

Why Dissenting Statements By FTC Commissioners Matter

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Last week, the FTC, by a 3-2 vote along party lines, adopted its click-to-cancel rule, which purports to make it easier to cancel gym memberships, streaming services, and the like. [We wrote about it here.] The final rule will apply across the economy to any business that offers negative option plans (e.g., subscriptions) and would provide the Commission with the ability to obtain civil penalties from covered entities for any misrepresentation about the underlying product or service.

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