



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

Office of the Secretary

June 2, 2015

Step Up Savannah
State of Georgia

Re: *In the Matter of First American Title Lending of Georgia, LLC.*
FTC File No. 1323264

Thank you for commenting on the Federal Trade Commission's proposed consent agreement in the above-referenced proceeding. The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration.

Your comment expresses support for the Commission's action. Specifically, you state that Step Up "applaud[s] the FTC's efforts to take action in this area" and that "actions of this nature by government ensure that large numbers of consumers may be protected." You further explain that Step Up Savannah has been examining the impact of car title loans for about five years and that "[c]ar title loans come at a high cost" that can "actually generate more debt for consumers since most rollover the loan." Additionally, you do not propose any revisions to the proposed complaint or consent agreement.

The Commission thanks you for your comment and expression of support. The proposed complaint and consent agreement should help address some of your concerns with regard to title loan advertising. Specifically, the proposed complaint alleges that First American Title Lending deceptively advertised car title loans at a 0% interest rate without adequately disclosing that the 0% offer was subject to significant qualifications. Additionally, the proposed complaint alleges that First American Title Lending failed to provide an "annual percentage rate" ("APR") alongside the advertised rate, in violation of the Truth in Lending Act ("TILA"). The proposed consent agreement requires First American Title Lending to clearly and conspicuously disclose all qualifying terms associated with obtaining the loan at its advertised rate, and to provide the APR alongside that rate.

After consideration of your comment, the Commission has determined that the relief set forth in the consent agreement is appropriate and sufficient to remedy the violations alleged in the Complaint. Accordingly, the Commission has determined that the public interest would best be served by issuing the Decision and Order in this matter in final form without modification. The final Decision and Order 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, and we thank you again for your comment.

By direction of the Commission.

Donald S. Clark
Secretary