



Consumer Federation of America

1620 I Street, N.W., Suite 200 * Washington, DC 20006

August 3, 2011

Donald S. Clark
Secretary
Federal Trade Commission
Room H-135 (Annex N)
600 Pennsylvania Avenue NW
Washington, DC 20580

RE: Dot Com Disclosures, P114506

Dear Mr. Clark:

Consumer Federation of America (CFA), a nonprofit association of some 300 consumer organizations in the United States, agrees that it is time to revisit the "Dot Com Disclosures" business guidance, particularly in light of the emergence of mobile advertising.

While the basic "Dot Com Disclosures" guidance is probably still germane for advertising on companies' websites, the examples that are provided may not work well in the mobile space considering the limited screen size of mobile devices. Furthermore, marketing messages can now be conveyed through social networking sites, "tweets" and other means that were not anticipated when the guidance was issued in 2000.

To supplement the information that the Federal Trade Commission (FTC) will gather from consumer protection agencies, advertisers and others through this notice, CFA suggests that the FTC should convene another public workshop to explore the matter further and test new examples.

Sincerely,

—

Susan Grant
Director of Consumer Protection