Federal Trade Commission

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The views expressed are those of the Chairman and do not necessarily reflect those of the Federal Trade Commission or the other Commissioners.

I am happy to be here today because I believe this audience is a particularly important one. Advertising agencies are at the fulcrum of the advertising process, creating imaginative and informative advertising that sparks our competitive marketing system.

Today I want to discuss with you some of our recent efforts in our traditional role as a law enforcer, and then later set out for you where we seek to provide leadership on what national advertising policy ought to be. This latter effort, which is particularly evident in the green claims advertising area, illustrates our endeavors to develop a cooperative approach to the law, and our effort to deal with the problem of conflicting legal standards.

At the outset, let me state that the views I express here are my own and not necessarily the views of the Commission or any other Commissioner.

Role of the Commission

Historically, the Commission has viewed itself as a law enforcement agency, and while I continue to view law enforcement as the Commission's primary role, I believe we have another important responsibility which is to try to enunciate a national advertising policy that can form the basis for a consistent regulatory approach among the various states and federal agencies involved in the regulation of national advertising.

The challenge for the Commission's advertising enforcement effort is, as always, to protect consumers while fostering the free operation of the competitive process, on the theory that this promotes the interests both of consumers and of business. Simply stated, the goal is to maximize the flow of information in advertising while eliminating false and deceptive messages.

Recent Enforcement Efforts

Our attention and resources devoted to advertising issues have increased and so has the number of Commission actions and open investigations involving advertising. I hope you will agree that the kinds of actions we have taken demonstrate our commitment to vigorous, but reasonable, law enforcement.

Let me give you just two recent examples of what I consider to be notable actions. This past year the Commission issued its first case ordering disgorgement of profits from a major national advertiser and from its advertising agency for allegedly deceptive television ads. The Commission determined that disgorgement was appropriate and wanted to be sure that the industry understood how strongly we viewed the allegations made in that case.

This year also saw the Commission's first action challenging violations of the 1986 Smokeless Tobacco Act's prohibition on television advertising of smokeless tobacco products. In this case, we challenged the paid-for sponsorship by a leading smokeless tobacco company of a televised "tractor pull" event

which prominently featured the brand name, logo and selling messages of the company's smokeless tobacco product.

The Commission has been increasingly active in a number of other areas, including allegedly deceptive or unsubstantiated advertising claims for a wide range of products and services, such as foods, diapers, gasoline, diet clinics, 900 numbers, infertility clinics, cosmetic surgery and more.

Impact of Deceptive Advertising on Competition and Consumers

Some of the claims we have challenged during the past year are not claims that go to the underlying efficacy or quality of the product, but are claims designed to give one product an undeserved advantage over competing products. Thus, for example, we raised no question about the quality of the trash bags and diapers for which environmental benefit claims have been recently challenged. Rather our complaints alleged that there was not sufficient evidence to show that these products offered the environmental advantages they claimed over their competitors. In such cases, just as consumers were allegedly deceived, competitors who made truthful and substantiated claims could have been disadvantaged. Similarly, the deceptive use of a demonstration, or an unsubstantiated efficacy or superiority claim, not only injures consumers and undermines their reliance on advertising, but also injures competitors who try to make truthful and substantiated claims. This concept, that the Commission's advertising enforcement program needs to reflect

both competition and consumer protection values, is inherent in the Federal Trade Commission Act.

In fact, for the first 24 years of its existence the Commission regulated deceptive advertising based solely on the grounds that it was an unfair method of competition. It was not until the passage of the Wheeler-Lea Act in 1938 that the Commission's deceptive advertising enforcement was given its current consumer protection authority. And while consumer protection is our paramount concern, I'm sure I don't have to explain to this audience the pernicious effect that deceptive advertising has on competition.

New Technologies

We are also trying to keep abreast of changing technology and marketing both to promote competition between existing products, and to preserve future competition that now is in its relative infancy. Let me explain.

In the areas of those 30-minute advertisements known as "infomercials" and in 900-number services, the Commission has seen numerous examples of fraud and deception playing upon consumers' unfamiliarity with these new marketing techniques and technologies. The agency has brought several enforcement cases in each of those areas. Nevertheless, as Joe Ostrow pointed out at the 10th Annual National Consumers Week Symposium last fall, interactive television services and alternative payment systems by telephone, will likely be mainstays of the marketplace by the

year 2000[1]. In the consent orders the Commission has approved in infomercial and 900-number cases, as in our collaboration with the Federal Communications Commission and the Congress, we have been careful to fashion remedies that will stop fraud and deception today, without inhibiting the potential utility of these techniques and technologies as these industries mature.

Coordination with States and Other Federal Agencies

In addition, the Commission's interest in consumer protection, and advertising in particular, is shared by a number of entities. Among the most important of these are the State Attorneys General.

The FTC and the state attorneys general have forged a much more constructive relationship. In a number of areas we are acting jointly, or coordinating our separate efforts to avoid conflicting legal standards. In some instances, states are deferring to FTC actions to resolve problems and to get an order with nationwide applicability. In all areas, we have been able to talk openly and candidly about mutual concerns, even when there have been some differences between the views of states and the FTC.

At the same time that we have made substantial progress in promoting consistent enforcement approaches with the states, we also are working more closely with a number of other federal agencies. In the area of green marketing, for example, we have

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[1] J. Ostrow, "The Media Bring Many Messages" presented at Consumer Protection in the Year 2000 Seminar. (Oct. 23, 1991)

formed a joint task force with EPA and the United States Office of Consumer Affairs. In the burgeoning area of 900 numbers, we have worked closely with the Federal Communications Commission. In alcohol advertising, we work with the Surgeon General and the Bureau of Alcohol Tobacco and Firearms. And in food advertising, we have a 37-year old memorandum of understanding with the Food and Drug Administration. In all these areas, we have intensified our liaison efforts with these other agencies.

Green Marketing

In at least two areas important challenges are posed for the Commission's advertising program. It is in these areas that I hope we can break new ground and try to articulate national advertising policies that will provide the basis for a more consistent approach to the regulation of national advertising.

The first is green marketing. I have made clear that I strongly support the attempt to develop environmental guidelines. I have tried to be equally clear, however, that while there appears to be general agreement from industry, the states, and consumer groups that guidelines would be useful, there is much less agreement on what the guidelines should say.

The FTC has made clear that its role is not to establish environmental policy, but to prevent deception. If the Commission determines to issue guidelines, I am sure that any guidelines we do accept will be flexible enough to adapt to new developments and innovations.

Food Advertising

The area of food advertising will continue to receive intense attention. As you are all aware, we share jurisdiction with the Food and Drug Administration in this area. Under our longstanding interagency agreement with FDA, the FDA is responsible for food labeling and the FTC is responsible for advertising.

Because of its importance to consumers, food advertising is a priority at the FTC. However, this area has recently received even greater attention due to the passage of the Nutrition Labeling and Education Act of 1990. This law was designed to address widespread concern about the accuracy and usefulness of information on food labels. It assigns to FDA the herculean task of issuing regulations that will lead to the relabeling of virtually every food product in America by as early as mid-1993.

In November the FDA published more than 500 pages of proposed regulations implementing the NLEA. The Commission staff has reviewed these proposed regulations, and today, is providing staff comments to the FDA.[2]

The comments are designed to assist FDA in its efforts to devise workable regulations that will ensure both that consumers are protected from deceptive or misleading labeling and that they will continue to receive truthful and non-misleading information

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[2] The USDA also published similar regulations for the labeling of meat and poultry. Today the Commission also provided staff comments to the USDA to assist in its deliberations.

about the nutritional content of foods and the health reasons for improving their diets. At the same time, the comments suggest ways the regulations could provide better incentives for product improvement and competition.

In commenting on the proposed regulations, the staff understood that it is not the FTC's role to act as a surrogate for FDA on scientific issues. These questions are within the scientific expertise of the FDA and the many industry, scientific and public health groups that I am sure will be commenting on these important aspects of the FDA proposal.

In contrast to these scientific issues, however, there are other issues raised by the proposed FDA regulations that address basic consumer information and competition questions where the Commission staff does have significant experience and, I believe, much to offer.

The comments highlight concerns about a number of provisions in the proposed regulations. For example, the staff comment raises concerns that the regulations would:

* prohibit simple statements such as "3 grams of fiber" on an apple, or "100 calories" on a container of yogurt.
* prohibit brand-to-brand comparisons such as "Our cola has 25% fewer calories than Brand A or B."

* prohibit comparisons across food groups, such as "Try our fruit cocktail for dessert, instead of cake, saves you 8 grams of fat."

The staff comment urges FDA to consider whether prohibitions like these are necessary to attain the goals of the NLEA, and suggests that, in many instances, they may have unintended, undesirable effects.

The comment focuses on the way consumers change their diet. It notes that many consumers are unlikely to give up all of their favorite foods in order to improve their diets. In many instances, people are more likely to switch to healthier versions of their favorite foods - such as leaner meats and lower fat products -- than to forego them entirely. The comment suggests that the regulations allow improvements in those choices and stimulate competition to improve products. The staff's analysis of the proposed regulations, however,indicates that the regulation would exclude health claims on a majority of foods across many food groups, even on foods generally recognized as helpful to consumers' efforts to improve their diets. For example, all labels for fish and poultry products, and most labels for cereals and breads would be prohibited from making statements explaining the health reasons why consumers should switch to these products from other less healthy foods.

As these examples illustrate, the FDA is currently in the process of dealing with difficult and important food labeling issues, and it is a tribute to the high quality of the FDA staff

that they have been able to publish proposals on a wide range of issues in such a short time. The comments we are filing today are designed to assist FDA in its ongoing review of those proposals as it moves forward to final rules on these questions.

Just as the issues facing FDA are complex, those facing the Commission in coordinating its food advertising policies with the NLEA and its implementing regulations will be equally so.

In enacting the NLEA, Congress decided not to apply its food labeling standards to food advertising. However, I also believe that there clearly is a need for a coordinated effort -- at state and federal levels -- on food labeling and advertising issues. Although almost all agree on this goal, there is substantial disagreement on the best way to obtain it. Thus, even before FDA's regulations were proposed or even drafted, there were calls for the FTC simply to apply the FDA's regulations on health claims and nutrient content descriptors, verbatim, to food advertising. The Commission questioned this approach. First, the Commission was concerned that without knowing what the final regulations will require, it is impossible to know whether it would make sense to apply all of them to advertising.

Second, the Commission was concerned that there are some important differences between labeling and advertising that argue against lockstep uniformity in approach, even where general consistency is desirable. I am pleased that FDA Commissioner David Kessler himself has acknowledged these differences on several occasions.

As raised in the comment, there are certain provisions of the proposed regulations that, even where appropriate on a label, would be impractical in advertising. The proposed model disclosure for calcium and osteoporosis claims on labels is almost 80 words long.[3] The first sentence is, by itself, 20 words long. Even if the FDA concludes in its final regulations that this disclosure -- or even a shorter one -- is appropriate on a label, it is unlikely such a disclosure requirement would be suitable for a 15 to 30-second TV ad.

Similarly, the disclosures required by the proposed regulations for comparative claims are shorter, but equally information-intensive. For example, to make a "lite" claim on a cheesecake label, the proposed regulations would require a disclosure that the cheesecake has:

> 1/3 fewer calories and 50% less fat than our regular cheesecake. Lite cheesecake: 200 calories, 4 grams of fat; regular cheesecake: 300 calories, 8 grams of fat per serving.

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[3] "Osteoporosis affects older persons, especially middle-aged white women and those whose families tend to have fragile bones in later years. A lifetime of regular exercise and eating a healthful diet that includes enough calcium, especially during the teen and early adult years, builds and maintains good bone health and may reduce the risk of osteoporosis in later life. Adequate calcium intake is important, but intakes above 1,8000 mg. are not likely to provide any additional benefit."

Even if this amount of information could be physically incorporated into a 15 or 30-second TV ad, I am not sure consumers could retain much of it. The potential problems here are compounded by the fact that if multiple claims are made for a product, multiple disclosures would be required as well.

An even more difficult requirement to implement for advertising would be that a nutrient content claim cannot be highlighted on a label. Under this proposed regulation, a nutrient content claim, such as "low sodium," could not be larger than or, made in a different style from, the product's statement of identity, such as "processed cheese food." Again, even if it is determined to be appropriate for labeling, applied literally to advertising -- as some have suggested we should do -- this requirement would prohibit any statement in an ad that is larger than the statement of identity on the product's label. Even if such a regulation could be adapted technically to advertising, it is a requirement that would cut against the most basic function of advertising, which is to reach out and grab the consumer's attention and focus them on the information that the ad is attempting to convey. If producers cannot reach out to attract consumers' attention to truthful product content claims, it will be much harder for new and better products to succeed in the market.

The Commission recognizes that there should be a consistent and coherent federal policy on food marketing. But as the above

Good afternoon. As hard as it is for a Washingtonian to give up the home field advantage to meet with you in Dallas, it is a pleasure for me to be here with you today to talk about the Federal Trade Commission's consumer protection mission. It is particularly fitting that I have this opportunity with the Better Business Bureau and the Rotary Club, organizations with longstanding reputations for service both locally and across the nation. Consumers outside of Washington, D.C. may not recognize the myriad of initials and acronyms for government agencies such as the FTC, the SEC, or the CFTC, but the letters BBB and the name Rotary Club are household terms throughout the United States. At this point, let me note that all of my remarks reflect my own views and not necessarily those of other Commissioners or the Commission as a whole.

The FTC works both nationally and locally. I am sure that many of you are familiar with Tom Carter, our Regional Director who has worked hard for outreach not only in the Dallas area but throughout the entire region. The more one looks at the BBB and the FTC, the more one is struck at how similar our efforts and interests are. We both spend much of our consumer protection resources maintaining truthful advertising standards, dealing with thorny issues of consumer credit, discovering and exposing fraud, and educating the consuming public and businesses as well.

The fascinating history of the Dallas Better Business Bureau that was published on your 60th anniversary in 1980 is a virtual history of business practices in the United States for this century. The Table of Contents alone -- with entries such as "Texas Oil Boom Stock Promotions," "Development of Retail Advertising Guidelines," "Pest Control Industry," "Private Employment Agencies," "Magazine Subscription Selling," "Proprietary Schools," "Fat Reducers and Skin Peelers," and "Ads for Models" -- could almost be confused with the Table of Contents for the Code of Federal Regulations that describes FTC activities over the same 60-year period. Interestingly, your monthly Bulletin and Annual Report shows how the BBB still is a reflection of the marketplace that the FTC must deal with. Last year in Dallas, for example, the great bulk of your inquiries were for phony sweepstakes opportunities, brokers offering advance fee loans, warranty questions, credit reporting questions, gold card schemes, and 900-telephone number problems. These are some of the many problems that occupied the FTC's consumer protection mission last year.

Your complaint system and data collection capacity, especially when it is shared with the National Council, puts the BBB at the cutting edge of detecting emerging problems in the marketplace. For example, advance fee schemes of one sort or another have been around for quite some time, mostly targeted to small businesses that needed capital. It was your telephone

lines, however, that gave a loud and clear warning last year that a new strain of this problem was being directed to consumers at epidemic levels.

While the BBB works largely through voluntary self-regulation and consumer education, we at the FTC must handle many of those same problems with subpoenas, consent orders, administrative trials and, with increasing frequency, going to federal district court to obtain injunctions and either civil penalties or redress for consumers.

In the last two fiscal years, our law enforcement activity moved at a brisk pace. In terms of numbers of new investigations, complaints, and court orders for injunctions, civil penalties, and consumer redress, we have had the most active time in the FTC's recent history. In addition to rooting out the frauds that concern our organizations, we spent much of our resources in the areas of credit and advertising, dealing with such issues as environmental claims, food and nutrition claims, diet products and programs, deceptive demonstrations in advertising, and more. In the last two years, many of our cases have involved large, well-known companies such as major food marketers, automobile companies, and large credit bureaus.

In spite of this active enforcement effort, even with highly visible companies, I am pleased that our agency continues to

enjoy support from the business community, which over the years has expressed increasing frustration at the differing rules and approaches of so many federal, state, and local agencies and legislatures that did not always coordinate or work toward consistency to the maximum extent possible. Our stepped-up activity level has not been met with cries of "re-regulation" or worse. To the contrary, business trade associations and other interested parties are accepting our efforts at policing the marketplace. I would like to think that this support is based on three key principles that the Commission has tried to follow in its consumer protection law enforcement program.

First, we try to listen to business and consumer groups alike to learn the facts about a problem not only to determine how consumers are being injured, but also to understand the legitimate needs that businesses have. I believe that if the Commission develops reasonable standards in its rules and orders, and articulates them to the public, we can enforce them vigorously.

When the Commission gave renewed attention to the responsibilities of advertisers and their agencies to present products truthfully and accurately, we received no public comments nor cries of "foul" from trade associations or companies in the same business to some major consent agreements. I would like to think that the public reaction, including the business

community's, followed from our efforts to explain to industry representatives the standards we were enforcing, taking into account their needs to compete honestly in the marketplace.

A good example of all this is our work in the areas of 30-minute infomercials and 900-telephone numbers. These two areas represent new approaches in marketing and technology and, unfortunately, in too many cases they have been marked by either deception or outright fraud. 900-number telephone lines, for example, have become identified in the public's mind with late night adult entertainment. However, as we have seen at the FTC, many of these phone lines are being used for outright fraudulent offers for job and credit opportunities. Infomercials got off the ground too often with baldness and other phony health cures, or claims of government giveaway programs.

Even as we attacked these problems on a case-by-case basis, we were mindful of the legitimate potential for program-length ads and new telephone technologies. A 900-telephone line, after all, is really an alternative payment system that uses the telephone and telephone billing services instead of credit card or other forms of payment. Indeed, in fundraising and other uses, such as up-to-date sports lines and weather lines, the 900-telephone line has proven useful, and its importance will likely grow as we become more and more dependant on electronic fund

transfers than on moving pieces of paper -- either checks or credit card slips.

Infomercials also have legitimate and important potential applications as a communications device. General Motors advertised its Saturn automobile through an infomercial, and the State of Arizona used program-length commercials to promote tourism in Arizona. I note that there is great interest among Fortune 500 companies for the possibilities of infomercials. I am encouraged that the Commission's high-visibility efforts may be succeeding in policing the industry against fraud without inhibiting or over-regulating the legitimate entrant to the market.

A second key to our enforcement approach has been to recognize that consumer protection activity should serve to protect both consumers and truthful competition. I recognize how frustrating it must be for businesses to have their lawyers -- either in-house or outside counsel -- advise them about the legal barriers to a proposed program or advertisement, only to discover that their competitors are doing pretty much exactly what their lawyers said would be a violation of the relevant law. Most companies follow honest practices not merely to avoid government action or bad publicity, but because they know that, in the long run, doing so also makes good business sense in a competitive marketplace. At the same time, it is important that companies

who follow the law have a sense that, if they play by the rules, they will not unfairly lose business to competitors that cheat or bend the rules. That is why I have said before, and repeat now, "we are trying to maintain a level playing field; we are not trying to stop the game."

In recent years, the Commission increasingly has been investigating and bringing clusters of cases, rather than filing a single test case against one key player in an industry. For example, the Commission accepted for public comment three consent agreements with makers of very low calorie diet programs. The three companies involved, who agreed to virtually identical orders, represent an estimated 70 percent of the very low calorie liquid diet market. Similarly, when the Commission announced consents and a complaint involving the marketing of 900-telephone number lines to children, it simultaneously brought actions involving three of the major players in the industry. Many of the companies involved in those and other enforcement efforts were more willing to cooperate with the Commission, I believe, because of a perception that their major competitors were being treated in the same manner.

Even when our focus is on a case-by-case approach, concerns about competition play a role. As you know, environmental claims in advertising and labeling have attracted much attention from the FTC and state Attorneys General, not to mention the Congress

and Environmental Protection Agency. A number of states, including Texas, brought a case against and ultimately reached agreements with Mobil for its marketing of plastic bags under the "Hefty" trademark. The FTC brought a similar action against First Brands, the maker of "Glad" plastic bags. These cases involved questions about how the respective plastic products would degrade when disposed of in a landfill, or as litter, or otherwise.

Consider the consumer injury in these cases. Apart from the frustrated hope of helping the environment years down the road, a consumer who purchases a common plastic or paper product suffers little, if any, direct and immediate financial loss if an environmental claim is unsupported.

At the same time, there is considerable injury to competition and competitors, particularly when companies that do spend money on research and development, and do bring improved products to market, lose sales because of exaggerated claims by competitors that show up either in advertising or on labels that consumers read when they are at the point-of-sale in a supermarket or other retail outlet. Environmental claims may well be an area where the potential injury to competition exceeds the immediate dollar loss to consumers. Nevertheless, with so much competition for essentially fungible products, not to mention competing type products, this impact on competition is

one that the Commission must consider in its law enforcement, just as the BBB addresses it in its self-regulatory approach through the National Advertising Division review process.

This concern is not limited to the environment. Unsubstantiated or false claims about food, health, and safety present the same issue. Marketers of improved products that have less fat or more nutrients should not lose sales to consumers who are misled into thinking that competing products have the same benefits. And, I should add, in areas involving health and safety, false and misleading advertising can cause substantial and immediate injury to consumers, as well as competition. I believe that the business community will continue to be more willing to support the FTC's law enforcement efforts when it perceives that we are protecting fair competition as well as consumers.

The third key to our law enforcement efforts has been a renewed effort to coordinate activities between federal, state, and local levels. Not only does this make for more efficient use of our all-too-scarce resources, but it facilitates a uniformity of approach that makes it easier for companies to understand and comply.

An interesting example of our coordination is in telemarketing and other frauds. Investigations of boilerrooms

over the years has shown a predictable pattern. Boilerrooms spring up in one state, make calls to consumers in other states, and, in many cases, ship their product (if at all) from yet another state, and use banks or other financial institutions across the country to process their payments. All of this has the effect, needless to say, of making law enforcement difficult. An Attorney General in a distant state is less likely to chase down a boilerroom in Texas when only a handful of consumers in his or her state have reported problems. Similarly, the use of mail drops and complex systems for clearing payments is another example of cooling the trail of investigators who are trying to "follow the money."

Often with the aid of state and local authorities, we are finding and prosecuting parties who provide turn-key operations for enterprising telemarketers. They provide scripts, lists of potential victims, product distribution services, and, perhaps most important, even find third parties to launder the credit card payments for boilerrooms who could not get their own merchant accounts with national credit card organizations. Viewing telemarketing fraud in this manner makes clear that shutting down one boilerroom or another will not have much of an impact on the overall problem of fraud. We must attack not only individual boilerrooms or retailers, but go after the "root system" that facilitates and allows the telemarketing fraud network to flourish.

Interagency cooperation is essential at the federal, state, and local levels to be able to put together the information to prosecute these frauds efficiently and effectively. State Attorneys General too often have only bits of information about victims or an individual boilerroom in his or her state. What is needed, as the Attorneys General and other agencies have recognized, is the type of cooperation -- both in information-sharing and joint effort -- that is needed to put together a picture of the entire operation as it crosses state borders in a Rube Goldberg-like pattern of fraud and deception.

One good example of the type of cooperation that is needed results from the BBB's own effort to highlight the advance fee loan fraud problem last year. At the request of more than 30 state bank regulators, the FTC convened a meeting at its headquarters in January for staffs of the FTC, the Postal Service, the Secret Service, State Banking Officials, and representatives of NAAG and NACAA to discuss advance fee loan schemes from the standpoint of their overall structure. The participants sought to determine how much of the activity is strictly local, without ties to interstate networks, and to what extent there are some of the same interstate features that characterized the boilerroom patterns I have described. We also discussed what legislative and law enforcement efforts have been successful in some states to combat this type of fraud. Based on that information, we have established a foundation for

information sharing and cooperation, so that state and local governments can attack the many schemes that are truly local in nature, while the FTC can help with problems that cross state lines and have a more complex structure.

The same cooperative approach works in advertising and credit enforcement, as well as in fraud. For example, the FTC and 10 states brought a case involving claims for Mazola corn oil in 1990, resulting in a "global" settlement that resolved all of the pending issues with consistent "orders." This approach is better for the company than having to deal with a number of state and federal enforcers who may not be applying the same standards. Similarly, in an important settlement with TRW that should bring great changes to the way consumers have their credit histories reported and corrected, the FTC and 19 states not only coordinated with each other, but for the first time in a consumer protection case of this type, they conducted joint negotiations with TRW.

I am sure that no company likes the prospect of a government investigation, much less a lawsuit. However, companies also recognize that being treated by different jurisdictions in a uniform manner, to the extent possible, is a better way for government law enforcement to proceed than otherwise, and particularly when they believe their competitors will be handled on similar terms.

These three keys, (1) listening to the legitimate needs of businesses when developing legal standards, (2) remaining mindful of the competitive impacts of our actions as we protect consumers, and (3) working with other agencies at all levels of government to provide as much efficiency and uniformity as possible, seem to be working, judging by the response we have gotten from the many constituencies who are affected by our work. I expect the Commission to continue with a large volume of high impact cases in the consumer protection area, but I hope that with an on-going dialogue with business and consumer groups, and with a high level of coordination with federal, state, and local agencies, we will continue to get the information that we need to develop the fair and sensible standards that, in turn, will allow us to maintain a vigorous law enforcement program that protects consumers and competition alike. Thank you.