

---

**From:** Su, Henry  
**Sent:** Thursday, March 05, 2015 6:51 PM  
**To:** Rob Mahini  
**Subject:** Accepted: Invitation: Rob/Henry coffee @ Tue Mar 10, 2015 10am - 11am  
(robmahini@google.com)

---

**From:** Su, Henry  
**Sent:** Monday, March 09, 2015 11:11 PM  
**To:** Rob Mahini  
**Subject:** Accepted: Updated Invitation: Rob/Henry coffee @ Tue Mar 10, 2015 9:30am - 10:30am (Robert Mahini)

**From:** Su, Henry <hsu@ftcexchange.com>  
**Sent:** Wednesday, March 18, 2015 9:12 PM  
**To:** Rob Mahini <robmahini@google.com>; Hipspsley, Heather <HHIPPSLEY@ftc.gov>  
**Subject:** RE:

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Dear Rob,

Yes, the Chairwoman would like Mr. Walker's cell number. If you give it to me, I will pass it on to her. I am still at the office. Thank you.

--Henry

Henry C. Su  
Attorney Advisor, Office of Chairwoman Edith Ramirez  
U.S. Federal Trade Commission  
Mail Drop H-444  
600 Pennsylvania Ave., N.W.  
Washington, DC 20580  
Direct: (202) 326-3659  
iPhone: (202) 660-8519  
E-mail: [hsu@ftc.gov](mailto:hsu@ftc.gov)

**From:** Rob Mahini  
**Sent:** Wednesday, March 18, 2015 5:18 PM  
**To:** Su, Henry; Hipspsley, Heather  
**Subject:**

Hi Henry and Heather - we have an urgent situation that Kent Walker would like to speak with the Chairwoman about. I'm happy to set up a time -- alternatively, I could call you and provide his cell phone number for her to call.

Thanks,  
Rob

Robert Mahini | Sr. Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)

**From:** Su, Henry <hsu@ftcexchange.com>  
**Sent:** Wednesday, March 25, 2015 11:47 AM  
**To:** 'Kent Walker' <kwalker@google.com>; [Non Responsive]  
**Cc:** [Non Responsive]; [Non Responsive]  
[Non Responsive]; [Non Responsive]  
[Non Responsive]; Kraus, Elizabeth <EKRAUS@ftc.gov>; Coppola, Maria <mcoppola@ftc.gov>; [Non Responsive]; 'Julia Holtz' <jholtz@google.com>; 'Pamela Howell' <phowell@google.com>; [Non Responsive]  
'Rosie Lipscomb' <r Lipscomb@google.com>  
**Subject:** RE: 17th International Conference on Competition, Berlin, 25-27 March 2015 - Media panel - PrepCall: Tuesday, 3 March 2015, 17:30 CET/ 16:30 GMT / 11:30 EST / 8:30 PST.

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Dear Kent and [Non]

Thank you for sending along these proposed remarks.

All the best,  
Henry

**From:** Kent Walker [mailto:kwalker@google.com]  
**Sent:** Wednesday, March 25, 2015 4:29 AM  
**To:** [Non]  
**Cc:** Su, Henry; [Non Respo]; [Non Responsive]; Kraus, Elizabeth; Coppola, Maria; [Non Respon]; Julia Holtz; Pamela Howell; [Non Responsive]; Rosie Lipscomb  
**Subject:** Re: 17th International Conference on Competition, Berlin, 25-27 March 2015 - Media panel - PrepCall: Tuesday, 3 March 2015, 17:30 CET/ 16:30 GMT / 11:30 EST / 8:30 PST.

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I look forward to seeing everyone tomorrow.  
-- Kent

\*\*\*\*\*

### **Big Data, Media, and Competition -- New Rules for the Digital Economy? Kent Walker, General Counsel, Google Inc.**

- I. Consumer welfare as the primary goal of competition analysis
- A. The European Commission's Directorate-General for Competition has, over the years, increasingly focused on long-term "consumer welfare" as the primary goal of competition law in Europe.

Merger Guidelines make explicit the goal of consumer welfare. See European Comm'n, EU Competition Law: Rules Applicable to Merger Control 184 (2010).

welfare is also referenced in the Commission's Article 82 Guidance. See Guidance on the Commission's Enforcement Priorities in Applying Article 82 of the EC Treaty to Abusive Exclusionary Conduct by Dominant Undertakings, 2009 O.J. (C 45) 9-10.

welfare has also been touted as a primary objective in statements made by senior Commission officials. See Neelie Kroes, European Comm'r for Competition, European Competition Policy— Delivering Better Markets and Better Choices, Speech at the European Consumer and Competition Day (Sept. 15, 2005) ("[A]im is simple: to protect competition in the market as a means of enhancing consumer welfare and

ensuring an efficient allocation of resources.”).

data and the role of privacy in antitrust analysis

A. What is “big data”?

to the European Commission, “The term ‘big data’ refers to large amounts of different types of data produced with high velocity from a high number of various types of sources. Handling today's highly variable and real-time datasets requires new tools and methods, such as powerful processors, software and algorithms.” Communication from the European Commission to the European Parliament, 2.7.2014, COM(2014) 442 final.

data is far too diverse to be analyzed in the aggregate. Competition analysis of data proceeds in the basic three steps:

. What type of data is at issue? For example, is the data freely available, or was it generated by a business through invention and ingenuity?

. How is the data being used? Is it an end product being bought or sold, or is it merely one of many inputs?

. What are at different sources of that data? Does access by one provider have the ability to impact rivals?

“big data” specific to the online world?

*Big Data Helps Chains Like Starbucks Pick Store Locations -- An (Unsung) Key To Retail Success*, Forbes, 4/24/14, <http://www.forbes.com/sites/barbarathau/2014/04/24/how-big-data-helps-retailers-like-starbucks-pick-store-locations-an-unsung-key-to-retail-success/>

*Supermarkets are Big Data Stars*, Information Week, 10/7/13, <http://www.informationweek.com/big-data/big-data-analytics/why-supermarkets-are-big-data-superstars/d/d-id/1111851?>

*expects big growth from 'big data' insights*, Reuters UK, 6/11/14, <http://uk.reuters.com/article/2014/06/11/us-mastercard-data-idUKKBN0EM1CI20140611>

D. How do we define a “relevant market” when data is the end-product versus only one of many inputs?

product. There is precedent in the U.S. and the EU for defining a market around data sold to customers. For example:

- a. CoreLogic/DataQuick (housing data)
- b. Thomson/Reuters (financial information)
- c. Dun & Bradstreet/QED (educational data)
- d. CCC/Mitchell (car damage estimates)

2. Input. There is no precedent for defining the data that firms generate, or use solely as an input for another product, as a “relevant market.” However:

a. The European Commission has analyzed the impact of user data and data sets on other markets. For example:

*/DoubleClick*: The Commission held that this merger of “big data” tools would not give the merged entity an insurmountable advantage. (Para. 269, 364)

*/WhatsApp*: The Commission held that, even if Facebook uses WhatsApp information as a new source of user data, sufficient alternative providers of online advertising services (with sufficient access to user data for advertising purposes) will remain. (Para. 188)

*/Omnicom:* The Commission held, regarding marketing communications and media buying services, that due to a “sufficient number of alternative providers of big data analytics . . . no serious doubts are arising from the Transaction in relation to big data.” (Para 625-630)

“big data” alone valuable?

EU Commission Expert Group on Taxation of the Digital Economy recently concluded that “the existence of data alone is not sufficient to generate value; the value comes from maximizing the efficacy of use from the actual data; but the challenge is deciding at which point and where the value is created.”

single market reforms

A. Businesses and the economy will benefit from one rulebook for digital markets

today’s economy, there is little that stands in the way of a business growing from serving 10, to 1000 to 1,000,000 customers.

rules across Europe’s 28 member states could slow down business growth and ultimately harm consumers.

of digital goods and services and consumer confidence will increase with a harmonized set of rules across the whole market.

calls for “platform” regulation, however, could hinder innovation and investment.

privacy concerns inform how competition regulators analyze conduct or mergers?

EU Court of Justice held that “issues relating to the sensitivity of personal data are not, as such, a matter for competition law, they may be resolved on the basis of the relevant provisions governing data protection.” *Asnef* case (2006)

European Commission’s recent decision in *Facebook/WhatsApp* held that “[a]ny privacy-related concerns flowing from the increased concentration of data . . . do not fall within the scope of the EU competition law rules but within the scope of the EU data protection rules.”

markets on the web

A. It is important for Europe to grow its online economy.

services and tools help small-to-medium sized enterprises reach a broad European and global audience.

growing numbers of European businesses are online, the trend is just taking off.

1. The digital single market presents an important opportunity for Europe, particularly for small and medium-sized businesses.

Non Responsive

**From:** Su, Henry [mailto:[hsu@ftc.gov](mailto:hsu@ftc.gov)]

**Sent:** 23 March 2015, 11:14 PM

**To:** Non [redacted] Non [redacted] 'kwalker@google.com'; Non Responsive [redacted]  
**Cc:** Non Responsive [redacted] Kraus, Elizabeth; Coppola, Maria; Non Respons [redacted] Non Responsive [redacted] 'Julia Holtz'; 'Pamela Howell'; Non Responsive [redacted] Non [redacted]

**Subject:** RE: 17th International Conference on Competition, Berlin, 25-27 March 2015 - Media panel - PrepCall: Tuesday, 3 March 2015, 17:30 CET/ 16:30 GMT / 11:30 EST / 8:30 PST.

Dear all,

Good evening. I am just checking in to see if others on the panel have draft summaries of their remarks, proposed questions, etc., that I can pass on to Edith. She and I working on the final version on her remarks, which I will send along as soon as they are ready. Thank you.

All the best,  
Henry

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**To:** Non Respon [redacted] Non Responsive [redacted] 'kwalker@google.com'; Non Responsive [redacted]  
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Dear all,

Attached is a summary of Edith's remarks that she has authorized me to share with you. She is still working on the remarks themselves and hopes to have something to send to you all on Monday.

All the best,  
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Non Responsive Rosie Lipscomb <r Lipscomb@google.com>  
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**Big Data, Media, and Competition -- New Rules for the Digital Economy?**  
**Kent Walker, General Counsel, Google Inc.**

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  - A. The European Commission's Directorate-General for Competition has, over the years, increasingly focused on long-term "consumer welfare" as the primary goal of competition law in Europe.
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    - A. What is "big data"?
      1. According to the European Commission, "The term 'big data' refers to large amounts of different types of data produced with high velocity from a high number of various types of sources. Handling today's highly variable and real-time datasets requires new tools and methods, such as powerful processors, software and algorithms." Communication from the European Commission to the European Parliament, 2.7.2014, COM(2014) 442 final.
    - A. Big data is far too diverse to be analyzed in the aggregate. Competition analysis of data proceeds in the basic three steps:
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    - A. Is "big data" specific to the online world?
      1. *How Big Data Helps Chains Like Starbucks Pick Store Locations -- An (Unsung) Key To Retail Success*, Forbes, 4/24/14, <http://www.forbes.com/sites/barbarathau/2014/04/24/how-big-data-helps-retailers-like-starbucks-pick-store-locations-an-unsung-key-to-retail-success/>
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I. Digital single market reforms

A. Businesses and the economy will benefit from one rulebook for digital markets

1. In today's economy, there is little that stands in the way of a business growing from serving 10, to 1000 to 1,000,000 customers.
2. Inconsistent rules across Europe's 28 member states could slow down business growth and ultimately harm consumers.
3. Trade of digital goods and services and consumer confidence will increase with a harmonized set of rules across the whole market.
4. Recent calls for "platform" regulation, however, could hinder innovation and investment.

I. Should privacy concerns inform how competition regulators analyze conduct or mergers?

1. The EU Court of Justice held that "issues relating to the sensitivity of personal data are not, as such, a matter for competition law, they may be resolved on the basis of the relevant provisions governing data protection." *Asnef* case (2006)
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A. It is important for Europe to grow its online economy.

1. Online services and tools help small-to-medium sized enterprises reach a broad European and global audience.
2. While growing numbers of European businesses are online, the trend is just taking off.
3. The digital single market presents an important opportunity for Europe, particularly for small and medium-sized businesses.

Non Responsive

**From:** Su, Henry [mailto:[hsu@ftc.gov](mailto:hsu@ftc.gov)]  
**Sent:** 23 March 2015 11:14 PM  
**To:** [Non Responsive]; 'kwalker@google.com'; [Non Responsive]  
**Cc:** [Non Responsive]; Kraus, Elizabeth; Coppola, Maria; [Non Responsive]; [Non Responsive]; 'Julia Holtz'; 'Pamela Howell'; [Non Responsive]  
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**Cc:** Non Responsive Kraus, Elizabeth <EKRAUS@ftc.gov>; Coppola,  
Maria <mcoppola@ftc.gov>; Non Responsive Non Responsive  
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**Subject:** RE: 17th International Conference on Competition, Berlin, 25-27 March 2015 - Media panel -  
PrepCall: Tuesday, 3 March 2015, 17:30 CET/ 16:30 GMT / 11:30 EST / 8:30 PST.  
**Attach:** Summary of ER remarks on big data and competition.docx

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Henry

Non Responsive

## Big Data and Competition

### I. Introduction – What Is Big Data?

- Properties of big data: volume (lots and lots of data), velocity (how fast data come in), variety (combination of different data types or datasets)
- Tools and practices for handling big data: collection (e.g., transaction, crowd sourcing, observation), management (i.e., storage, organization, access), analysis (e.g., pattern recognition, predictive modeling, regression)

### II. Potentials Uses of Big Data in Antitrust Markets

- As input for product or service
  - Case example: *Reed Elsevier–ChoicePoint* (2008), <https://www.ftc.gov/enforcement/cases-proceedings/081-0133/reed-elsevier-nv-et-al-matter>
  - Product = electronic public records services for law enforcement customers
  - Big data = wide array of public and non-public records about individuals and businesses, which are combined to provide services that help law enforcement build suspect profiles and develop leads for investigations
- As product or service itself
  - Case example: *Dun & Bradstreet/Quality Education Data* (2010), <https://www.ftc.gov/enforcement/cases-proceedings/091-0081/dun-bradstreet-corporation-matter>
  - Product = education marketing data, including contact, demographic, and other information
  - Big data = same as the product, which is then used by customers with analytics to do targeted marketing by email and direct mail
- As part of shared platform or exchange
  - Case example: *Provident/UNUM* (1999), <https://www.ftc.gov/enforcement/cases-proceedings/9910101/provident-companies-inc-unum-corporation>
  - Product = disability insurance for individuals

- Big data = data relating to disability insurance claims
  - Which are used to make actuarial predictions about the types, frequency of occurrence, and duration of disability claims
  - Which are then used to underwrite policies on an individualized basis
- Large firms possess a sufficiently large set of proprietary claims data to make predictions; small firms do not and must rely on shared claims data, which is aggregated and reported by an independent third party

### III. Big Data in Digital Markets – Areas for Further Inquiry

- Cases examples: *Google/DoubleClick* (2007), <https://www.ftc.gov/enforcement/cases-proceedings/071-0170/proposed-acquisition-hellman-friedman-capital-partners-v-lp>; *Facebook/WhatsApp* (2014)
- Are there any effects on competition from the merger of two big datasets?
  - Big data as an input – will the combined datasets allow a firm post-merger to make data-dependent improvements to its products or services that smaller rivals cannot replicate?
  - Big data as a product – will the combined datasets allow a firm doing business, for example, in data mining or display advertising to exert greater market power?
  - Big data as an aspect of a platform – will the combined datasets allow a firm that operates a platform to draw more users than rival platforms?

**From:** Su, Henry <hsu@ftcexchange.com>  
**Sent:** Thursday, March 5, 2015 2:27 PM  
**To:** Non Responsive  
Non Responsive; 'kwalker@google.com'; Non Responsive  
**Cc:** Non Responsive; Kraus, Elizabeth <EKRAUS@ftc.gov>; Coppola, Maria <mcoppola@ftc.gov>; Non Responsive; Non Responsiv  
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Liebe Barbara,

Guten Tag. Thank you for summarizing the next steps. They are consistent with Edith's understanding. We would just ask that the circulation of next Friday's draft remarks be limited to the other panelists, Professor Haucap, and you. We will then strive to finalize the remarks for translation into Deutsch a week in advance of the program.

Herzliche Grüsse,  
Henry

Non Responsive



**From:** Rob Mahini <robmahini@google.com>  
**Sent:** Tuesday, March 10, 2015 11:37 AM  
**To:** Su, Henry <hsu@ftc.gov>  
**Subject:** RE: Contact info

---

Sorry - bad traffic this morning. Running late, should be there in 5.

On Mar 9, 2015 10:58 AM, "Su, Henry" <hsu@ftc.gov> wrote:  
Sure, that's fine. --Henry

From: Rob Mahini  
Sent: Monday, March 09, 2015 10:56 AM  
To: Su, Henry  
Subject: Re: Contact info

Henry - I have a meeting at the FTC now at 11am. Would it be okay to meet earlier tomorrow morning? I get in ar  
On Mar 5, 2015 3:50 PM, "Rob Mahini" <robmahini@google.com<mailto:robmahini@google.com>> wrote:  
Done - looking forward to it.

On Thu, Mar 5, 2015 at 3:49 PM, Su, Henry <hsu@ftc.gov<mailto:hsu@ftc.gov>> wrote:  
Sorry, I didn't focus on the proposed time in your earlier email. 10:00 a.m. is fine on Tuesday. Could you send me a

From: Rob Mahini  
Sent: Thursday, March 05, 2015 3:42 PM  
To: Su, Henry  
Subject: Re: Contact info

I have a call that ends around 9:30, and then can come straight after that. I think that would get me there around

On Thu, Mar 5, 2015 at 3:32 PM, Su, Henry <hsu@ftc.gov<mailto:hsu@ftc.gov><mailto:hsu@ftc.gov<mailto:hsu@f  
Can you meet early?

From: Rob Mahini  
Sent: Thursday, March 05, 2015 3:31 PM  
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Subject: Re: Contact info

Henry - do mean the one on 7th and E?

On Thu, Mar 5, 2015 at 3:27 PM, Rob Mahini <robmahini@google.com<mailto:robmahini@google.com><mailto:robn  
Sounds great.

On Thu, Mar 5, 2015 at 3:24 PM, Su, Henry <hsu@ftc.gov<mailto:hsu@ftc.gov><mailto:hsu@ftc.gov<mailto:hsu@f  
Sure, how about the Starbucks on the corner of 7th and F? It's a little roomier than the one on Indiana.

From: Rob Mahini  
Sent: Thursday, March 05, 2015 3:23 PM  
To: Su, Henry  
Subject: Re: Contact info

Great - how about 10am on Tues? Happy to come to your neck of the woods.

On Thu, Mar 5, 2015 at 1:42 PM, Su, Henry <hsu@ftc.gov<mailto:hsu@ftc.gov><mailto:hsu@ftc.gov<mailto:hsu@f  
Rob, any of those mornings will work for me. --Henry

From: Rob Mahini  
Sent: Thursday, March 05, 2015 12:40 PM  
To: Su, Henry  
Subject: Re: Contact info



--

Robert Mahini | Sr. Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)<mailto:[robmahini@google.com](mailto:robmahini@google.com)>

**From:** Su, Henry <hsu@ftcexchange.com>  
**Sent:** Thursday, March 19, 2015 12:01 AM  
**To:** Rob Mahini <robmahini@google.com>  
**Subject:** RE: Re:

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Yeah, it's getting late here. Certainly, the Chairwoman is prepared to call him at 7:30 a.m. tomorrow. Thanks for checking. -- Henry

**From:** Rob Mahini  
**Sent:** Wednesday, March 18, 2015 9:58 PM  
**To:** Su, Henry  
**Subject:** Re: Re:

Hi Henry - Sorry, but I haven't heard back from Kent. His assistant thinks he's likely commuting home now. I'll email you when I hear back, but if it's too late by then the times I gave tomorrow morning would still work.

Thanks again -  
Rob

On Wed, Mar 18, 2015 at 9:33 PM, Su, Henry <[hsu@ftc.gov](mailto:hsu@ftc.gov)> wrote:  
Rob, I'm still here at the office, (202) 326-3659. --Henry

From: Rob Mahini  
Sent: Wednesday, March 18, 2015 9:14 PM  
To: Su, Henry  
Subject: Re:

Hi Henry - I missed your email til now. Let me know when would be a good time to call.

Thanks,  
Rob

On Wed, Mar 18, 2015 at 7:11 PM, Su, Henry <[hsu@ftc.gov](mailto:hsu@ftc.gov)<<mailto:hsu@ftc.gov>>> wrote:  
Dear Rob,

Yes, the Chairwoman would like Mr. Walker's cell number. If you give it to me, I will pass it on to her. I am still at the office. Thank you.

--Henry

Henry C. Su  
Attorney Advisor, Office of Chairwoman Edith Ramirez  
U.S. Federal Trade Commission  
Mail Drop H-444  
600 Pennsylvania Ave., N.W.  
Washington, DC 20580  
Direct: (202) 326-3659<<tel:%28202%29%20326-3659>>  
iPhone: (202) 660-8519<<tel:%28202%29%20660-8519>>  
E-mail: [hsu@ftc.gov](mailto:hsu@ftc.gov)<<mailto:hsu@ftc.gov>>

From: Rob Mahini  
Sent: Wednesday, March 18, 2015 5:18 PM  
To: Su, Henry; Hipsley, Heather

Subject:

Hi Henry and Heather - we have an urgent situation that Kent Walker would like to speak with the Chairwoman about. I'm happy to set up a time -- alternatively, I could call you and provide his cell phone number for her to call.

Thanks,  
Rob

Robert Mahini | Sr. Policy Counsel |  
[robmahini@google.com](mailto:robmahini@google.com)<mailto:robmahini@google.com><mailto:robmahini@google.com<mailto:robmahini@google.com>>

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Robert Mahini | Sr. Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)<mailto:robmahini@google.com>

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Robert Mahini	Sr. Policy Counsel	<a href="mailto:robmahini@google.com">robmahini@google.com</a>
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**From:** Rob Mahini <robmahini@google.com>  
**Sent:** Thursday, March 5, 2015 3:29 PM  
**To:** Hipsley, Heather <HHIPPSLEY@ftc.gov>  
**Subject:** #DearMe campaign

---

Hi Heather - I hope this email finds you well. I wanted to reach out to you on a YouTube global video initiative called [#DearMe](#), which aims to inspire and empower teenage girls. Here's more information for the campaign, which I think both you and the Chairwoman would be perfect for!

Thanks,  
Rob

For this campaign, female role models record a video letter to their younger selves with the prompt "If you could go back in time and talk to your younger teenage self, what advice or encouragement would you give her?"

The initiative kicked off with a special video posted to the YouTube Spotlight Channel, which has over 22 million subscribers. We hope this video will inspire many more women around the world to create their own video letters after the launch of this video and help activate the YouTube community and social media. Since the initiative

What We Are Asking For:

- Create a video!
- Film 1-3 minute individual video giving advice to your younger self (prompts & sample questions below)
- Upload video on personal or organizations YouTube Channel andtag #DearMe to join the movement.
- Promote via social media using hashtag #DearMe
- Invite other inspiring women in your life to film a video too!

We're really excited about this initiative and hope that you'll participate and ask your friends and family to join the movement with you. Below we have details including prompts and sample questions about filming your own video.

**#DearMe Video Recommendations:**

- Record the video on a laptop or your phone (landscape mode). No need for professional camera.
- Speak directly to the camera.
- Keep your video between 1-3 minutes.

**Overview:**

Think of this video as a video letter to your younger self. If you could go back in time, what would you tell your 13-year old self? (Note: we're looking for stories of yourself as a young teenager, it doesn't have to be exactly 13).

**Questions and Prompts:**

Below are some questions and prompts to help you tell your story. Feel free to answer as many or as few as you want -- it's your story!

If you could go back in time and talk to your younger self, what advice and encouragement would you give?

What kept you awake at night?

- Did you worry too much about what people thought of you?
- Did you feel you weren't good enough? Pretty enough? Popular enough? Smart enough?
- Were you afraid to speak up? Did you feel powerless?
- Did you get picked on? Bullied?
- Did you feel completely alone?

Knowing what you know now, what would you tell yourself to do differently?

- How would you tackle and overcome your fears?
- How would you inspire confidence in yourself?

Paint a picture of your younger self.

- What did you like to do? What were your favorite subjects? What music did you listen to? Who did you have a crush on?
- What kind of woman did you dream of becoming in 10 or 20 years?
- Was there anything you wanted to do that didn't seem possible? Were there people who told you it was impossible?
- Who were your biggest critics?

Sign off your video with powerful words of encouragement (fill in the blank).

- YOU ARE \_\_\_\_\_ (Strong, fierce, awesome, beautiful, confident, proud, really funny, one amazing woman -- whatever strikes a chord with you!)

End your video with "Love, me" or "Love, [first name]".

**Posting Instructions:**

Here are a few guidelines for posting to make sure your video joins the campaign with the many other videos uploaded.

- For the video title, please start with **#DearMe:**
- For the video description, please make sure to include #DearMe (ex: Jamie Hill's #DearMe submission)
- For the video tags, include #DearMe, dearme, dear me, female empowerment, girl empowerment, girl power

**From:** Johanna Shelton <jshelton@google.com>  
**Sent:** Wednesday, March 25, 2015 12:00 AM  
**To:** Hipsley, Heather <HHIPPSLEY@ftc.gov>  
**Subject:** can you give me a quick call

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at (b)(6)

thanks much

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Johanna Shelton  
Director, Public Policy  
Google  
25 Mass Ave NW, 9th FL  
Washington, DC 20001  
202.709.7005 Google Voice  
[jshelton@google.com](mailto:jshelton@google.com)



**From:** Johanna Shelton <jshelton@google.com>  
**Sent:** Monday, March 23, 2015 7:55 PM  
**To:** Hipsley, Heather <HHIPPSLEY@ftc.gov>  
**Subject:** Google further follow-up

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Heather -

Google remains deeply troubled by the FTC's lack of an on-the-record clarification about the effect of the Bureau of Competition staff memo. We are puzzled why the FTC has not affirmed on the record that it took the staff recommendations from the Bureau of Competition, as well as the Bureau of Economics and others, fully into account in the final decision to close the investigation. Over the weekend we saw several press outlets confuse the Bureau of Competition's recommendations for further action with the question of search bias, and we saw a number of press outlets write that the Commission's ultimate decision went against the Bureau of Competition staff recommendations.

It also appears that the FTC is not responding to requests for comment from a number of outlets, nor commenting on the record that the Commission took the staff recommendations into account in its final agency action. This is enabling our competitors to make misleading statements that are not getting corrected. As you know, Google's competitors have used this document release to sow confusion and undermine the FTC's conclusions, especially in Europe. European policymakers are being quoted saying that this is "new" and "crucial".

We believe it is critical for the FTC to defend its reputation, showing that it followed a thorough process and fully took into account the Bureau of Competition staff memo, among other internal agency opinions including the Bureau of Economics. A public statement standing by the FTC's ability to make a final decision after assessing differing internal views would go far in the international space to restore the reputation of the FTC, especially on due process. We recall that in February 2013, when the process and result were similarly called into question by our competitors, every Commissioner, including then-Commissioner Ramirez, wrote a clarifying letter to the editor of Politico standing by the staff and their work in this matter. We believe this unfortunate FOIA incident is similarly worthy of a public statement of the FTC standing by its decision.

I detail some of this confusion and its impact below. We understand the Chairwoman will be in Europe this week and may have opportunities to express that the staff memo was fully taken into account and not inconsistent with the final agency action.

- Johanna

(b)(6)

1) Without a clear statement from the FTC to set the record straight, third parties are confusing and distorting the staff recommendations, creating a misleading impression that the FTC failed to take the staff recommendations into account when the Commission closed the investigation.

- Yelp's Luther Lowe has been widely quoted saying the FTC went against the recommendation of its staff. "With the F.T.C. agreeing to a weak settlement **against the recommendation of professional staff**, this anti-consumer behavior has been effectively greenlighted in the United States." (New York Times, 3/19/15, [Take Google to Court, Staff Report Urged F.T.C.](#))
- Matthew Reilly, Simpson Thacher/FairSearch counsel and former FTC official, is claiming on the record that the Commission voted against the division recommendation: "It's really remarkable the staff recommended issuing a complaint, and **the commission not only disagreed** but allowed Google to issue a letter saying 'we won't do it again,' rather than enter into a consent decree" (New York Times, 3/19/15, [Take Google to Court, Staff Report Urged F.T.C.](#))
- Consumer Watchdog, urging the Senate to examine how Google "**escaped prosecution for its anticompetitive practices**" (MediaPost, 3/20/15, [Advocacy Group Calls For FTC To Reopen Google Investigation](#)).
- Scott Cleland, Net Competition Chairman and Microsoft Consultant: "**The FTC staff findings and recommendation are very different from the ultimate FTC-Google settlement, which oddly did not focus primarily on fully resolving the FTC staff's recommendations**", creating "the appearance that the Google antitrust case was resolved for political reasons." (Daily Caller, 3/20/15, [Googlegate: FTC Political Appointees Bury Report Alleging Search Manipulation](#)).

2) It appears the FTC is declining to speak on the record.

- "A spokesman for the agency called the release of the documents unfortunate, but **declined to respond about their contents.**" (New York Times, 3/19/15, [Take Google to Court, Staff Report Urged F.T.C.](#))
- "A representative of the FTC said the agency had no comment on the report." (Reuters, 3/19/15, [Confidential FTC report found Google anticompetitive tactics: WSJ](#)).
- "A representative of the FTC said the agency had no comment on the report." (DailyMail.com, 3/20/15, [Google DID skew its search results: Report reveals tech firm favoured its own services over its rivals](#)).
- "The FTC declined to comment." (CNN, 3/19/15, [Google abused its monopoly power, FTC experts found](#)).
- "The FTC has not responded to a request for comment." (CNET, 3/20/15, [Ugly documents surface in antitrust case that Google settled with FTC](#)).

3) The release of the internal staff memo is creating the very type of confusion in the public that the FOIA exemption for pre-decisional agency analysis is designed to avoid. In particular, press outlets are questioning whether the final decision of the FTC really represented the agency's views, especially on search bias, and are skewing the agency's regular process as internal discord.

- "[W]hether the Federal Trade Commission made the right call when it **rebuffed its own staff recommendation** in 2013 to take Google to court over alleged anti-competitive practices." (Brian Fung and Andrea Peterson, The Washington Post, 3/20/15, [The FTC's internal memo on Google teaches companies a terrible lesson](#)).
- "The FTC's decision not to sue Google **contradicted those findings**." "But the Journal report shows that **U.S. regulators were more worried than they led on**." (CNN, 3/19/15, [Google abused its monopoly power, FTC experts found](#)).
- "Google was almost prosecuted by the US government three years ago for **skewing its search results**, according to a confidential report." (DailyMail.com, 3/20/15, [Google DID skew its search results: Report reveals tech firm favoured its own services over its rivals](#)).
- ['Googlegate': FTC Political Appointees Bury Report Alleging Search Manipulation](#), Daily Caller, 3/20/15.
- [Google cooked search results - FTC](#), RT, 3/20/15

4) This confusion is having a direct impact in Europe and other international investigations.

Ramon Tremosa i Balcells, European MEP from Catalonia: "This **new element and evidence is crucial** and could not come at better time" (NY Times, 3/20/15, [European Lawmaker Pushes Europe to Take Stronger Stance on Google](#)).

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Johanna Shelton  
Director, Public Policy  
Google  
25 Mass Ave NW, 9th FL  
Washington, DC 20001  
202.709.7005 Google Voice  
[jshelton@google.com](mailto:jshelton@google.com)

**From:** Zullo, Evan <ezullo@ftc.gov>  
**Sent:** Thursday, May 8, 2014 11:17 AM  
**To:** Rob Mahini <robmahini@google.com>  
**Cc:** Kestenbaum, Janis <jkestenbaum@ftc.gov>  
**Subject:** RE: Today's speech by the Chairwoman

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Hi Rob—This event is at the Media Institute, but you might have to contact them to determine if the event is public. I don't know.

Evan

**From:** Rob Mahini  
**Sent:** Thursday, May 08, 2014 7:00 AM  
**To:** Zullo, Evan  
**Subject:** Today's speech by the Chairwoman

Hi Evan - I saw the below in this morning's Politico email. Is the speech open to the public? If so, what time is it at? I can't find any link online anywhere for it.

Thanks,  
Rob

**BUZZ: RAMIREZ TALKING DATA SECURITY CASES TODAY** — The Federal Trade Commission chairwoman delivers a speech this morning at the St. Regis Hotel, and MT hears via an FTC aide that she's set to give an update on the commission's latest work in data security cases. If that's not enough to pique your interest — after all, we know the commission was investigating the Target breach, though there's no guarantee Ramirez will discuss that today — her remarks will also be her first foray into data privacy issues since the White House's big data report landed a week ago. We're tracking.

--

Robert Mahini | Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)

**From:** Barron, Katia <kbarron1@ftcexchange.com> on behalf of  
ftc100 <ftc100@ftcexchange.com>  
**Sent:** Thursday, October 16, 2014 8:35 PM

**To:**

**Bcc:** Non Responsive; [redacted] vieffries@wsqr.com;

Non Responsive; fobmahini@google.com; Non Responsive

Non Responsive

**Subject:** FTC Centennial Dinner and Symposium

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Dear FTC Alum,

As we continue to celebrate the FTC's centennial, I want to invite all of you to attend the 100th Anniversary Dinner on Thursday, November 6. The festivities begin at 5:30 pm with a reception followed by dinner at the JW Marriott Hotel here in Washington. This will be a special gathering of FTC staff, alumni, friends, and supporters. I am delighted to announce that Indra Nooyi, Chairman and CEO of PepsiCo, will be the evening's keynote speaker. Mrs. Nooyi has directed the company's global strategy for more than a decade, and this year ranked #13 in Forbes World's list of the 100 most powerful women. She is an engaging and provocative speaker, with stories to share on her company's dealings with the Commission both on competition and consumer protection matters. The FTC is co-hosting the dinner with the Antitrust Section of the ABA. For more information or to purchase tickets, visit the event's registration page at: [http://www.americanbar.org/calendar/2014/11/2014-ftc\\_100\\_dinner/overview.html](http://www.americanbar.org/calendar/2014/11/2014-ftc_100_dinner/overview.html).

I also invite you to attend the FTC Symposium that will be held on November 7th at the Constitution Center Auditorium. I am very excited about our agenda and the panelists who have agreed to participate, all of whom share my passion for the FTC. Each of my fellow Commissioners will moderate one of four panels that will examine the FTC's unique "toolkit," comprised of enforcement, remedies, research and advocacy, and business guidance and consumer education. I will moderate a roundtable to conclude the day-long symposium. We have seven former Chairmen participating so I expect it to be a fascinating walk through the administrations from the early-seventies through the present. For more information about the symposium please visit our website at: <http://www.ftc.gov/about-ftc/our-history/centennial-dinner-symposium>.

I hope to see you at what should be a wonderful set of events.

With warm regards,  
Edith Ramirez  
Chairwoman

**From:** Barron, Katia <kbarron1@ftcexchange.com> on behalf of  
ftc100 <ftc100@ftcexchange.com>  
**Sent:** Friday, February 20, 2015 2:44 PM  
**To:**  
**Bcc:** Non Responsive  
'robmahini@google.com'; Non Responsive

Non Responsive

**Subject:** Miles W. Kirkpatrick Award Ceremony  
**Attach:** Kirkpatrick Award Invite.pdf

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Dear FTC Alum,

I invite you to join us as the Federal Trade Commission recognizes the distinguished careers of former Bureau Directors David C. Vladeck and William J. Baer. To recognize the centennial of the FTC's service to the American public, I will have the honor of awarding the Commission's Miles W. Kirkpatrick Award to David and Bill for their lifetime of inspired leadership in our core missions of consumer protection and competition. David was the Director of the Bureau of Consumer Protection from 2009 to 2012. Prior to and after his time at the Commission, David has been a professor at Georgetown University Law Center inspiring students to pursue careers in public service. Bill was Director of the Bureau of Competition from 1995 to 1999 and served in a variety of roles at the Commission from 1975 to 1980. As part of his long and distinguished career in the antitrust field, Bill has continued his work to promote competition as the current Assistant Attorney General for the Antitrust Division of the Department of Justice.

The ceremony will take place on March 16th at 1:30 pm in the Constitution Center Auditorium with a reception to follow. Please join me in celebrating 100 years since the agency opened its doors with two of our finest Bureau Directors.

With warm regards,  
Edith Ramirez  
Chairwoman

Please RSVP to [ftc100@ftc.gov](mailto:ftc100@ftc.gov).

**From:** Barron, Katia <kbarron1@ftcexchange.com> on behalf of  
ftc100 <ftc100@ftcexchange.com>  
**Sent:** Tuesday, December 2, 2014 3:28 PM  
**To:**  
**Bcc:**

Non Responsive

'robmahini@google.com', Non Responsive

Non Responsive

**Subject:** Record Your FTC Moment

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Hi everyone, I can't wait to see you on Thursday night at the Casto C. Geer reception! As an esteemed alum of the FTC, we hope you will consider contributing to our FTC Moments project that evening. Our staff will be set up in an adjoining room at the reception to record your moment in FTC history. It really only takes a moment, so please come with a memory to share. For a flavor of what your colleagues have done, check out <http://www.ftc.gov/about-ftc/our-history/ftc-moments>. And to see the montage of Moments presented at the 100<sup>th</sup> Anniversary Dinner a few weeks ago, check out <https://www.youtube.com/watch?v=mfB7uB7dZR0&list=UUT-0Lw1AytpgikOiEwLvlZw>.

See you Thursday,  
Heather

Heather Hipsley  
Chief of Staff  
Office of Chairwoman Ramirez  
Federal Trade Commission  
Washington, D.C. 20580  
(202) 326-3285  
[hhipsley@ftc.gov](mailto:hhipsley@ftc.gov)

**From:** Barron, Katia <kbarron1@ftcexchange.com> on behalf of  
ftc100 <ftc100@ftcexchange.com>  
**Sent:** Tuesday, March 10, 2015 5:25 PM  
**To:**  
**Bcc:**

Non Responsive

'robmahini@google.com'; Non Responsive

Non Responsive

**Subject:** Reminder - Miles W. Kirkpatrick Award Ceremony  
**Attach:** Kirkpatrick Award Invite.pdf

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Dear FTC Alum,

Come celebrate our final 100th anniversary event. Please join us on Monday, March 16 at 1:30 pm in the Constitution Center Auditorium for our final centennial event to celebrate the day 100 years ago that we opened our doors to serve the American public. We will celebrate with a ceremony to award the Miles W. Kirkpatrick Award to William J. Baer and David C. Vladeck for their lifetime of inspired leadership in the agency's core missions of consumer protection and competition. A reception will follow. Please feel free to contact me if you have any questions.

For directions to Constitution Center, please follow this link: <https://www.ftc.gov/news-events/events-calendar/directions-ftc-satellite-building-conference-center>.

Regards,  
Katia Barron  
Honors Paralegal  
Office of Chairwoman Ramirez  
Federal Trade Commission  
(202) 326-2620 | [kbarron1@ftc.gov](mailto:kbarron1@ftc.gov)

**Carter, Monica M.**

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**From:** Rob Mahini  
**Sent:** Tuesday, May 27, 2014 2:16 PM  
**To:** Carter, Monica M.  
**Subject:** Re: Glass demo for Chairwoman's office

Hi Monica - We could do 2pm on July 10, if that works better for you. Thanks, and looking forward to it!

On Fri, May 23, 2014 at 5:54 PM, Carter, Monica M. <[MCARTER@ftc.gov](mailto:MCARTER@ftc.gov)> wrote:

Hi Rob,

Can we move the meeting to 2pm, if not I will hold 3pm on the calendar. Will circle back when I return to the office on Tuesday, May 27th. Have a great holiday!

Monica Carter Etheridge  
Executive Assistant to Chairwoman Edith Ramirez  
US Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
Email: [mcarter@ftc.gov](mailto:mcarter@ftc.gov)<<mailto:mpyos@ftc.gov>>  
[202-326-2666](tel:202-326-2666) (ofc)  
[202-326-2396](tel:202-326-2396) (fax)

"Life isn't about waiting for the storm to pass. It's about learning to dance in the rain."

**From:** Rob Mahini  
**Sent:** Friday, May 23, 2014 11:39 AM  
**To:** Carter, Monica M.  
**Subject:** Re: Glass demo for Chairwoman's office

Hi Monica - thought I'd check in again to lock down a time and date. Thanks!

Rob

On Mon, May 19, 2014 at 5:20 PM, Rob Mahini <[robmahini@google.com](mailto:robmahini@google.com)<<mailto:robmahini@google.com>>>> wrote:

Thanks for the reply, Monica. How about July 10th at 3pm?

On Mon, May 19, 2014 at 11:06 AM, Carter, Monica M.

<[MCARTER@ftc.gov](mailto:MCARTER@ftc.gov)<<mailto:MCARTER@ftc.gov>>>> wrote:

Good morning Rob,

Let's look at the week of July 7-10, 2014 – @3pm. Let me know what works on your end. Thank you so very much.

Regards,

Monica Carter Etheridge  
Executive Assistant to Chairwoman Edith Ramirez  
US Federal Trade Commission



600 Pennsylvania Avenue, NW  
Washington, DC 20580

Email: [mcarter@ftc.gov](mailto:mcarter@ftc.gov)<<mailto:mcarter@ftc.gov>><<mailto:mpyos@ftc.gov><<mailto:mpyos@ftc.gov>>>  
[202-326-2666](tel:202-326-2666)<<tel:202-326-2666>> (ofc)  
[202-326-2396](tel:202-326-2396)<<tel:202-326-2396>> (fax)

“Life isn’t about waiting for the storm to pass. It’s about learning to dance in the rain.”

From: Rob Mahini  
Sent: Monday, May 19, 2014 10:21 AM  
To: Carter, Monica M.  
Subject: Glass demo for Chairwoman's office

Hi Monica -

I recently offered to Heather Hipsley a Google Glass demo for the Chairwoman and her office staff by our Glass demo team, and Heather recommended that I work with you on potentially scheduling that. I'm happy to either suggest potential dates or to take back dates to our team that work for the Chairwoman in June or later.

Thanks,  
Rob

Robert Mahini | Policy Counsel |  
[robmahini@google.com](mailto:robmahini@google.com)<<mailto:robmahini@google.com>><<mailto:robmahini@google.com><<mailto:robmahini@google.com>>>

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Robert Mahini | Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)<<mailto:robmahini@google.com>>

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Robert Mahini | Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)<<mailto:robmahini@google.com>>

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Robert Mahini	Policy Counsel	<a href="mailto:robmahini@google.com">robmahini@google.com</a>
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**Carter, Monica M.**

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**From:** Rob Mahini  
**Sent:** Wednesday, August 20, 2014 8:35 PM  
**To:** Carter, Monica M.  
**Cc:** Kestenbaum, Janis  
**Subject:** Re: Google data security briefing

Monica -- Sept. 16 at 1:30 pm sounds great. Thank you for all of your help setting up this meeting.

Sincerely,  
Rob

On Wed, Aug 20, 2014 at 11:10 AM, Carter, Monica M. <[MCARTER@ftc.gov](mailto:MCARTER@ftc.gov)> wrote:

Good afternoon Rob,

Chairwoman Ramirez will be available to have a 30 minute meeting w/you on either Monday, September 15th @11:30am or Tuesday, September 16@10am or 1:30pm. Please confirm date and time. Thank you so very much for your assistance with this meeting request.

All my best,

Monica Carter Etheridge  
Executive Assistant to Chairwoman Edith Ramirez  
US Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
Email: [mcarter@ftc.gov](mailto:mcarter@ftc.gov)<<mailto:mpyos@ftc.gov>>

[202-326-2666](tel:202-326-2666) (ofc)

[202-326-2396](tel:202-326-2396) (fax)

“Life isn’t about waiting for the storm to pass. It’s about learning to dance in the rain.”

“When people show you who they are, believe them the first time.”

—Maya Angelou

**From:** Rob Mahini  
**Sent:** Friday, August 15, 2014 11:55 AM  
**To:** Kestenbaum, Janis  
**Cc:** Carter, Monica M.  
**Subject:** Re: Google data security briefing

Thanks, Janis.

On Tue, Aug 12, 2014 at 4:44 PM, Kestenbaum, Janis <[jkestenbaum@ftc.gov](mailto:jkestenbaum@ftc.gov)<<mailto:jkestenbaum@ftc.gov>>> wrote:

Hi, Rob -- I will be away then but we will get back to you about the Chairwoman's availability for this. Thanks.

Janis

**From:** Rob Mahini

Sent: Tuesday, August 12, 2014 04:38 PM  
To: Kestenbaum, Janis  
Cc: Carter, Monica M.  
Subject: Google data security briefing

Hi Janis -- it was nice to see you at the CDT event a few weeks ago. I hope the rest of your summer has gone well.

I was writing to let you know that one of our security product managers, Stephan Somogyi, will be in DC on Sept. 15-17. He is an expert on our recent technical efforts to keep Internet users safe from the latest data security threats facing consumers across the web.

I was hoping that the Chairwoman, you, and others in her office might be interested and available for us to come in with Stephan, so that he could provide you with a briefing on our latest data security efforts. If so, please let me know what might work -- Stephan is free all day Sept 15-16 and most of Sept. 17 (until he leaves DC in the mid-afternoon).

Thanks,  
Rob

Robert Mahini | Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)<<mailto:robmahini@google.com>>

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Robert Mahini | Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)<<mailto:robmahini@google.com>>

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Robert Mahini	Policy Counsel	<a href="mailto:robmahini@google.com">robmahini@google.com</a>
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Non Responsive

**From:** Rob Mahini  
**Sent:** Tuesday, August 12, 2014 4:39 PM  
**To:** Kestenbaum, Janis  
**Cc:** Carter, Monica M.  
**Subject:** Google data security briefing

Hi Janis -- it was nice to see you at the CDT event a few weeks ago. I hope the rest of your summer has gone well.

I was writing to let you know that one of our security product managers, Stephan Somogyi, will be in DC on Sept. 15-17. He is an expert on our recent technical efforts to keep Internet users safe from the latest data security threats facing consumers across the web.

I was hoping that the Chairwoman, you, and others in her office might be interested and available for us to come in with Stephan, so that he could provide you with a briefing on our latest data security efforts. If so, please let me know what might work -- Stephan is free all day Sept 15-16 and most of Sept. 17 (until he leaves DC in the mid-afternoon).

Thanks,  
Rob

Robert Mahini | Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)

**From:** Nick Bauer <nbauer@google.com>  
**Sent:** Friday, November 21, 2014 4:38 PM  
**To:** Watson, Shaundra <SWATSON@ftc.gov>  
**Subject:** Google Invoice - Cafe Lunch

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Dear Commissioner Ramirez,

Google complies with federal, state, and local ethics laws. These laws address gifts from vendors like Google. Our records show that you and/or your colleagues may be required to pay for meals or other items you received. If your institution requires, please mail a check to Google Inc. for the items invoiced below. If you are allowed to accept the items you received from Google, please notify us for our records.

Kind Regards,

-Nick

Nick Bauer | Political Ethics Legal Assistant | [nbauer@google.com](mailto:nbauer@google.com) | 650-861-7940



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## INVOICE

BILLED TO: Edith Ramirez,  
Commissioner, Federal Trade  
Commission

Invoice Number CAT561

Invoice Date 11/21/14

Terms Net30

SEND PAYMENT TO: Nicholas Bauer  
25 Massachusetts Ave NW  
Google Inc. - 9th Floor  
Washington, D.C. 20001

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QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
2	Google Cafe Lunch	\$18	\$36

Note: Please make checks payable to Google Inc.

Questions concerning this invoice? Call 650-861-7940

**Pay this amount** \$36

--  
Nick Bauer | Political Ethics Legal Assistant | [nbauer@google.com](mailto:nbauer@google.com) | 650-861-7940



**From:** Richard Salgado <rsalgado@google.com>  
**Sent:** Thursday, November 6, 2014 3:18 PM  
**To:** Feuer, Stacy <SFEUER@ftc.gov>; Watson, Shaundra <SWATSON@ftc.gov>  
**Cc:** Bryan Schilling <bschilling@google.com>  
**Subject:** Quick Chat with Google

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Hi Stacy and Shaundra,

I hope you're both doing well. Would either of you have time today or tomorrow for a quick chat with Bryan and me about the Safe Web Act processes?

Thanks!

Richard

**From:** Watson, Shaundra <swatson@ftcexchange.com>  
**Sent:** Friday, January 9, 2015 5:42 PM  
**To:** Rob Mahini <robmahini@google.com>  
**Subject:** RE: Quick chat

---

Meeting starting now; will get back to you.

**From:** Rob Mahini  
**Sent:** Friday, January 09, 2015 2:35 PM  
**To:** Watson, Shaundra  
**Subject:** Re: Quick chat

Kinda. Had a quick question for you - shouldn't take more than 30 seconds. Can I call you now?

On Fri, Jan 9, 2015 at 2:32 PM, Watson, Shaundra <SWATSON@ftc.gov> wrote:  
Is it urgent? If not, can we talk Monday afternoon?

From: Rob Mahini  
Sent: Friday, January 09, 2015 1:24 PM  
To: Watson, Shaundra  
Subject: Re: Quick chat

Anything opening up for you?

On Fri, Jan 9, 2015 at 10:05 AM, Rob Mahini <robmahini@google.com<mailto:robmahini@google.com>> wrote:  
Sure thing, thanks.

On Fri, Jan 9, 2015 at 10:05 AM, Watson, Shaundra <SWATSON@ftc.gov<mailto:SWATSON@ftc.gov>> wrote:  
Sure, maybe this afternoon. Can I get back to you on possible timing?

From: Rob Mahini  
Sent: Friday, January 09, 2015 10:04 AM  
To: Watson, Shaundra  
Subject: Quick chat

Hi Shaundra - happy new year! Are you around for a quick phone call today?

--  
Robert Mahini | Sr. Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)<mailto:robmahini@google.com><mailto:robmahini@google.com><mailto:robmahini@google.com>>

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Robert Mahini | Sr. Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)<mailto:robmahini@google.com>

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Robert Mahini | Sr. Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)<mailto:robmahini@google.com>

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**Robert Mahini** | **Sr. Policy Counsel** | [robmahini@google.com](mailto:robmahini@google.com)



**From:** Rob Mahini <robmahini@google.com>  
**Sent:** Friday, January 16, 2015 11:19 AM  
**To:** Watson, Shaundra <SWATSON@ftc.gov>  
**Subject:** Re: Quick chat

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Thanks (b)(6)

Yes. What's your number?

----- Original Message -----  
Subject: Re: Quick chat  
From: Rob Mahini <robmahini@google.com>  
To: "Watson, Shaundra" <SWATSON@ftc.gov>  
CC:  
Date: Fri, January 16, 2015 6:28 AM

Hi Shaundra - no problem, I'm sorry you had to work so late. There was one thing I wanted to give you and the Chairwoman a heads-up on today that I think she'd want to know about. Could you call me at 9:30? Or would it be better if I give Heather a call? Whatever you think works best.

On Thu, Jan 15, 2015 at 11:25 PM, Watson, Shaundra <SWATSON@ftc.gov<mailto:SWATSON@ftc.gov>> wrote:  
Hi Rob,

I am just now leaving work, so I am sorry that I couldn't back to you earlier. I'll be in transit tomorrow morning but could probably talk between 9:30-10:00 if you give me a number where I can reach you.

Thanks,

Shaundra

From: Rob Mahini  
Sent: Thursday, January 15, 2015 11:21 AM  
To: Watson, Shaundra  
Subject: Re: Quick chat

How does the late afternoon look for a phone call? We can lock down a lunch date at the same time.

On Wed, Jan 14, 2015 at 10:17 PM, Watson, Shaundra <SWATSON@ftc.gov<mailto:SWATSON@ftc.gov><mailto:SWATSON@ftc.gov><mailto:SWATSON@ftc.gov>>> wrote:  
Thanks! Let's touch base tomorrow because I'm out on Friday. Also, in re to lunch, the second or third week of February likely works, though it will be freezing outside.

----- Original Message -----  
Subject: Re: Quick chat  
From: Rob Mahini <robmahini@google.com<mailto:robmahini@google.com><mailto:robmahini@google.com<mailto:robmahini@google.com>>>>  
To: "Watson, Shaundra" <SWATSON@ftc.gov<mailto:SWATSON@ftc.gov><mailto:SWATSON@ftc.gov><mailto:SWATSON@ftc.gov>>>>  
CC:  
Date: Wed, January 14, 2015 10:05 PM

Hi Shaundra -- absolutely not a problem, please don't apologize! I was happy to see on Monday why you've been so busy -- it was for a very good reason! It would be great to chat Thurs or Friday if you're free.

Also, let's try to get a lunch on the calendar. It's been too long - how does the next couple weeks look for you?

On Wed, Jan 14, 2015 at 12:31 AM, Watson, Shaundra <SWATSON@ftc.gov<mailto:SWATSON@ftc.gov><mailto:SWATSON@ftc.gov><mailto:SWATSON@ftc.gov><mailto:SWATSON@ftc.gov>>>> wrote:  
Rob,

My sincerest apologies for the delay in getting back to you. I've been absolutely swamped. I'm not sure whether you still have an interest in speaking, but if you do, I am generally around tomorrow. Again, apologies if it was a time-sensitive matter.

Thanks,

Shaundra

From: Rob Mahini  
Sent: Friday, January 09, 2015 1:24 PM  
To: Watson, Shaundra  
Subject: Re: Quick chat

Anything opening up for you?

On Fri, Jan 9, 2015 at 10:05 AM, Rob Mahini <robmahini@google.com<mailto:robmahini@google.com><mailto:robmahini@google.com><mailto:robmahini@google.com>>>><mailto:robmahini@google.com<mailto:robmahini@google.com>>>> wrote:  
Sure thing, thanks.

On Fri, Jan 9, 2015 at 10:05 AM, Watson, Shaundra <SWATSON@ftc.gov<mailto:SWATSON@ftc.gov><mailto:SWATSON@ftc.gov><mailto:SWATSON@ftc.gov><mailto:SWATSON@ftc.gov>>>> wrote:  
Sure, maybe this afternoon. Can I get back to you on possible timing?

From: Rob Mahini  
Sent: Friday, January 09, 2015 10:04 AM  
To: Watson, Shaundra



**From:** Watson, Shaundra <swatson@ftcexchange.com>  
**Sent:** Monday, February 23, 2015 12:58 PM  
**To:** Rob Mahini <robmahini@google.com>  
**Subject:** RE: YouTube

---

Okay, thanks.

**From:** Rob Mahini  
**Sent:** Monday, February 23, 2015 9:52 AM  
**To:** Watson, Shaundra  
**Subject:** Re: YouTube

Hi Shaundra - hope you had a nice weekend. I could do the 25th - let's go with that.

On Sat, Feb 21, 2015 at 10:42 AM, Watson, Shaundra <SWATSON@ftc.gov> wrote:  
Thanks. In re lunch, I'm free March 13, March 19, and March 24-26. Actually, March 25 and 26 are probably the best dates.

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**From:** Rob Mahini  
**Sent:** Thursday, February 19, 2015 08:59 PM  
**To:** Watson, Shaundra  
**Subject:** YouTube

Hi Shaundra - I just wanted to let you know that it's likely that on Monday we'll be launching the product we demoed for the Chairwoman and Ashkan in Mountain View.

I still need to show it to you -- and also get back to you on lunch! I'm out of town next week, so how does early March look for you?

Robert Mahini | Sr. Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)

Robert Mahini | Sr. Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)

Non Responsive

On Wed, Mar 25, 2015 at 12:30 AM, Watson, Shaundra <[SWATSON@ftc.gov](mailto:SWATSON@ftc.gov)> wrote:  
Rob, Apologies, but could we reschedule?

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**From:** Rob Mahini  
**Sent:** Tuesday, March 24, 2015 09:49 PM  
**To:** Watson, Shaundra  
**Subject:** Tomorrow

Hi Shaundra - I have a 10:45 doctor's appointment that should be over in time for us to meet for lunch, but will keep you posted if the doc is running late. Let's shoot for 12:15. Where would you like to meet?

Thanks,  
Rob

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Robert Mahini | Sr. Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)

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Robert Mahini | Sr. Policy Counsel | [robmahini@google.com](mailto:robmahini@google.com)