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Dear Mr. Ferron:

This responds to the March 31st, 2009 announcement by the Competition Bureau seeking comments on its *Draft Information Bulletin on Consumer Rebate Promotions*. I believe that the *Bulletin* provides useful information for companies engaging in the practice of offering rebates to consumers, and should improve the disclosures to consumers about these offers. Eventually, this should reduce consumer confusion and help maintain trust in the marketplace, as consumers will know what to expect at the point of sale and after.

I have a few minor comments and suggestions to offer with respect to the draft *Bulletin*, particularly with respect to two of the examples of advertisements: On page 9, Section 5.3, Mail-in Rebates Disguised as Instant Rebates, the mock advertisement should make a claim with respect to an instant rebate in order to clearly illustrate the problem. You may also wish to consider adding a snapshot of the mail-in coupon that would appear at point of sale, to better illustrate the misleading nature of an instant rebate that is actually a mail-in rebate.

On page 11, Section 6, Best Practices, the mock advertisement does not necessarily constitute a *best practice*, since the bottom-line price is not explicitly disclosed, and the language used is ambiguous. A best practice advertisement for a mail-in rebate would disclose "price at time of purchase," "mail-in rebate," and "price after rebate". It would also include a timeframe for the rebate to arrive - "please allow 4 - 6 weeks for rebate processing." For an instant rebate, "price at time of purchase, after the instant rebate" would be a strong disclosure. It would be useful to have a mock advertisement in the *Bulletin* that conveys all of the ideal information, and therefore is not misleading, for each type of rebate. You may also wish to add to the *Bulletin* a simple checklist for business that clearly sets out all of the required elements, so that a firm can quickly check its own practices.

As we have done in the past, the Office of Consumer Affairs is planning to develop an information piece for consumers on rebates, in support of the Bureau's effort to inform businesses through its *Bulletin*. We would draw on the information and examples in the *Bulletin*, so that consumers can use the information that businesses provide. We hope to benefit from Bureau comments on our product once a good draft is available. This would build on successful collaborations with the Bureau on textile care labelling and environmental claims.

The consumer-oriented product on rebates should be available in the autumn, along with the consumer information on environmental claims and logos. Thank you for the opportunity to comment on the *Bulletin*, and I look forward to continued collaboration in the future.

Maryanne Murphy

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