

From: Jean Brownell
Sent: Friday, October 19, 2007 11:04 AM
To: Behavioral Advertising Comments
Subject: Comment:The Presumption Effect of Behavioral Targeting

Dear FTC:

As a young, professional woman, I am no stranger to stereotyping. My concern about behavioral targeting centers around the use of gender and other demographic information in order to make assumptions about what ads an individual would or would not want to see while online. Especially among children and teens, showing ads for one product to females and another to males, for instance, has the potential to systematically reinforce gender roles in a way not contemplated in America for 50 years.

I hear a lot about how behavioral targeting is good for consumers because it shows them relevant ads, and how it's harmless to consumers because it is anonymous. But the reason we value commercial speech -- I thought -- is that it gives us information about what's being offered out there so that we can make choices about what we might want to buy or do. By hyper-targeting through audience segmentation, large advertisers make the choices (or presumption) about what we see online, which is a space where we find ourselves more and more, and hide the things they don't think we would want. Meanwhile, this negative effect does not depend on whether the data used to target the ad is identifiable to me personally.

I hope that the FTC will try to address this important point in its upcoming Town Hall. Many thanks for your excellent work,

Jean B. Brownell