



October 17, 2025

Via electronic submission: <http://www.regulations.gov>

Federal Trade Commission
600 Pennsylvania Ave., NW
Washington, D.C. 20580

Re: Request for Public Comment on the FTC Strategic Plan (Fiscal Years 2026-2030) (Doc ID FTC-2025-0660-0001)

The International Franchise Association (“IFA”) appreciates the opportunity to comment on the Federal Trade Commission’s (“Commission”) proposed *Strategic Plan for Fiscal Years 2026–2030* (“Strategic Plan”).

IFA commends the Commission for reaffirming its long-standing mission: enforcing laws that protect the public from anticompetitive, unfair, and deceptive business practices **without unduly burdening legitimate business activity**. This principle is critical to maintaining an economic environment in which ethical, well-regulated businesses can thrive.

I. THE ECONOMIC VALUE AND REACH OF FRANCHISING

IFA is the largest organization representing franchising. Its members include franchise companies in over 300 different industries, individual franchisees, and companies that support those franchise companies in marketing, law, technology, human resources, business development, and operations. At a time of economic instability in the U.S., franchising serves as **powerful engine of economic growth**, contributing an estimated **\$896.9 billion in economic output** and providing an estimated **8.8 million direct jobs** in 2024.¹ Beyond these direct impacts, franchising sustains significant **indirect economic activity** in

¹ Ashley Rogers, Jin Qi & Khadija Cochinwala, 2025 FRANCHISING ECONOMIC OUTLOOK 1-2, (INT’L FRANCHISE ASS’N 2025), <https://www.franchise.org/franchising-economic-outlook/>.

manufacturing, warehousing, logistics, and transportation — sectors essential to supporting franchise operations and serving millions of consumers nationwide.

II. MODERNIZATION OF THE FRANCHISE RULE

Franchising is governed at the federal level by the Commission’s Franchise Rule (16 C.F.R. Parts 436 and 437), which was last amended in 2007. To fulfill Objective 1.1 of the Strategic Plan — *detering and addressing unfair and deceptive practices* — the **Franchise Rule must be modernized** to reflect current technology, business realities, and consumer expectations.

The Franchise Rule has been under review by the Commission since March 2019.² Its framework, developed decades ago, no longer reflects the scale and sophistication of modern franchising. The franchise disclosure document (“FDD”) plays a vital role in ensuring informed decision-making, but its current form — a static, text-heavy PDF often exceeding hundreds of pages — does not align with how today’s investors and entrepreneurs consume information.

Modern disclosure formats should allow **multimedia, searchable, and interactive content** — including graphics, video, and hyperlinks — to enhance comprehension and accessibility. The Commission’s disclosure regime should not inhibit innovation by limiting franchisors to outdated delivery methods inconsistent with today’s technology standards.

A. IFA’s Prior Recommendations

In its previous submissions responding to the Commission’s *Solicitation for Public Comments on Provisions of Franchise Agreements and Franchisor Business Practices* (Docket Nos. FTC-2023-0026-2152 and FTC-2023-0026-2777) (collectively, the “IFA Comments”), IFA provided specific recommendations for modernizing the Franchise Rule.

² Disclosure Requirements and Prohibitions Concerning Franchising, 84 Fed. Reg. 9051 (Mar. 13, 2019).

These recommendations align closely with the Commission’s goals under **Objective 1.1 of the Strategic Plan**, including promoting transparency, improving the effectiveness of disclosures, and ensuring regulatory consistency without stifling legitimate commerce.

B. IFA’s Recommendations for the Strategic Plan

IFA respectfully urges the Commission to include within its Strategic Plan a clear commitment to:

1. **Finalize its review and amendment of the Franchise Rule**, incorporating modern disclosure technologies and formats that facilitate informed decision-making.
2. **Ensure regulatory balance**, maintaining robust consumer protections while avoiding unnecessary burdens on lawful business models that drive economic opportunity.
3. **Engage with industry stakeholders**, including franchisors, franchisees, and small business advocates, to ensure that updates to the Franchise Rule reflect practical realities across diverse sectors of the U.S. economy.

IFA appreciates the Commission’s continued efforts to protect consumers and promote fair competition. By modernizing the Franchise Rule in alignment with today’s marketplace and technology, the Commission can strengthen both franchise transparency and economic growth.

Thank you for the opportunity to share our views and for your consideration of IFA’s perspective.