burden: 12,000,000 total burden hours (solely relating to disclosure⁴).

Staff estimates that approximately 1,200,000 manufacturers, packagers, distributors, and retailers of consumer commodities make disclosures at an average burden of ten hours per company, for a total disclosure burden of 12,000,000 hours.

Estimated annual cost burden: \$168,000,000 (solely relating to labor costs).

The estimated annual labor cost burden associated with the FLPA disclosure requirements consists of the cost of one hour of managerial or professional time per covered entity (at an average cost of \$50 per hour) and nine hours of clerical time per covered entity (at an average cost of \$10), for a total of \$168,000,000 (\$140 per covered entity times 1.2 million entities).

Total capital and start-up costs are de minimis. The packaging and labeling activities that require capital and start-up costs are independent of the FPLA, and would be performed by covered entities in the ordinary course of business regardless of the statute. Because FPLA requires that the information be placed on packages and labels, which firms provide in the ordinary course of business, there appear to be no additional operation, maintenance, or purchase of service costs.

Debra A. Valentine,
General Counsel.

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BILLING CODE 6750-01-M

FEDERAL TRADE COMMISSION

[File No. 972-3209]

Castrol North America, Inc.; Analysis To Aid Public Comment

AGENCY: Federal Trade Commission.

ACTION: Proposed consent agreement.

SUMMARY: The consent agreement in this matter settles alleged violations of federal law prohibiting unfair or deceptive acts or practices or unfair

methods of competition. The attached Analysis to Aid Public Comments describes both the allegations in the draft complaint that accompanies the consent agreement and the terms of the consent order—embodied in the consent agreement—that would settle these allegations.

DATES: Comments must be received on or before December 6, 1999.

ADDRESSES: Comments should be directed to: FTC/Office of the Secretary, Room 159, 600 Pennsylvania Ave., NW, Washington, DC 20580.

FOR FURTHER INFORMATION CONTACT: C. Lee Peeler or Michael Derschowitz, FTC/S-4002, 600 Pennsylvania Ave., NW, Washington, DC 20580, (202) 326-3090 or 326-3158.

SUPPLEMENTARY INFORMATION: Pursuant to section 6(f) of the Federal Trade Commission Act, 38 Stat. 721, 15 U.S.C. 46 and § 2.34 of the Commission's rules of practice (16 CFR 2.34), notice is hereby given that the above-captioned consent agreement containing a consent order to cease and desist, having been filed with and accepted, subject to final approval, by the Commission, has been placed on the public record for a period of sixty (60) days. The following Analysis to Aid Public Comment describes the terms of the consent agreement, and the allegations in the complaint. An electronic copy of the full text of the consent agreement package can be obtained from the FTC Home Page (for September 15, 1999), on the World Wide Web, at "http://www.ftc.gov/os/actions97.htm." A paper copy can be obtained from the FTC Public Reference Room, Room H-130, 600 Pennsylvania Avenue, NW, Washington, DC 20580, either in person or by calling (202) 326-3627.

Public comment is invited. Comments should be directed to: FTC/Office of the Secretary, Room 159, 600 Pennsylvania Ave., NW, Washington, DC 20580. Two paper copies of each comment should be filed, and should be accompanied, if possible, by a 3½ inch diskette containing an electronic copy of the comments. Such comments or views will be considered by the Commission and will be available for inspection and copying at its principal office in accordance with § 4.9(b)(6)(ii) of the Commission's rules of practice (16 CFR 4.9(b)(6)(ii)).

Analysis of Proposed Consent Order To Aid Public Comment

The Federal Trade Commission has accepted, subject to final approval, an agreement containing a consent order from respondent Castrol North America Inc. ("Castrol").

The proposed consent order has been placed on the public record for sixty (60) days for reception of comments by interested persons. Comments received during this period will become part of the public record. After sixty (60) days, the Commission will again review the agreement and the comments received and will decide whether it should withdraw from the agreement or make final the agreement's proposed order.

Castrol manufactures and sells automotive products, including fuel additive products added by consumers to a car's gas tank. This matter concerns allegedly deceptive advertising claims regarding the performance attributes of a fuel additive product, Castrol's Syntec Power System ("Castrol Syntec"). The Commission's proposed complaint alleges that Castrol made unsubstantiated claims that Castrol Syntec significantly improves engine power and acceleration for motor vehicles generally. The complaint also challenges as unsubstantiated the claim that Castrol Syntec is superior to other fuel system treatments in improving engine power and acceleration. Finally, the complaint challenges as false or misleading the claims the laboratory tests prove that Castrol Syntec (a) significantly improves engine power and acceleration, and (b) is superior to other fuel system treatments in improving engine power and acceleration.

The proposed consent order contains provisions designed to prevent respondent from engaging in similar acts and practices in the future.

Part I of the proposed order prohibits respondent claiming that Castrol Syntec or any other fuel oil additive improves power or acceleration, or is superior to other products in this regard, unless the claim is substantiated by competent and reliable scientific evidence. Part II of the proposed order requires Castrol to have substantiation for any representation concerning the performance, benefits, efficacy, attributes of use of Castrol Syntec or any other fuel additive product.

Part III of the proposed order prohibits respondent from misrepresenting the existence, contents, validity, results, conclusions, or interpretations of any test, study or research done on any fuel additive product.

Part IV of the proposed order requires respondent to maintain copies of all materials relied upon in making any representation covered by the order.

Part V of the proposed order requires respondent to distribute copies of the order to its operating divisions and to

⁴Neither the FPLA nor the implementing regulations impose any specific recordkeeping requirements.