

INFORMATION AND DOCUMENT REQUEST

1. Does your company have a contract(s) and/or agreement with a primary ticket platform to provide ticket services for your company's live events?

Yes, the Buffalo Bills is party to an agreement with a primary ticket platform, Ticketmaster, L.L.C., for ticketing services (the "Ticketing Agreement").

1.1. If yes, what are the parameters of the contract, including but not limited to restrictions on transferability, fees, and resale guidelines.

The provisions of the Ticketing Agreement are subject to confidentiality requirements. However, as it relates to the nature of this question, the Buffalo Bills do not restrict the transfer or resale of tickets and do not charge fees for the same. If a consumer wishes to resell its tickets outside of the digital ticketing platform environment, we provide a paper ticket to the consumer upon their request at no additional charge.

2. Does your company have a contract(s) with a secondary market ticket exchange to provide ticket resale services for your live events?

The Buffalo Bills participate in the NFL Ticket Exchange as an authorized secondary marketplace, pursuant to a contract between the NFL and Ticketmaster.

2.1. If yes, what are the parameters of the contract, including but not limited to restrictions on transferability, fees, and resale guidelines.

As noted above, the Buffalo Bills participate in the NFL Ticket Exchange as an authorized secondary marketplace pursuant to a contract between the NFL and Ticketmaster. The Buffalo Bills are not in a position to be able to disclose the specifics of the agreement because of confidentiality obligations; however, there are no prohibitions on the transferability of Bills tickets either within or outside the NFL Ticket Network and the Network provides several consumer friendly benefits, including authenticated tickets, instant delivery of tickets, and other protections against fraud.

3. Does your organization use a team-sponsored market place for ticket exchanges or resale tickets?

No.

4. What fees does your organization charge per ticket sale, and how are those fees calculated?

The fees charged per ticket sale in addition to the ticket face value vary depending on (1) the type of event, and (2) whether the ticket is purchased through the Buffalo Bills or the ticketing service provider. The fees include a service charge and, if applicable, a credit card fee.

4.1. Please provide a copy of any policies related to how your company sets and calculates fees.

The Buffalo Bills do not have a policy relating to setting fees. The fees are established pursuant to a negotiated Ticketing Agreement with the ticket service provider, the specific terms of which are subject to confidentiality obligations.

4.2. Does your company charge a facility fee?

The Buffalo Bills charges a facility fee for certain non-football game events.

4.3. Does your company charge a delivery fee for mobile or print at home tickets?

No.

5. What expenditures, if any, are associated with each fee charged per ticket sale?

Expenditures associated with each fee charged per ticket sale includes software and licensing fees.

6. For live events held in New York State in 2018 and 2019, please provide the average mark up of resold tickets above face value for:

6.1. All events; and

The Buffalo Bills are aware of the following figures responsive to your request. Please note, these figures are derived by a third party and do not reflect any firsthand information on the Buffalo Bills' part.

2019 142,081 tickets resold: 6% above face value

2018 144,423 tickets resold: -27% below face value

6.2. Sold out events.

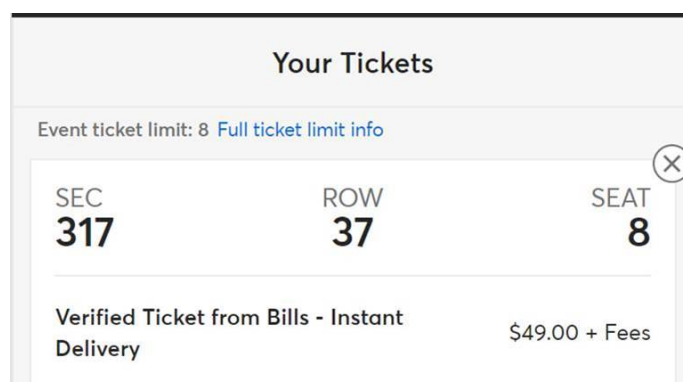
No sold out events during this timeframe.

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

The consumer is informed of the types and amounts of ancillary fees after they have selected their seats as they begin the checkout process, but before the purchase is completed.

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

While ticket shopping on the website, the consumer would first see this:



When the consumer selects their seats and moves forward toward purchase, they are shown the following:

Order Details	
	Cancel Order
1 Verified Ticket from Bills - Instant	\$49.00
Delivery ▾	(\$49.00 x 1)
Fees	
\$7.70 (Service Fee) x 1	\$7.70
Order Processing Fee	\$3.25
Delivery ▾	FREE
Total	\$59.95
By continuing past this page, you agree to our Terms of Use .	
Next	

8. Does your company use all-in pricing for events in New York State?

No.

9. Does your company charge a fee for the transfer of a live event ticket in New York State?

No.

9.1. If yes, please provide all policies related to fees on ticket transfers.

Not applicable.

10. Does your company work with, own, or operate any platform and/or website that make any representations of affiliation or endorsement to your organization when in fact no formal affiliation or representation exists (also known as white-label websites)? If yes, please provide a list of these websites and explain:

No.

10.1. How your company coordinates with any such websites, including the sharing of technology and/or sales inventory.

Not applicable.

10.2. If and how your company notifies consumers that the website and/or platform is not endorsed or affiliated with the venue, team, or artist represented on your company's properties.

Not applicable.

11. Does your company sell tickets with limits on the transferability or resale limitations 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 Buffalo Bills do not limit the transfer or resale of tickets. If a consumer wishes to resell its tickets outside of the digital ticketing platform environment, we provide a paper ticket to the consumer upon their request at no additional charge.

11.1. What party is responsible for deciding whether tickets to live events in New York State will include non-transferrable tickets?

Not applicable.

12. Does your company permit ticket vendors to promote resale tickets for live events when primary sale tickets are available?

Yes.

12.1. Does your organization receive any monetary benefit for promoting secondary sales/resale tickets over primary ticket sales?

The Buffalo Bills does not receive monetary incentives to prioritize secondary ticket sales over primary ticket sales. The Buffalo Bills prefers consumers purchase primary tickets directly from the Buffalo Bills and engages in significant promotional efforts to encourage consumers to purchase directly from the Buffalo Bills.

13. For each of the 5 highest grossing sporting events held in New York State in 2018 and 2019, please provide the percentage a resale ticket was sold when a comparable primary ticket was available (ex: same section).

The Buffalo Bills is not in possession of this information.

14. Does your company “mark down” resale ticket prices, also known as “drip pricing?”

No.

14.1. This practice may include but is not limited to reducing the up-front price of a ticket, but adding the amount of the reduction (or more) into the fees charged later in the transaction.

No.

15. Does your company set price floors for resale tickets to live events in New York State?

On the NFL Ticket Exchange marketplace, the official ticket resale marketplace for Buffalo Bills football games, the Buffalo Bills sets price floors for resale tickets to Buffalo Bills football games, which floors are well below the face value of the ticket. The price floors ranged from \$5 to \$40 for regular seats (depending upon the game) to \$100 for club seats. However, consumers are free to resell tickets outside of the NFL Ticket Exchange marketplace where the Buffalo Bills do not and cannot set a price floor.

15.1. If yes, please provide the total number of live events that had a price floor set for resale tickets for the calendar years 2018, 2019.

In total, the Buffalo Bills set a price floor for resale tickets on NFL Ticket Exchange for 20 games total during the 2018 and 2019 calendar years.

16. Does your organization permit the sale of speculative tickets for your organization's live events?

The Buffalo Bills does not authorize the sale of speculative tickets for its live events. Because the Buffalo Bills does not control the secondary market or ticket resellers, it cannot confirm whether ticket resellers attempt to sell speculative tickets. As noted above, the Buffalo Bills participate in the NFL Ticketing Network, where one of the benefits offered to users is the ability to purchase authenticated resale tickets.

16.1. What disclosure does your company make to alert consumers of the speculative nature of the ticket and how and when in the purchase process is this disclosure made?

The Buffalo Bills does not authorize the sale of speculative tickets for its live events.

16.2. What actions has your company taken to address speculative tickets sold on your company's platform, including legal or other actions taken to enforce your company's speculative tickets policy?

On NFL Ticket Exchange, a genuine ticket barcode is required in order for a reseller to post tickets for resale.

16.3. In the past year, have any speculative tickets for live events in New York State been sold to an event held by your organization?

Because the Buffalo Bills does not control the secondary market or ticket resellers, it cannot confirm whether ticket resellers attempt to sell speculative tickets.

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

No.

18. Does your organization sell a percentage of tickets directly to brokers and/or broker organizations?

The Buffalo Bills do not allocate a percentage of tickets for sale to ticket broker or ticket broker organizations. Consistent with applicable law, ticket brokers or ticket broker organizations can purchase tickets pursuant to the same policies that apply to all other consumers.

19. What market-based approaches does your company use or offer clients the option to use to address concerns regarding secondary market activity? Examples of approaches include, but are not limited to, delivery delays, dynamic pricing, verified fan programs, and face-value resale exchanges.

The Buffalo Bills uses a dynamic pricing approach to more closely align pricing for tickets based on the demand in the market for particular events.

20. Does your company have protocols in place to ensure that tickets sold for your organization's events are not purchased using bots or fictitious accounts?

The Buffalo Bills' ticketing provider uses a verification mechanism when processing ticket sales.

20.1. What analysis has your organization completed to determine the effectiveness of these protocols?

The verification mechanism is operated by a third party who is obligated to establish verification mechanisms to combat bots and fictitious accounts. The Bills have not independently conducted an analysis to measure the effectiveness.

21. Does your company have protocols in place to ensure that consumers are afforded a reasonable opportunity to obtain face-value tickets?

The Buffalo Bills sets ticket limits and facilitates a number of presales and group ticket promotions in an effort to create opportunities for consumers to obtain face-value tickets. As noted above, the Buffalo Bills also engages in significant promotional efforts to encourage consumers to purchase face-value tickets directly from the Buffalo Bills.

However, under NYS law, the Buffalo Bills are not able to legally control whether a purchaser obtains tickets for him or her own personal use, or if the purchaser is a ticket broker who intends to resell on the secondary market for profit.

21.1. What analysis has your company completed to determine the effectiveness of these protocols?

Not applicable, as these are not formal protocols but instead represent ongoing best efforts.

22. Does your company have protocols in place to ensure ticket purchase limits are enforced?

The Buffalo Bills make reasonable efforts to enforce ticket purchase limits but cannot control if "strawmen" purchase tickets for a broker beyond the ticket limit.

22.1. What analysis has your company completed to determine the effectiveness of these protocols?

Not applicable.

23. Does your organization take any proactive measures to restrict ticket sales in the secondary market?

No, in accordance with NYS law, the Buffalo Bills do not restrict ticket sales in the secondary market.

24. Does your organization disclose the use of dynamic pricing to consumers?

Yes.

24.1. Who determines whether dynamic pricing will be used?

The Buffalo Bills determine for football games and the promoters determine for their respective events.

25. Does your organization have a ticket exchange program wherein a season ticket holder could submit a ticket for resale upon certain conditions?

No.

26. Does your company contract with credit card companies to permit cardholders or card members exclusive access to tickets, seats, presales or packages through your company's primary ticket platform or secondary ticket exchange (if applicable)?

No.

26.1. If yes, please provide the parameters of the contract.

Not applicable.