



Office of the Secretary

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

May 11, 2020

National Consumer Law Center  
Attn: Margo Saunders, Senior Counsel  
1000 Connecticut Ave., NW  
Washington, D.C.  
[msaunders@nclc.org](mailto:msaunders@nclc.org)

Re: *In the Matter of Rent-to-Own Store Swaps*, File No. 191-0074, C4714, C4715,  
C4716

Dear Ms. Saunders:

Thank you for your comment of March 25, 2020, regarding the proposed consent orders accepted by the Federal Trade Commission for public comment in the above-captioned matter. The Commission has placed your comment on the public record pursuant to the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration in connection with its decision concerning whether to accord final approval to the proposed consent orders.

Your comment raises three concerns about the proposed consent orders: (1) the effectiveness of the proposed consent orders; (2) the parties' disclosures of the terms and conditions for the services they provide; and (3) RTO contractual terms and conditions are unfair. Regarding the concerns about the parties' disclosure practices and RTO contracts terms being unfair, the Commission has a Congressional mandate to enforce Section 5 of the Federal Trade Commission Act, which prohibits deceptive and unfair acts or practices in or affecting commerce. The Commission has taken your concerns under advisement. Regarding the effectiveness of the proposed consent orders, the Commission has determined that the public interest would be best served by issuing the Decision and Orders in final form without modification. The final Decision and Orders 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 on antitrust and consumer protection issues and we appreciate your interest in this matter.

By direction of the Commission, Commissioners Chopra and Slaughter dissenting.

April Tabor  
Secretary (Acting)