

FEDERAL TRADE COMMISSION
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Section I: Steps Taken to Apply the Presumption of Openness

The guiding principle underlying the President's [FOIA Memorandum](#) and the Attorney General's [2009 FOIA Guidelines](#) is the presumption of openness.

Please answer the following questions in order to describe the steps your agency has taken to ensure that the presumption of openness is being applied to all decisions involving the FOIA. You may also include any additional information that illustrates how your agency is working to apply the presumption of openness.

FOIA Training:

1. Did your agency conduct FOIA training during the reporting period for FOIA professionals?

Answer: Yes.

2. If yes, please provide a brief description of the type of training conducted and the topics covered.

Answer: In 2015, the FTC FOIA Office conducted FOIA training for the various FTC Bureaus, Offices and Regional Offices that included over 100 participants. The training concentrated on the best practices in conducting FOIA searches, new developments in FOIA policy, and addressed the proper application of FOIA exemptions. The training also covered current topics of interest and recent FOIA activities at the FTC. The FOIA Office also provided FOIA training to all new attorneys and economists at the New Attorney and Economist retreat. This training emphasized the importance of the public's trust and confidence, timely processing, and transparency in processing FOIA requests. Additionally, the FOIA Office communicates daily with internal and external customers regarding questions related to pending FOIA requests, appeals, litigation, and fee policy procedures.

3. If no, please explain why your agency did not hold training during the reporting period, such as if training offered by other agencies was sufficient for your agency's training needs.

Answer: N/A.

4. Did your FOIA professionals attend any FOIA training or conference during the reporting period during the reporting period such as that provided by the Department of Justice?

Answer: Yes. The Associate General Counsel attended and taught at the American Society of Access Professional's annual training on the FOIA and Privacy Act. All new employees responsible for processing FOIA requests attend the Office of Legal Education's 2-day training program on FOIA processing procedures and exemptions. Additionally, staff attended the Department of Justice's training on fee waivers and fee schedules. A new staff member for FY 2015 also attended the associated training hosted by the Department of Justice's Office of Information Policy.

5. Provide an estimate of the percentage of your FOIA professionals and staff with FOIA responsibilities who attended FOIA training during this reporting period.

Answer: One hundred percent of staff members responsible for processing FOIA requests received substantive FOIA training during this reporting period.

6. OIP has directed agencies to “take steps to ensure that all of their FOIA professionals attend substantive FOIA training at least once throughout the year.” If your response to the previous question is that less than 80% of your FOIA professionals attended training, please explain your agency’s plan to ensure that all FOIA professionals receive or attend substantive FOIA training during the next reporting year.

Answer: N/A.

Outreach:

7. Did your FOIA professionals engage in any outreach or dialogue with the requester community or open government groups regarding your administration of the FOIA?

Answer: Each FOIA staff member handling a request provides his or her direct telephone number to the requester in the acknowledgment, extension, and response letters. Additionally, individuals can contact the FTC’s FOIA Hotline, at (202) 326-2430, with questions. The FTC also provides the contact information for its FOIA Public Liaison on its website, available at <https://www.ftc.gov/about-ftc/foia/freedom-information-act-contacts>. Through these mechanisms, the FOIA Office routinely communicates with requesters and other members of the public on an individual basis, and is available to answer questions regarding FOIA policies or procedures.

8. If you did not conduct any outreach, during the reporting period, please describe why.

Answer: N/A.

Discretionary Releases:

9. Does your agency have a distinct process or system in place to review records for discretionary release?

Answer: The FTC makes every effort not to withhold information simply because it may do so legally. FOIA staff evaluates each document on a case-by-case basis, to determine if not only an exemption applies, but also what specific harm would result from its release. Typically, FOIA staff requires the author of the document to articulate such harm. In the absence of such a showing, FOIA staff will release the document to the requester. Whenever possible, FOIA officers will release more information than is legally required when disclosure will increase public understanding of the subject matter without interfering with agency proceedings.

10. During the reporting period, did your agency make any discretionary releases of information?

Answer: Yes, the agency made numerous discretionary releases of legally exempt information. The Agency has long sought to comply with the FOIA's spirit of maximum possible disclosures and has a long-standing practice of releasing as much information to the public as possible. All reviewers are trained to conduct FOIA reviews in compliance with the provisions of the FOIA and relevant FOIA case law.

11. What exemption(s) would have covered the material released as a matter of discretion?

Answer: The agency will waive the deliberative process privilege imbedded in Exemption 5 of the FOIA when doing so will increase public understanding of the subject matter and have no chilling effect on agency proceedings. Additionally, the agency has released information that would otherwise have been covered by Exemption 2.

12. Provide a narrative description, as well as some specific examples, of the type of information that your agency released as a matter of discretion during the reporting year.

Answer: In some cases, the FTC released internal recommendations and drafts that the agency could have withheld under Exemption 5. We released this information because, following discussions with staff, we determined that release would not chill future deliberations or harm agency proceedings. For instance, we released internal discussion memorandum that were contained in investigation documents from the 1970s under Exemption 5. In another example, we released internal personnel forms for background and credit checks under Exemption 2.

13. If your agency was not able to make any discretionary releases of information, please explain why.

Answer: N/A.

Other Initiatives:

14. Describe any efforts your agency has undertaken to inform non-FOIA professionals of their obligations under the FOIA.

Answer: As explained above, the Assistant General Counsel provides FOIA training for all new attorneys and economists. This training emphasizes the importance of the presumption of openness under the FOIA, provides an overview of each of the FOIA exemptions, and highlights the agency's record retention policies. Throughout the year, the Assistant General Counsel meets with agency staff as needed to discuss FOIA-related issues as they arise. The agency's FOIA officers are also available at any time to answer any questions that arise.

15. If there are any other initiatives taken by your agency to ensure that the presumption of openness is being applied, please describe them here.

Answer: The agency posts frequently requested documents and documents relating to “hot topics” in its online FOIA Reading Room, available at: <https://www.ftc.gov/about-ftc/foia/foia-reading-rooms>. Both FOIA and agency staff are responsible for identifying these topics, and are encouraged to make proactive disclosures. In addition, the FTC places a large volume of records relating to both its enforcement and policy mandates on its public website, including all adjudicative decisions, rulemaking materials and comments, workshop information, speeches, and a wide range of other documents (see <http://www.ftc.gov>).

Section II: Steps Taken to Ensure that Your Agency Has an Effective System in Place for Responding to Requests

The Attorney General’s [2009 FOIA Guidelines](#) emphasized that “[a]pplication of the proper disclosure standard is only one part of ensuring transparency. Open government requires not just a presumption of disclosure, but also an effective system for responding to FOIA requests.” It is essential that agencies effectively manage their FOIA program.

Please answer the following questions to describe the steps your agency has taken to ensure that the management of your FOIA program is effective and efficient. You should also include any additional information that that describes your agency's efforts in this area.

Processing Procedures:

1. For FY 2015, what was the average number of days your agency reported for adjudicating requests for expedited processing?

Answer: 8 days to adjudicate requests for expedited processing.

2. If your agency’s average number of days to adjudicate requests for expedited processing was above ten calendar days, please describe the steps your agency will take to ensure that requests for expedited processing are adjudicated within ten calendar days or less.

Answer: N/A.

3. If your agency has a decentralized FOIA process, has your agency taken steps to make the routing of misdirected requests within your agency more efficient? If so, please describe those steps.

Answer: N/A.

4. On July 2, 2015, OIP issued new guidance to agencies on the proper procedures to be used in the event an agency has a reason to inquire whether a requester is still interested in the processing of his or her request. Please confirm here that to the extent your agency may have

had occasion to send a “still interested” inquiry, it has done so in accordance with the new guidelines for doing so, including affording requesters thirty working days to respond.

Answer: The agency does not currently send “still interested” letters.

Requester Services:

5. Agency FOIA Requester Service Centers and FOIA Public Liaisons serve as the face and voice of an agency. In this capacity they provide a very important service for requesters, informing them about how the FOIA process works and providing specific details on the handling of their individual requests. The FOIA also calls on agency FOIA Requester Service Centers and FOIA Public Liaisons to assist requesters in resolving disputes. Please explain here any steps your agency has taken to strength these services to better inform requesters about their requests and to present or resolve FOIA disputes.

Answer: If a requester has questions or comments about the FOIA process, they may call the FOIA Requester Service Center at (202) 326-2430 to either speak directly to a FOIA Case Officer or leave a voice message. A requester may ask the FOIA Case Officer to speak with the FOIA Public Liaison if there are concerns about the quality of the service received regarding the processing of an initial response or appeal. Moreover, the FOIA Public Liaison’s contact information is available here: <https://www.ftc.gov/about-ftc/foia/freedom-information-act-contacts>), and any individual can directly contact the FTC’s FOIA Public Liaison. FOIA Case Officers and the Public Liaison are available to assist individual requesters at each step of the process in filing a FOIA request.

The FTC’s FOIA process includes sending acknowledgment letters to requesters if processing the request will likely take longer than five business days. The acknowledgment letter includes FOIA staff contact information in case the requester has questions. Additionally, the FTC’s website includes a “Track Your FOIA Request” feature, which allows requesters to keep track of FOIA requests that have opened and closed in the most recent month.

Further, the FTC’s substantive response letters to FOIA appeals notify requesters about the mediation services offered by OGIS. These letters describe the mediation process and provide requesters with information on how to pursue this option. Thereafter, the Public Liaison also works with OGIS on a case-by-case basis to respond the questions or concerns of FOIA requesters.

Other Initiatives:

6. If there are any other steps your agency has undertaken to ensure that your FOIA system operates efficiently and effectively, such as conducting self-assessments to find greater efficiencies, improving search processes, eliminating redundancy, etc., please describe them here.

Answer: The FOIA Office holds biweekly meetings in which staff members evaluate processing procedures, identify areas that can be improved, and offer recommendations for improvement. In addition, FOIA staff frequently consults with FOIA Access Officers throughout the FTC to determine how to make the agency's search process more efficient. FOIA staff also searches the agency's electronic FOIA database for related requests. If a similar request has been filed in the past, staff asks the requester if they would like to access these records to decrease processing time.

Section III: Steps Taken to Increase Proactive Disclosures

Both the [President's](#) and [Attorney General's](#) FOIA memoranda focused on the need for agencies to work proactively to post information online without waiting for individual requests to be received.

Please answer the following questions to describe the steps your agency has taken to increase the amount of material that is available on your agency websites. In addition to the questions below, you should also describe any additional steps taken by your agency to make and improve proactive disclosures of information.

Posting Material:

1. Describe your agency's process or system for identifying "frequently requested" records required to be posted online under Subsection (a)(2) of the FOIA.

Answer: FOIA staff are trained to identify instances where three or more requests have sought the same set of documents. When this occurs, staff posts the accessible documents in the agency's FOIA reading room. These requests can be found here:

<https://www.ftc.gov/about-ftc/foia/foia-reading-rooms/frequently-requested-records>.

2. Does your agency have a distinct process or system in place to identify other records for proactive disclosure? If so, please describe your agency's process or system.

Answer: Yes. Whenever the Commission votes to approve any action, the Commission determines whether documents that are the result of that action are of public interest. If so, the Commission creates a press release pertaining to the action and proactively posts the documents in conjunction with the news release.

3. When making proactive disclosures of records, are your agency's FOIA professionals involved in coding the records for Section 508 compliance or otherwise preparing them for

posting? If so, provide an estimate of how much time is involved for each of your FOIA professionals and your agency overall.

Answer: Yes—the FOIA staff spends an estimated 5% of its workweek preparing proactive disclosures of records for posting.

4. Has your agency encountered challenges that make it difficult to post records you otherwise would like to post?

Answer: No.

5. If so, please briefly explain those challenges.

Answer: N/A.

6. Provide examples of material that your agency has proactively disclosed during the past reporting year, including links to the posted material.

Answer: As explained above, documents posted on the agency’s website include court documents and adjudicative decisions (<https://www.ftc.gov/enforcement/cases-proceedings>), public comments (<https://www.ftc.gov/policy/public-comments>), workshop and event information (<https://www.ftc.gov/news-events/events-calendar>), speeches (<https://www.ftc.gov/news-events/speeches>), and a wide range of other documents.

Additionally, as described above, the FOIA Office has posted frequently requested records, available at: <https://www.ftc.gov/about-ftc/foia/foia-reading-rooms/frequently-requested-records>. Some examples of records that have been posted in the last fiscal year include documents relating to LifeLock, Google, and the FOIA Improvement Act, as well as consumer complaints regarding various companies, such as Vemma and KickStarter. Also available online are “hot topics” such as the Do-Not-Call and Consumer Sentinel complaint databases (<https://www.ftc.gov/about-ftc/foia/foia-reading-rooms/hot-topics>).

7. Did your agency use any means to publicize or highlight important proactive disclosures for public awareness? If yes, please describe those efforts.

Answer: The FTC increases proactive disclosure by disseminating new information daily, through a variety of mechanisms. The FTC’s Office of Public Affairs routinely issues press releases announcing Commission activities and directing consumers to web pages containing additional information. The agency also maintains Twitter, Facebook and YouTube accounts. The FTC’s official Twitter account is available in both English and Spanish. In addition, the Chairwoman and Commissioners each have their own Twitter accounts, which they use to disseminate a wide array of information regarding Commission activities. Finally, various divisions throughout the Commission maintain blogs relating to specific topics of interest to consumers or businesses. For more information on the FTC’s use of social media, please see: <https://www.ftc.gov/news-events/social-media>.

Other Initiatives:

8. If there are any other steps your agency has taken to increase proactive disclosures, please describe them here.

Answer: As described above, the FTC posts a wide array of documents to its public website, including frequently requested records.

Section IV: Steps Taken to Greater Utilize Technology

A key component of the President's [FOIA Memorandum](#) was the direction to "use modern technology to inform citizens about what is known and done by their Government." In addition to using the internet to make proactive disclosures, agencies should also be exploring ways to utilize technology in responding to requests.

Please answer the following questions to describe how your agency is utilizing technology to improve its FOIA administration and the public's access to information. You should also include any additional information that that describes your agency's efforts in this area.

Making Material Posted Online More Usable:

1. Beyond posting new material, is your agency taking steps to make the posted information more useable to the public, especially to the community of individuals who regularly access your agency's website?

Answer: Yes.

2. If yes, please provide examples of such improvements.

Answer: The FOIA Office is working with the agency's web team to make its Frequently Requested Documents page more user friendly. Additionally, FOIA staff routinely guide requesters to pertinent information on the FTC's public website when they are having difficulty navigating the site. In addition, the public may now use optical character recognition (OCR) on PDF files. OCR allows the public to more easily search PDF files for key words and/or terms.

3. Have your agency's FOIA professionals interacted with other agency staff (such as technology specialists or public affairs or communications professionals) in order to identify if there are any new ways to post agency information online?

Answer: No.

Use of Technology to Facilitate Processing of Requests:

4. Did your agency conduct training for FOIA staff on any new processing tools during the reporting period, such as for a new case management system, or for search, redaction, or other processing tools?

Answer: Yes, FOIA staff received training on a program called ZyLAB, which is the FTC's new Document Review Platform. ZyLAB has an advanced user interface that will enable the FOIA staff to efficiently review large sets of data for FOIA requests.

5. Beyond using technology to redact your documents, is your agency taking steps to use more advanced technology to facilitate overall FOIA efficiency, such as improving record search capabilities, utilizing document sharing platforms for consultations and referrals, or employing software that can sort and de-duplicate documents? If yes, describe the technological improvements being made.

Answer: Yes, the FTC utilizes various electronic databases to facilitate the processing of FOIA requests. The FTC has processed all of its FOIA requests electronically since 2003, using the FOIAXpress software. The agency frequently upgrades to new versions of this software to ensure that it is able to process requests as quickly as possible. Agency staff is able to provide the FOIA Office with responsive records electronically, either via e-mail or by placing the documents on the agency's shared drive.

FOIA requesters most frequently request consumer complaints or data relating to these complaints. This information is contained in the agency's Consumer Sentinel database, and is accessible to the FOIA staff. Therefore, the FOIA Office can process these requests extremely efficiently.

Additionally, the Office of the Secretary maintains a document management database containing congressional correspondence, investigative records, internal memoranda and coding forms, and documents relating to the agency's consumer education and advocacy initiatives. The agency also utilizes Oracle's Business Objects software to document all official matters. FOIA staff is able to search these two databases to locate responsive records or determine which offices throughout the Commission may have responsive records.

6. Are there additional tools that could be utilized by your agency to create further efficiencies?

Answer: The FTC continues to explore new technologies and other methods in which we can make the facilitation of processing FOIA requests more efficient.

Other Initiatives:

7. Did your agency successfully post all four quarterly reports for FY 2015?

Answer: Yes, the reports were posted.

8. If your agency did not successfully post all quarterly reports, with information appearing on FOIA.gov, please explain why and provide your agency's plan for ensuring that such reporting is successful in FY 2016.

Answer: The FTC has worked with DOJ to ensure successful reporting in FY 2016.

9. Do your agency's FOIA professionals use e-mail or other electronic means to communicate with requesters whenever feasible? If yes, what are the different types of electronic means that are utilized by your agency to communicate with requesters?

Answer: The FOIA staff e-mails requesters regularly to discuss the scope of their requests or fee-related issues, and often sends responses to FOIA requests via e-mail correspondence.

10. If your agency does not communicate electronically with requests as a default, are there any limitations or restrictions for the use of such means? If yes, does your agency inform requesters about such limitations?

Answer: N/A.

Section V: Steps Taken to Improve Timeliness in Responding to Requests and Reducing Backlogs

The President's [FOIA Memorandum](#) and the Attorney General's [2009 FOIA Guidelines](#) have emphasized the importance of improving timeliness in responding to requests. This section of your Chief FOIA Officer Report addresses both time limits and backlog reduction. Backlog reduction is measured both in terms of numbers of backlogged requests or appeals and by looking at whether agencies closed their ten oldest requests, appeals, and consultations.

For the figures required in this Section, please use the numbers contained in the specified sections of your agency's 2015 Annual FOIA Report and, when applicable, your agency's 2014 Annual FOIA Report.

Simple Track: Section VII.A of your agency's Annual FOIA Report, entitled "FOIA Requests – Response Time for All Processed Requests," includes figures that show your agency's average response times for processed requests. For agencies utilizing a multi-track system to process requests, there is a category for "simple" requests, which are those requests that are placed in the agency's fastest (non-expedited) track, based on the low volume and/or simplicity of the records requested.

1. Does your agency utilize a separate track for simple requests?

Answer: Yes.

2. If so, for your agency overall in FY 2015, what was the average number of days to process simple requests 20 working days or fewer?

Answer: 5.73 days

3. Please provide the percentage of requests processed by your agency in FY 2015 that were placed in your simple track.

Answer: 59.6%

4. If your agency does not track simple requests separately, was the average number of days to process all non-expedited requests 20 working days or fewer?

Answer: N/A.

Backlogs: Section XII.A of your agency's Annual FOIA Report, entitled "Backlogs of FOIA Requests and Administrative Appeals" shows the numbers of any backlogged requests or appeals from the fiscal year. You should refer to these numbers from your Annual FOIA Reports for both Fiscal Year 2014 and Fiscal Year 2015 when completing this section of your Chief FOIA Officer Report.

5. If your agency had a backlog of requests at the close of FY 2015, did that backlog decrease as compared with the backlog reported at the end of FY 2014?

Answer: No. In FY 2015, FTC had a backlog of eight requests, as opposed to FY 2014, which had a backlog of seven requests. The agency continues to close the vast majority of its overdue requests before the end of each fiscal year.

6. If not, explain why and describe the causes that contributed to your agency not being able to reduce its backlog.

Answer: FTC received 107 more FOIA requests in FY 2015 than in FY 2014. The agency continues to close the vast majority of its overdue requests before the end of each fiscal year.

7. If you had a request backlog, please report the percentage of requests that make up the backlog out of the total number of requests *received* by your agency in FY 2015.

Answer: 0.52%

Backlogged Appeals:

8. If your agency had a backlog of appeals at the close of FY 2015, did that backlog decrease as compared with the backlog reported at the end of FY 2014?

Answer: Yes—at the close of FY 2014, FTC had a backlog of two appeals, as opposed to the end of FY 2015, which had no backlog of appeals.

9. If not, explain why and describe the causes that contributed to your agency not being able to reduce backlog.

Answer: N/A.

10. If you had an appeal backlog, please report the percentage of appeals that make up the backlog out of the total number of appeals *received* by your agency in FY 2015.

Answer: N/A.

Backlog Reduction Plans:

11. In the [2015 guidelines for Chief FOIA Officer Reports](#), any agency with a backlog of over 1,000 requests in Fiscal Year 2014 was asked to provide a plan for achieving backlog reduction in the year ahead. Did your agency implement a backlog reduction plan last year? If so, describe your agency's efforts in implementing this plan and note if your agency was able to achieve backlog reduction in Fiscal Year 2015.

Answer: N/A.

12. If your agency had a backlog of more than 1,000 requests in FY 2015, what is your agency's plan to reduce this backlog during FY 2016?

Answer: N/A.

Status of Ten Oldest Requests, Appeals, and Consultations: Section VII.E, entitled "Pending Requests – Ten Oldest Pending Requests," Section VI.C.(5), entitled "Ten Oldest Pending Administrative Appeals," and Section XII.C., entitled "Consultations on FOIA Requests – Ten Oldest Consultations Received from Other Agencies and Pending at Your Agency," show the ten oldest pending requests, appeals, and consultations. You should refer to these numbers from your Annual FOIA Reports for both Fiscal Year 2014 and Fiscal Year 2015 when completing this section of your Chief FOIA Officer Report.

Ten Oldest Requests:

13. In FY 2015, did your agency close the ten oldest requests that were reported pending in your FY 2014 Annual FOIA Report?

Answer: Yes.

14. If no, please provide the number of these requests your agency was able to close by the end of the fiscal year.

Answer: N/A.

15. Of the requests your agency was able to close from your ten oldest, please indicate how many of these were closed because the request was withdrawn by the requester. If any were closed because the request was withdrawn, did you provide any interim responses prior to the withdrawal?

Answer: N/A.

Ten Oldest Appeals:

16. In FY 2015, did your agency close the ten oldest appeals that were reported pending in your FY 2014 Annual FOIA Report?

Answer: N/A.

17. If no, please provide the number of these appeals your agency was able to close by the end of the fiscal year.

Answer: N/A.

Ten Oldest Consultations:

18. In FY 2015, did your agency close the ten oldest consultations that were reported pending in your FY 2014 Annual FOIA Report?

Answer: N/A.

19. If no, please provide the number of these consultations your agency was able to close by the end of the fiscal year.

Answer: N/A.

Additional Information on Ten Oldest Requests, Appeals, and Consultations & Plans:

20. Briefly explain any obstacles your agency faced in closing its ten oldest requests, appeals, and consultations from FY 2014.

Answer: N/A.

21. If your agency was unable to close any of its ten oldest requests because you were waiting to hear back from other agencies on consultations you sent, please provide the date the request was initially received by your agency, the date when your agency sent the consultation, and the date when you last contacted the agency where the consultation was pending.

Answer: N/A.

22. If your agency did not close its ten oldest pending requests, appeals, or consultations, please provide a plan describing how your agency intends to close those “ten oldest” requests, appeals, and consultations during FY 2016.

Answer: N/A.

Interim Responses:

23. Does your agency have a system in place to provide interim responses to requesters when appropriate?

Answer: The FTC frequently issues rolling responses to requesters.

24. If your agency had a backlog in FY 2015, please provide an estimate on the number or percentage of cases in the backlog where a substantive, interim response was provided during the fiscal year, even though the request was not finally closed.

Answer: Approximately 55%. As stated above, it is standard procedure for the FTC to issue partial releases to requesters.

Use of the FOIA’s Law Enforcement Exclusions

1. Did your agency invoke a statutory exclusion, 5 U.S.C. § 552(c)(1), (2), (3), during FY 2015?

Answer: No.

2. If so, please provide the total number of times exclusions were invoked.

Answer: N/A.

Success Story

Out of all the activities undertaken by your agency since March 2015 to increase transparency and improve FOIA administration, please briefly describe here at least one success story that you would like to highlight as emblematic of your agency’s efforts. The success story can come from any one of the five key areas. As noted above, these agency [success stories](#) will be highlighted during Sunshine Week by OIP. To facilitate this process, all agencies should use bullets to describe their success story and limit their text to a half page. The success story is designed to be a quick summary of key achievements. A complete description of all your efforts will be contained in the body of your Chief FOIA Officer Report.

Answer: During the reporting period, the FTC received and processed the most FOIA requests than it had in previous years. This occurred despite attrition in FOIA staff and submission of increasingly complex requests. These significant milestones were achieved as a result of focused training and program oversight, working smarter, and support from the highest levels FTC

management. The FTC also received high rating in the Department of Justice's Summary of Agency Chief FOIA Officer Reports.