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April 11, 2005

Federal Trade Commission
Consumer Response Center
Room 130
600 Pennsylvania Avenue, N.W.
Washington, DC 20580

FEDERAL TRADE COMMISSION
RECEIVED DOCUMENTS
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SECRETARY

RE: FTC File No. 0223278 – CompUSA

Ladies/Gentlemen,

I have kept rebate records on an Excel spreadsheet for almost six (6) years now for myself and two friends. We have made every effort to keep them as accurate as possible. For a great many of these – of which there are thousands, each of us has kept copies of original submissions.

While the above-noted "file" deals specifically with the retailer, CompUSA, the problems described by this action are actually endemic to what is basically a high-volume/highly-competitive portion of the retail industry – especially that area dealing with electronics and computer goods. This also extends into other areas, though usage of rebating as a marketing tool is less evident elsewhere. In this particular instance, items purchased by the above-mentioned individuals at CompUSA represent the largest portion of overdue and/or unpaid rebates – totaling ***thousands*** of dollars; the term "overdue" indicates non-payment 13 weeks or more beyond submission. I am certain that these include both manufacturers' and CompUSA-sponsored rebates.

There also are dozens of examples where fulfillment agents erroneously and unilaterally disqualified items based on ***their*** errors – in some cases, refusing resubmissions – and have denied others by either changing or altering the terms of an offer after the fact. Many submissions go unacknowledged. In one case that was handled – but not followed up – by the New York State Attorney-General's office (Westchester), a fulfillment agent apparently withheld ***all*** rebate payments because the ZIP-code was considered to be "invalid." When authorities approached, short-lived objection was raised; there was apparently a subsequent agreement to comply – though still half of those rebates outstanding at the time remain unpaid.

If you wish me to share portions of this information, please let me know so that arrangements can be made.

Thank you for listening.

Sincerely,

Fred W. Johnson