



Office of the Secretary

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

[Date]

[Company/Counsel]

[Address]

[City, State Zip]

Dear [Company/Counsel]:

Enclosed is an Order to File a Special Report (“Order”), issued by the Federal Trade Commission pursuant to Section 6 of the FTC Act. The Order seeks information from [your client/your company] (hereinafter “you”) regarding the method and manner in which you collect, analyze, verify, and report information about entities, and the marketing practices for any products you sell entities to enable them to monitor or supplement the information you report about them.

Please review the Order, including all definitions and instructions, carefully and consider the availability of the requested data and information. You are required to respond to this Order using information in your possession, custody, or control. However, you should not seek any responsive information from separately incorporated subsidiaries or affiliates or from individuals (other than in their capacity as your employee or as your agent). Your response as it relates to separately incorporated subsidiaries or affiliates should only include information from or about such entities if you already have access to it, including information maintained in a central data repository.

No later than [insert date 14 days after service], you must contact Commission staff identified in this letter and indicate whether all of the information required to respond to this Order is in your possession, custody, or control. If certain information is not in your possession, custody, or control, no later than [insert date 14 days after service] you also must: (1) identify, both orally and in writing, each question or sub-question that you are not able to fully answer because information is not in your possession, custody, or control, and (2) for each, provide the full names and addresses for all entities or individuals who have possession, custody, or control of such missing information.

Submissions responsive to this Order that are marked “confidential” will not be disclosed without first giving you ten (10) days’ notice of the Commission’s intention to do so, except as provided in Sections 6(f) and 21 of the FTC Act. Confidential or privileged commercial or financial information will be reported only on an aggregate or anonymous basis, consistent with Sections 6(f) and 21(d) of the FTC Act.

In addition to the above requested information, we would be happy to consider any additional information you consider relevant to this inquiry. If you have any questions about the issuance of this Order or your filing of a Special Report to the FTC, please contact Harris Senturia (216-263-3420, hsenturia@ftc.gov).

Regards,

April J. Tabor