



## TABLE OF CONTENTS

I.	Introduction. . . . .	2
II.	A Publicly Available Database Would Benefit Consumers and the Commission Alike. . . . .	3
	A. A Consumer Complaint Database Would Benefit Consumers. . . . .	3
	B. A Consumer Complaint Database Would Help The Commission Better Achieve Its Goals. . . . .	4
III.	The Commission’s Current Consumer Complaint System Is Inadequate . . . .	6
IV.	The Consumer Complaint Databases at the CPSC and CFPB Can Serve as Models for a Complaint Database at the FCC. . . . .	8
V.	Recommendations for a Successful Consumer Complaint Database. . . . .	11
	A. A Database Should be Sortable According To Certain Specific Criteria. . . . .	12
	B. A Database Should Have Mechanisms In Place to Help Ensure Reliability of Data. . . . .	13
	C. A Robust Database Should Provide Information About the Resolution of Consumers’ Complaints. . . . .	14
VI.	Conclusion. . . . .	15

## I. Introduction

Consumers Union<sup>1</sup> offers its comments in response to the Commission's Public Notice seeking comment on the Commission's Report on Process Reform ("Report")<sup>2</sup> and recommendations therein. We share the Commission's interest in ensuring that the agency operates "in the most effective, efficient, and transparent way possible."<sup>3</sup> We especially appreciate that the Commission is considering ways to enhance transparency, more effectively communicate with the public, and improve its handling of consumer complaints. Specifically, we believe that *Recommendation 2.23*, which would establish a publicly-available consumer complaint database, should be a top priority for the Commission.

Consumers Union has a longstanding interest in making more information available to consumers and has played a major role in helping other agencies establish such databases, including at the Consumer Product Safety Commission ("CPSC") and the Consumer Financial Protection Bureau ("CFPB"). Our comments to the Commission draw on this extensive experience to make the recommendations set forth below, which we believe will result in a consumer database that will benefit the public and the Commission by making more information available in a publicly available, easy-to-use, and searchable database.

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<sup>1</sup> Consumers Union is the public policy and advocacy division of Consumer Reports. Consumers Union is an expert, independent, nonprofit organization whose mission is to work for a fair, just, and safe marketplace for all consumers and to empower consumers to protect themselves. Consumer Reports is the world's largest independent product-testing organization with more than 50 labs, auto test center, and survey research center, the nonprofit organization rates thousands of products and services annually. Founded in 1936, Consumer Reports has over 8 million subscribers to its magazine, website, and other publications.

<sup>2</sup> See Report on FCC Process Reform, Federal Communications Commission (Feb. 14, 2014) available at <http://www.fcc.gov/article/da-14-199a2> ("Report").

<sup>3</sup> FCC Seeks Public Comment on Report on Process Reform, Public Notice, DA 14-199 (Feb. 14, 2014) ("Public Notice").

## **II. A Publicly Available Database Would Benefit Consumers and the Commission Alike**

The development of a consumer complaint database will ensure that consumers have a transparent, efficient, and effective way to seek assistance and learn of others' experiences. Consumers should have maximum opportunities to provide valuable information to the Commission so that information can be used in the decision-making process. In addition to serving as an invaluable resource to consumers, improving the consumer complaint process will allow the Commission to more easily focus on key trends and problems in the media and telecommunications marketplace and help it better achieve its consumer protection goals.

### **A. A Consumer Complaint Database Would Benefit Consumers**

A public complaint database would serve as an invaluable resource, allowing consumers to benefit from the knowledge and experiences of others. Consumers continue to be faced with new decisions as new services, devices, and features are introduced and bundled in various ways. As Commissioner Rosenworcel aptly noted in a 2012 speech, “[i]t is vitally important to get consumers the information they need to make choices with confidence in a marketplace that can be bewildering to navigate.”<sup>4</sup> The Commission made a similar observation in a 2009 Notice of Inquiry, as it explored the actions it could take to further empower consumers.<sup>5</sup> There, the Commission noted that “[b]etter access to clear information is particularly important in light of the substantially increased

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<sup>4</sup> See Jessica Rosenworcel, Commissioner, Federal Communications Commission, Remarks Before Practising Law Institute (Dec. 13, 2012), available at <http://www.fcc.gov/document/comm-rosenworcels-remarks-practising-law-institutes-event> (discussing the need for a more transparent consumer complaint system).

<sup>5</sup> In the Matter of Consumer Information and Disclosure, CG Docket No. 09-158, Truth-in-Billing and Billing Format, CC Docket No. 98-170, IP-Enabled Services, WC Docket No. 04-36 (rel. Aug. 28, 2009) (“Consumer Disclosure NOI”).

number of delivery platforms and service options that have become available . . . .”<sup>6</sup> Five years later, this is all the more true. Technology has brought with it a number of new choices for consumers – but also greater consumer confusion. Consumers need the proper information and tools to understand all of the various options available to them.

According to the Commission’s own data, cable prices continue to rise faster than the rate of inflation,<sup>7</sup> and households are now spending an average of \$154 per month on home communications services – more than what they spend on clothing, furniture, or electricity.<sup>8</sup> Yet, as we report in the May 2014 issue of *Consumer Reports*, customer satisfaction remains low.<sup>9</sup> A publicly available consumer complaint database will shed light on price information. It will also improve transparency around customer service practices, spurring companies to better address consumers’ needs.

### **B. A Consumer Complaint Database Would Help The Commission Better Achieve Its Goals**

A public database would help the Commission achieve many of its goals, including modernizing its reporting systems and promoting transparency and data-driven policymaking. As the FCC has identified in its Report, it would also “facilitate improved customer care overall,” and make the Commission “better able to efficiently link the intake of informal consumer complaints to the Commission’s policymaking and enforcement processes.”<sup>10</sup> Other agencies – including the FTC and the CFPB – use complaint data to help with their initiatives and enforcement actions, and as

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<sup>6</sup> Consumer Disclosure NOI at 8.

<sup>7</sup> See FCC Report on Cable Industry Prices, MM Docket No. 92-966, available at [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DA-13-1319A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-13-1319A1.pdf).

<sup>8</sup> See *Untangling The Bundle*, CONSUMER REPORTS MAGAZINE, May 2014, at 22.

<sup>9</sup> *Id* at 22-23.

<sup>10</sup> Report at 25.

*Recommendation 2.14* of the Commission’s working group’s report correctly recognizes, revamping the consumer complaint process would also help FCC staff use complaint data as a “reliable resource for the agency’s enforcement initiatives.”<sup>11</sup>

Making consumer complaint data available in an easy-to-use, searchable database will assist the Commission in its efforts to track and identify existing and emerging abuses. Consumers continue to find unexpected charges on their bills, face problems understanding opaque billing practices, and have less-than-satisfactory experiences with customer service. Complaints provide important information about these experiences and flag “tip-of-the-iceberg” abuses and widespread consumer dissatisfaction. Unfortunately, the Commission’s current complaint process makes it difficult for it to learn about new threats to consumers, identify common issues or areas where more enforcement may be necessary, and obtain more information about what is going wrong. As the Report notes in *Recommendation 2.22*, an approach similar to the CFPB’s that processes complaints within a single system and makes the resulting data accessible to staff would significantly help the FCC’s Consumer and Governmental Affairs Bureau (“CGB”) and other Bureaus at the Commission improve their use of complaint data internally.<sup>12</sup>

Finally, revamping the complaint process according to the recommendations has the potential to spur companies to improve or change their practices for the better. As the CFPB Director Richard Cordray noted, the mere fact of having a database can change companies’ behaviors. Director Cordray has also explained that companies “know that [the CFPB’s] supervision and enforcement teams are keeping a watchful eye on the consumer complaints . . . . Many are therefore building into their compliance

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<sup>11</sup> *Id.*

<sup>12</sup> *Id.* at 29.

management systems an increased attention to the broader trends revealed by their analysis of consumer complaints . . . which will tend to minimize litigation risk, reputational risk, and regulatory risk. Through all of these means, [the consumer complaint database at the CFPB is] bringing new levels of accountability to the consumer financial marketplace.<sup>13</sup>”

### **III. The Commission’s Current Consumer Complaint System Is Inadequate**

Although the Commission currently collects detailed information about consumer complaints, this information is only made available to the public on a limited basis. Currently, the Commission compiles and publishes information about consumer complaints in quarterly reports. These reports share only aggregate data about the top complaints and inquiries under broad subject categories, without any additional detail. Aggregate data is insufficient to enable the public to make meaningful decisions. Furthermore, the Commission noticeably lacks any data on the identity of specific companies in its public complaint data.

It is not currently entirely clear to consumers what they can expect from the Commission’s complaint process, and there is a need for more information about the treatment of consumer complaint data. As the Commission notes in its Report, consumers are not able to track the status of their complaints.<sup>14</sup> Often, when consumers complain to the Commission, it seems as if their comments go into a black hole, with no clear follow-up as to how a complaint was ultimately addressed. Consumers will be unlikely to further use the complaint system if they do not receive any meaningful redress from it.

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<sup>13</sup> Richard Cordray, Director, Consumer Financial Protection Bureau, Remarks at the American Banker Regulatory Symposium (Sep. 24, 2013), *available at* <http://www.consumerfinance.gov/newsroom/director-cordray-remarks-at-the-american-banker-regulatory-symposium/>.

<sup>14</sup> Report at 24.

In addition, consumers continue to face difficulties filing complaints because of the confusing interface utilized by the Commission. As the Commission notes in its report, the consumer interface for submitting complaints includes sixteen different complaint forms.<sup>15</sup> Furthermore, there is no clear explanation online as to how the Commission treats complaints in its multi-step review process, nor is there a way for consumers to check the status of their submitted complaints at any point along the Commission's process. The difficulties associated with filing can discourage consumers from submitting complaints. When it is too hard to complain, consumers don't get the help they need and regulatory agencies don't get enough information about what is going wrong for consumers in the marketplace.

Industry often points to the number of complaints collected by the Commission as support for the argument that everything is working well in the market and that regulatory intervention is unnecessary. However, low complaint numbers do not necessarily indicate the market is fine. For example, in our work on cramming, we have found that industry has relied on the Commission's quarterly reports to argue that the Commission wasted valuable resources to address wireless cramming, claiming that it was "a nonexistent issue."<sup>16</sup> In that case, industry representatives argued that regulatory intervention was unnecessary because the number of wireless cramming complaints "fell below the threshold requirement to be placed on the quarterly reports."<sup>17</sup> Yet, as the Senate

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<sup>15</sup> *Id* at 24.

<sup>16</sup> *See, e.g.*, Comments of CTIA, CG Docket No. 09-158, at 3-4 (June 25, 2012), *available at* <http://www.ctia.org/docs/default-source/fcc-filings/ctia-files-comments-in-cramming-proceeding---fnprm.pdf?Status=Master&sfvrsn=0>.

<sup>17</sup> *Id* at 3-4.



Commerce Committee<sup>18</sup> and Federal Trade Commission<sup>19</sup> have recognized recently, wireless cramming remains a continuing problem today.

Senator Nelson and Senator Udall correctly recognized, in a recent letter to the FCC urging the development of a public database, that low complaint numbers may be an indication of the inadequacies with the Commission's complaint process.<sup>20</sup> As they noted – and as the GAO found in a 2009 review – complaint numbers may be low because consumers are not aware of the Commission's filing process and procedures.<sup>21</sup>

#### **IV. The Consumer Complaint Databases at the CPSC and CFPB Can Serve as Models for a Complaint Database at the FCC**

Consumers Union played an important role in developing and implementing databases at the CPSC and CFPB, which we believe have been very effective to date. We believe that there are components of both databases that should be included in a consumer complaint database at the FCC.

Through its Consumer Complaint Database, which was launched in June 2012, the Consumer Financial Protection Bureau hears directly from consumers about the challenges they face in the marketplace, brings their concerns to the attention of financial

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<sup>18</sup> See, e.g., Press Release, Senate Commerce Committee, Rockefeller Vows To Avert Wireless Cramming Scams on Consumers (Mar. 1, 2013), available at [http://www.commerce.senate.gov/public/index.cfm?p=PressReleases&ContentRecord\\_id=cd0edc13-b355-4d4e-9619-7035329daa1a](http://www.commerce.senate.gov/public/index.cfm?p=PressReleases&ContentRecord_id=cd0edc13-b355-4d4e-9619-7035329daa1a). In fact, as recently as just a few weeks ago, the Committee has continued its efforts to seek additional information on consumer complaint data on the topic of wireless cramming. See Press Release, Senate Commerce Committee, Rockefeller Issues Subpoena in Wireless Telephone Cramming Investigation (Mar. 14, 2014), available at [http://www.commerce.senate.gov/public/index.cfm?p=PressReleases&ContentRecord\\_id=6398a98b-1b7c-4874-a8d8-fb480de41ab9](http://www.commerce.senate.gov/public/index.cfm?p=PressReleases&ContentRecord_id=6398a98b-1b7c-4874-a8d8-fb480de41ab9).

<sup>19</sup> See Transcript, FTC Mobile Cramming Roundtable (May 8, 2013), available at [http://www.ftc.gov/sites/default/files/documents/videos/mobile-cramming-roundtable-part-1/130508mobilecramming\\_sess1.pdf](http://www.ftc.gov/sites/default/files/documents/videos/mobile-cramming-roundtable-part-1/130508mobilecramming_sess1.pdf) (noting the FTC's position that wireless cramming remains an important and likely underreported problem).

<sup>20</sup> See Letter from Senator Udall and Senator Nelson to Tom Wheeler, Chairman, Federal Communications Commission, GN Docket No. 14-25 (Mar. 25, 2014).

<sup>21</sup> *Id.*

institutions, and assists in addressing their complaints. The database allows the public to see what consumers complained about, as well as how and when the company in question responds. Furthermore, users are able to track, sort, search, and download information – which is updated on a daily basis. Indeed, the complaint database at the CFPB has already proved to be valuable to consumers and the Bureau. As CFPB Director Richard Cordray has noted, the database has already affected companies' behavior and encouraged them to respond quickly when contacted about complaints.<sup>22</sup>

In its Report, the FCC references the CFPB numerous times, and suggests that it should make its consumer complaint practices more similar to those of the CFPB.<sup>23</sup> However, the report also notes that the statutory mandates for CFPB and FCC differ. While it is true that the collection and publication of consumer complaints is central to the CFPB's mission as set forth by Congress,<sup>24</sup> this does not make a consumer complaint database any less necessary at the FCC. Under its public interest mandate, the Commission is charged with protecting consumers in the telecommunications marketplace. And as then-Chairman Julius Genachowski correctly noted when referencing the Commission's ongoing efforts to empower consumers, “[e]very decision this Commission makes . . . affects the day-to-day lives of American consumers . . . [and

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<sup>22</sup> See Jayne O'Donnell, *Watchdog's Complaint Tracking Gets Results*, USA TODAY, (Aug. 4, 2013), <http://www.usatoday.com/story/money/personalfinance/2013/08/04/cfpb-cordray-mortgage-loans-complaint-database/2613413/>.

<sup>23</sup> Report at 24, 25, 29.

<sup>24</sup> Congress set forth in the Dodd-Frank Act that collecting, investigating, and responding to consumer complaints are integral parts of the CFPB's work. See Dodd-Frank Act, Pub L. No. 111-203, Sec. 1021(c)(2).

the Commission] is responsible for ensuring that our agency’s decisions are always in the interest of consumers of communications services.”<sup>25</sup>

Consider the CFPB’s own explanation of how it uses consumer complaint database to protect consumers: “Listening and responding to consumers is an integral part of the CFPB’s work . . . . The Bureau uses consumer complaints to inform its work in making prices and risks clearer, protecting consumers of . . . products and services, and encouraging . . . markets to operate fairly and competitively.”<sup>26</sup> This is exactly what the FCC should strive for in its efforts to protect consumers. The creation of a public database could greatly help the Commission protect consumers against the similar harms that the CFPB addresses – including unauthorized transactions, confusing billing statements, and practices that give companies wide discretion to assess additional fees.<sup>27</sup>

Consumers Union also played an important role in the development of the Consumer Product Safety Commission’s SaferProducts.gov, which allows people to share and access safety information about products they already own or are considering purchasing.<sup>28</sup> This website maintains a publicly available, searchable database on the safety of consumer products and other products or substances regulated by the Commission. The database provides consumers with an opportunity to research particular products, while allowing the CPSC to identify safety trends more quickly and efficiently. Significantly, the CPSC requires inclusion of certain information before a report is made publicly available. In doing so, it identifies the type of filer submitting a report, requires

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<sup>25</sup> Julius Genachowski, Chairman, Federal Communications Commission, Statement on Consumer Information and Disclosure NOI (Aug. 27, 2009), *available at* [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/FCC-09-68A2.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-09-68A2.pdf).

<sup>26</sup> See Report, Consumer Financial Protection Bureau, Consumer Response: A Snapshot of Complaints Received Through February 28, 2013 at 14 (March 2013), *available at* [http://files.consumerfinance.gov/f/201303\\_cfpb\\_Snapshot-March-2013.pdf](http://files.consumerfinance.gov/f/201303_cfpb_Snapshot-March-2013.pdf)

<sup>27</sup> *Id* at 14.

<sup>28</sup> See <http://www.SaferProducts.gov>.

the contact information of a filer, and takes other reasonable steps to ensure that disclosure of information is accurate and fair.

A very early analysis of the CSPC's database by the House Energy and Commerce Committee found that the database had rapidly become a popular resource for consumers.<sup>29</sup> A joint report and analysis from Consumers Union and the Consumer Federation of America released one year after the implementation of the database also indicated that the database served as an effective place for consumers to share stories with each other, and that it was successfully engaging companies to respond to consumers' complaints.<sup>30</sup> Finally, a separate analysis of the database by Kids in Danger two years after implementation demonstrated that the database was providing meaningful information about safety problems associated with particular companies.<sup>31</sup> Just as it has proved to be useful at the CPSC, the FCC could also benefit from the public availability of a consumer complaint database.

## **V. Recommendations for a Successful Consumer Complaint Database**

For the reasons discussed above, Consumers Union strongly recommends developing a publicly available, easy-to-use, and searchable database on the FCC's website. We agree with *Recommendation 2.23* that consumers should be able to sort or filter data according to specific criteria, and we believe that a consumer database should be organized in a way that facilitates easy use by consumers. Drawing on the CFPB and

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<sup>29</sup> See Report, U.S. House of Representatives Committee on Energy and Commerce, Democratic Staff, Evaluation of the Consumer Product Safety Database (July 13, 2011) available at <http://democrats.energycommerce.house.gov/sites/default/files/documents/Consumer-Product-Safety-Database-2011-7-7.pdf>.

<sup>30</sup> See Press Release, Consumer Federation of America and Consumers Union, One Year Anniversary of CPSC Consumer Safety Information Database's Postings (Mar. 29, 2012), available at <http://consumersunion.org/wp-content/uploads/2013/02/CPSC-1-year-report.pdf>.

<sup>31</sup> See Press Release, Kids in Danger, "Kids Releases New Report on SaferProducts.Gov" (Aug. 9, 2013), available at <http://www.kidsindanger.org/2013/08/09/4187/>.

CPSC’s work, we also believe that an effective complaint database should collect the contact information of filer, provide an opportunity for companies to respond to complaints, establish certain minimum requirements before publication of data, and include mechanisms to verify the authenticity of any information submitted into a publicly available database.

**A. A Database Should Be Sortable According to Certain Specific Criteria**

We believe that an effective database should be searchable by certain criteria, including type of complaint, name of company, incident date, zip code, category of complaint filer (such as individual consumer, public safety or consumer organization, government entity, or law enforcement, among other categories). A consumer complaint database that is sortable by the name of a company can help improve customer service. Including the name of a company in a public database would encourage companies to compete more effectively on customer care and quality of service, and would help the public make more informed purchasing decisions regarding particular companies. It is important to note that, when it was implemented at the CFPB, a consumer complaint database that included publicly available information about particular companies “actually [led] the market forward toward more responsible conduct” and “play[ed] a tangible role in producing a shift toward emphasis on excellent customer service.”<sup>32</sup> To this point, Director Cordray noted that as of February of this year, companies had responded to more than ninety percent of the complaints made about them, further

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<sup>32</sup> Richard Cordray, Director, Consumer Financial Protection Bureau, Remarks at the Clearing House Annual Conference (Nov. 21, 2013), available at <http://www.consumerfinance.gov/newsroom/director-cordray-remarks-at-the-clearing-house-annual-conference/>.

helping consumers voice their concerns and get their issues addressed.<sup>33</sup> Furthermore, we also believe that the category of complaint filer, which is currently required by the CPSC's database, is another important piece of information to collect and would allow the public and the FCC to understand the complaint submitter's perspective.

### **B. A Database Should Have Mechanisms In Place to Help Ensure Reliability of Data**

We also agree with the Commission's recommendation that it would be important to ensure the reliability of any published data.<sup>34</sup> The CPSC has a number of protections built in to ensure accuracy, and we believe that they provide a useful model in this instance. For example, those who submit complaints to the CPSC are required to include certain minimum pieces of information before their complaint can be submitted into the public database, including contact information of the person submitting the complaint. It is important to note that this information is not publicly disclosed in the CPSC's database. This information is only used for the purpose of verifying a complaint and is nonpublic in order to protect the privacy of the complaint filer. As is required by both the CFPB and CSPC, the Commission could also require a verification procedure by which the party submitting the complaint certifies to the FCC that the information they have submitted is true. Finally, as is the case at both the CFPB and CPSC, companies could be given the option to dispute information in a published complaint, or otherwise be given the opportunity to submit comments to be displayed in the database along with a consumer's complaint.

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<sup>33</sup> Richard Cordray, Director, Consumer Financial Protection Bureau, Remarks at the Consumer Advisory Board Meeting (Feb. 27, 2014), available at <http://www.consumerfinance.gov/newsroom/prepared-remarks-of-cfpb-director-richard-cordray-at-the-consumer-advisory-board-meeting/>.

<sup>34</sup> Report at 29.

**C. A Robust Database Should Provide Information About the Resolution of Consumer Complaints**

Ideally, a consumer complaint database at the Commission would also include information about how an issue was ultimately resolved. The Commission could mirror the CFPB in this regard. In its consumer complaint database, the CFPB keeps track of how a company responds to a complaint – including the actions taken by a particular company, whether the response is timely, and whether a consumer disputes the company’s response. We agree with *Recommendation 2.14* that consumers should be “better informed about the treatment of their complaints soon after submission and through the FCC’s processing of their complaints,”<sup>35</sup> as well as *Recommendation 2.21*, which suggests measures to improve responses to complaints.<sup>36</sup> Promoting better handling of complaints and more extensive coordination with companies would serve consumers at the FCC, just as it has before the CFPB. Indeed, as the CFPB noted in a 2013 report, as a result of its consumer complaint database, companies have responded to ninety-five percent of the complaints sent to them and tens of thousands of consumers have had the opportunity to dispute companies’ responses when they found them to be inadequate.<sup>37</sup> The process has greatly improved the ability of the CFPB to resolve complaints and better address consumers’ needs.<sup>38</sup>

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<sup>35</sup> *Id* at 25.

<sup>36</sup> *Id* at 28.

<sup>37</sup> See Report, Consumer Financial Protection Bureau, Consumer Response: A Snapshot of Complaints Received Through February 28, 2013 at 14 (March 2013), available at [http://files.consumerfinance.gov/f/201303\\_cfpb\\_Snapshot-March-2013.pdf](http://files.consumerfinance.gov/f/201303_cfpb_Snapshot-March-2013.pdf)

<sup>38</sup> See Report, U.S. PIRG, Big Credit Bureaus, Big Mistakes: The CFPB’s Consumer Complaint Database Gets Real Results for Victims of Credit Reporting Errors (Nov. 19, 2013) at 19-20, available at <http://uspirgedfund.org/reports/usf/big-credit-bureaus-big-mistakes> (detailing how the CFPB consumer complaint database has helped consumers receive monetary or non-monetary relief).

## **VI. Conclusion**

An easy-to-use, public consumer complaint database would help the Commission achieve its goals of ensuring that consumers have the tools and information they need to make informed choices and protect consumers from harm in the communications marketplace. A public database can also help companies improve their service and outreach to consumers, thereby strengthening their own bottom line. Our work with the CPSC and CFPB suggest that consumer complaint databases at these agencies are working very well. We believe certain components of these databases should serve as a model for a consumer complaint database at the FCC. We appreciate the opportunity to provide comments and look forward to working with the Commission to improve transparency and help create an effective public tool for consumer complaints.

Respectfully Submitted,



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