



Office of the Secretary

UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

March 10, 2014

Irish Bender
State of Georgia

Re: In the Matter of Aaron's, Inc., File No. 122 3264

Thank you for your comments regarding the Federal Trade Commission's consent agreement in the above-entitled proceeding. The Commission has placed your comments on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given them serious consideration.

Your comments express your outrage about the conduct alleged in the Commission's complaint against Aaron's, Inc. The Commission agrees that Aaron's franchisees' undisclosed use of monitoring technology on computers rented by consumers caused substantial harm to those individuals. You also inquire whether, as a customer who rented a computer from an Aaron's store, you may file a claim in the Commission's settlement with the company. The proposed consent order does not include a monetary settlement, however, and therefore there are no funds to distribute to individual claimants. Further, the Commission does not have information about any particular monetary harm that Aaron's conduct caused any specific consumers that would provide a basis to compensate any such individuals.

The Commission is committed to safeguarding consumer privacy and believes the proposed order will substantially protect consumers and effectively deter future privacy violations by Aaron's and its network of franchised rent-to-own stores. The order, which is effective for 20 years, bans Aaron's from using monitoring technology on computers rented to consumers. In addition, it generally prohibits Aaron's from using geographical tracking technology to gather information from any rented consumer product without obtaining affirmative express consent from the consumer at the time of rental and providing clear and prominent notice to computer users immediately prior to each time tracking technology is activated. The proposed order provides assurances that Aaron's and its franchisees will destroy previously collected webcam photos and other data if collected in a manner that would violate the terms of the proposed order. If you have questions about whether PC Rental Agent was installed on a computer you rented from an Aaron's store, you may contact Aaron's at 1-877-496-1606 for more information.

Accordingly, the Commission believes that the proposed consent order will provide strong protections for consumers' privacy and has determined that the public interest would best be served by issuing the Decision and Order in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. It helps the Commission's analysis to hear from a variety of sources in its work. Thank you again for your comments.

By direction of the Commission.

Donald S. Clark
Secretary