

ELECTRONIC PRIVACY INFORMATION CENTER

[By e-mail authenticationsummit@ftc.gov]

September 28, 2004

Email Authentication Summit-Request to Participate
Secretary
Federal Trade Commission
Room 159—H (Annex V)
600 Pennsylvania Ave.
Washington, DC 20580

Dear Secretary,

On behalf of the Electronic Privacy Information Center, I request the opportunity to participate in the E-mail Authentication Summit to be held in Washington, DC on November 9-10, 2004.

EPIC is a not-for-profit research center that focuses on privacy, the First Amendment, and promoting Constitutional values. EPIC has a long history of participation in the spam debate from a pro-consumer perspective. In particular, we have focused on the application of new technology to the spam problem, including the risks posed by single-signon identification systems, such as Microsoft Passport; databases, such as WHOIS; and emerging technologies, such as ENUM (Electronic Numbering).

Most recently, EPIC submitted a paper on spam to the International Telecommunications Union. *Consumer Perspectives on Spam*, by Marc Rotenberg and Samantha Liskow, discusses consumer approaches to spam domestically and internationally. That paper specifically discusses authentication to address spam, warning that:

From the consumer perspective, it remains unclear whether this approach will reduce the spam problem. While consumers clearly favour techniques that will diminish spoofing and phishing, user-identified e-mail also raises the prospect of more intrusive data collection that will lead to more aggressive commercial marketing by the private sector and more surveillance under law enforcement. Such a scheme could also impact on principles of free expression and anonymity, if senders of non-commercial messages are required to disclose their identity. As the Council of Europe stated in its Declaration on Freedom of Communication on the Internet:

