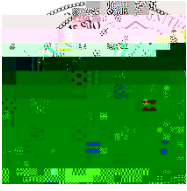


UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580



Office of the Secretary

March 13, 2013

Daniel Martin Bellemare  
Counsel to Steerads Inc.  
1010 Sherbrooke Street West, Suite 2200  
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Canada H3A 2R7

Benjamin Masse, President  
Steerads Inc.  
3535 Queen Mary Street Suite 200  
Montréal, Québec  
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*Re: In the Matter of Epic Marketplace, Inc., and Epic Media Group, LLC  
File No. 112 3182, Docket No. C-4389*

Dear Mr. Bellemare and Mr. Masse:

Thank you for your comment on behalf of Steerads Inc. regarding the Federal Trade Commission's proposed 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.

We appreciate Steerads' support for the order's requirement that Epic delete all data acquired via history sniffing and that it provide a sworn statement verifying that it has done so. Your comment also urges the Commission to reconsider obtaining civil penalties only in the case ~~in~~ of the conse

\$16,000 per violation or up to \$16,000 per day in the case of a continuing violation, under Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 CFR 1.98(c).

Your comment expresses concern that the proposed order is a "naked" cease and desist order that will have no deterrent effect and states that "only compensation to victims would send

a clear message that the law must be obeyed.” Your comment urges the Commission to include an “asphalt clause” in the order, which, as you describe is “a waiver of all statutory limitations set forth in the Antitrust Procedures and Penalties Act (15 U.S.C. § 16(a)) (‘Tunney Act’), specifically the provision preventing consent judgment and decrees from having *prima facie* effect in civil actions for damages pursuant to the Clayton Act Section 4 (15 U.S.C. § 15).” However, this action stems from Epic’s violations of Section 5 of the FTC Act relating to unfair and deceptive trade practices and not a viol0 0.00000 TD(t)Tj3.3600 0.ci000 TDShermai00Tj5.273iol0 0.00000

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<sup>1</sup> The Commission also notes that the Tunney Act does not apply to the Commission, but only to the Department of Justice.