

Dear Ms. Khan:

On behalf of the American Booksellers Association (ABA) and its 2,500+ independent bookstores across the country, we just wish to reiterate our support for the Federal Trade Commission's investigation into Amazon and the coming antitrust lawsuit.

We also want to address the meeting between Amazon and the FTC, which is reported to be occurring this week. It would not be surprising if Amazon used this meeting as a last-ditch attempt to swing some deal that *appears* to punish the online giant, but in the long run, does nothing to curb Amazon's anticompetitive behavior. We firmly believe that the only solution to stop the Amazon monopoly is to break the company up. And we strongly assert that it's the FTC's responsibility to fully investigate before making a determination.

Fines or simply breaking off the third-party marketplace will do nothing to change the behavior of a company with billions of dollars and the power to dominate any new market it enters. It would do nothing to target Amazon's worst offenses, or its clear monopoly and monopsony in the book and e-book markets. Worse still, we believe that any decision by the Commission to back away from an antitrust lawsuit could set the modern antitrust fight back decades, and the FTC would be providing tacit approval for other companies to behave as Amazon does.

ABA has been down this road before. Booksellers were the first to feel the brunt of Amazon's monopolistic behavior, and we've watched Amazon use these same anticompetitive tactics in every market they've entered. To that end, we've attached our latest white paper, which details how Amazon uses each market it dominates as a stepping stone to a new market.

Amazon has become the monopolistic/monopsonistic behemoth it is today in part due to its ability to game the system. We believe Amazon will try to use this meeting to game the system to its advantage.

The games need to stop. Amazon must be broken up.

We trust the FTC to carry out its mission to "[protect] the public from deceptive or unfair business practices and from unfair methods of competition through law enforcement,

advocacy, research, and education."

Thank you for your consideration.

Allison K Hill, CEO American Booksellers Association