



# NO 113 TAIWAN FTC NEWSLETTER

2023.10

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FTC International Exchange Activities in July and August 2023


## ZHAO Brunch and Weili Rongye Violated the Fair Trade Act for not Disclosing Complete Information during Franchisee Recruitment

The FTC decided at the 1629<sup>th</sup> Commissioners' Meeting on December 14, 2022 that ZHAO Brunch, a sole proprietorship business, and Weili Rongye Co., Ltd. (hereinafter referred to as “Weili Rongye”) had violated Article 25 of the Fair Trade Act for not providing prospective franchisees with complete franchise information before entering into a contract when recruiting franchisees for the ZHAO Brunch chain. The information included the actual or estimated amount of expenses when purchasing products and raw materials “before starting operation” as well as “during operation.” The practice was obviously unfair and able to affect trading order. Therefore, the FTC imposed an administrative fine of NT\$100,000 on each business.

Joining a franchise is one of the main channels for people to start a business in the country. The franchisor is required to provide important franchise information for prospective franchisees to thoroughly consider before making decisions. The amount of money needed to purchase products and raw materials before and during operation is crucial information for prospective franchisees when deciding whether or not they will join the franchise. Such information can be provided in hardcopy or through email or communications software such as LINE for prospective franchisees to learn about.

ZHAO Brunch and Weili Rongye had an information advantage. If the aforementioned crucial franchise information is not provided during the recruitment process, prospective franchisees will be unable to

evaluate the investment needed before starting a business and the expenses during operation. As a result, they will not be able to make correct judgments regarding the transaction and their interests might be jeopardized. Moreover, the opportunities for competing franchisors to get franchisees will also decrease. For these reasons, the practice was obviously unfair and able to affect trading order and thus the FTC imposed a fine of NT\$100,000 on each business.


The FTC noted that franchisors and franchisees are partners in such a start-up operation, and reminded the franchisors that they are obligated to fully communicate and provide complete information with regard to the franchise terms and costs to build decent cooperative relationships and create a win-win outcome for both sides in order to reduce disputes. Franchisors must abide by the “Fair Trade Commission Disposal Directions (Guidelines) on the Business Practices of Franchisors.” 

## **Libang Construction Violated the Fair Trade Act by Restricting the Right of Homebuyers to Review Presale House Contracts**

The FTC decided at the 1656<sup>th</sup> Commissioners' Meeting on July 5, 2023 that Libang Development and Construction Co., Ltd. (hereinafter referred to as "Libang Construction") had violated Article 25 of the Fair Trade Act by requesting that homebuyers pay a deposit to acquire the purchasing contract when marketing the "Green Light Forest No.30 Starting a Family" presale housing project. The practice was obviously unfair and able to affect trading order. The FTC imposed an administrative fine of NT\$600,000 on Libang Construction.

Presale home transactions involve large amounts of money and the contract is complicated. Therefore, the homebuyers should be given adequate time to review the content, or it would be obviously unfair. Accordingly, Libang Construction requested that homebuyers pay a deposit in order to review the presale house purchasing contract when marketing the housing project in question in September 2022. The FTC dispatched staff to the reception center for investigation. It was found that the salespeople indeed made such a request. The investigation showed that the company had started to sell the units from the end of October in 2020 and had asked every homebuyer to pay a deposit to acquire the presale home purchasing contract until November 16, 2022. The practice restricted the right of homebuyers to review the contract. It constituted obviously unfair conduct.

It is known that presale homes have not as yet been constructed and the amount involved is large compared with other consumer products. Therefore, most people do not have much experience in making such transactions. In contrast to the real estate developer or sales agent, homebuyers are in a disadvantageous position as far as home purchase information is concerned. When the builder or sales agent takes advantage of information asymmetry and requests that homebuyers pay a deposit or a certain fee to acquire the purchasing contract, the homebuyers will face psychological pressure. Under such a disadvantageous position due to information asymmetry, homebuyers might be affected when making transaction decisions. On the other hand, the practice will also constitute unfair competition for other competitors who provide homebuyers with purchasing contracts according to the law. For this reason, the practice of Libang Construction was obviously unfair and its practice of restricting the right of homebuyers to review the contract was in violation of Article 25 of the Fair Trade Act.

The FTC would like to emphasize that homebuyers deserve the right to review the purchasing contract. Therefore, real estate developers and broking agencies have the obligation to provide the purchasing contracts to homebuyers so that they can be fully reviewed in advance. It is unlawful to restrict the homebuyer's right to review purchasing contracts. 


## Pig's Blood Food Product Businesses Violated the Fair Trade Act by Engaging in a Concerted Action

Pig's blood food products are snacks favored by the public. The FTC received complaints accusing Pengsheng Foods Co., Ltd. (hereinafter referred to as "Pengsheng Foods") and Deyi Livestock and Poultry Co. (hereinafter referred to as "Deyi Co.") of jointly raising the prices of pig's blood food products in early November 2022. After investigation, the FTC decided at the 1640th Commissioners' Meeting on March 8, 2023 that the two companies had engaged in a concerted action by jointly increasing the prices of pig's blood food products. The conduct was prohibited by the Fair Trade Act, and therefore, the FTC imposed administrative fines of NT\$100,000 on each company.

Pig's blood food products are foods made from blood collected during slaughtering and are processed to be edible. The FTC's investigation showed that Pengsheng Foods and Deyi Co. were the only two larger suppliers of pig's blood food products in northern Taiwan. They mainly sold their products to vendors in traditional markets and faced the same group of customers. Both companies intended to raise the price due to cost increases, but they also wanted to avoid loss of customers. Therefore, the two companies held discussions about their production costs and the scale of their respective price increases

on several occasions either over the phone or through LINE in August and September 2022. Subsequently, they countersigned a price increase agreement stating that the price of pig's blood products would go up by NT\$10 per layer starting from November 1, 2022 and notified the downstream vendors. After the increase, the price per bucket went up from NT\$400 to NT\$450 (for five layers) or to NT\$460 (for six layers).

The FTC paid visits to various traditional markets in the northern region and found out that the vendors were highly dependent on the supplies of pig's blood products by Pengsheng Foods and Deyi Co. Apparently, the price increase had affected the supply-demand function in the pig's blood food product market in the northern region.

The FTC reminded the related undertakings that entering into agreements with competitors for joint price increases or even signing affidavits to show loyalty to one another is considered to be a concerted action which is in violation of the law. When such a violation is discovered, the loss will be greater than the gain. Meanwhile, the FTC has substantially increased informers' rewards to encourage people to report illegal activities. Do not try your luck! 


## Merger of Walsin Lihwa with Swedish Steel Company not Prohibited

The FTC decided at the 1654<sup>th</sup> Commissioners' Meeting on June 21, 2023 not to prohibit the merger of Walsin Lihwa, Italian company Cogne Acciai Speciali S.p.A. (CAS) and Swedish Company Outokumpu Long Products AB (the target company) by citing Article 13(1) of the Fair Trade Act.

Walsin Lihwa intended to indirectly hold over one third of the shares of the target company through its subsidiary CAS and gain control of the management and personnel appointment and dismissal of the target company. Since the condition reached the filing threshold, Walsin Lihwa filed a pre-merger notification with the FTC.

Both Walsin Lihwa and the target company produced and sold stainless steel billets and straight rods. Therefore, they were horizontal competitors in the relevant markets. Meanwhile, as stainless steel billets were the principal materials used in the production of stainless steel straight rods, a potential vertical seller-buyer relationship also existed between the

two companies. The target company ran its operation mainly in Europe and did not sell its products in the domestic market. In 2022, the target company's market share in Taiwan was zero. After merging, Walsin Lihwa's existing business involving stainless steel billets and stainless steel straight rods in the domestic market would not be affected and it would still face competition from domestic and foreign companies. In other words, the merger would not have any influence on the structure of the domestic stainless steel billet and stainless steel straight rod markets. Hence, the merger would not lead to any competition restraints in the relevant product markets.

Through the merger, Walsin Lihwa would be able to expand its market in Europe and improve customer management in Scandinavia and the Baltic region. There was no concern that the merger would result in competition restraints in the domestic market. Hence, the FTC cited Article 13(1) of the Fair Trade Act and did not prohibit the merger. 

## **Jiemusz Biotechnology Violated the Multi-level Marketing Supervision Act by not Refunding Participants According to Law**

The FTC decided at the 1638<sup>th</sup> Commissioners' Meeting on February 22, 2023 that Jiemusz Strontium Biotechnology Co., Ltd. (hereinafter referred to as "Jiemusz Biotechnology") had violated Article 16(2) and Article 20(2) of the Multi-level Marketing Supervision Act. It had recruited an individual with limited capacity for civil conduct to be a participant without acquiring the prior consent of his/her legal representative and attaching it to the contract. Moreover, it failed to handle the process of rescinding or terminating the participation contract and handling refunds according to the law when participants intended to withdraw from the business. For the above reasons, the FTC imposed an administrative fine of NT\$240,000 on the company.

Jiemusz Biotechnology filed its application with the FTC in August 2020 in order to operate as a multi-level marketing business that would market food and beauty products. Staff members of the FTC visited the main office of the company to conduct business inspections and found that the company had recruited an individual with limited capacity for civil conduct to be a participant in October 2021, but the written consent of the legal representative had not been attached to the individual's participation contract. The company was thus in violation of Article 16(2) of the Multi-level Marketing Supervision Act.

Meanwhile, the FTC's investigation also indicated that the company had accepted the applications to rescind or terminate the participation contract from two participants. The participants should therefore have had their payments for goods made upon purchase and any other fees paid fully refunded because their withdrawal notices were submitted within 30 days of entering into the contract. However, Jiemusz Biotechnology failed to follow the statutory requirements and deducted 10% of the payments. It was in violation of Article 20(2) of the Multi-level Marketing Supervision Act.

The FTC would like to remind multi-level marketing enterprises that, in order to protect participants with limited capacity for civil conduct, they are required to obtain the written consent of such participants' legal representatives and attach it to the contract; otherwise they will be in violation of the Multi-level Marketing Supervision Act. In the meantime, multi-level marketing enterprises must calculate the refunds according to statutory requirements when participants apply for rescission or termination of the contract. The multi-level marketing enterprises should not by any means try to reduce the returned payments and the process of making a refund should be completed within 30 days.




## Action Electronics and Trigger Co. Violated the Fair Trade Act for Posting False Advertisements

Taiwanese people enjoy visiting Japan and are fond of Japanese products. Many people will buy products with the “Made in Japan” label because they have confidence in the quality. Apparently, the place of origin of such products can be an important consideration for an individual when making purchases.

The FTC decided at the 1642<sup>nd</sup> Commissioners’ Meeting on March 22, 2023 that Action Electronics Co., Ltd. (hereinafter referred to as “Action Electronics”) and Trigger Co., Ltd. (hereinafter referred to as “Trigger Co.”) had violated Article 21(1) of the Fair Trade Act for posting the claim “Insisting on using motors manufactured in Japan” when marketing the Axion German aesthetic foldable 12-inch voice-controlled DC fan on the crowdfunding platform zeczec. However, the motor was actually made in China. The FTC imposed administrative fines of

NT\$100,000 on Action Electronics and NT\$50,000 on Trigger Co.

The FTC’s investigation showed that the motor of the product of concern was produced in China by a wholly-owned subsidiary of a Japanese company. Action Electronics and Trigger Co. posted the wording “Made in Japan” in error due to negligence. It was a false and misleading representation that misled the consumers to believe that Japan was its place of origin in violation of the Fair Trade Act.

The FTC would like to remind all undertakings that the place of origin of a product is an important consideration when consumers make transaction decisions. If “Japan” is advertised as the place of origin of a product, there has to be a rightful basis, otherwise the advertiser might be fined for breaking the law. 

## **“Merger Types to Which Paragraph 1 of Article 11 of the Fair Trade Act Does not Apply” and “Fair Trade Commission Disposal Directions (Guidelines) on Handling Merger Filings” Amended**

Business can increase resources, combine advantages and strengthen competitiveness through mergers. Meanwhile, merger review is to prevent business mergers from increasing market concentration or monopolization and weakening market competition and harming consumer interests as a result. To avoid delaying the business opportunity of enterprises, the pre-merger notification will be divided into two different review systems that are the regular review procedure and simplified review procedure. They are applied in accordance with the level of concern about the likelihood of causing competition restraint.

On July 28, 2016, the FTC made an announcement to include “an enterprise acquiring another enterprise that is controlled by, controlling or affiliated with the acquiring enterprise, and by an enterprise where both it and the acquiring enterprise are controlled by the same enterprise or enterprises” and three other merger types to be merger types to which Paragraph 1 of Article 11 of the Fair Trade Act does not apply. In order to further reduce the burden of enterprises in merger filing and shorten the time for merger review, the FTC reexamined the “Merger Types to Which Paragraph 1 of Article 11 of the Fair Trade Act Does not Apply” and the “Fair Trade Commission Disposal Directions (Guidelines) on Handling Merger Filings” and amended some of the provisions. The amendments took effect on July 28 and 30, 2023, respectively. The key points of the revisions are as follows:

1. Point 5 was added to include extraterritorial merger types that need not be filed with the FTC to the

“Merger Types to Which Paragraph 1 of Article 11 of the Fair Trade Act Does not Apply.” The reason is that, when foreign enterprises outside the territory merge by jointly establishing or operating joint ventures that do not engage in economic activities within the territory, it will not have direct, substantial and reasonably foreseeable influence on domestic relevant markets. Therefore, there are no grounds to control such merger types and such enterprises shall not file with the FTC. Accordingly, such a kind of merger type is included in the “Merger Types to Which Paragraph 1 of Article 11 of the Fair Trade Act Does not Apply.”

2. In the amendment to Point 7 of the “Fair Trade Commission Disposal Directions (Guidelines) on Handling Merger Filings,” Subparagraphs 6 and 7 were added to Paragraph 1 to specify merger types to which the simplified review procedure may apply. At the same time, methods for calculating the sales of controlling and controlled enterprises were also added in Paragraph 2:


- (1) The impacts of extraterritorial mergers in the domestic market vary. In the past, a few cases did reach the filing thresholds, but the FTC’s review indicated that there would be no significant effects in the domestic market. Taking into consideration the efficiency of merger review, the FTC decided to act in line with the experience of handling extraterritorial mergers in the past and apply the simplified review procedure to merger cases which would only have insignificant impacts in the domestic market in order to accelerate the review process.



(2) In addition to the original five merger types to which the simplified review procedure applies, three more merger types may apply, namely, where the transaction amount is less than NT\$2,500 million, the sales of merging parties are less than NT\$200 million in the country, and the merging parties do not operate in the country. It is stipulated that the simplified review procedure shall be applied because the influences on competition in domestic relevant markets are relatively insignificant.

(3) Meanwhile, in order to specify the methods to be adopted in the calculation of the sales of the controlling and controlled enterprises, the following has been added in Paragraph 2: "The amount of the sales referred to in Subparagraph 7 of the preceding paragraph shall include the sales amount regarding the relevant product or service for the merger

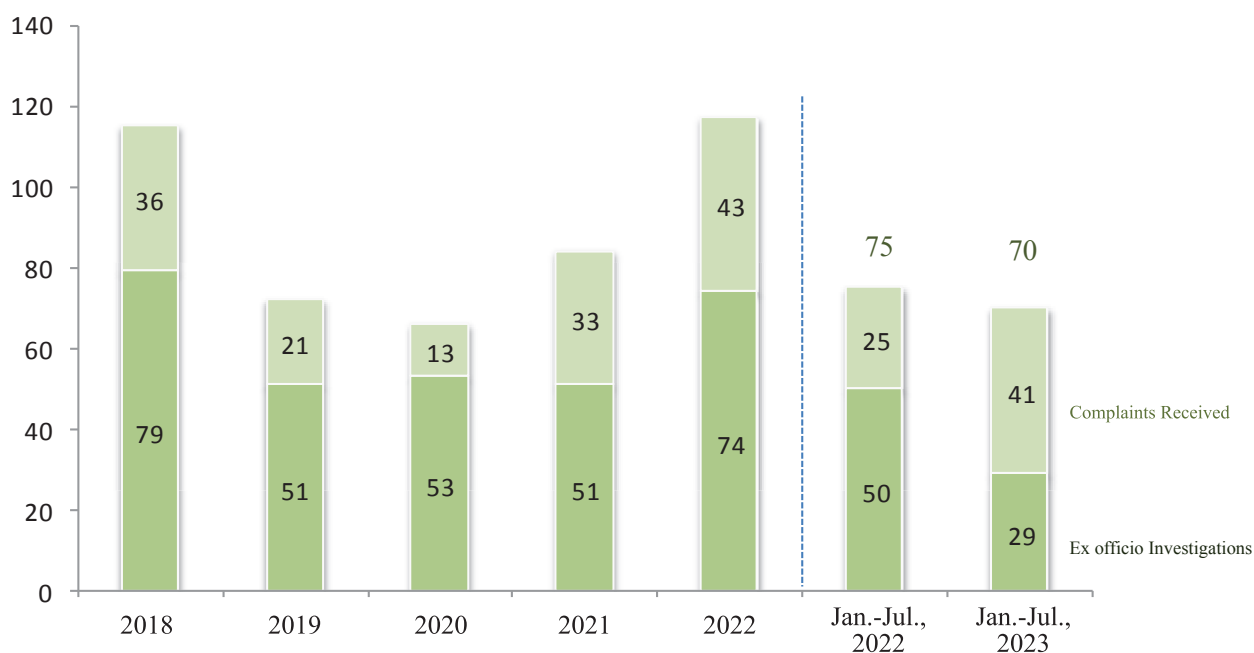
of the enterprise having a controlling or subordinate relationship with the merging parties, and of the enterprise where both it and the merging parties are controlled by the same enterprise or enterprises."

When the amendments to the "Merger Types to Which Paragraph 1 of Article 11 of the Fair Trade Act Does not Apply" and the "Fair Trade Commission Disposal Directions (Guidelines) on Handling Merger Filings" were promulgated, the "Fair Trade Commission Disposal Directions (Guidelines) on Handling Extraterritorial Mergers" were abolished at the same time. In the future, there will not be any question about applying different disposal directions in relation to extraterritorial mergers. If there are any inquiries regarding merger filing, it is recommended that the enterprises take advantage of the FTC's "Consulting Service for Businesses Prior to Merger Notification." 

## Statistics on Cases with Sanctions Administered

The FTC investigates practices suspected of being in violation of the Fair Trade Act and the Multi-level Marketing Supervision Act and administers sanctions on businesses or individuals for the violations in order to maintain trading order in society and ensure fair competition in the market. According to the statistics, the FTC closed 52 cases with sanctions administered between January and July in 2023. The FTC had issued 70 dispositions, including 41 complaints and 29 cases in which ex officio investigations were initiated (Fig. 1). From 2018 to the end of July this year (hereinafter referred to as “the five recent years”), the FTC made administrative sanctions and issued 524 dispositions.

Fig. 1 Cases with Sanctions Administered - Divided by Case Types



Judged by industry in terms of 70 dispositions issued between January and July in 2023, 48 cases (68.6%) involving wholesale and retail trade made up the largest proportion. Judged by industry in terms of 524 dispositions issued in the five recent years, 380 cases (72.5%) also involving wholesale and retail trade made up the largest proportion, followed by the 59 cases (11.3%) involving real estate activities. The two groups together accounted for about 84% (Fig. 2).

Judged by the amount of fines in terms of 51 sustained dispositions between January and July this year, 44 cases (86.3%) in which the fines imposed were less than NT\$1 million accounted for the largest proportion. Judged by the amount of the fines in terms of 473 sustained dispositions in the five recent years, there were 404 cases (85.4%) in which the fines imposed were less than NT\$1 million, 59 cases (12.5%) in which the fines imposed were more than NT\$1 million but less than NT\$10 million, 5 cases in which the fines imposed were more than NT\$10 million but less than NT100 million, and 5 cases in which the fines were NT100 million or more (Table 1).

Fig. 2 Cases with Dispositions Issued in the Five Recent Years – Divided by Industry

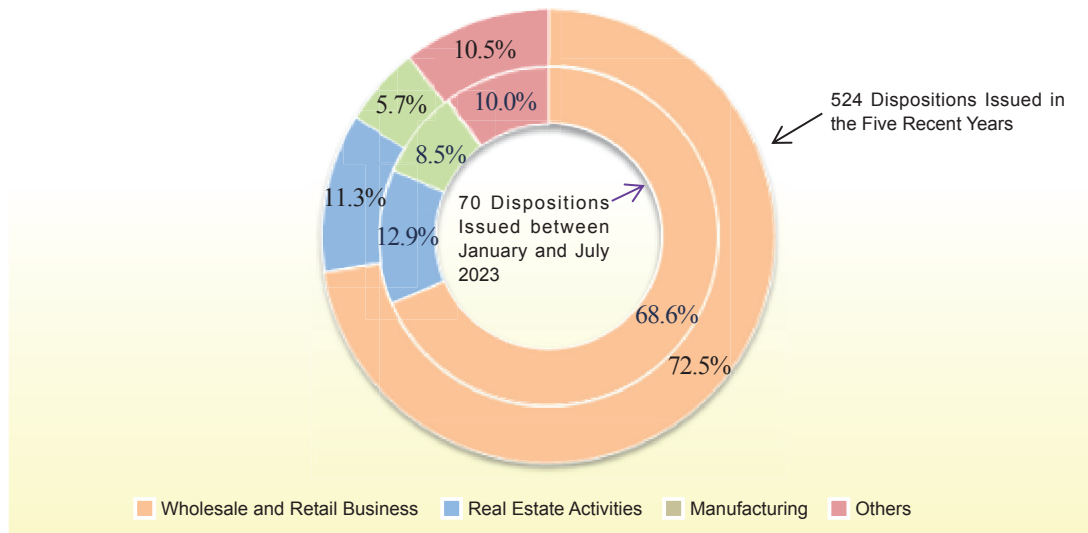


Table 1 Cases with Fines Sustained in the Five Recent Years Divided by Types of Violation as Indicated in the Disposition to the end of July 2023

Unit: Case

Year	Total	Less than NT\$1 million	NT\$1 million to less than NT\$10 million	NT\$10 million to less than NT\$100 million	NT\$100 million or more
<b>Total (2018 to Jul. 2023)</b>	473	404	59	5	5
2018	111	98	13	–	–
2019	71	64	6	1	–
2020	66	56	8	–	2
2021	83	66	13	2	2
2022	91	76	13	2	–
Jan. to Jul., 2023	51	44	6	–	1

## FTC Activities in July and August 2023

- ▲ On Jul. 7, 12 and 14, the FTC conducted presentations on “2023 Various Aspects of Trading Traps” respectively at the Yongkang District Office of Tainan City, the Department of Legal Affairs of Taipei City and the Regional Senior Citizens’ Service Center of Meinong District in Kaohsiung City.
- ▲ On Jul. 7, the FTC conducted a presentation on “Compliance and Competition in the Manufacturing Industry” for workers in the medical industry in Kaohsiung City.
- ▲ On Jul. 7, the FTC conducted a presentation on the “Online Operation of the Fair Trade Commission Multi-level Marketing Supervision System and Things to Note” in Taipei City.
- ▲ On Jul. 12, 13, 14, 20 and 21 and Aug. 4, the FTC conducted the “Fair Trade G2B Express” project respectively at Delta Electronics Inc., Micro-Star International Co., Ltd., Acer Incorporated, Highwealth Construction Corp., Pacific SOGO Department Stores Co., Ltd. and LCY Chemical Corp.
- ▲ On Jul. 21 and Aug. 7, the FTC conducted presentations on “Fair Trade Commission Regulations Regarding False Advertising and Past Cases” respectively in Tainan City and Kaohsiung City.
- ▲ From Aug. 10 to 11 the FTC held the “2023 Fair Trade Commission-Local Government Coordination Meeting” in Taibao City, Chiayi County.
- ▲ On Aug. 18, the FTC conducted a presentation on “Law Observance and Competition in the Manufacturing Industry” for workers in the power industry in Taichung City.



1. The FTC conducting presentations on “2023 Various Aspects of Trading Traps” at the Yongkang District Office of Tainan City



2. The FTC conducting a presentation on “Compliance and Competition in the Manufacturing Industry” for workers in the medical industry in Kaohsiung City





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3. The FTC conducting a presentation on the "Online Operation of the Fair Trade Commission Multi-level Marketing Supervision System and Things to Note" in Taipei City
4. The FTC conducting the "Fair Trade G2B Express" project at LCY Chemical Corp.
5. The FTC conducting presentations on "Fair Trade Commission Regulations Regarding False Advertising and Past Cases" in Tainan City
6. The FTC conducting presentations on "Fair Trade Commission Regulations Regarding False Advertising and Past Cases" in Kaohsiung City
7. The FTC holding the "2023 Fair Trade Commission-Local Government Coordination Meeting" in Taibao City, Chiayi County
8. The FTC conducting a presentation on "Law Observance and Competition in the Manufacturing Industry" for workers in the power industry in Taichung City

## FTC International Exchange Activities in July and August 2023

- On Jul. 25 and 26, the FTC attended the 18th East Asia Top Level Officials' Meeting on Competition Policy and the 15th East Asia Conference on Competition Law and Policy in Thailand.
- From Aug. 13 to 15, the FTC attended "The Enhanced APEC Agenda for Structural Reform (EAASR) Mid-Term Review Meeting" and the Second Meeting of the Economic Committee (EC2) of APEC in the USA.
- On Aug. 24 and 31 and Sep. 7, the FTC attended the "Virtual Series on Policies and Tools for Improving Digital Economy and Competition in Digital Markets: Current Issues" held by APEC (videoconferencing).
- From Aug. 26 to Sep. 2, the FTC attended the Taiwan-US Conference on Competition Law and Taiwan-Canada Conference on Competition Law in the USA and Canada.



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1. The FTC attending the 18th East Asia Top Level Officials' Meeting on Competition Policy and the 15th East Asia Conference on Competition Law and Policy in Thailand
2. The FTC attending the Taiwan-Canada Conference on Competition Law in Canada

# Taiwan FTC Newsletter

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12-14 F, No. 2-2, Sec. 1 Jinan Rd., Taipei City, Taiwan, R.O.C.  
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