UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

GRACE MURRAY, AMANDA ENGEN, JEANNE TIPPET, STEPHEN BAUER, ROBIN TUBESING, NIKOLE SIMECEK, MICHELLE MCOSKER, JACQUELINE GOFF, and HEATHER HALL, on behalf of themselves and others similarly situated,

Case No. 19-cv-12608-WGY

Plaintiff,

v.

GROCERY DELIVERY E-SERVICES USA INC. DBA HELLO FRESH,

Defendant.

Economic Assessment of Remedial Relief in Connection with Class Action Settlement Agreement

March 5, 2021

Prepared by

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ECONOMIC ASSESSMENT OF THE VALUE OF REMEDIAL RELIEF

I. Introduction

A class action settlement was reached on behalf of all persons in the United States from September 5, 2015 to December 31, 2019 to whom HelloFresh, either directly or by a vendor of HelloFresh, (a) placed one or more calls on their cellphones placed via a dialing platform; (b) placed at least two telemarketing calls during any 12-month period where their phone numbers appeared on the NDNCR for at least 31 days before the calls; and/or (c) placed one or more calls after the consumer requested their telephone number be placed on HelloFresh's Internal DoNot-Call List. The lawsuit alleges that such contact by Defendant Grocery Delivery E-Services USA, Inc. DBA Hello Fresh, violated the Telephone Consumer Protection Act, 47 U.S.C. § 227, et seq. (the "TCPA").

The Defendant denies each allegation of unlawful conduct, any wrongdoing, and any liability whatsoever, and no court or other entity has made any judgment or other determination of liability. HelloFresh further denies that any Class Member is entitled to relief and, other than for settlement purposes, that this Action is appropriate for certification as a class action.

All parties have agreed to settle this lawsuit pursuant to a Settlement Agreement ("Settlement Agreement and Release") to avoid further burden and expense of protracted litigation and to be completely free of any further controversy with respect to the claims asserted in the class action litigation. The Settlement Agreement is a compromise of disputed claims and does not mean Defendant Hello Fresh is liable or did anything wrong. The Court has scheduled a settlement final approval hearing to determine whether the settlement is fair, reasonable and adequate.

Plaintiffs' counsel retained the undersigned economist, Jon Haghayeghi, Ph.D., to assess (the "Assessment") the benefits accruing to class members from the remedial relief the Settlement Agreement provides. The Assessment includes reviewing, analyzing and evaluating the economic impact of the Settlement Agreement, and identifying the net benefits conferred on members of the class. The Assessment also identifies and measures other positive externalities inuring to the favor of non-party beneficiaries and related parties. The Assessment measures the aggregate economic value of the Settlement to class members against the backdrop

¹Grace Murray, on behalf of herself and others similarly situated, Plaintiff v. Grocery Delivery E-Services USA Inc. DBA Hello Fresh, LLC, Defendant, in the United States District Court of Case No.2:19-cv-12608-WGY, United States District Court for the District of Massachusetts, Settlement Agreement and Release.

of conventionally accepted measurement methodologies extant within the discipline of economics and its sub-field, cost-benefit analysis.

It merits noting that the Assessment's quantitative analysis includes the monetized value of non-monetary remedial relief inherent in the Settlement Agreement. By agreeing to change its practices to avoid non-compliance with the TCPA, Defendant Hello Fresh has set in motion a series of positive benefits that may be readily valued for a broad swath of society.

In summary, the undersigned economist believes the Settlement Agreement has far-reaching societal effects and bestows positive economic externalities reaching well beyond the benefits directly bestowed on the parties subject to the Settlement Agreement.

II. QUALIFICATIONS

Dr. Haghayeghi joined J. Herbert Burkman & Associates economics consulting firm in 2009. He earned his bachelor's and master's degrees in Economics from Southern Methodist University, Dallas, Texas. In 2012, Dr. Haghayeghi represented the United States at the Institute for Studies on Economics and Employment, a conference hosted by Nobel Laureates in Economics in Iseo, Italy. He earned his Ph.D. in economics in 2017 from the Department of Economics, Claremont Graduate University, Claremont, California. Dr. Haghayeghi wrote his dissertation on weak-form efficiency in U.S. equity markets under the guidance of Dr. John Rutledge. Throughout his tenure in his doctoral program, he taught courses at California State Polytechnical University in the Department of Finance, Real Estate, and Law, Pomona, California.

Dr. Haghayeghi has taught at Loyola Marymount University, Department of Economics, Los Angeles, California. He has also taught valuation seminars in Las Vegas and San Diego, 2014 and 2017 respectively, to members of American Rehabilitation Economics Association on calculating economic damages. Dr. Haghayeghi currently serves as the Executive Director of the State of Alaska's Commercial Fisheries Entry Commission, a quasi-judicial agency dedicated to preserving the economics of commercial fishing for the state.

III. ECONOMICS OF THE SETTLEMENT AGREEMENT

As noted in the introduction, the discipline of economics provides the theoretical framework and quantitative methods central to assessing the benefits accruing to all persons affected by the Settlement Agreement. With respect to the

settlement, review and analysis have identified the following benefits inuring to the class and a broad spectrum of society:

1) Economic Benefit

The first economic benefit to consumers is the value of provided by a change in Hello Fresh's behavior. Ceasing the calling conduct assures all current and future targeted consumers will not experience interference of privacy from telemarketing calls by Hello Fresh. In this matter, the absence of telemarketing calls from Hello Fresh, assures privacy from telephone calls from HelloFresh. At the same time, revised practices assure Hello Fresh that in the future consumers may not challenge its telemarketing practices. The revision of practice has three broad categories of beneficiaries, including 1) targeted consumers 2) Hello Fresh, and 3) society in general. Revisions to practice represent assured privacy to consumers and relief of displeasure. It is understood that the pre-class action lawsuit status quo has been permanently altered.

2) Determining Willingness-to-Pay

In order to determine a reasonable aggregate value of the relief brought about by the production of settlement-compliant (i.e. improved) products and services, economists rely on the methods and procedures established in the discipline of economics and its sub-field, cost-benefit analysis (CBA). In assessing benefits, cost-benefit analysts routinely rely on consumers' willingness-to-pay to gain knowledge or remove an undesired feature impacting consumer satisfaction derived through a purchase. The willingness-to-pay methodology permits direct assessment of a range of reasonable choices in the decision process in this matter. Economists identify value associated with each choice.

3) Valuing Privacy and the Absence of Telemarketing Calls

As with all decisions to spend on goods and services, consumers seek to maximize their satisfaction, or utility, through their purchases. Relatedly, in their selection and purchase of any good or service, consumers exhibit a willingness-to-pay for the absence of an undesired feature. CBA allows economists to measure and then place a value on benefits that derive from how much consumers are willing-to-pay for the absence of an undesired feature, or in this case, the forbiddance of telemarketing calls. With reference to the mentioned practices of HelloFresh, any phone call made *implies* displeasure and diminishment of privacy. What value does the absence of an undesired feature have for consumers? The answer is: the value improves their utility, or

their satisfaction, when consuming the product, and is similar to registration for the national Do-Not-Call list. When economists are asked to value payment for these conditions, which enhances privacy and pleasure, they may provide a range of plausible prices and observe how frequently consumers respond. Armed with knowledge of demand theory, consumer well-being and consumer choice, economists can assess within reason a range of values that consumers place on the absence of an undesired feature. Both characteristics further assure consumers their privacy as they routinely go about their daily lives. An array of reasonable values, arising from knowledge of consumer choice, may be constructed. Aggregating these arrays of individual values leads to a range of measures of aggregate consumer well-being that the Settlement Agreement brings. Relying on economic terminology, economists uniformly state that consumers attempt to maximize their utility. The following two equations illustrate the consumer-utility function inherent in the economics of the Settlement Agreement.

$$u(y_0 - WTP(y_0), x_1) = u(y_0, x_0)$$

$$u(y_0 - WTP(y_0), 0) = u(y_0, 1)$$

The equations above demonstrate a utility function with respect to willingness-to-pay. Let u(y, x) represent the utility function where y is income or initial wealth, and x demonstrates telemarketing calls - in this case, calls by Hello Fresh. The variable "x" may be referred to as a dichotomous variable where the value "1" denotes the presence of an undesired feature, and the value "0" suggests the removal or absence of an undesired feature.

4) Determining Value and Benefit to Society.

Because the absence of an undesired feature creates value, a value construct reveals benefits to society. The value of information is most readily observed by a range of benchmark prices. For example, would a consumer be willing-to-pay an additional \$0.55 in a specific period (for example, a year) for the absence of an undesired feature and assurance of privacy without further concern for experiencing future damages? Alternatively, would a consumer be willing-to-pay an additional \$4.99 per year for the absence of an undesired feature and assurance of privacy without further concern for experiencing future damages? Or, would a consumer be willing-to-pay \$98.33 per year for the absence of an undesired feature and assurance of privacy without further

² Horowitz, John Keith; Mcconnell, Kenneth (2003). "Willingness to Accept, Willingness to Pay and the Income Effect" (PDF). Journal of Economic Behavior & Organization. 51 (4): 537–54

concern for experiencing future damages?³ Clearly, willingness-to-pay reveals a range of reasonable values representing the diversity of consumer preferences.

With the range of prices presented in Appendix 1, Table 1, Table 2.A, Table 2.B, Table 2.C, the undersigned economist has relied on information provided in the Settlement Agreement and peer-reviewed research on value of privacy to assess societal value of remedial relief.

In summary, this analysis follows the broad assessment guidelines established by the framework of economic theory and the application of empirical analysis to the determination of economic value. As reviewed above, the broad foundations of microeconomic theory and cost-benefit analysis are drawn upon to assess the reasonable value of the reformed and modified business practices and initiatives acknowledged in the parties' Settlement Agreement. It is the undersigned economist's opinion, developed with a reasonable degree of economic certainty, that the estimates in this report are conservatively low, especially since they are limited to analysis of classmembers and future consumers and ignore other societal interests and stakeholders that would typically be included in a comprehensive cost-benefit analysis.

B. Correcting Market Externalities

Before briefly outlining this report's conclusions, it is useful to identify the manner in which economics provides the framework for valuation undertakings.

By definition, economics is the study of how a society values its resources. Economists widely agree that a society's resources -- naturally occurring, human, and capital -- are valued by a combination of their usefulness, their abundance or scarcity and prevailing supply and demand conditions. Ultimately, the value of a resource is reflected in its price. Natural resources -- the earth's bounty of land, minerals and water, to name a few naturally-occurring resources -- are valued by the dollars spent to bring them to market, where supply conditions meet demand. Capital, often referred to as man-made means of production, is valued by its role in transforming natural resources into usable final goods and services. Finally, labor -- the human resource -- is valued

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³ See Appendix 2, Table 1 for a reasonable range of plausible price points for purchasing privacy and the absence of displeasure.

by its ability to work with capital and natural resources in delivering a product with timely and efficient effort.

In assessing the value of a resource, economists rely on factual information, assumptions and forecasts. In those rare instances when the basic facts about a resource are known and generally agreed upon, economic assessment is often straightforward. When basic facts are subject to interpretation and conflict, analysis and review are critical. When forecasts become part of the equation, any number of conflicting interpretations may arise. Assessment proceeds with the recognition that underlying premises, assumptions, and expectations are often controversial.

As the assessment progresses, additional factual issues arise regarding the assumptions and premises. Have all the facts been made available? Does the economist understand the nature of the issues, including concepts, premises and assumptions used in the absence of facts? Has the economist selected reasonable values for the all the variables under examination? Has the economist selected appropriate growth rates for changes that may impact future values? Has the economist selected an appropriate discount rate in reporting the present value of future values? Is the economist's methodology sound? Is the methodology acceptable and widely used? Have peer-reviewed journals and government databases been relied upon? Are relevant assumptions used? Are they reasonable?

It is important to note that the legislative history and statutory language of any public policy may be relevant when considering the societal benefit that may result from the enactment of the public policy. With respect to the TCPA, Congress acknowledges prospective gains in societal benefit by prohibiting non-consensual telephone solicitations when it provided for the recovery of actual monetary loss or statutory damages in the amount of \$500 for each such violation, whichever is greater. And certainly, there are consumers who value such protection in the amount of \$500 dollars or more. Assuming that all consumers place the maximum statutory value on being protected from or for acquiescing to the receipt of such non-consensual calls, the gains in societal benefit from the agreed to remedial relief are significant and substantial. Similarly, there are certainly consumers who value such protection in the amount of \$500 or more.

In the instant matter, we pursue a more conservative approach by identifying several annual willing-to-pay price points based on the conclusions of Do-Not-Call research.⁴ Table 1 in Appendix 2 summarizes these values

7

⁴ Png, Ivan P. L., On the Value of Privacy from Telemarketing: Evidence from the 'Do Not Call' Registry (June 2007, September 2007 Update).

ranging from a minimum of \$0.55 to a maximum of \$98.33.⁵ Each value represents a willingness-to-pay for the benefit of not receiving unwanted cell phone calls. It is from these values that we derive our best estimate of the present value of the post-settlement remedial relief using an *average* willing-buyer-price-point. With recognition that there are short-term and long-term values associated with remedial relief delivered by the Settlement Agreement, the undersigned economist has calculated annual values for the next five years.

This study concludes that the most conservative estimate of remedial relief measured at an annual price-to-avoid of \$.55 is \$2,657,205 (see Appendix 1, Table 1 and Table 1.A) per year. Using another baseline estimate of remedial relief measured at an annual price-to-avoid of \$3.22 is \$15,556,725 per year.

IV. CONCLUSION

As reviewed herein, it is my opinion – held with reasonable economic certainty -- that the economic value of the benefits bestowed on class members is likely at least \$2,657,205 per year.

This Assessment does not cover any additional broad societal interests and their values, and once again remains a conservative assessment of the value of the Settlement Agreement in this matter.

In closing this report, the undersigned economist is available to respond to any question raised about the methods and procedures used in reaching the conclusions herein.

The above-cited appendices follow.

Jon Haghayeghi, Ph.D.

⁵ The sources of all values are provided in Appendix 2.

APPENDIX 1

VALUING REMEDIAL RELIEF

TABLE 1

SUMMARY TABLE

PRESENT VALUE OF REMEDIAL RELIEF FOR INDIVIDUALS IMPACTED BY HELLO FRESH 2020 TO 2024

Matter of Grace Murray, on behalf of herself and similarly situated, Plaintiffs, v. Grocery Delivery E-Services USA Inc. DBA Hello Fresh

Case No.2:19-cv-12608-WGY, United States District Court for the District of Massachusetts

Number of members of the settlement class benefiting from the absence of undesired phone calls			Aggregate Present Value of Remedial Relief from Non-Consensual Telemarketing Calls with Willingness-to-Pay Methodology and Prices Ranging from \$.55 to \$8.27 annually								
			\$.55 / year		\$3.22 / year		\$8.27 / year				
In 2020, the expected annual number of non- consensual telemarketing calls made	4,831,281		\$2,657,205	[1]	\$15,556,725	[2]	\$39,954,694	[3]			
For 5 years (2020 to 2024), the expected number of non consensual telemarketing calls	24,156,405		\$13,252,159	[4]	77,585,368	[5]	199,264,284	[6]			

[1] If all impacted members of the settlement class were willing to pay \$.55 annually in order to avoid the cost of experiencing telemarketing calls. See Table 2.A, Column 7. Varian, Hal, Fredrik Wallenberg, and Glenn Woroch, "Who Signed Up for the Do-NotCall List?" School of Information, University of California, Berkeley, June 15, 2004.

[2] If all impacted members of the settlement class were willing to pay \$.55 annually in order to avoid the cost of experiencing telemarketing calls. See Table 2.A, Column 8. Varian, Hal, Fredrik Wallenberg, and Glenn Woroch, "Who Signed Up for the Do-NotCall List?" School of Information, University of California, Berkeley, June 15, 2004.

[3] If all impacted members of the settlement class were willing to pay \$3.22 annually in order to avoid the cost of experiencing telemarketing calls. See Table 2.C, Column 7. Png, Ivan P. L., On the Value of Privacy from Telemarketing: Evidence from the 'Do Not Call' Registry (June 2007). Available at SSRN: https://ssrn.com/abstract=1000533 or http://dx.doi.org/10.2139/ssrn.1000533 [4]If all impacted members of the settlement class were willing to pay \$3.22 annually in order to avoid the cost of experiencing telemarketing calls. See Table 2.A, Column 8. Png, Ivan P. L., On the Value of Privacy from Telemarketing: Evidence from the 'Do Not Call' Registry (June 2007). Available at SSRN: https://ssrn.com/abstract=1000533 or http://dx.doi.org/10.2139/ssrn.1000533

[5] If all impacted members of the settlement class were willing to pay \$8.27 annually in order to avoid the cost of experiencing telemarketing calls. See Table 2.B, Column 8 Png, Ivan P. L., On the Value of Privacy from Telemarketing: Evidence from the 'Do Not Call' Registry (June 2007). Available at SSRN: https://ssrn.com/abstract=1000533 or http://dx.doi.org/10.2139/ssrn.1000533

[6] If all impacted members of the settlement class were willing to pay \$8.27 annually in order to avoid the cost of experiencing telemarketing calls. See Table 2.C, Column 8. Png, Ivan P. L., On the Value of Privacy from Telemarketing: Evidence from the 'Do Not Call' Registry (June 2007). Available at SSRN: https://ssrn.com/abstract=1000533 or http://dx.doi.org/10.2139/ssrn.1000533

For a complete review of willingness-to-pay methodology, see Anthony E. Boardman, David H. Greenberg, Aidan R. Vining, and David L. Weimer, **Cost-Benefit Analysis, Concepts and Practice**, Prentice Hall, 4th Edition, Boston, 2011, pages 81-99.

TABLE 2.A

PRESENT VALUE OF REMEDIAL RELIEF

SCENARIO 1: VALUE OF AVOIDING UNWANTED TELEMARKETER PHONE CALLS

Matter of Grace Murray, on behalf of herself and similarly situated, Plaintiffs, v. Grocery Delivery E-Services USA Inc. DBA Hello Fresh

Case No.2:19-cv-12608-WGY, United States District Court for the District of Massachusetts

	COL 1	COL 2	COL 3		COL 4	COL 5		COL 6	COL 7
YEAR		SIZE OF SETTLEMENT CLASS	ANNUAL WILLINGNESS-TO-PAY		EXPECTED BENEFIT TO CONSUMERS	DISCOUNT FACTOR		PRESENT VALUE OF EXPECTED BENEFIT	CUMULATIVE PRESENT VALUE OF EXPECTED BENEFIT
								COL 5 / COL 6	
		(#)	(#)		(\$)	(\$)		(\$)	(\$)
	2020	4,831,281	[1] 0.55	[3]	2,657,205	1.000		2,657,205	2,657,205
	2021	4,831,281	0.55		2,657,205	1.000		2,657,205	5,314,409
	2022	4,831,281	0.55		2,657,205	1.001	[4]	2,655,346	7,969,755
	2023	4,831,281	0.55		2,657,205	1.003		2,648,455	10,618,210
	2024	4,831,281	[2] 0.55		2,657,205	1.009		2,633,949	13,252,159
	Total							13,252,159	

^[1] The settlement class includes 4,831,281 individuals. The start date of this analysis is January 1, 2020.

^[2] This model terminates December 31, 2024, or after five years.

^[3] Research indicates that lowest estimated willingess-to-pay for privacy from telemarkers is \$.55 annually. See Table 1.

^[4] Factors in this column are based on yields on U.S. Treasury Securities as of February 19, 2021.

TABLE 2.B

PRESENT VALUE OF REMEDIAL RELIEF

SCENARIO 2: VALUE OF AVOIDING UNWANTED TELEMARKETER PHONE CALLS

Matter of Grace Murray, on behalf of herself and similarly situated, Plaintiffs, v. Grocery Delivery E-Services USA Inc. DBA Hello Fresh

Case No.2:19-cv-12608-WGY, United States District Court for the District of Massachusetts

COL 1	COL 2	COL 3		COL 4	COL 5		COL 6	COL 7
YEAR	SIZE OF SETTLEMENT CLASS	ANNUAL WILLINGNESS-TO-PA		EXPECTED BENEFIT TO CONSUMERS	DISCOUNT FACTOR		PRESENT VALUE OF EXPECTED BENEFIT	CUMULATIVE PRESENT VALUE OF EXPECTED BENEFIT
							COL5/COL6	
	(#)	(#)		(\$)	(\$)		(\$)	(\$)
2020	4,831,281	[1] 3.22	[3]	15,556,725	1.000		15,556,725	15,556,725
2021	4,831,281	3.22		15,556,725	1.000		15,556,725	31,113,450
2022	4,831,281	3.22		15,556,725	1.001	[4]	15,545,843	46,659,292
2023	4,831,281	3.22		15,556,725	1.003		15,505,500	62,164,793
2024	4,831,281	[2] 3.22		15,556,725	1.009		15,420,575	77,585,368
Total				-			77,585,368	

^[1] The settlement class includes 4,831,281 individuals. The start date of this analysis is January 1, 2020.

^[2] This model terminates December 31, 2024, or after five years.

^[3] Research indicates that baseline willingess-to-pay for privacy from telemarkers is \$3.22 annually. See Table 1.

^[4] Factors in this column are based on yields on U.S. Treasury Securities as of February 19, 2021.

TABLE 2.C

PRESENT VALUE OF REMEDIAL RELIEF

SCENARIO 3: VALUE OF AVOIDING UNWANTED TELEMARKETER PHONE CALLS

Matter of Grace Murray, on behalf of herself and similarly situated, Plaintiffs, v. Grocery Delivery E-Services USA Inc. DBA Hello Fresh

Case No.2:19-cv-12608-WGY, United States District Court for the District of Massachusetts

	COL 1	COL 2	COL 3		COL 4	COL 5		COL 6	COL 7
	YEAR	SIZE OF SETTLEMENT CLASS	ANNUAL WILLINGNESS-TO-PA		EXPECTED BENEFIT TO CONSUMERS	DISCOUNT FACTOR		PRESENT VALUE OF EXPECTED BENEFIT	CUMULATIVE PRESENT VALUE OF EXPECTED BENEFIT
								COL 5 / COL 6	
		(#)	(#)		(\$)	(\$)		(\$)	(\$)
)	2020	4,831,281	[1] 8.27	[3]	39,954,694	1.000		39,954,694	39,954,694
1	2021	4,831,281	8.27		39,954,694	1.000		39,954,694	79,909,388
2	2022	4,831,281	8.27		39,954,694	1.001	[4]	39,926,745	119,836,133
3	2023	4,831,281	8.27		39,954,694	1.003		39,823,133	159,659,266
4	2024	4,831,281	[2] 8.27		39,954,694	1.009		39,605,018	199,264,284
	Total				-			199,264,284	

^[1] The settlement class includes 4,831,281 individuals. The start date of this analysis is January 1, 2020.

^[2] This model terminates December 31, 2024, or after five years.

^[3] Research indicates that central willingess-to-pay for privacy from telemarkers is \$8.27 annually. See Table 1.

^[4] Factors in this column are based on yields on U.S. Treasury Securities as of February 19, 2021.

APPENDIX 2

SUPPORTING DOCUMENTS FOR VALUING WILLINGNESS-TO-PAY

TABLE 1

VALUE OF PROTECTION FROM NON-CONSENSUAL SURVEY CALLS: WILLING BUYER'S PRICE POINTS

PRICE POINT	SOURCE / SUPPORT
\$0.55	See Png, Ivan PL, "On the Value of Privacy from Telemarketing: Evidence from the 'Do Not Call' Registry." Available at SSRN 1000533 (2007, p.3, fn.5) - referencing Varian, et al (2004): "To be precise, Varian, et al.'s (2004) estimate ranged from \$60 million to \$3.6 billion a year. With 108.4 million households, this was the equivalent range of \$0.55 to \$33.21 per household per year."
\$2.00	Beth Pinsker, "Your money: Should you pay to stop phone spam?" (https://www.reuters.com/article/us-money-telecoms-robocalls/your-money-should-you-pay-to-stop-phone spam-idUSKCN1SL185). "Nomorobo's more straightforward approach uses an app that works in the background for \$2 a month."
\$2.25	Minimum State fee (Texas, 2015)
\$2.99	Beth Pinsker, "Your money: Should you pay to stop phone spam?" (https://www.reuters.com/article/us-money-telecoms-robocalls/your-money-should-you-pay-to-stop-phone spam-idUSKCN1SL185). "Some carriers sell their highest level of services, like Verizon, which charges \$2.99 a month for its Call Filter."
\$4.99	Beth Pinsker, "Your money: Should you pay to stop phone spam?" (https://www.reuters.com/article/us-money-telecoms-robocalls/your-money-should-you-pay-to-stop-phone spam-idUSKCN1SL185). "For \$4.99 a month, Robokiller hits back at scammers by answering their calls with bots which tie up their lines."
\$13.19	See Png, Ivan PL, "On the Value of Privacy from Telemarketing: Evidence from the 'Do Not Call' Registry." Available at SSRN 1000533 (2007, p. 3). "Using the parameters of the demand curve, I computed three estimates of the value of the federal 'do not call' registry: \$13.19, \$50.57, \$98.33."
\$33.21	See Png, Ivan PL, "On the Value of Privacy from Telemarketing: Evidence from the 'Do Not Call' Registry." Available at SSRN 1000533 (2007, p.3, fn.5) - referencing Varian, et al (2004): "To be precise, Varian, et al.'s (2004) estimate ranged from \$60 million to \$3.6 billion a year. With 108.4 million households, this was the equivalent range of \$0.55 to \$33.21 per household per year."
\$50.57	See Png, Ivan PL, "On the Value of Privacy from Telemarketing: Evidence from the 'Do Not Call' Registry." Available at SSRN 1000533 (2007, p. 3). "Using the parameters of the demand curve, I computed three estimates of the value of the federal 'do not call' registry: \$13.19, \$50.57, \$98.33."
\$98.33	See Png, Ivan PL, "On the Value of Privacy from Telemarketing: Evidence from the 'Do Not Call' Registry." Available at SSRN 1000533 (2007, p. 3). "Using the parameters of the demand curve, I computed three estimates of the value of the federal 'do not call' registry: \$13.19, \$50.57, \$98.33."