I am not saying that under a test case that if that ad was put in the Nashville paper, and the Nashville paper because it is read widely, is sent to Washington and other places, we could not say the advertising itself is in commerce and proceed against it. I am saying if we do that, then if we pursue and open that avenue of jurisdiction at the Federal Trade Commission, I have got to have a pretty good-sized barn to receive all the complaints we are going to get because then I am in business against the corner grocery store man, everybody in the United States that advertises anywhere on any condition because nearly everything goes in commerce today—the papers and even the little weeklies get across the line.

Mrs. SULLIVAN. If we are able to keep this provision in H.R. 11601 and we still left it under the jurisdiction of the Federal Reserve Board, it is not limited to interstate commerce, is it?

Mr. DIXON. No, the Federal Reserve Board is under the monetary clause. The jurisdiction there is under the monetary clause and it goes right down.

Mrs. SULLIVAN. If they do not have the proper facilities for policing this, is there any way under the bill that they could designate the Federal Trade Commission to handle this for them?

Mr. DIXON. I don't know of any ready way that can be done because they could not transfer their responsibility. We would still—we would still be the Federal Trade Commission and have all the authority of our basic statute. We are a statutory creature and we must live directly and strictly within it.

Mrs. SULLIVAN. In order to let this authority be used anyplace in the United States, would this bill need some sort of amendment?

Mr. DIXON. Congressman Hanna has a section in here that has the language that will do it. On page 16 of H.R. 12100 he has a section (m) under section 4(m) way over, right at the end, he would add this language, "authority for prescribing regulations and enforcement of regulations relative to subsection (j) and (k), and this advertising of this section shall be vested in the Federal Trade Commission."

Mrs. SULLIVAN. Would that preclude you from doing anything on advertising that is not interstate?

Mr. DIXON. This would broaden clearly the circumstances—the jurisdictional base of the Federal Trade Commission to move against this type of advertising. Now, you have here on (j)—this is the language of your bill now:

> No creditor in order to aid, promote, or assist, directly or indirectly, in any consumer credit sale, extension of credit or open-end credit plan may state or otherwise represent in any advertisement in interstate commerce or affecting interstate commerce.

That is broader language, you see. What Congressman Hanna has done is to say, "That authority shall be vested in the Federal Trade Commission with the responsibility of enforcing sections (j) and (k)." That is the way it could be accomplished.

Mrs. SULLIVAN. I would like to ask you right at this point, as concerns the matter of credit advertising in H.R. 11601—we have placed the responsibility for such enforcement in the Federal Reserve Board and they have indicated, as you say——