

UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

Office of the Secretary

June 25, 2014

Robert Webb
Peoria, Arizona 85382

Re: In the Matter of PDB Sports, Ltd. d/b/a Denver Broncos Football Club, File No. 1423025.

Dear Mr. Webb:

Thank you for your comment regarding the Federal Trade Commission's ("Commission" or "FTC") consent agreement in the above-entitled proceeding. The Commission has placed your comment on the public record pursuant to Rule 9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(ii), and has given it serious consideration.

Your comment notes that, due to the Section 5 violation alleged in the Commission complaint, PDB Sports, Ltd. d/b/a Denver Broncos Football Club ("the Denver Broncos") should be "stripped of the conference title" or should not be "allowed to 'compete' in the upcoming Super Bowl." The proposed complaint against the Denver Broncos alleges that the team misrepresented that it was a current participant in the U.S.-EU Safe Harbor framework, when, in fact, its self-certification had lapsed. The proposed order prohibits the Denver Broncos from making such misrepresentations in the future. If they do, or if they violate any other term of the final order, they could be liable for civil monetary penalties of up to \$16,000 per violation, or up to \$16,000 per day in the case of continuing violation (as provided by Section 5(l) of the FTC Act). Accordingly, the Commission feels that the proposed order appropriately addresses the conduct at issue in this case.

In light of the considerations discussed above, the Commission has determined that the public interest would best be served by issuing the Decision and Order in the above-titled proceeding in final form without any modifications. The final Decision and Orders and other relevant materials are available from the Commission's website <http://www.ftc.gov>. It helps the Commission's analysis to hear from a variety of sources in its work, and it thanks you again for your comment.

By direction of the Commission.

Donald S. Clark
Secretary

