

**StubHub Remarks for the
White House Convening on the Economic Case for “Junk” Fee Policies
Tuesday, March 21, 2023**

Good afternoon and thank you for the opportunity to participate in today’s discussion. My name is Laura Dooley, and I am the Head of Global Government Relations for StubHub. StubHub was founded in 2000 and revolutionized the secondary ticket market by providing fans a safe and transparent platform to buy and sell tickets. Our industry leading FanProtect Guarantee and customer service has helped established StubHub as the world’s leading ticket resale marketplace.

As a marketplace, StubHub provides a service to buyers and sellers. We do not sell tickets directly. StubHub provides the platform that connects buyers and sellers, as well as the infrastructure to ensure those transactions are successful. Our sellers set their ticket prices and collect the proceeds of the sale. StubHub’s only revenue from a transaction is the fees charged to the buyer and seller for the use of our service. Our fees are transparent and fully disclosed to buyers and sellers before the completion of any transaction.

That said, we believe that increasing price transparency with the adoption federal regulations to require “all-in pricing” is a positive step forward for all consumers, not just in live events ticketing, but across all of commerce.

StubHub’s position is informed by our own experience with all-in pricing. In 2014, the company voluntarily moved to all-in pricing believing it was desired by consumers and would create a competitive advantage for the business that would ultimately force the rest of the industry to follow suit.

Unfortunately, the broader industry did not adopt all-in pricing, leaving buyers confused and StubHub at a significant competitive disadvantage. StubHub’s all-in pricing confused buyers who assumed our prices were exclusive of fees and therefore more expensive relative to our competitors. The result was a significant shift in market share away from StubHub to our competitors.

To remain competitive, StubHub reverted to the industry’s traditional pricing model in the Fall of 2015. At the same time, to empower buyers, we introduced an optional display toggle that allows buyers to view prices inclusive of estimated fees earlier in the transaction.

This experience has driven StubHub’s perspective that federal legislation or rulemaking is not just necessary, but critical to implementing all-in pricing equitably across the entire live event ticketing industry, as well as commerce at large.

StubHub's experience has also informed our perspective that a federal law or regulation, creating a single uniform standard, is preferable to a state-by-state patchwork of inconsistent laws that will create a disparate shopping experience for consumers from state to state. Similarly, we believe a federal rule should be specific enough to avoid varying interpretations, and that strong enforcement is critical to successfully implementing a new standard.

We strongly encourage the Administration, the FTC, Congress, and any other agency or state considering an all-in pricing requirement to ground their discussion in the principles of consistency, clarity, and strong enforcement to ensure both consumers and market participants are protected.

Finally, I'd be remiss if I didn't thank the Administration for acknowledging the significant concertation in the live events industry and highlighting that a lack of consumer choice with respect to ticket sales can exacerbate fees. StubHub believes it is past time for federal regulators and policymakers to take action to instill competition into the live events industry to benefit fans.

Thank you for the opportunity to participate today. StubHub looks forward to being a partner and resource in this conversation going forward.

Laura Dooley
Head of Global Government Relations