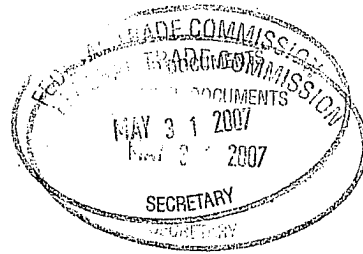


RICHARD PU, P.C.



May 31, 2007

Federal Trade Commission
Washington, D.C.

Re: FTC-2007-0025, Guides Concerning the Use of
Endorsements and Testimonials in Advertising

Dear FTC:

This responds to your request for comments on the above-mentioned guidelines. In particular, I respond to your question about how the guidelines can be improved.

As a practical matter, regulations such as the one in question are ineffectual unless they enable lawyers in the private sector to sue over noncompliance. That's because the FTC lacks the resources to bring such actions.

However, the private bar does have the resources. And more importantly, lawyers in the private sector have a financial incentive to prosecute enforcement actions-- i.e., they are compensated for their work. The incentive is enhanced if the regulations permit recovery of attorneys fees by a successful consumer. Thus, if the FTC truly means to pass effective legislation, it should include a provision granting a private cause of action, and the recovery of attorneys fees.

Sincerely

Richard Pu