



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

Office of the Secretary

December 3, 2012

Kendall Laughlin  
State of Texas

*Re: In the Matter of ABCSP, Inc., File No. 112 3168; Docket C-4378*

Dear Mr. Laughlin:

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 states that ABCSP, Inc. provides housing to renters, which would be a real estate transaction in most states, and asks whether we reviewed this possibility. In light of your submission, we have considered this question. We note that ABCSP provides placement recommendations to seniors seeking long-term care, but does not provide housing to seniors and is not a party to the agreements entered into by the senior and long-term care facilities to provide such housing. We continue to believe that the settlement with ABCSP properly addresses the deceptive marketing practices alleged in the Commission's complaint.

Accordingly, the Commission has determined that the public interest would best be served by issuing the Decision and Order 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