



CALIFORNIA CONSUMER AFFAIRS ASSOCIATION

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Federal Trade Commission
919 Albany Street
Los Angeles, CA 90015

Dear Public Interest Fellowship Committee:

RE: OPPOSE: AMENDMENT TO FTC'S DOOR-TO-DOOR SALES RULE

The California Consumer Affairs Association praises the FTC for inviting public comment to its proposed amendment to the Door-to-Door Sales Rule (Rule). CCAA opposes the proposed change to raise the minimum amount from \$25 to \$130 because we believe it would be harmful to consumers and similar local consumer protection statutes.

Established in 1974, CCAA is a statewide association of government agencies and non-profit organizations dedicated to promoting consumer protection for California consumers through education, advocacy and collaboration. CCAA members include prosecuting, licensing, enforcement, and advocacy agencies and organizations.

CCAA members are constantly fighting deceptive and fraudulent door-to-door sellers who take advantage of vulnerable consumers like seniors, new immigrants and low-income families. According to the AARP, door-to-door scams are among the most common crimes against seniors. And the Better Business Bureau reports that the number of door-to-door complaints has nearly tripled during the last three years. Immigrants and their families are relentlessly pursued by door-to-door sellers pushing phony miracle cures, pyramid schemes, and security systems.

The Rule's 3-day cancellation notice for sales that are \$25 or greater is a vital tool for both consumers and consumer protection agencies to combat fraudulent and abusive door-to-door sales. It allows consumers to cancel purchases they make under duress, deceit or fraud. Increasing the minimum to \$130 would remove this crucial safeguard against more abusive door-to-door sales. And raising the Rule's minimum amount has real potential to effectively undermine local consumer protection statutes like California's Home Solicitations Act, which also gives consumers a 3-day right to cancel purchases that are \$25 or greater. CCAA members regularly apply this provision to help consumers who are victims of abusive door-to-door sales. If the Rule raises the minimum to \$130, unscrupulous door-to-door sellers can challenge California's and other similar statutes.

For the reasons stated above, CCAA respectfully requests that the FTC do not change the Rule. Please feel free to contact me at **213-974-9758** if you need more information.

Sincerely,

Gil De Luna
Legislative Chair