



November 10, 2022

Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

**Submitted via:** <https://www.regulations.gov/document/FTC-2022-0053-0001>

**Re: ANPR on Commercial Surveillance and Data Security, Docket No. 2022-0053**

Dear Federal Trade Commissioners,

As small business owners, we are deeply troubled by the Commission's plans to impose sweeping new regulations on the digital economy that could hurt the millions of small businesses across the country – including ours – that rely on data-driven digital advertising to reach, attract, and better serve customers.

Data-driven advertising has huge benefits for consumers, small businesses, and competition. Digital advertising lets entrepreneurs – from established mom-and-pop businesses to brand new entrants – get our message and offerings in front of the individuals most likely to need and want what we're selling, more efficiently than ever before.

That's good for the consumers who find what they're looking for. It's good for the small businesses who can gain new customers more cost-effectively. And it's good for competition itself, empowering new entrants and introducing consumers to new choices they would not have otherwise discovered.

Small businesses have suffered immensely over the past few years due to the twin challenges of COVID-19 and surging inflation. But some of the proposed changes could gut the effectiveness and efficiency of digital advertising, forcing small businesses to spend much more on advertising just to maintain the same results. Those increased costs and likely loss of customers could be devastating for many small businesses – and the millions of Americans they employ.

The Commission's proposed rulemaking is rooted in the false premise that data-driven advertising hurts consumers and small businesses. But survey research confirms that consumers actually prefer tailored, relevant advertising and discounts to generic, less-relevant offerings.<sup>1</sup> Similarly, small businesses that use targeted ads are 16% more likely to report positive sales growth than those who do not.<sup>2</sup>

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<sup>1</sup> Mark Sableman, Heather Shoenberger & Esther Thorson, [Consumer Attitudes Toward Relevant Online Behavioral Advertising: Crucial Evidence in the Data Privacy Debates](#) (2013)

<sup>2</sup> Deloitte Dynamic Markets, [Small Business Through the Rise of the Personalized Economy](#) (2021)

We share your view that privacy and security are vitally important in this digital age. But we strongly disagree with the Commission’s blanket approach attacking the whole of data-driven digital advertising ecosystem – which has delivered enormous economic benefits to consumers and businesses – instead of narrowly and carefully addressing specific abuses by bad actors.

Policy changes of the scale your Advanced Notice of Proposed Rulemaking envisions would fundamentally remake the ad-supported digital economy, which accounts for 12% of GDP.<sup>3</sup> Policy changes that far-reaching should be debated and decided by our elected representatives in Congress, not by appointees stretching their authority under a law passed more than half a century before the commercial internet was even born.

We urge you to reconsider your proposed rulemaking, which would have far-reaching negative impacts on small businesses and the customers we serve.

Sincerely,

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Irvine Homes

Brandy Miller  
Miller Girls Dog Walking Service

Kylie Strawn  
KLS Marketing

Shandon Armstrong  
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<sup>3</sup> John Deighton and Leora Kornfeld, [The Economic Impact of the Market-Making Internet](#), INTERACTIVE ADVERTISING BUREAU, 5, (Oct. 18, 2021)

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