



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

Commissioner Christine S. Wilson

October 14, 2022

Today, my colleague Commissioner Noah J. Phillips concludes his tenure on the Federal Trade Commission. The FTC has benefitted greatly from his service, and so have I. It has been a blessing to count Noah as a colleague, a friend, and an ally in preserving the rule of law and rigorous, effects-based antitrust enforcement.

As a Commissioner, Noah has served at the epicenter of the lively and historic debate on issues of profound significance, including the goals of antitrust enforcement, the scope of the FTC's jurisdiction, the constitutionality of the agency's administrative litigation function, the legitimacy of "unfair methods of competition" rulemaking, the limits of Section 5 unfairness authority in consumer protection, and the propriety of circumventing the Hart-Scott-Rodino Act to heighten risk and increase delay for mergers. This list is merely illustrative, not exhaustive — critics of the agency and sound law enforcement are almost too numerous to count.

In the midst of this historic debate, Commissioner Phillips has served as a voice of reason. His decision making reflects a strong commitment to the rule of law, a keen awareness of the separation of powers, and continued faith that free markets and limited government benefit consumers. He has been swift to punish law violations but careful to exercise the power of the government responsibly. He leaves behind a body of opinions, speeches, and dissents that will continue to serve as important landmarks for years to come.

I know I speak for the entire FTC community in thanking Commissioner Phillips for his service.