meeting of the minds on it. The figures they showed us on the chart this morning are not the kind of figures they use when they figure the interest on any of these charges for these people.

Mr. DIXON. One thing is clear, Madam Chairman, the purpose of this legislation is to state it in simple interest annually and if you charge something—if you set out with a figure 1½ percent then stated annually it comes to 18 percent. Maybe that is too simple.

Mr. STEPHENS. If that is true, provided you have the same amount that you put in, it is 1½ percent on each month. If you have a different amount it does not amount to 18 percent.

Mrs. SULLIVAN. They still charge 1½ percent for a given period of time—a month.

Mr. DIXON. They still charge 1½ percent per month. You are going to pay 18 percent—maybe the amount will vary, but at the end of the year you paid 18 percent on something if you still owed them something.

Mrs. SULLIVAN. Mr. Wylie?

Mr. WYLIE. Thank you, Madam Chairman.

First of all, Mr. Dixon, I would like to clarify one point. I asked Secretary Trowbridge this morning this question, whether he thought the administrative enforcement of the Sullivan bill would be better left to the Federal Trade Commission and then I asked the alternative question, would the administration of the provisions with reference to advertising perhaps be better left with the Federal Trade Commission? As I understood from what you said, you thought maybe the administrative provisions of any truth-in-lending act could well be left to the Federal Trade Commission.

Did I interpret correctly? Is that a fair statement of what you said?

Mr. DIXON. With respect to the advertising part of it, yes.

Mr. WYLIE. Advertising only?

Mr. DIXON. Yes.

Mr. WYLIE. All right.

Mr. DIXON. If you are going to adopt the Senate version, the enforcement of the bill is going to be left to the private citizen, plus a criminal enforcement part of it, if necessary, by the Department of Justice. There, under S. 5, the function of the Federal Reserve would be to promote the regulations and what have you, and any enforcement will come by the private citizen in any competent court.

If you adopt Mrs. Sullivan's bill, then this encompasses the traditional point of enforcement entirely by Government and, as provided in her bill, which is practically a rewrite of section 5 of the Federal Trade Commission Act of how we must proceed to enforce, but this does not mean that the Federal Reserve Board could not follow those procedures.

When I was talking about this—I think I was making reference primarily to Governor Robertson's reference to the advertising, the advertising sections of your bill, Mrs. Sullivan.

Mr. WYLIE. Just to pursue that, one more question. Do you think jurisdiction should be left more properly with the Federal Trade Commission or with the Federal Reserve Board? That will require an answer as to one or the other.