

**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION**

**COMMISSIONERS:** Jon Leibowitz, Chairman  
Pamela Jones Harbour  
William E. Kovacic  
J. Thomas Rosch

FTC Matter No. P104801

**ORDER TO FILE A SPECIAL REPORT**

Pursuant to a resolution of the Federal Trade Commission (henceforth the “Commission” or the “FTC”) dated December 16, 2009, titled “*Resolution Directing the Use of Compulsory Process to Study the Practice of Debt Buying,*” a copy of which is enclosed, [COMPANY] is ordered to file a Special Report with the Commission no later than February 25, 2010, containing the information and documents specified herein.

The Special Report should restate each item of this Order with which the corresponding answer is identified. The Report is required to be subscribed and sworn to by an official of [COMPANY] who has prepared or supervised the preparation of the Report from books, records, correspondence, and/or other data and material in its possession, custody or control. If any Specification cannot be answered fully, provide the information that is available and explain in what respects and why the answer is incomplete.

Please provide the data, information, and documents requested in the following Specifications, consistent with the Definitions and Instructions attached as Exhibit A.

FTC Matter No. P104801

## SPECIFICATIONS

### **I. Background Information.** Please provide the following information:

- A. Identify by full name, business address, telephone number, and official capacity, the officers of the Company who have prepared or supervised the preparation of its response to this Order.
- B. Identify the Company by full name, address, and state of incorporation.

### **II. Interrogatories and Document Requests.**

#### A. Debt Buyer Business Information

- 1. For each of the years 2006, 2007, and 2008, state the Company's annual total revenues earned from (a) collecting on purchased debt, (b) selling debt portfolios, and (c) other debt collection-related activities; and state the Company's annual total profits earned from (a) collecting on purchased debt, (b) selling debt portfolios, and (c) other debt collection-related activities.
- 2. State the number of portfolios the Company purchased during each of the years 2006, 2007 and 2008.
- 3. For each portfolio the Company purchased between July 1, 2006, and June 30, 2009, provide:
  - a. A unique numerical identification number;
  - b. The portfolio seller's name;
  - c. The number of consumer accounts in the portfolio;
  - d. The types of accounts included (e.g., credit card, medical, auto, etc.);
  - e. The amount the Company paid for the portfolio;
  - f. The average and standard deviations of the face value of accounts;
  - g. The average and standard deviations of the age of accounts;
  - h. The number and average face value of accounts the Company attempted to collect using in-house collectors;
  - i. The number and average face value of accounts the Company sent to collection agencies or collection law firms on a contingency basis;
  - j. The number and average face value of accounts the Company sold without first attempting to collect;
  - k. The number and average face value of accounts which were not sold and for which no collection effort was attempted;
  - l. The number and average face value of accounts that have been:
    - (1) owned only by the original creditor prior to the Company's purchase;
    - (2) owned by one debt buyer prior to the Company's purchase;
    - (3) owned by two debt buyers prior to the Company's purchase; and

- (4) owned by three or more debt buyers prior to the Company's purchase;
- m. The number and average face value of accounts that were:
  - (1) not placed with any contingency collectors prior to purchase by the Company;
  - (2) placed with one contingency collector prior to purchase by the Company;
  - (3) placed with two contingency collectors prior to purchase by the Company;
  - and
  - (4) placed with three or more contingency collectors prior to purchase by the Company.

Provide documents showing how the Company arrived at the information provided in response to this specification.

- 4. Describe the Company's policies and procedures concerning whether to add interest, fees, or other charges to the amount owed on the accounts it purchases. If interest, fees, or other charges are added, describe how the Company determines how much to add to the balance of an account. Provide all manuals and other documents that relate to these policies and procedures.
- 5. For each portfolio the Company purchased between July 1, 2006, and June 30, 2009, provide:
  - a. The portfolio identification number assigned in 3a;
  - b. The number and average face value of accounts the Company attempted to collect for which the consumer disputed all of the debt in writing;
  - c. The number and average face value of accounts the Company attempted to collect for which the consumer disputed part of the debt in writing;
  - d. The number and average face value of accounts the Company attempted to collect for which the consumer disputed all or part of the debt orally;
  - e. The number and average face value of accounts for which the Company provided written verification of the debt to the consumer after receiving a written dispute;
  - f. The number and average face value of accounts for which the Company provided written verification of the debt to the consumer after receiving an oral dispute;
  - g. The number and average face value of accounts that were disputed which the Company sold without sending written verification to the consumer;
  - h. The number and average face value of accounts that were disputed which the Company sold after sending written verification to the consumer;
  - i. The number and average face value of accounts that were disputed in writing and that were:
    - (1) owned only by the original creditor prior to purchase by the Company;
    - (2) owned by one debt buyer prior to purchase by the Company; and
    - (3) owned by two or more debt buyers prior to purchase by the Company;
  - j. The number and average face value of disputed debts that had been:
    - (1) owned only by the original creditor prior to purchase by the Company and for which the Company sent written verification to consumers;

- (2) owned by one debt buyer prior to purchase by the Company and for which the Company sent written verification to consumers; and
- (3) owned by two or more debt buyers prior to purchase by the Company and for which the Company sent written verification to consumers;
- k. The average number of phone numbers called per account; and
- l. The average number of incorrect parties reached per account.

Provide documents showing how the Company arrived at the information provided in response to this specification.

6. Identify all purchasers to whom the Company has resold accounts, and state how many accounts the Company sold to each purchaser. For each purchaser, state the number of accounts the Company sold for which the consumer paid to the Company (a) a portion of the amount owed, and (b) none of the amount owed. Provide documents showing how the Company arrived at the information provided in response to this specification.

#### B. Purchasing of Debt

1. Describe the process through which sellers create portfolios to be offered for sale, including whether accounts in portfolios are grouped by age of debt, by type of creditor, by similarly sized accounts, by other categories, or by a combination of these categories.
2. Describe the process through which the Company learns of portfolios of consumer accounts being offered for sale. Provide all advertising and other marketing materials relating to any portfolios the Company has purchased or bid on.
3. Describe the information and documents that the Company obtains or obtains access to from sellers before the Company decides whether to purchase a portfolio of consumer accounts. For every portfolio that the Company purchased or bid on, provide all information and documentation relating to the portfolio that the Company obtained or obtained access to before deciding whether to bid on or purchase it.
4. Describe the process the Company uses to evaluate a portfolio before determining whether to bid on or purchase it. Provide all manuals and other documents relating to this decision-making process.

#### C. Contracts to Purchase Debt

1. Describe the agreements in which the Company is required to purchase accounts from debt sellers on a regular basis, often called “forward-flow agreements,” including the process through which the Company chooses to enter into a forward-flow agreement. To the extent the Company is not required to purchase every portfolio that a seller

offers as part of a forward-flow agreement, describe how the Company selects which of these portfolios to purchase, including a description of the documents that the sellers provide or provide access to before the Company decides whether to purchase a portfolio. Provide copies of the forward-flow agreements to which the Company is a party, and provide the portfolio identification numbers of the portfolios associated with each contract.

2. Describe each of the different types of contracts that the Company has used when buying consumer accounts. Provide a copy of all contracts that the Company has used to buy consumer accounts, and list the portfolio identification numbers of the portfolios associated with each contract.

#### D. Information About Purchased Debt

1. Describe the information and documents about a portfolio that the Company obtains or obtains access to from the seller at the time the Company purchases a portfolio. To the extent that the information varies depending on the type of debt in the portfolio (e.g., credit card, auto loan, or medical debt), describe the differences, including whether the completeness or reliability of documentation and other information varies by type of debt, by original creditor, or by some other consideration. For each portfolio purchased during the period March 2009 through August 2009, provide: (a) the portfolio identification number; and (b) all information about the portfolio the Company obtained or obtained access to from the seller at the time of purchase, including the schedule of accounts and the bill of sale.
2. Describe the terms and conditions under which the Company is permitted to obtain or obtain access to additional information from the seller about accounts in a portfolio after the time of purchase. For each portfolio the Company purchased during the period March 2009 through August 2009, provide: (a) the portfolio identification number; and (b) all additional information the Company has obtained or obtained access to from the seller since the time of purchase.

#### E. Selling of Debt

1. For each portfolio the Company has sold, provide: (a) the name of the buyer; (b) the number of consumer accounts; (c) the types of debt included (e.g., credit card, medical, auto, etc.); (d) the total face value of the accounts in the portfolio; (e) the amount the buyer paid; and (f) the average face value of the accounts in the portfolio. Provide documents showing how the Company arrived at the information provided in response to this specification.
2. Describe the Company's policies and procedures for determining whether to resell to another debt buyer accounts on which the Company has not collected any amount. Provide all manuals and other documents relating to these policies and procedures.

3. Describe the Company's policies and procedures for determining whether to resell to another debt buyer accounts on which the Company has collected some, but not all, of the debt. Provide all manuals and other documentation that relate to these policies and procedures.

#### F. Contracts to Sell Debt

1. Describe each of the different types of contracts that the Company has used when selling consumer accounts. Provide a copy of all contracts that the Company has used to sell consumer accounts. To the extent that some contracts are identical to each other except for the names of the other parties to the contract, provide only one of the contracts and provide a list of the other parties on those contracts that the Company is not producing in response to this request.

#### G. Information About Sold Debt

1. Describe the terms and conditions under which a Secondary Debt Buyer can obtain or obtain access to documents and other information about an account from the Company or from the original creditor at the time the Secondary Debt Buyer purchases from the Company the portfolio containing the account. Provide all manuals and other documents that relate to these terms and conditions.
2. Describe the information and documents that the Company provides or provides access to Secondary Debt Buyers at the time it sells a portfolio. To the extent the information varies depending on the type of debt in the portfolio (*e.g.*, credit card, auto loan, or medical debt), describe the differences. For each portfolio the Company sold during the period March 2009 through August 2009, provide (a) the portfolio identification number; and (b) all information the Company provided or provided access to the Secondary Debt Buyer at the time of purchase, including the schedule of accounts and the bill of sale.
3. Describe the terms and conditions under which a Secondary Debt Buyer can obtain or obtain access to documents and other information about an account from the Company or the original creditor after the time of purchase from the Company. Provide all manuals and other documents that relate to these terms and conditions. For each portfolio that the Company sold to a Secondary Debt Buyer during the period March 2009 through August 2009 and for which the Company has provided or provided access to documents and other information to the Secondary Debt Buyer after the time of purchase, provide: (a) the portfolio identification number; and (b) all documents and other information the Company provided, directly or indirectly, to the Secondary Debt Buyer after the time of purchase.
4. Describe the terms and conditions under which a Tertiary Debt Buyer can obtain or obtain access to documents and other information about an account from the

Company or the original creditor. Provide all manuals and other documents that relate to these terms and conditions. For each account for which the Company has provided or provided access to Tertiary Debt Buyers in 2009, provide: (a) the portfolio identification number of the portfolio in which the account was sold to the Secondary Debt Buyer; and (b) all documents and other information the Company provided, directly or indirectly.

#### H. Information About Computer Systems

1. Identify and describe all computer databases or other software used to maintain, update, and analyze records of consumer accounts, collection calls, collection payments, and other collection data. Provide:
  - a. The name of the database;
  - b. The time period during which the database was used;
  - c. A list of the tables in each database and a list of the data fields in each table;
  - d. Whether the database was purchased, developed in-house, or custom-designed for the company;
  - e. If the database was purchased, provide the name of the manufacturer and seller;
  - f. If the database was custom-designed, provide the name of the company or parties that designed it;
  - g. The name of any relational database programs (such as Oracle, Access, or MySQL) used as a back-end in the database software; and
  - h. Any manuals that apply to the database software.
2. Describe the process used to ensure that debt information arrives in a useable form when purchasing portfolios of debt, and describe how data about debts is entered into the Company's database.
  - a. For each portfolio of debt purchased by the Company, describe the file format in which debt data was provided from the debt seller.
3. Identify and describe all computer programs (aside from databases) that the Company uses in the collection of debts. Include programs such as dialers and skip tracing software.
  - a. Provide the time period during which each program was used;
  - b. If the software was purchased, provide the name of the software manufacturer and the seller; and
  - c. If the software was custom-designed, provide the name of the company or parties that designed it.
4. Specifically identify and describe the Company's policies and procedures for:
  - a. Recording Consumer Communications;
  - b. Updating relevant databases in response to Consumer Communications; and
  - c. Responding to Consumer Communications.

## EXHIBIT A

### DEFINITIONS AND INSTRUCTIONS

For the purposes of this Order, the following specific definitions and instructions apply unless otherwise specified:

#### DEFINITIONS

1. “All” means “any and all.” “Any” means “any and all.”
2. “And” as well as “or” shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any Specifications all information that otherwise might be construed to be outside the scope of the Specification.
3. “Company” or “You” means [COMPANY] and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of [COMPANY].
4. “Consumer Communication” means
  - a. A written request from a consumer that the company cease communication;
  - b. A written notification from a consumer that a debtor being sought in collection calls to the consumer is not at the telephone number being called and/or that the consumer has no knowledge of the debtor’s location;
  - c. An oral request from a consumer that the company cease communication; or
  - d. An oral notification from a consumer that a debtor being sought in collection calls to the consumer is not at the telephone number being called and/or that the consumer has no knowledge of the debtor’s location.
5. “Contingency collector” means a debt collection agency or collection law firm that collects on behalf of another entity and receives from the agency a contingency fee based on the amount of money the agency or firm collects.
6. “Describe” means to provide information sufficient to allow a reasonable and complete understanding of the substance of any policy, procedure, or other referenced matter. Where “describe” is specified, if summaries, compilations, lists, or synopses are available that are sufficient to provide a reasonable and complete understanding of the requested information, these should be provided in lieu of the underlying documents.
7. “Document” means the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram,

report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs, and such codes or instructions as will transform such computer materials into easily understandable form).

8. "Each" shall be construed to include "every," and "every" shall be construed to include "each."
9. "Including," "e.g.," and "such as" mean "including but not limited to."
10. "Portfolio" means a collection of consumer accounts that are sold as a group.
11. "Relating to" or "with respect to" any given subject means in whole or in part constituting, containing, concerning, embodying, reflecting, discussing, explaining, describing, analyzing, identifying, stating, referring to, dealing with, or in any way pertaining to.
12. "Secondary Debt Buyer" means a debt buyer that purchases a portfolio or portfolios from the Company.
13. "Tertiary Debt Buyer" means a debt buyer that purchases a portfolio or portfolios from a Secondary Debt Buyer.

## INSTRUCTIONS

1. **Submission Information.** Please send responses to Margaret Patterson, Bureau of Economics, Federal Trade Commission, 601 New Jersey Avenue, N.W., Mail Drop NJ-4136, Washington, D.C. 20580. Ms. Patterson may be reached at (202) 326-3472. A representative of [COMPANY] does not need to personally deliver the responses. Each Specification of this Order contemplates a complete search of all of [COMPANY]'s files and any other materials otherwise in [COMPANY]'s possession, custody, or control. Responsive material should be submitted on a rolling basis, with those documents and/or files that constitute a complete response to a given Specification to be submitted as soon as possible prior to the final return date.
  - a. Prior to production of any of the materials requested in this Order, [COMPANY] should confer with Commission staff to ensure that the data and documents to be produced in response to this Order are consistent with the staff's understanding of what each data item represents. Additionally, if [COMPANY] wishes to produce data or documents in a format other than one of those specified in this Order, please contact Commission staff to discuss this option before doing so.
2. **Applicable Time Period:** Unless otherwise specified, provide all information and documents for the period from July 1, 2006, up to and including June 30, 2009.

3. **Time for Compliance.** Any request to extend the time for compliance with this Order will be resolved under Commission Rule of Practice 2.12(b). 16 C.F.R. § 2.12(b).
4. **Material Withheld, Claims of Privilege.** If [COMPANY] withholds all or any portion of any responsive piece of data or document for any reason, including an asserted privilege, state in writing individually for each piece of data or document: its type, title, subject matter, and date; the names, addresses, positions, and organizations of each author and recipient; and the specific grounds for claiming that the document is privileged, as well as facts sufficient to support such a claim. For each piece of responsive data, or document, withheld under a claim that it constitutes or contains attorney work product, also state whether the document was prepared in anticipation of litigation or for trial and, if so, identify the anticipated litigation or trial upon which the assertion is based.
5. **Data/Documents Lost or Destroyed.** If data or documents responsive to a particular Specification no longer exist, but are known to have been in existence, please: (1) state the circumstance under which they were lost or destroyed; (2) describe the data or documents to the fullest extent possible; (3) identify persons having knowledge of the content of such documents; and (4) provide a statement of the data or document retention policies.
6. **Verb Tenses, Plural vs. Singular.** In each Specification, the present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense. The singular shall be construed to include the plural, and the plural shall be construed to include the singular.
7. **Document Organization.** This set of instructions should be followed for all document submissions, whether submitted in electronic form or in hard copy:
  - a. All documents submitted in response to Specifications should be Bates-stamped or otherwise sequentially numbered.
  - b. Provide a master list showing all documents produced, identified by document Bates or control number, name of the person, department, and, if applicable, the entity (e.g., subsidiary or affiliate) that created the document, and the Specification number to which the document is responsive.
  - c. Documents that may be responsive to more than one Specification of this Order need not be submitted more than once; however, please indicate, for each document submitted, each Specification to which the document is responsive. If any documents responsive to this Order have been previously supplied to the Commission, in lieu of re-supplying those materials it is permissible to identify the document(s) previously provided and the date of submission.
8. **Submission of Electronically Stored Information.** The following guidelines refer to any electronically stored information (“ESI”) the Company submits. But, before submitting any

ESI, You must confirm with the FTC that the proposed formats and media types that contain ESI will be acceptable to the government.

- a. Magnetic and other electronic media types accepted
  - i. CD-R CD-ROMs formatted to ISO 9660 specifications.
  - ii. DVD-ROM for Windows-compatible personal computers.
  - iii. IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.
  - iv. Note: Other types of tape media used for archival, backup, or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT, or other types of media will be accepted only with prior approval.
- b. File and record formats
  - i. E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files, and Lotus Notes NSF files. Any other electronic submission of email will be accepted only with prior approval.
  - ii. Scanned Documents: Image submissions accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:
    - (a) All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.
    - (b) If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a \*.TXT extension.
    - (c) Note: Single-page, 300 DPI - Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Documents breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a \*.TXT extension.
  - iii. Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2003 version or earlier. Spreadsheets should be in MS Excel 2003 (\*.xls) version or earlier. Database files should be in MS Access 2003 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2003 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed

ZIP format to reduce size and ease portability. Adobe Acrobat PDF (\*.pdf) may be submitted where the normal business practice storage method is PDF.

- iv. Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

c. Security

- i. All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.
- ii. Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:

**MAGNETIC MEDIA -- DO NOT X-RAY  
MAY BE OPENED FOR POSTAL INSPECTION.**

9. **Submission of Documents in Hard Copies.** Any hard copy documents or narrative responses shall be submitted as follows:

- a. The FTC accepts hard copies of documents where the normal business practice storage method for these documents is in such a format – and only if such documents are not maintained also in electronic form. Documents and/or narrative responses submitted in hard copy shall be submitted in sturdy cartons not larger than 1.5 cubic feet. Number each such box and mark each such box with corporate identification and the name(s) of the person(s) whose files are contained in the box.
- b. All hard copy documents responsive to these Specifications shall be produced in complete form, unredacted unless privileged, and in the order in which they appear in the Company's files (unless otherwise specified).
- c. Unless otherwise stated, legible photocopies may be submitted in lieu of original documents, provided that the originals are retained in their state at the time of service of this Order. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents. A complete copy of each document should be submitted even if only a portion of the document is within the terms of the Specification. The document shall not be edited, cut, or expunged, and shall include all covering letters, memoranda, transmittal slips, appendices, tables, or other attachments, and all other documents referred to in the document or attachments.
- d. Transport hard copies using a delivery method that offers a tracking service, such as UPS or FedEx, or the equivalent. If a courier is used, ensure that there are no stops between pickup and delivery.

10. **Sensitive Personally Identifiable Information.** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us to discuss whether it would be appropriate to redact the sensitive information. If that information will not be redacted, contact us to discuss ways of protecting the information during production, including encrypting any electronic copies of such material with encryption software such as SecureZip and providing the encryption key in a separate communication.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or phone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

11. **Verification.** The attached verification form should be executed by the official supervising compliance with this request and notarized.

**VERIFICATION**

This response to the Order of the Federal Trade Commission for information, together with any and all attachments thereto, was prepared and assembled under my supervision. The information is, to the best of my knowledge, true, correct, and complete.

\_\_\_\_\_  
TYPE OR PRINT NAME AND TITLE

\_\_\_\_\_  
SIGNATURE

Subscribed and sworn to before me at the City of \_\_\_\_\_, State of \_\_\_\_\_,  
this \_\_\_\_\_ day of \_\_\_\_\_ 2009.

\_\_\_\_\_  
Notary Public

My commission expires: \_\_\_\_\_.

By the direction of the Commission.

Jon Leibowitz  
Chairman

SEAL

Date of Order: \_\_\_\_\_, 2009

The Special Report required by this Order,  
or any inquiry concerning it, should be  
addressed to the attention of:

Margaret Patterson  
Bureau of Economics  
Federal Trade Commission  
601 New Jersey Ave., NW, NJ-4143  
Washington, DC 20580  
(202) 326-3472 (telephone)  
(202) 326-3443 (facsimile)  
[mpatterson@ftc.gov](mailto:mpatterson@ftc.gov)

Thomas E. Kane  
Division of Financial Practices  
Bureau of Consumer Protection  
Federal Trade Commission  
601 New Jersey Ave., NW, NJ-3158  
Washington, DC 20580  
(202) 326-2304 (telephone)  
(202) 326-3768 (facsimile)  
[tkane@ftc.gov](mailto:tkane@ftc.gov)