



Nathaniel J. Lipman
President & CEO

January 6, 2010

VIA HAND DELIVERY & EMAIL

John D. Rockefeller IV
Chairman, U.S. Senate Committee on
Commerce, Science and Transportation
Washington, D.C. 20510-6125

RE: U.S. Senate Commerce Committee Investigation

Dear Chairman Rockefeller:

As you know, on July 10, 2009, the U.S. Senate Committee on Commerce, Science, and Transportation (the "Committee") sent Affinion Group Inc. ("Affinion") a letter seeking information regarding certain e-commerce marketing practices in which Affinion engages. Specifically, in its letter, the Committee stated that it was interested in information regarding "business arrangements" between Affinion and its business partners wherein a "pop-up" window or hyperlink appears after consumers complete a purchase from the website of an Affinion business partner offering the consumers "a cash back award for their next purchase" if they "sign up for an online membership service or discount club offered by an Affinion company." The letter further explained that if the offer is accepted, the consumer's "debit card or credit card account number is automatically forwarded to Affinion from the website where they completed their purchase." Affinion commonly refers to this practice as post-transaction online datapass marketing.

Based upon the Committee's investigation to date, the Committee has expressed specific concerns regarding consumers' expectations about the online purchasing process within the context of post-transaction online datapass marketing. In particular, notwithstanding that Affinion solicitations fully disclose all terms and conditions and require the consumer to take affirmative steps to authorize the transfer of billing information for enrollment and billing of membership fees, we understand the Committee remains concerned that due to the internet's iterative and fluid environment, consumers may make automatic or unconscious decisions without fully considering all available information, especially in a post-transaction scenario. While Affinion has been engaged in post-transaction online datapass marketing for

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only a few years (since 2004), we understand the importance in making certain marketing changes in this spontaneous, fluid and evolving media.

Accordingly, we wish to inform you that, after careful consideration of the ever changing nature of the internet, Affinion has decided to cease online datapass marketing for its membership programs. Specifically, Affinion, when marketing these programs online, will require consumers to provide all 16 digits of their credit or debit card number when enrolling in Affinion membership programs in the online post-transaction environment. We will begin to work in good faith with our marketing partners to implement this change as expeditiously as possible. This, of course, is in addition to the several enhancements to the disclosures, the increased display of the 1-800 cancellation/refund number and other changes to Affinion web pages that we have already begun implementing in connection with post-transaction on-line marketing, as described to the Committee Staff last November.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nathaniel Lipman', with a long horizontal flourish extending to the right.

Nathaniel Lipman

January 11, 2010

Honorable John D. Rockefeller, Chairman
Committee on Commerce, Science, and Transportation
United States Senate
Washington, D.C. 20510-6125

Dear Mr. Chairman:

As you are aware, Webloyalty.com Inc. has been cooperating fully with the inquiry of the Committee on Commerce, Science and Transportation initiated last May into e-commerce marketing practices. The Committee expressed specific concerns regarding post-transaction marketing practices used by Webloyalty prior to August 2009. As we informed the Committee, beginning in August 2009, Webloyalty implemented enhanced disclosures and a requirement that consumers authorize the transfer of billing information for enrollment and billing of membership fees by entering the last four digits of the credit card used to complete their transaction on the merchant site. Notwithstanding these measures, Webloyalty understands the Committee remains concerned about the consumer enrollment experience.

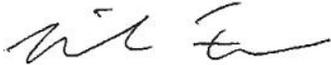
Webloyalty shares the Committee's goal of transparency for online consumers and is taking the following step to address the Committee's concerns regarding online data pass marketing: When Webloyalty markets its programs following the completion of a transaction at one of its partners' sites, Webloyalty will now require consumers to enter the full 16 digits of their credit or debit card in order to enroll in its membership programs. We will be implementing this change immediately and it will be fully effective as of Wednesday, January 13, 2010.

This action builds on Webloyalty's existing consumer protection practices, which also include:

- Frequent Communication Provided to Members
 - At least 5 emails in the initial 30-day trial membership period
 - Two of these initial emails remind members they will be charged \$12/month at the conclusion of the trial
 - Monthly communications after the conclusion of the trial period
 - All emails include the toll-free customer service number for inquiries, cancellations and refunds
- Strict "No Hassle" Cancellation Policy
 - Consumers wishing to cancel a membership are not pressured to remain members

Webloyalty programs provide valuable benefits to our members and it is important to find the right way to make them available to consumers, particularly in the midst of an economic downturn when many find the discounts especially welcome. We believe the steps we have taken address the Committee's concerns and its goal of ensuring that all online shoppers are protected.

Sincerely yours,



Richard Fernandes
CEO

January 12, 2010

VIA HAND DELIVERY

The Honorable John D. Rockefeller IV
Chairman
Committee on Commerce, Science and Transportation
United States Senate
Washington, DC 20510-6125

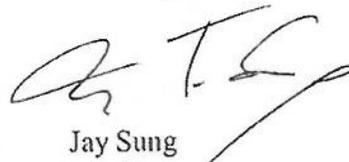
Dear Senator Rockefeller:

Adaptive Marketing LLC ("Adaptive") appreciates the Senate Commerce Committee's interest in ensuring key protections for consumers. As outlined in its November 16, 2009 staff report, the Committee has identified specific concerns with regard to certain post-transaction e-retail marketing practices.

To address these concerns, Adaptive, in December of last year, supplemented its existing Best Marketing Practices. Specifically, in all post-transaction e-retail membership program marketing by Adaptive, consumers will be required to provide all sixteen digits of their payment account number in order to enroll in the programs. Thus, Adaptive will no longer conduct "datapass" marketing on the Internet.

We have already begun to work with our marketing partners to effectuate this change as soon as possible.

Sincerely,



Jay Sung
President

cc: Senator Kay Bailey Hutchison, Ranking Member