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TAIWAN FTC NEWSLETTER

2014.02

Samsung's Improper Online Marketing Approaches in Violation of Fair Trade Act

The FTC decided at the 1146th Commissioners' Meeting on Oct. 23, 2013 that Samsung Taiwan (hereinafter referred to as Samsung) and its sales agents OpenTide Taiwan Co., Ltd. (hereinafter referred to as OpenTide) and Shang Duo Li International Co., Ltd. (hereinafter referred to as Shang Duo Li) had violated Article 24 of the Fair Trade Act for pretending to be private individuals to promote Samsung's products online by comparing and commenting on the products of Samsung's competitors. The FTC ordered the companies to immediately cease the unlawful act the day after receiving the disposition and also imposed administrative fines of NT$10 million on Samsung, NT$3 million on OpenTide, and NT$50,000 on Shang Duo Li.

When signing the annual contract each year between 2007 and 2012, Samsung and OpenTide would decide the projected number of statements to be released. Then, according to the targets achieved and status of execution, OpenTide would present to Samsung weekly and monthly reports on the overall operations, results of handling of critical issues, lists of weekly topics, numbers of articles posted, Viral management achievements, outlines of responses to positive/ negative comments, and operating plans for the following week

so that Samsung could be updated on the status of execution and determine measures to be taken against marketing crises. The methods of execution included hiring large numbers of bloggers and appointing company employees to use personal accounts or communal accounts provided by the company to post comments as private individuals on online discussion platforms such as Mobile 01 and others to help market Samsung's products. The statements were posted to report new product test results, neutralize negative information about Samsung products, or compare and expose the defects of products from competitors. Such statements were presented as articles to share information with net users, or unboxing or inquiring articles about new products or user comments to draw attention and create discussion topics. The hired or appointed personnel were requested to post a certain number of articles each month to help increase the visibility of Samsung's products. OpenTide also commissioned Shang Duo Li to run the operations for some time during 2012.

As a result of their habitual use of online information, some consumers could take the user experiences of other consumers into account when considering purchasing certain commodities. Therefore, such comments posted by people hired by or associated with a business were meant to affect consumers in their decisions to purchase certain products. By concealing their true identity, the people posting the comments misled consumers into believing that the comments did not come from any business and thus increased the credibility of the statements. Meanwhile, the competitors were also unsure whether the comments had come from a business rival or consumers. Out of their respect for freedom of speech as well as their fear of the consequences of offending consumers, the competitors were unable to rebuke the comments or resort to administrative or judicial procedures as they would when knowing such comments had come from a business rival. Hence, the marketing approaches adopted by Samsung and the two other companies to draw interest and create discussion topics and to assign people to assume several identities each and take turns to use the same communal accounts to publish statements to win the trust of net users were meant to deceive consumers or at least conceal their true identity to promote the products of a business. They were deceptive conduct able to affect trading order in violation of Article 24 of the Fair Trade Act.

Tong Hui Construction Violates Fair Trade Act for Failing to Provide Buyers with List of Unit Area Shares

The FTC decided at the 1134th Commissioners' Meeting on Jul. 31, 2013 that the failure of Tong Hui Construction Co., Ltd. (hereinafter referred to as Tong Hui Construction) to provide the list of unit area shares when marketing the "Zi Jin Cang" presold homes was deceptive conduct able to affect trading order in violation of Article 24 of the Fair Trade Act. The FTC imposed on the company an administrative fine of NT$500,000.

Since presold homes have not yet taken form, buyers have access to only a very limited amount of information when signing purchase contracts. On the other hand, the builder has the information advantage. To prevent builders from abusing their information advantage, the FTC has therefore listed out a number of unlawful practices of builders in the "Fair Trade Commission Disposal Directions (Policy Statements) on Selling Presold Houses". Related regulations have been clearly stipulated for builders to understand and follow. If any builder should fail to provide in writing the list of unit area shares to homebuyers when selling presold homes, it is deceptive conduct in violation of Article 24 of the Fair Trade Act.

The FTC's investigation showed that Tong Hui Construction never provided the list of unit area shares to homebuyers or displayed it at the location where the presold homes were being marketed. Under such circumstances, homebuyers had no way of understanding the sizes of the main structure of each unit, the affiliated structures and the communal property, the proportion of the communal property each unit held, and whether the area allotted to each unit was fair. Neither would they be able to find out if the area of the unit they purchased was correct. It could have had an effect on the purchase decisions of home buyers and was obviously unfair competition to builders who provided such a list as required by law. Therefore, it was deceptive conduct able to affect trading order in violation of Article 24 of the Fair Trade Act. After assessing all possible factors according to Article 36 of the Enforcement Rules to the Fair Trade Act, the FTC imposed on Tong Hui Construction an administrative fine of NT$500,000.

Price Restriction by Turkey Meat Suppliers in Violation of Fair Trade Act

The FTC decided at the 1145th Commissioners' Meeting on Oct. 17, 2013 that Mr. Li and four other turkey meat suppliers had violated Article 14 (1) of the Fair Trade Act for their joint decision achieved through meetings to demand their upstream turkey poult suppliers to stop supplying their competitors in order to prevent price competition. The conduct could affect the supply-demand function of the turkey meat market and the FTC therefore acted according to the first section of Article 41(1) of the same law, ordered the said parties to immediately cease the unlawful act the day after receiving the disposition, and also imposed an administrative fine of NT$50,000 on each of them.

Between May and July in 2012, the informer sent advertising flyers to many turkey rice vendors in the country to market turkey meat at lower prices. As a consequence, a number of clients of the offenders, Mr. Li and the four other suppliers, switched to the informer for turkey supply and the business of Mr. Li and the four other suppliers was thus affected. To stop the informer from engaging in price competition, the offenders contacted one another and requested that the ROC Turkey Association meet and discuss the issue in July 2012. During the meeting, it was decided that the association would demand that turkey poult suppliers stop supplying the informer in order to maintain the price of turkey meat. At the same time, a written notice issued in the name of the association was sent to tell the informer that the turkey poult supply would be suspended and the informer could call to negotiate, but the association would have to give its consent before the resumption of supply.

The main purpose of the mutual understanding achieved was to maintain the price of turkey meat sold by the five offenders. Requesting that turkey poult suppliers suspend supply to the informer was in order to force the informer to negotiate and raise the price in order to ensure that no price competition would take place. The conduct was a restriction on turkey meat price competition, which met one of the descriptions of concerted actions set forth in Article 7 (1) of the Fair Trade Act and was in violation of Article 14(1) of the same Act. After assessing the proportion of the turkey meat market share of each of the offenders, the impact on the market, and the level of cooperation during the investigation, the FTC imposed on each of the offenders an administrative fine of NT$50,000.

Yang Da Hang's False Advertisement in Violation of Fair Trade Act

The FTC decided at the 1143rd Commissioners' Meeting on Oct. 2, 2013 that the "statement claiming the filters from Yang Da Hang being No. 1 in Taiwan" distributed by Yang Da Hang was a false, untrue and misleading representation with regard to quality of product in violation of Article 21 (1) of the Fair Trade Act. In addition to ordering the company to cease the unlawful act, the FTC also imposed on it an administrative fine of NT$50,000.

The FTC's investigation showed that the "statement claiming the Filters from Yang Da Hang being No. 1 in Taiwan" distributed and also published in Aquazoonews Yang Da Hang indicated that the company's aquarium filters had been awarded a number of patents in Taiwan and other regions. However, the findings of the investigation revealed that only one of the 12 items listed was really patented, with the patent being held by the person in charge of Yang Da Hang. Meanwhile, without having the infringement of its aquarium products appraised or acquiring the ruling of a court of first instance to confirm the infringement, Yang Da Hang claimed in the said statement, "Our company is the only legal user of the patent in the market; other companies selling cheaper products with similar looks, besides being unable to provide quality and performance guarantees, may have infringed our copyrights." The wording was likely to mislead consumers into believing that Yang Da Hang's aquarium filters were the only legal products in the market. Therefore, the FTC concluded that the conduct of Yang Da Hang had violated Article 21 (1) of the Fair Trade Act and made the aforesaid sanction.

A Case Study on Mergers Involving Enterprises Individually Investing in New Companies

An enterprise meeting one of the merger type descriptions set forth in Paragraph 1, Article 6 of the Fair Trade Act still needs to achieve the merger notification filing threshold specified in Article 11 of the same act and none of the exemption conditions prescribed in Article 11-1 of the same act exists before such an enterprise is required to file a merger notification. Under such circumstances, are existing enterprises required to file merger notifications when they invest individually to establish a new business?

As a result of business expansion or plans for conglomerate management, enterprises may have the need to invest individually and set up new businesses. As described in the FTC's administrative interpretation dated Aug. 20, 2002: "Whether an enterprise invests in an existing business or a new business, there is no difference in the competition restraint likely to occur in the relevant market. Hence, the term "another enterprise" applied in Paragraph 1, Article 6 of the Fair Trade Act, besides referring to any existing enterprise at the time of the merger, "should also include new businesses." Therefore, if an enterprise sets up a new business and holds 100% of its shares from the beginning, the condition should be considered to have met the merger description of "where an enterprise holds or acquires the shares or capital contributions of another enterprise to an extent of more than one-third of the total voting shares or total capital of such other enterprise" set forth in Subparagraph 2, Paragraph 1, Article 6 of the Fair Trade Act. As to whether it is required to file a merger notification with the FTC in such a situation, according to related regulations stipulated in the current Fair Trade Act, the FTC will make a case-by-case assessment and take all statutory considerations into account before making the decision.

Background

Enterprise A established Company A on Dec. 28, 2011 and held 100% of its shares. Enterprise A accounted for 51.4% and 42.9% of the solid polyester granule and polyester cotton markets respectively in 2011. However, it did not file a merger notification with the FTC. Violation of the Fair Trade Act was suspected and the FTC initiated an investigation.

Case Analysis

The investigation indicated that Enterprise A did set up Company A on Dec. 28, 2011 and held 100% of its shares. The situation met the description set forth in Subparagraph 2, Paragraph 1, Article 6 of the Fair Trade Act, "where an enterprise holds or acquires the shares or capital contributions of another enterprise to an extent of more than one-third of the total voting shares or total capital of such other enterprise." According to Enterprise A's 2011 annual report, evidence Company A presented to the FTC, and data from the FTC's industrial database, Enterprise A indeed accounted for over one quarter of the domestic polyester cotton market share and the condition complied with the merger notification filing threshold set forth in Subparagraph 2, Paragraph 1, Article 11, "one of the enterprises in the merger has one fourth of the market share." Therefore, by holding 100% of the shares of Company A that it had set up but not filing a merger notification with the FTC, Enterprise A seemed to have violated Subparagraph 2, Paragraph 1, Article 11 of the Fair Trade Act.

However, as stipulated in Subparagraph 3, Article 11-1 of the Fair Trade Act, "Where an enterprise assigns all or a principal part of its business or assets, or all or part of any part of its business that could be separately operated, to another enterprise newly established by the former enterprise solely," if the enterprise adopts a corporate division to assign part of its business or assets to a new company that it has established, such a practice involves only the division of an economic entity and the likelihood of jeopardizing market competition does not exist. Meanwhile, regarding the recognition of a "principal

part of its business or assets," besides assessment of the ratio of "quantity" of assets assigned to the new company to the entire assets of the enterprise and the significance of the "quantity" of assigned assets in comparison with the remaining assets of the enterprise, it is more important to evaluate whether the market status of the merging businesses will become different as a consequence. The following factors can be taken into account when such evaluation is conducted on a case-by-case basis: 1) the ratio of the assigned assets or business to the enterprise's total asset value and sales; 2) whether the assigned assets or business can be regarded as an independent operation separated from the enterprise (such as having its own business locations, business departments, trademarks, copyrights, patents, or other rights or benefits); 3) the level of significance of the assigned assets or business in the aspects of production, marketing channels and other market considerations; and 4) whether the assignment of such assets or business to the new company will increase the economic capacity and market status of the enterprise.

The investigation showed that, after its establishment in 1951, Enterprise A had operated under the original name "Company A" for six decades until a new name was adopted in a shareholder meeting in 2009. According to the first section of Paragraph 1, Article 18 of the Company Act, "No company may use a corporate name which is identical with that of another company." In other words, company names are an important basis in distinguishing business entities and should therefore be regarded an as intangible asset. Considering the reputation that Enterprise A had built up in the last six decades and the connection between Enterprise A and the name "Company A" in the minds of consumers and trading counterparts, the practice of Enterprise A setting up a new company under its original name "Company A" and holding 100% of the shares of the company to prevent confusion in the market should the original company name have been registered by another business indicated that Enterprise A recognized the significance of the name "Company A" to its business management and the order of related markets. Therefore, the name "Company A" has to be regarded as a principal part of Enterprise A's assets. Moreover, as the business of Company A did not involve the production of solid polyester granules and polyester cotton and there was no impact on competition in the corresponding markets, Enterprise A's establishment and holding 100% of the shares of Company A was intrinsically similar to an enterprise's business scale expansion where it transfers a principal part of its assets to a new business that it has set up. The situation can be regarded as meeting the exemption condition specified in Subparagraph 3, Article 11-1 of the Fair Trade Act. Hence, there was no need to file a merger notification with the FTC. With all the above combined, the FTC found it difficult to conclude that Enterprise A's establishment and holding 100% of the shares of Company A without filing a merger notification had been in violation of the Fair Trade Act.

Conclusion

In the draft addition of Subparagraph 5, Article 12 to the Fair Trade Act, the regulation regarding the obligation of "an enterprise reinvesting to establish and hold 100% of the shares or the contributed capital of a subsidiary" to file a merger notification has been removed. The revision has made it clear that there will be no impact on the related market structure when "an individual enterprise reinvests to establish and hold 100% of the shares or contributed capital of a subsidiary and, judging from the legislative purpose of the merger control regulations, there is no need for such an enterprise to file a merger notification." Nevertheless, before the said addition is approved, an enterprise individually investing in a new business operation is still required to abide by the current Fair Trade Act to determine whether it is necessary to file a merger notification with the FTC in order to prevent the violation of the law.

T-Plan Technology's False Advertisement in Violation of Fair Trade Act

The FTC decided at the 1146th Commissioners' Meeting on Oct. 23, 2013 that the advertisement posted by T-Plan Technology Co., Ltd. (hereinafter referred to as T-Plan Technology) for the "electromagnetic wave filter and power saver" was a false, untrue and misleading representation with regard to quality of product in violation of Article 21 (1) of the Fair Trade Act. The FTC therefore imposed on the company an administrative fine of NT$50,000.

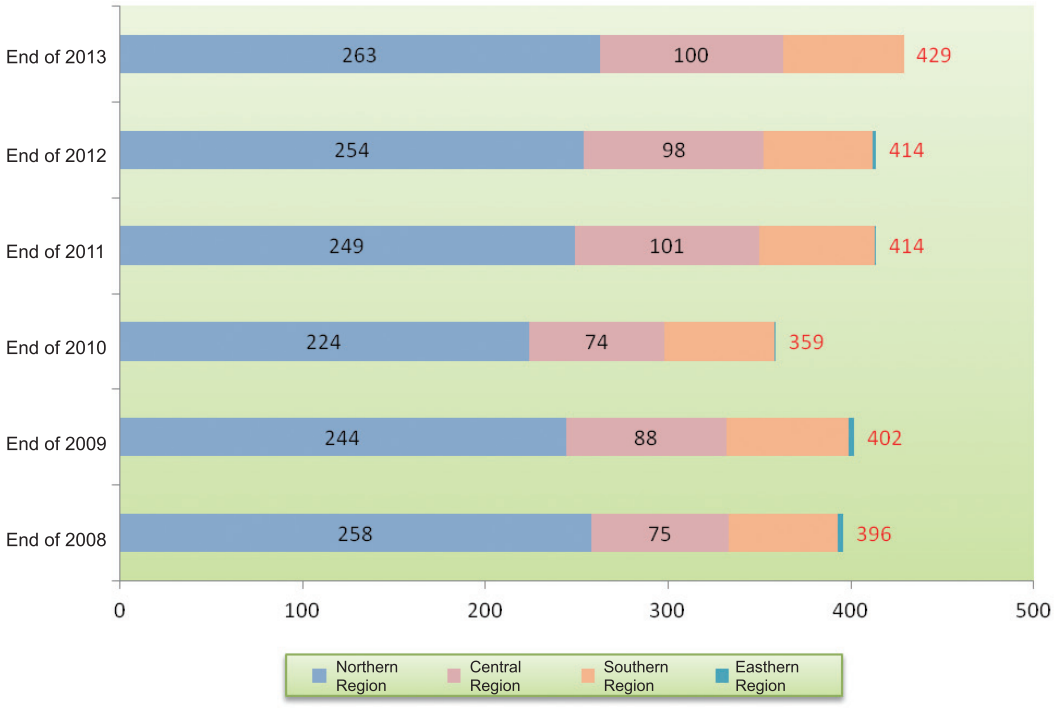
In the advertisement for the "electromagnetic wave filter and power saver," T-Plan Technology claimed that the product could "save 10%~30% of power." The wording gave consumers the overall impression that they could save 10%~30% of power when using the product. However, T-Plan Technology was unable to provide fair and objective scientific data to prove the claimed performance that they could save 10%~30% of power or present any documents in relation to the composition and structure of the product for appraisal. Therefore, the FTC concluded that the claim was groundless. It was a false, untrue and misleading representation in violation of Article 21 (1) of the Fair Trade Act.

Statistics on Unlawful Multilevel Sales Cases

People generally associate “multilevel sales” with “pyramid schemes.” In fact, however, multilevel sales are a type of marketing. By recruiting others to join, a multilevel sales organization is established to promote and sell products to make a profit. A “pyramid scheme,” on the other hand, is an illegal money-making activity carried out in the name of marketing; it is not a business organization with the purpose of promoting and selling products. Therefore, before signing up, people ought to know more about multilevel sales and related regulations.

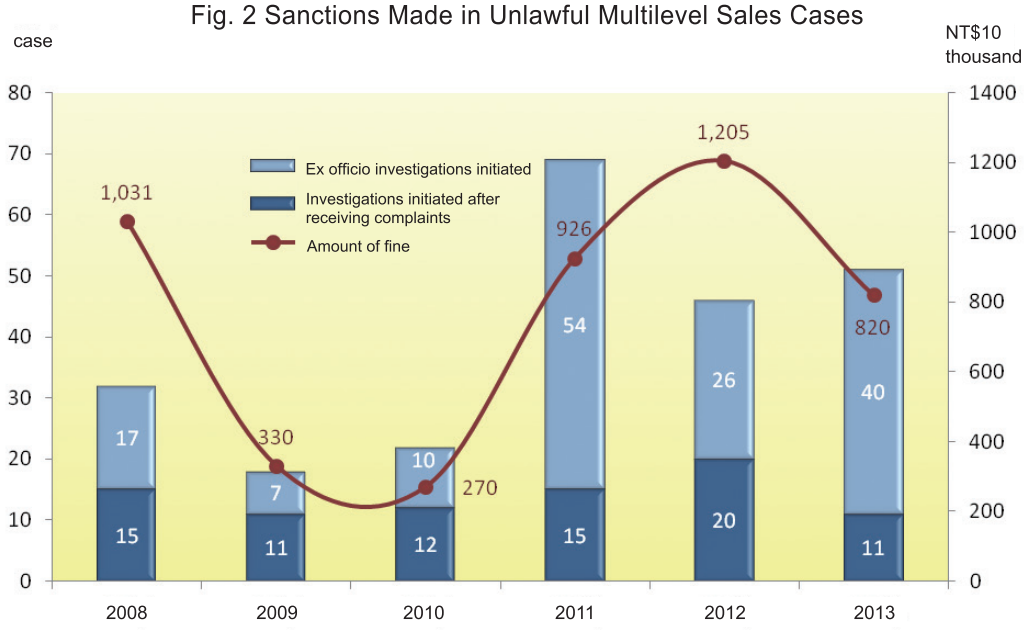
As set forth in the Supervisory Regulations Governing Multilevel Sales, all multilevel sales businesses are required to file with the FTC. Statistics show that 145 new multilevel sales businesses registered with the FTC in 2013 whereas 130 businesses withdrew their registration, and the number of registered multilevel sales businesses totaled 429 as of the end of 2013. According to the registered addresses, there were 263 multilevel sales businesses (61.3%) in northern Taiwan and 100 (23.3%) in the central region. 183 businesses (42.7%) were located in Taipei City and 93 (21.7%) in Taichung City. These statistics indicate that multilevel sales operations tend to concentrate in populous metropolitan areas

Fig. 1. Spread of Multilevel Sales Businesses in the Country



In 2013, the FTC handed down sanctions in 51 cases of unlawful multilevel sales practices (5 cases more than the year before). The FTC initiated ex officio investigations in 40 (78.4%) of these cases and started investigations after receiving complaints in 11 (21.6%) cases. The administrative fines imposed totaled NT$8.2 million. According to the regulations cited (some of the cases involved two or more illegal practices), 51 of the cases involved violations of the Supervisory Regulations Governing Multilevel Sales (Article 23-4 of the Fair Trade Act), 3 were violations of the regulation on contract termination by multilevel sales participants (Article 23-2 of the Fair Trade Act), 2 were violations of the regulation on contract cancellation by multilevel sales participants (Article 23-1 of the Fair Trade Act), and 1 was a violation of the regulation against the imposition of damage compensation or breach-of-contract fines on participants by multilevel sales businesses (Article 23-3 of the Fair Trade Act).

Fig. 2 Sanctions Made in Unlawful Multilevel Sales Cases



Among the cases concluded as violations of the Supervisory Regulations Governing Multilevel Sales (Article 23-4 of the Fair Trade Act), 38 of them were due to the failure to file changes with the FTC in violation of Article 7, 8 were practices in violation of Article 16 (participant recruitment restrictions), another 8 were practices in violation of Article 5 (filing with the FTC before starting multilevel sales operations), and 4 were practices in violation of Article 12 (signature of contracts with participants).

Table 1 Numbers of Unlawful Multilevel Sales Cases Processed – Sorted by the Article in the Supervisory Regulations Governing Multilevel Sales Violated

Unit: Case

Year	Article 5	Article 7	Article 11	Article 12	Article 13	Article 14	Article 15
2008	3	14	-	8	1	2	7
2009	5	6	-	3	3	3	2
2010	5	9	-	4	-	-	4
2011	19	44	-	22	6	3	11
2012	13	25	2	15	2	-	1
2013	8	38	-	4	1	1	-
Year	Article 16	Article 17	Article 18	Article 19	Article 20	Article 22	Article 23
2008	1	4	3	-	-	1	-
2009	1	-	2	-	-	-	1
2010	1	1	-	-	-	1	-
2011	2	-	3	-	-	1	-
2012	4	-	2	-	2	3	-
2013	8	-	2	1	-	3	-

Note: Some of the cases involved the violation of two or more regulations; therefore, the total number of articles cited is larger than the aggregate of the number of cases processed.

FTC Activities in November and December 2013

- On Nov. 1, the FTC conducted the “Seminar on Antitrust Regulations and Law Abidance of Enterprises” at the Competition Policy Information & Research Center.
- On Nov. 4, 5 and 8, the FTC conducted presentations on “Various Aspects of Trading Traps” respectively at Pingtung City Institute for Senior Citizens and Binmao Tribal Settlement in Jinfeng Township and Chenggong Town Office in Taitung County.
- On Nov. 14, Mr. James Killick, a lawyer from White & Case Law Firm, gave a lecture on “Competition Lawsuits in Europe and North America” at the invitation of the FTC.
- On Nov. 15, the FTC held a seminar on “High Speed Rail Ticket Price Increase and the Fair Trade Act”.
- On Nov. 18, the FTC conducted the “Fair Trade Act Training Camp” at National Chin-Yi University of Technology.
- On Nov. 21, the FTC held the “Presentation on Online Multilevel Sales System Operation and Related Regulations” at the FTC.
- On Nov. 29, the FTC hosted the “20th Conference on Competition Policy and the Fair Trade Act” at the Competition Policy Information and Research Center.
- On Dec. 2, the FTC held the “Seminar on Professional Services and Competition” in Taipei City.
- On Dec. 10, Professor Säcker from Free University of Berlin, Germany gave a lecture on “The New Development in Antitrust Law in Germany and in the European Union” at the invitation of the FTC.
- On Dec. 11 and 19, the Department of Economics of Chinese Culture University and the Department of Communications Management of Shih Hsin University respectively attended the “Fair Trade Act Training Camp” at the Competition Policy Information and Research Center.

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1.The FTC Chairperson Wu Shiow-Ming delivering the opening speech at the “20th Conference on Competition Policy and the Fair Trade Act”
2.The FTC conducting the “Seminar on Professional Services and Competition” in Taipei City

FTC International Exchanges in November and December 2013

- On Nov. 5, 14 and 27, the FTC respectively attended the “Information Exchange” teleconference of Subgroup 1 of the ICN Cartel Working Group, the “International Cooperation Practices in Merger Cases: Investigation” teleconference of the ICN Merger Working Group, and the teleconference of Subgroup 2 of the ICN Cartel Working Group.
- On Nov. 27 and 28, the FTC representatives attended the 38th Taiwan-Japan Economic and Trade Consultation” and the “Taiwan-Japan Competition Authority Bilateral Meeting” in Tokyo, Japan.
- On Nov. 29, the FTC attended the 3rd Meeting of the “International Economic and Trade Working Group” convened by the Ministry of Economic Affairs.
- On Dec. 3, the FTC attended the “Atypical Cartel” teleconference of Subgroup 1 of the ICN Cartel Working group.
- On Dec. 4, the FTC signed the “Competition Law Application Protocol” with the Panamanian Consumer Protection and Free Competition Authority.
- On Dec. 5, US Federal Trade Commission official Michael Panzera called on the FTC and exchanged ideas with FTC officials on “Unfair Competition and Multilevel Sales” and other issues. Also present were representatives from the Consumer Protection Committee of the Executive Yuan and the American Institute in Taipei.
- From Dec. 10 to 14,the FTC representatives attended the “Workshop on Complicated Mergers” held by the OECD Korea Policy Centre in Busan, Korea.
- On Dec. 11, the FTC attended the teleconference of the ICN Agency Effectiveness Working Group.
- On Dec. 19, the FTC attended the teleconference on “The Roles of Economists and Economic Evidence in Merger Analysis” held by the ICN Merger Working Group.

1.The FTC Department of Planning Director Hu Kuang-Yu, (left) attending “The 38th Taiwan-Japan Economic and Trade Consultation” and the “Taiwan-Japan Competition Authority Bilateral Meeting” in Tokyo, Japan

2.The FTC Chairperson Wu Shiow-Ming (right) and Panamanian Consumer Protection and Free Competition Authority (ACODECO) Commissioner Mr. Melán signing the “Competition Law Application Protocol”

3.The FTC officials and ACODECO delegation and guests after the signing of the “Competition Law Application Protocol”

4.US Federal Trade Commission official Michael Panzera (second from left) calling on the FTC to exchange ideas on “unfair competition and multilevel sales” and other issues

5.The FTC representative attending the “Workshop on Complicated Mergers” held by the OECD Korea Policy Centre in Busan, Korea

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