



Federal Trade Commission

applications that involved specific technologies proposed for, and

information, in violation of JEDEC's operating rules and procedures, and through other alleged bad-faith, deceptive conduct, the complaint charges that Rambus purposefully sought to, and did, convey to JEDEC the materially false and misleading impression that it had no relevant intellectual property rights. Specifically, the complaint alleges that

"Rambus's non-participation in JEDEC resulted with its failure to make

of Section 5 of the FTC Act, "has illegally monopolized, attempted to monopolize, or otherwise engaged in unfair methods of competition in certain markets relating to technological features necessary for the design and manufacture of [SDRAM]."

While the FTC's complaint notes that the agency would have latitude to