



Office of the Secretary

United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

April 11, 2013

Gregory
State of Colorado

Re: In the Matter of DesignerWare, LLC, File No. 112 3151, Docket No. C-4390

Dear Sir or Madam:

Thank you for your comment regarding the Federal Trade Commission's consent agreement in the above-entitled 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 suggests that the proposed orders with DesignerWare, LLC, and its principals will have a limited impact on the market for monitoring technology that can be used on rented computers. You claim that other software manufacturers continue to market products similar to DesignerWare's program and that "99% of the industry [will] go[] unchanged" as a result of the Commission's actions.

The Commission appreciates your comment and your concern about the rent-to-own ("RTO") industry's use of monitoring technology on rented computers. The Commission takes seriously these concerns, as evidenced by the coordinated enforcement actions in this matter against not only DesignerWare and its principals, but also against seven RTO companies: Aspen Way Enterprises, Inc.; B. Stamper Enterprises, Inc.; C.A.L.M. Ventures, Inc.; J.A.G. Rents, LLC; Red Zone Investment Group, Inc.; Showplace, Inc.; and Watershed Development Corporation. All of these companies, which collectively operate RTO stores throughout the country, have agreed to settle charges similar to those brought against DesignerWare and its principals. We hope these orders have a deterrent effect on other RTO stores as well.

In addition, the settlements with DesignerWare, its principals, and the RTO companies do not preclude the Commission from taking future action against other companies whose practices violate Section 5 of the Federal Trade Commission Act ("FTC Act") or other laws it enforces. To the extent you would like to provide further information about specific industry practices that you believe are unlawful, we encourage you to file a complaint with the Commission's Consumer Response Center. Complaints filed with the Commission are part of the Consumer Sentinel database and provide an important source of information for the Commission and

hundreds of other federal and state law enforcement agencies. You may file a complaint at <https://www.ftccomplaintassistant.gov/>.

In light of these considerations, the Commission has determined that the public interest would best be served by issuing the Decision and Order against DesignerWare in final form without any modifications. 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. The Commission thanks you again for your comment.

By direction of the Commission, Commissioner Wright not participating.

Donald S. Clark
Secretary