



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

Office of the Secretary

May 11, 2020

U.S. Public Interest Research Group
Attn: Edmund Mierzwinski
Senior Director, Federal Consumer Programs

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

Dear Mr. Mierzwinski:

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 concerns regarding the parties' disclosures of the terms and conditions for the services they provide. The Commission has a Congressional mandate to enforce Section 5 of the Federal Trade Commission Act, which prohibits deceptive acts or practices in or affecting commerce. The Commission has taken your concerns under advisement. With regard to the acts and practices of Aaron's Inc., Buddy's Newco, LLC, and Rent-A-Center, Inc., relating to their store swaps, 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)