



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

Office of the Secretary

May 11, 2020

Open Markets Institute

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

Dear Anonymous:

Thank you for your comment of March 27, 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 two primary concerns about the proposed consent orders: (1) the Commission used the wrong legal standard in evaluating the parties' store swaps; and (2) the Commission's complaints for Aaron's, Inc., and Buddy's Newco, LLC should have included an interlocking directorate count. Both of these concerns are addressed in statements issued by the Commission when it voted to place the proposed orders on the public record. 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)