



OFFICE OF THE DIRECTOR-GENERAL

20 June 2023

Chair Lina Khan
Federal Trade Commission
600 Pennsylvania Avenue NW
Washington, DC 20580

Dear Chair Khan,

The Transnational Alliance to Combat Illicit Trade (TRACIT) is an independent business association consisting of multinational corporations working together to mitigate the economic and social damages of illicit trade.

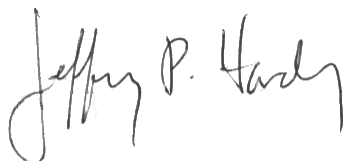
TRACIT respectfully requests the Federal Trade Commission to vigorously enforce the INFORM Consumers Act (INFORM) to ensure that consumers are protected from the sale of harmful counterfeit and stolen products increasingly available on online marketplaces (platforms). Far too many families, communities, and legitimate businesses have been harmed by illegitimate, unscrupulous and often criminal third-party sellers who exploit system weakness to reach online shoppers in all corners of the country.

The INFORM Act, passed with bipartisan support as part of last year's Omnibus Appropriations Bill, becomes effective on June 27, 2023. It finally establishes the much-needed transparency and accountability for these platforms and requires them to collect and verify specific information about third party sellers, and to disclose certain seller information to consumers.

INFORM is the single most important piece of legislation currently available to ensure a safe and secure online shopping experience. Consequently, it is imperative FTC immediately promulgate a set of rules that forcefully implements and enforces the provisions of the new law. Strong enforcement of these provisions, as well as the new requirement that online marketplaces provide a "reporting mechanism" for suspicious activity on each covered seller's product listing, is vitally important to protecting both consumers and honest businesses.

TRACIT will be ready to provide information or assistance that would be helpful to the FTC as it seeks to fulfill its mission. We commit to regularly sharing specific products identified by our rightsholders.

Warm regards,

A handwritten signature in black ink that reads "Jeffrey P. Hardy". The signature is written in a cursive, flowing style.

Jeffrey P. Hardy
Director-General
Transnational Alliance to Combat Illicit Trade

cc:

Samuel Levine, Director, Bureau of Consumer Protection

Serena Viswanathan, Associate Director, Division of Advertising Practices