

January 10, 2020

Mr. Mohammad Aslami
Counsel
House Energy and Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515-6115
Mohammad.Aslami@mail.house.gov
Delivered via Electronic Mail

RE: Response to Committee's November 21st Letter

Dear Mr. Aslami and Honorable Committee Members,

Please find attached Tickets.com's formal response to the House Energy and Commerce Committee's letter dated December 12, 2019 to Tickets.com, LLC.

Thank you for the opportunity to assist the Committee's efforts to improve the ticketing industry and to ensure consumers have fair access to live entertainment and sports events.

Please let us know if you have any questions regarding our response.

Sincerely,

Joe Choti

President and CEO

DOCUMENT AND INFORMATION REQUEST

To assist the Committee in its investigation, please respond to the following questions by providing the requested documents and information:

Please note that throughout this response that references to "client organization" and/or "client" refer to Tickets.com's clients which typically operate one or more venues. References to "patrons" and "consumers" refer to individual ticket purchaser.

1. Please provide a list of all primary market ticket platforms and secondary market ticket exchanges, if applicable, owned or operated by your company, and the total number of tickets sold on each platform or exchange in 2018.

Tickets.com's primary ticketing platform is called ProVenue, which serves as the core of a comprehensive suite of products and services that are utilized by our 250 plus United States client organizations to sell tickets under their own brand. ProVenue is a white-label software as a service (SaaS) solution that is customized by each client organization for both box-office and online, including mobile, ticket sales. A company and product overview providing a summary of the ProVenue ticketing platform features and functionality is attached as Exhibit A. In addition to the ProVenue SaaS offering, Tickets.com also supports its legacy client-hosted software known as ProVenueMax.

In 2018, the total number of tickets sold by Tickets.com client organizations utilizing the ProVenue and ProVenueMax technology platforms for box office and online sales channels were as follows (rounded to the nearest thousand):

Tickets.com	Box Office	Online	Total
Ticket Sales	Tickets Sold	Tickets Sold	Tickets Sold
2018			

Online tickets sales by client organizations utilizing the ProVenue ticketing platform utilize either ProVenueOnline or MyProVenue functionality to sell client organization tickets under the client's branded purchase flow. There is no singular Tickets.com purchase flow for online ticket sales, but rather unique purchase flows for each client organization. Nor is there a singular Tickets.com patron account; patrons purchasing tickets may establish separate and unique user accounts with each client organization.

While Tickets.com operates a business to consumer website www.tickets.com, the website does not serve as a primary market ticket platform. Rather, the website is designed to help fans search and explore the world's live entertainment tickets and direct fans to client



organization websites to purchase tickets through the client branded, Tickets.com hosted, online purchase flow.

While Tickets.com has technology known as Replay, that ProVenue client organizations can utilize to facilitate secondary market ticket sales by their patrons, as of 2018, and currently, no United States client organizations are utilizing the secondary sales technology.

2. What fees does your company charge per ticket sale, and how are those fees calculated? Please provide a copy of any policies related to how your company sets and calculates fees.

Tickets.com does not set or influence the ticket prices or ticketing fees charged to consumers. All pricing and related ticketing fees charged to consumers are solely defined by and through client organizations.

Many, but not all, Tickets.com agreements with client organizations include fees paid to Tickets.com based on a per-ticket, per-order and/or method of delivery fee basis; however, it is solely the client organization's decision on whether to pass Tickets.com's service fees, in whole or in part, onto the client's patrons in the form of ticketing fees. Additionally client organizations may choose to set their own ticketing fees in which Ticktes.com may share a portion of those fees. Tickets.com fees based on ticket volumes generally only apply to online ticket sales; Tickets.com agreements typically do not include fees for box office sales.

Tickets.com charges its client organizations based on the estimated ticket volumes, cost of delivering ticketing services, hardware and infrastructure. Alternatively, Tickets.com agreements may include software license or subscription, credit card processing and/or other charges based on an array of premium features, functionality and services desired by the client organization.

Please see the response to Question 3 below for more detail on Tickets.com's ticket volume based revenue.

- 3. How much revenue did your company generate from ticket fees in calendar years 2016, 2017, and 2018?
 - a. Please provide this figure for each of your company's primary and secondary ticket sales platforms for each of the above years, if applicable.

The gross ticketing fee revenue generated by all U.S. Tickets.com client organizations utilizing the ProVenue and ProVenueMax technology platforms for box office and online sales channels, and Tickets.com's share of the gross ticket fee revenue was as follows (rounded to nearest thousand):

ProVenue	FY 2016		FY 2017		FY 2018	
	Gross Fees	TDC Fees	Gross Fees	TDC Fees	Gross Fees	TDC Fees
Primary						
Box Office						
Online						
Total Primary						
Secondary						
Replay						
Total Fees						

b. Do you share fee-generated revenue with any Major League Baseball (MLB) teams? If yes, what is the average percentage of fee-generated revenue that goes to MLB teams?



4. At what point during the purchase process does your company make the consumer aware of the type and amount of ancillary fees charged?

Tickets.com's ProVenue ticketing platform allows client organizations the option of configuring the purchase flow to make patrons aware of the type and amount of ancillary fees at various points.

In all instances, ancillary fees are displayed to the patron in the shopping cart prior to completing the purchase and in advance of requesting payment information. Additionally, if a client organization elects to utilize "all-in" pricing functionality, patrons purchasing tickets are presented with the total ticket cost, including ancillary fees, throughout the entire purchase process.

While "all-in" pricing provides a mechanism to present the patron a single ticket price that includes ancillary fees at the beginning of a purchase flow, disclosing some ancillary fees that vary based on patron choices (e.g. ticket delivery options) is impossible at the beginning of a transaction. Specifically, the following are examples of ancillary charges, which may be charged that are unknown prior to finalizing a purchase:

- a. Method of delivery fees, if any, which may vary based on how the ticket purchasers chooses to have the ticket delivered (e.g. overnight delivery versus standard post versus digital deliver);
- b. Per-Order processing fees, if any, are generally applied on a per-order basis which, depending on the client organization, may include tickets for multiple events, dates and seating locations in a single shopping cart;
- c. Parking Fees, if any, which are generally optional add-on fees elected by customer during the purchase process;
- d. Fees for other optional add-on or upsell items offered during the purchase process, including for example, a premium fee for concessions included with a game ticket, fees for promotional merchandise items or special offers for additional tickets; and
- e. Taxes which are determined by location and purchase total.

By necessity the above ancillary charges would be difficult, if not impossible to disclose, at the beginning of a transaction in an "all-in" manner, so are generally displayed in the shopping cart prior to the customer completing their purchase.



a. Where and how is this information communicated to consumers?

See Exhibit B attached hereto for screen shots of the purchases flows showing how ancillary fees are presented and displayed during several types of purchases flows, including the following:

- 1. Purchase flow where ticket price includes ancillary fees;
- 2. Purchase flow where displayed ticket price does not include ancillary fees;
- 3. Purchase flow with an optional upsell offer.

As shown in Exhibit B, example 2, the terms of use link available during the purchase process also includes information regarding ancillary fees that may be assessed during the purchase process. ProVenue functionality provides client organizations the ability to provide links to specific ticket terms and conditions and/or to require the patron's affirmative acknowledgment of such terms to complete a purchase.

b. Since January 1, 2016, has any federal, state, or local entity or individual taken legal action against your company regarding the lack of "all-in" pricing? If yes, please provide a list of such actions, the claim alleged in each action, and, if applicable, the results of any such action.

No. As noted above, Tickets.com's ProVenue ticketing platform includes functionality that permits client organizations, at their sole discretions, to display "all-in" pricing.



5. Regarding ticket refunds, in what instances does your company provide consumers with a refund for the total cost of the ticket, including any ancillary fees?

Tickets.com does not set the refund polices for tickets sold by its client organizations utilizing the ProVenue ticketing platform. Client organizations are solely responsible for determining whether refunds will include refunds of related ancillary fees. Client organization refund policies can vary from venue to venue, and at times by event within a venue, the reason for the refund and the type of ancillary fees.

a. Is your company's refund policy disclosed to the consumer during the transaction process? If yes, please explain what information regarding your refund policy is provided to consumers, how your company discloses this information to consumers, and at what point in the purchasing process this information is disclosed.

The ProVenue ticketing platform provides a variety of ways for client organizations to disclose refund policies to consumers throughout the purchase flow, including customized text information, web links to client organization specific terms and, optionally, requiring affirmative patron acknowledgement to complete a purchase.

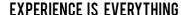
b. Please provide a copy of all policies related to ticket refunds.

Tickets.com does not set policies related to ticket refunds.

6. Does your company sell ticket insurance, or contract with or otherwise permit a third- party to sell ticket insurance on your platform or website? If so, please explain the ticket insurance that your company offers, including whether the ticket insurance is a set price or calculated based on the cost of the ticket, and what the ticket insurance covers.

Tickets.com has partnered with third-party integrators to, at the sole election of its client organizations, to offer patrons ticket insurance. Under Tickets.com's current ticketing insurance agreement, the optional patron ticket insurance premium is set by the provider at 5.75% of the face value of the ticket price (excluding ancillary fees), subject to a minimum premium of \$6.99. Coverage provides reimbursement for ticket costs up to \$10,000 if a customer cannot attend the ticketed event for a variety of reasons specified in the insurer's master policy subject to specified limitations, including the following:

- Illness or Serious Injury preventing the customer and companions from being able to use the event ticket, or if a family member is hospitalized or requires care;
- Traffic accidents & Automobile mechanical breakdowns that prevent the customer from getting to an event;



- Airline or other common carrier delays (including bad weather) that prevent a customer from attending the event;
- Uninhabitable home or business due to fire, flood, vandalism, burglary or natural disasters;
- Employer Termination providing protection in the event a customer is laid-off;
- Jury Duty that prevents a customer from attending an event;
- Work Relocation over 100 miles from your home at the time the customer purchased the ticket;
- Military Duty preventing a customer from attending the event; and
- Death of the ticket purchaser, an event companion, or immediate family member.
- 7. How does your company determine the number of tickets that will be sold or distributed for any given event that are 1) presales; 2) holds; 3) general sales; and 4) other categories of sales to the extent not already covered?

Tickets.com does not determine the number presales, holds, general sales or other categories of sales for any events sold by client organizations. Tickets.com's client organizations are solely responsible for determining the number of tickets sold or distributed in any given category.

The ProVenue ticketing platform includes functionality that allows client organizations, at their sole discretion, to configuration allocations for presales, holds, general sales and other categories.

8. Does your company disclose the total number of tickets available to the general public? If yes, when and how is this information conveyed to consumers?

Whether to disclose the total number of tickets available to the general public is a decision made solely by the client organization. While technologically it's possible to display available inventory versus total event capacity in the online purchase flow, this is not standard functionality and to date has not been requested by a client organization. However, if a client organization enables the seat-map view, a patron can see the total number of seats that the client organizations has made available at that moment in time.

a. Does your company disclose to the public the number of tickets sold in presale? If yes, when and how is this information conveyed to consumers?

The disclosure of the number of tickets sold as part of a presale is solely a decision made by the client organization, event promoter, artist or other third party.



b. Does your company disclose to the public the number of tickets held back for teams, sponsors, performers, or any other entity? If yes, when and how is this information conveyed to consumers?

The disclosure of the number of tickets held back for teams, sponsors, performers or any other entity is solely a decision made by the client organization, event promoter, artist or other third party.

9. Does your company sell tickets with limits on the transferability or resell of tickets, including limits on the mechanisms or platforms by which a ticket may be transferred? If yes, please describe such limitations in detail and the reasons for such limitations, including the following:

The ProVenue ticketing platform has a variety of features that a client organization, in its sole discretion, may utilize to control patron resale or transferability of tickets. These features include the following:

- Delayed Delivery
 - Tickets are not delivered to the patron until a date/time configured by the client organization
- Barcode Embargo
 - The ticket barcode, which is required for resale, is not available until a date/time specified and configured solely by the client organization.
- Ticket Forward Restrictions
 - Client organizations may configure the system to restrict patrons from forwarding tickets to another individual
- StubHub integration Restrictions
 - Client organizations may configure the system to prevent patrons from utilizing the StubHub resale integration.
 - If a client organization elects to restrict patron access to the StubHub resale integration, patrons may still post tickets to StubHub and other secondary marketplaces independently.
 - a. For calendar years 2016, 2017, and 2018, please provide the percentage and number of tickets sold that included limits on transferability or resell limitations, including limits on the mechanism or platforms by which a ticket may be transferred. If transferability is limited for only a portion of tickets or certain kinds of tickets for any given event, please explain.

The limitation of ticket transferability and resale is determined and controlled solely by client organizations. To that end, Tickets.com does not have nor maintain the requested sales data.



b. At what point in the ticket purchasing process are consumers informed that tickets contain transferability or resale limitations? Please explain where and how this information is communicated to the consumer.

Client organizations that impose transferability or resale limitations, my present a disclaimer in the sales flow at the time of seat selection, at checkout, and/or in the order confirmation. Client organizations can optionally require patrons to affirmatively acknowledgment such restrictions to complete a ticket purchase.

c. To the extent that a transfer or resale is done using technology used, owned, or operated by your company or any parent or affiliated company, what information about the consumer and the transfer is collected; for what purposes is such information used; is the information shared with third parties and, if so, for what purpose; and how is the consumer informed of such information practices?

When a client organization enables a patron to utilize the StubHub resale integration, the following secondary purchaser's information is collected at the order level each time a ticket is resold for purposes of validating and servicing the ticket:

- Data & Time of Secondary Purchase
- Seller proceeds (how much they sold it for)
- Original Value of the Ticket
- Buyer's Name
- Address
- Phone number
- Email
- Gate Scan information

The secondary purchaser is recorded as the attending patron. The aforementioned information belongs exclusively to the client organization and is not shared by Tickets.com with any third parties.

d. Please provide all policies related to the related to the transferability or resell limitations of tickets.

All ticket transferability and resell limitation policies are set and communicated solely by the client organizations.



10. What mechanisms does your company have in place to ensure that consumers are afforded a reasonable opportunity to obtain face-value tickets? What analysis has your company completed to determine the effectiveness of these mechanisms?

Tickets.com provides a variety of technological solutions that client organizations may optionally utilize, to ensure that consumers are afforded a reasonable opportunity to obtain face-value tickets.

Available System Configurations

- Protected promotions
- Account-specific offers
- Single-use offer codes
- Geographic sales restrictions
- Event run purchase limits
- Ticket quantity limits

Internal Blacklists

Tickets.com maintains and blocks purchases from known malicious purchasers by

- IP addresses
- Email addresses
- Credit Cards.

External Traffic Modeling

To thwart BOT attacks, online purchase flow traffic may be profiled through a third party provider who inspects all traffic attempting to access purchase flows utilizing default rules and Artificial Intelligence (AI) to determine its legitimacy (i.e. to prevent and block automation and scripters).

Ticket Transferability and Resale Controls

The transferability and resale controls, as specified in response to Question 9 above, can further aid in insuring that patrons have access to face-value tickets as noted by the New York Attorney General in its investigation of ticketing industry practices (see http://www.ag.ny.gov/pdfs/Ticket_Sales_Report.pdf) recommending that New York end its ban on non-transferrable paperless tickets to effectively reduce ticket broker activity and by extension increase the availability of face-value tickets for the general public.



11. Does Tickets.com disclose the use of dynamic pricing to fans?

The use and related disclosure of dynamic pricing policies is at the sole discretion of client organizations.

The ProVenue ticketing platform provides client organizations a variety of tools that could be utilized to analyze ticket sales and make pricing decisions. Once pricing decisions are made, client organizations can adjust ticket prices manually through the ProVenue user interface or by utilizing the price file import utility. Client organizations may also engage third party integrators to assist in price changes recommendations.

a. Who determines whether dynamic pricing will be used?

Use of dynamic pricing is at the sole discretion of the client organizations.

b. Has Tickets.com ever provided recommendations, advice, guidance, or instructions to teams on whether to use dynamic pricing? If yes, please describe.

No. Tickets.com does not provide recommendations, advice, or guidance to client organizations on use of dynamic pricing other than providing access to the tools mentioned above.

Exhibit A

Question 1 - Tickets.com Company & Product Overview





PRODUCT & SERVICES OVERVIEW



- FULLY CUSTOMIZABLE WHITE LABEL WEBPAGES
- MOBILE-FIRST APPROACH

CREATE MORE OPPORTUNITIES TO SELL MORE TICKETS

- YOUR BOX OFFICE
- YOUR WEBSITE
- YOUR LOYAL CUSTOMERS



TRACK AND UPDATE ALL INTERACTIONS WITH YOUR PATRONS



INTERACTIVE SEAT MAPS

CREATE TARGETED MARKETING CAMPAIGNS

ANALYZE TRENDS AND DEVELOP METRICS



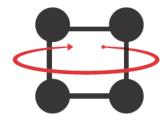


MANAGE BOX OFFICE EFFICIENTLY AND COST EFFECTIVELY



USER-FRIENDLY INTERFACE

TRAINING YOUR STAFF IS QUICK AND EASY



OPEN ARCHITECTURE PROVIDES A

360° V I E W

SEAMLESSLY INTEGRATE TICKETS.COM PRODUCTS AND SERVICES, AS WELL AS THIRD-PARTY APPLICATIONS



OFFER PATRON
UPSELLS,
CROSS-SELLS AND
PATRON-SPECIFIC
OFFERS

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COMPANY OVERVIEW

Tickets.com is a leading provider of fully integrated event ticketing solutions and services for hundreds of top arts, entertainment, and sports organizations worldwide. Delivering the latest in ticketing technology, Tickets.com offers the advanced ProVenue® ticketing platform, which serves the core of a comprehensive suite of integrated features, products, and services that help clients enhance ticket sales, marketing efforts, and the overall customer experience.

Tickets.com is headquartered in Costa Mesa, California, and has regional offices across the U.S. and internationally in the United Kingdom, Netherlands, Germany and Australia.

For more information please visit www.tickets.com/provenue

PROVENUE® TICKET INVENTORY MANAGEMENT

Complete control in one place. All inventory is controlled through one application: ProVenue. The Tickets.com ProVenue platform is a full service, integrated ticketing solution designed to enable you to sell tickets to patrons under your own brand. ProVenue clients capture, access and own patron data, providing venues with a 360° view of the buying habits and preferences of your patrons. Our browser-based, hosted web application can go with you anywhere.

WHITE LABEL SOLUTION

Our business model enables venues to highlight their brand while selling tickets. Your patrons interact directly with your brand throughout the entire purchase experience.

BUILT WITHOUT LIMITS

The ProVenue platform has no virtual limit on the number of venues, hold codes, events, packages, buyer types, price scales, prices, and service charges that can be set in service of a single organization or multiple organizations.

MYPROVENUE™ MOBILE FIRST APPROACH

MyProVenue is a next-generation web application, entirely devoted to optimizing the patron's desktop and mobile ticketing experience. The intuitive interface streamlines the actions of buying tickets and managing account preferences, all within a responsive framework that works flawlessly on any device. MyProVenue focuses on the patron experience, providing a higher level of flexibility and usability compared to traditional e-commerce platforms.



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Tickets.com/provenue | sales@tickets.com

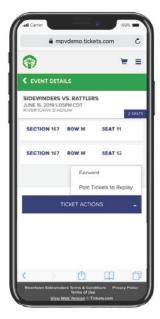


MYTICKETS™

PATRON'S MANAGE THEIR TICKETS

Put the power in your patron's hands. Managing inventory from a computer or mobile device has never been easier! Patrons are able to redeem vouchers online as well as print, donate, forward, exchange or resell their tickets all from within their MyTickets account.

Patrons can easily manage their ticket inventory on the go, including forwarding and retracting unused tickets up to the very last minute before an event.



1 SELECT AN ACTION

Patron logs into MyTickets and selects the appropriate action for making a change to their ticket inventory

2 SELECT SEATS

Patron selects the seats they want to forward, exchange, donate or resell

3 CONFIRM AND PROCEED

MyTickets processes the change

PAYMENT FLEXIBILITY

Allow your patrons to decide which payment method is right for them. In addition to traditional payment card options and digital wallet support, Tickets.com offers the PayPal® e-commerce payment method for online purchases.

TICKET PAYMENT PLANS

ProVenue supports the creation of flexible payment plans that can be used for both box office and online transactions. Various permissions and settings determine which payment plans can be used for specific orders. For box office sales, certain users can be configured to create their own ad hoc payment plans if desired.

Payment plans can also be linked to scheduled payments where future installments are automatically charged to specific credit cards. Support includes the ability to use multiple cards for a single installment and/or different cards for each installment.

TICKET RESALE OFFERINGS

Tickets.com offers a variety of solutions and integrations for ticket resale that patrons can access through their MyTickets account.

Our Replay™ technology allows venues to take control of the secondary market. Rather than monitoring and relying on third-party sites for your venue's secondary market ticket sales, Replay allows you to track and manage pricing and transactions all from within ProVenue.

Our Consign-Back™ solution allows patrons to resell unused tickets directly through primary ticket sales channels with no financial risk to the venue.

Patrons can also easily resell tickets directly on the StubHub® website or post tickets to StubHub through their MyTickets account. No matter which path is chosen, patron data is captured and sent to our ProVenue ticketing system.

OPEN ARCHITECTURE & REGISTERED DEVELOPER PROGRAM

The Registered Developer Program allows clients and third-parties to develop their own applications utilizing Tickets.com data services. The program benefits patrons, venues, and third-party solution providers. We provide developers with the tools necessary to seamlessly integrate their technology with the ProVenue platform. Our all-star lineup of Registered Developers gives you access to leading industry technologies.

ALFRED

Tickets.com has developed and introduced the 'Alfred' solution to several venues. With Alfred, Tickets.com is the first to bring the convenience of Near Field Communication (NFC) via Apple® Wallet to the ticketing market.

Using NFC, Alfred allows the patron to choose frictionless venue entry, streamlining attendance for both the patron and the venue worker. In contrast to conventional barcode scanning, the new NFC option allows patrons to enter the venue simply and securely with a push of the home button or through facial recognition on their Apple iPhone® or Apple Watch®. Alfred offers the NFC option in addition to traditional entry methods.



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THIRD-PARTY ACCESS CONTROL SOULTIONS

Tickets.com also provides an integration to GateLink, the third-party Access Control solution from Alvarado. ProVenue provides ticket/transaction information in real-time so that tickets can be validated via the local Access Control server, admitting only authorized fans and returning scan information back to ProVenue.

IMPLEMENTATION SERVICE & SUPPORT

Best-in-class service from Tickets.com begins prior to selling a ticket from the ProVenue platform. We work with venues to design a transition plan that sets the tone for our partnership and mutual success, placing a high emphasis on communication, transparency, and training.

We recognize that each venue has unique needs and business requirements. Therefore, each implementation and training plan is customized based on an operational assessment performed by Tickets.com.

Once implemented, Tickets.com provides supportviaphone, emailand our ServiceNow client portal. ServiceNow tracks requests and incidents, and allows clients to access product release notes and the ProVenue Knowledge Base. The ProVenue Knowledge Base includes training, best practices, and ProVenue Quarterly Client Education Session recordings.

JOIN THE MOVEMENT

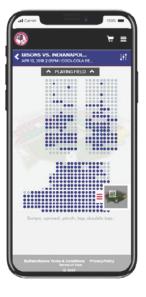
Contact <u>sales@tickets.com</u> or visit us at <u>tickets.com/provenue</u>



INTERACTIVE SEAT MAPS

Well-designed venue maps communicate a professional image for your organization. Having venue maps that truly reflect your brand with an intuitive design decreases abandonment while increasing checkouts.





ADVANCED REPORTING TECHNOLOGIES

The ProVenue® Reporting Portal offers a versatile alternative to running reports directly from within ProVenue—providing reporting capabilities for users with or without access to core ProVenue features ('report-only' access for promoters, for example).

Users can easily run, schedule, and receive various reports while operating outside of the Tickets.com® Virtual Private Network. The Reporting Portal includes standard reports adapted from the ProVenue ticketing system, as well as new reports available exclusively in the Reporting Portal. Optional design privileges are also available for custom reporting and data analysis using the Ad Hoc Designer.

MARKETING CAPABILITIES

Reward your most loyal patrons! Set up Targeted Promotions to incentivize or reward your most prized customer-base by giving them online access to special presales, VIP seating areas, and/or targeted discounts via their MyTickets account.

We'll help you maximize attendance and drive sales for your events by delivering industry-leading products and services, and by creating a collaborative community that fosters innovation and growth.

Tickets.com trusted partner, Fan Interactive, can help you focus on digital advertising based on data for Search Engine Marketing (SEM), retargeting, Facebook and other social channels.

CUSTOMER RELATIONSHIP MANAGEMENT (CRM)

ProVenueForce™ is Tickets.com's premium Customer Relationship Management (CRM) solution—a seamless, end-to-end integration between ProVenue® and Salesforce®, the market leader in CRM. Your Salesforce instance will deploy pre-configured for your operation—with your ProVenue patron and order data flowing—on Day One.

The Tickets.com Registered Developer Program (see next page) includes several additional CRM solutions that allow your data to seamlessly flow between ProVenue and your CRM platform. These integrations take advantage of our new ProVenue CustomerConnect Data Feed which delivers patron and transaction activity in near real-time.

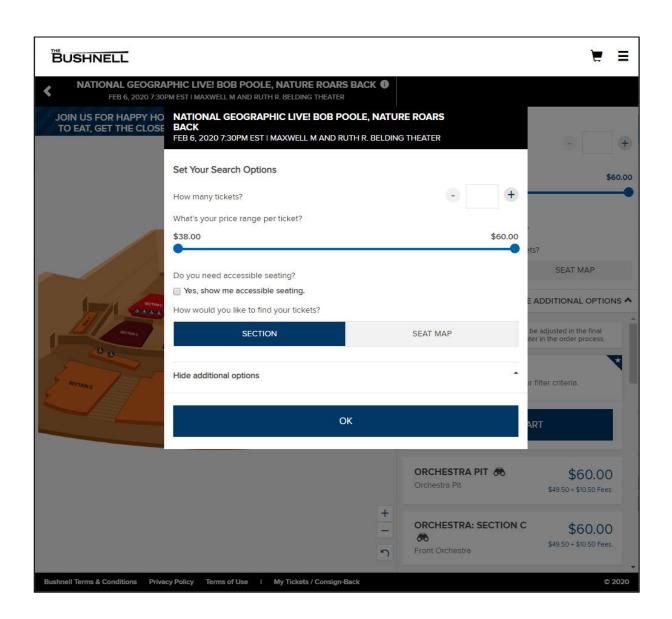
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Exhibit B

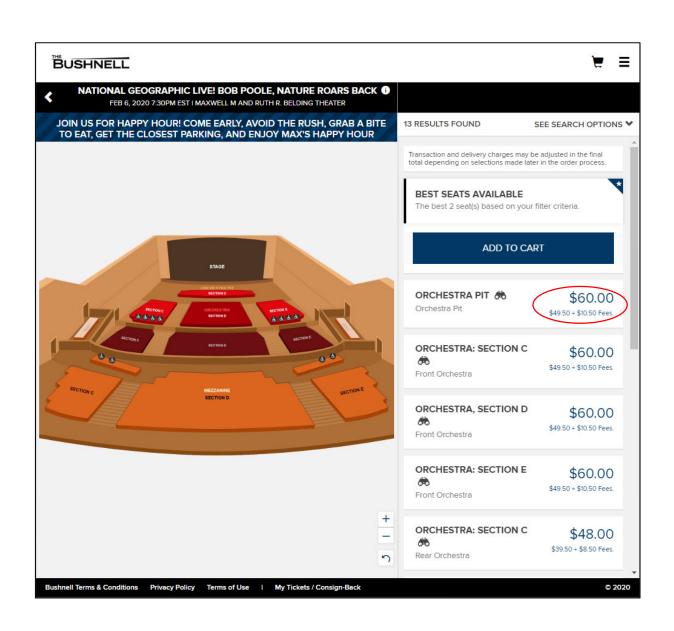
Question 4a. – Examples of Ticket Purchase Flows

Question 4a. – ProVenue Ticket Purchase Flow Examples

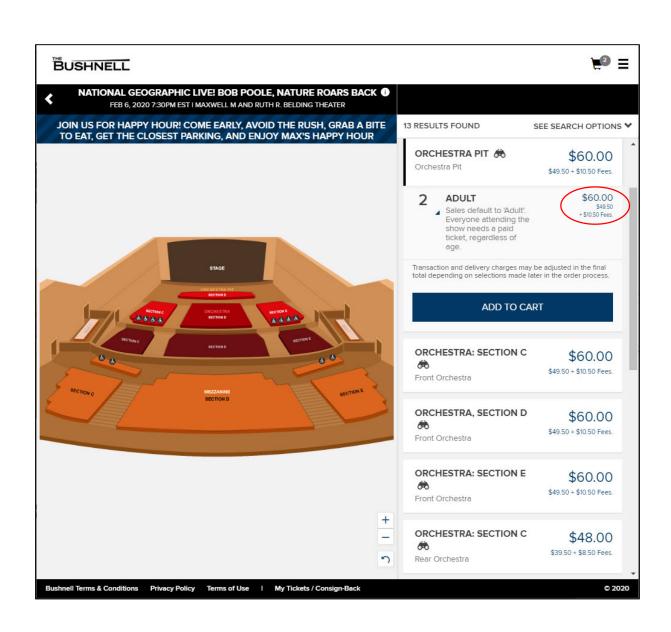
1. Purchase flow where ticket price includes ancillary fees



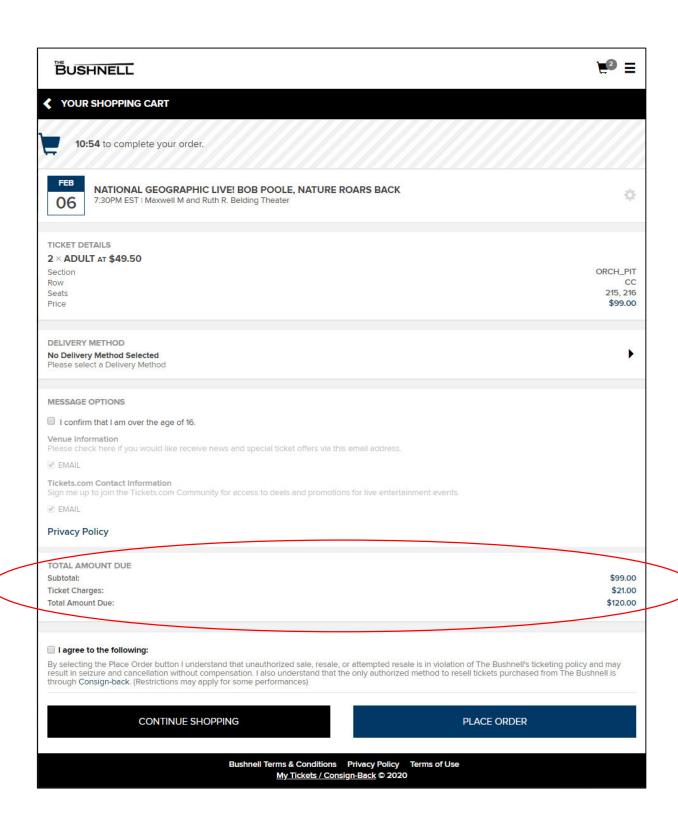
All-in Pricing - Search Options



All-in Pricing – Available Seating

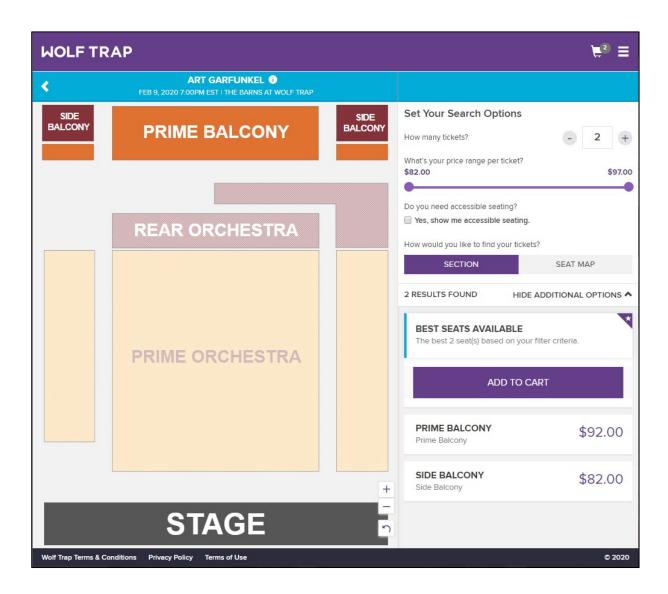


All-in Pricing – Add to Cart

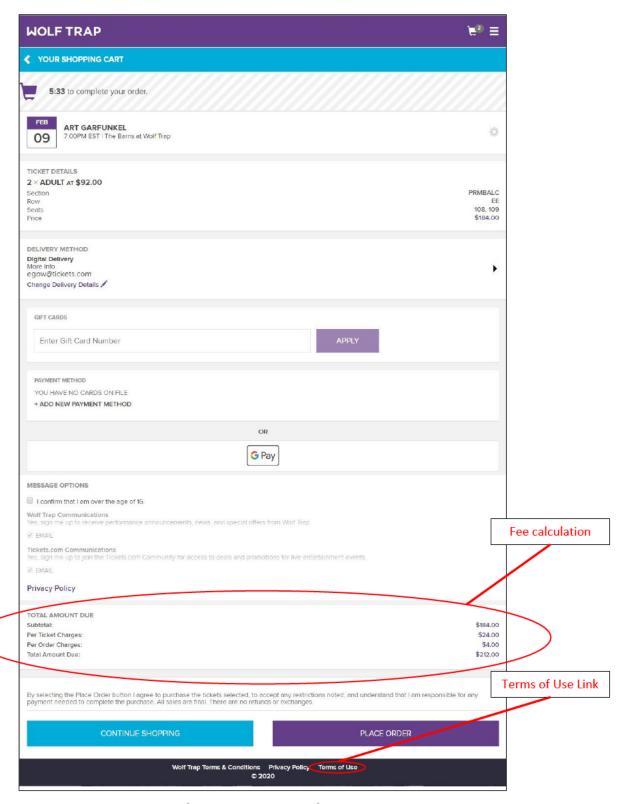


All-in Pricing - Shopping Cart

2. Purchase flow where displayed ticket price does not include ancillary fees



Pricing without Fees – Search Options



Pricing without Fees - Shopping Cart

give rise to civil liability or otherwise violate any law; (iv) creates or attempts to create any liability of the Company, (v) contains advertising or any solicitation with respect to products or services, unless we have approved such material in writing, in advance of its transmission; (vi) introduces any program, executable file or routine (such as a worm, Trojan horse, cancelbot, time bomb or virus) into our system for any purpose, irrespective of whether any such program or routine results in detrimental harm to our system or our data; or (vii) threatens the continuous services of our ISP's, suppliers and vendors.

Any conduct by you that in our sole discretion restricts, inhibits, or interferes with any other consumer from using or enjoying this Website is expressly prohibited.

5. Transaction and Processing Fees

There is no fee for accessing this Website and viewing our content and the content of third parties that we display.

If you decide to purchase tickets or other merchandise, you agree to pay, in addition to the price for the ticket or merchandise, other fees and charges that we may impose, including but not limited to,, convenience fees, processing fees, method of delivery fees and other miscellaneous fees. The amount of each fee may vary, depending on the tickets or merchandise you purchase and the method you select to receive your tickets or merchandise.

Fees and charges, including (but not limited to) charges for issuance, convenience, handling, processing, shipping, delivery, (including but not limited to, charges for Federal Express or other courier delivery), and any other miscellaneous charges assessed by us represent, among other things, the costs we incur in providing our goods and services to you. The fees and charges we assess may be greater than our actual cost of providing those services, and we may retain a portion of all such fees and charges as profit.

For example, we retain as profit, a percentage of what we charge you for FedEx delivery of your tickets or merchandise. Our profit may vary from transaction to transaction, depending upon such factors as (for example) the "zone" to which your tickets or merchandise are shipped, the delivery time you request (express, overnight, 2-day or 3-day) and the size and weight of your package.

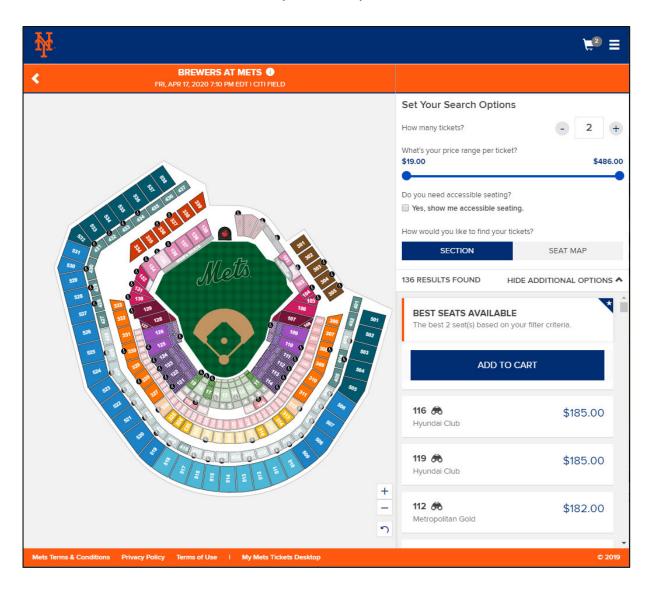
You are urged to review all pages displayed during your completion of a purchase. All fees and charges related to your transaction will be disclosed to you during the purchase process. If you do not agree to pay the fees or charges associated with your purchase, you may cancel your transaction.

6. Links to Other Websites

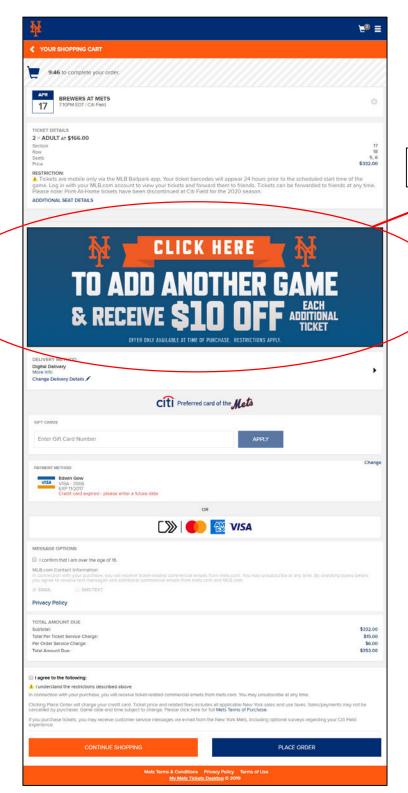
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3. Purchase flow with an optional upsell offer

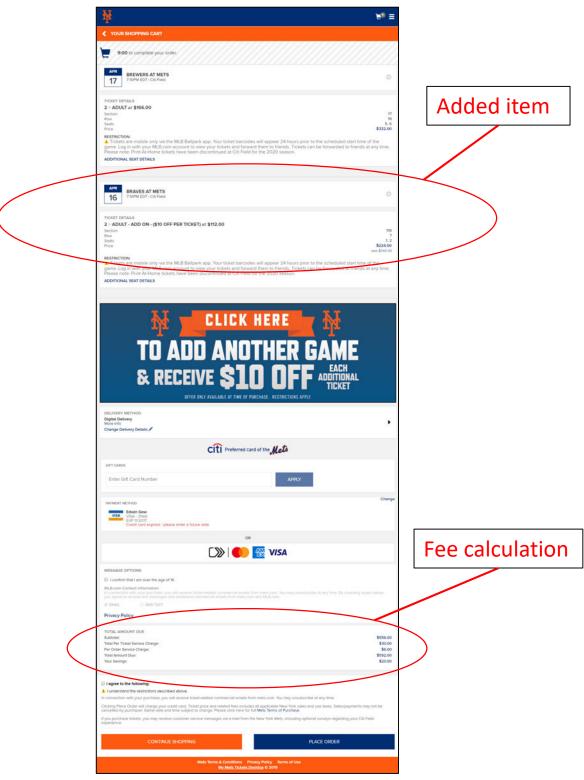


Upsell Offer – Search Options



Upsell Offer – Shopping Cart

Upsell offer



Upsell Offer – Shopping Cart with Additional Item