



December 16, 2015

Federal Trade Commission  
600 Pennsylvania Avenue  
N.W. Room H-113 (Annex B)  
Washington, DC 20580

**Re: Comments Following the November 2015 FTC Workshop on Cross-Device Tracking**

The Network Advertising Initiative (NAI) is pleased to submit additional comments following the Federal Trade Commission's (FTC) cross-device tracking workshop on November 16, 2015. As we stated in our October 16, 2015 comments, NAI believes that existing self-regulatory frameworks are the most effective way of ensuring responsible data collection and use for interest-based advertising, particularly with emerging technology such as cross-device linking. Cross device technologies utilize a number of different methods to link devices, including the use of deterministic data. During the workshop, the technology panel discussed the use of hashing emails (one form of deterministic data) to link devices. The panel also noted that data used to link devices for interest-based advertising is not particularly sensitive and securing this data may consist of a variety of technical and administrative controls.

Securitizing information utilizing technology, such as hashing, allows advertising technology companies to reap the benefits of that information without sacrificing privacy protections. Hashing, particularly when layered with additional controls such as contractual provisions, data retention and minimization requirements, can create significant barriers to re-identification. NAI and its members have long supported the FTC's position on security practices, which requires the implementation of reasonable security controls based on the sensitivity of the underlying information. NAI members are mindful of the security and privacy controls that protect data used to link devices and implement controls that are reasonable in light of the sensitivity of this data. These controls may include hashing and internal prohibitions on data access and use. Additionally, NAI members are subject to the NAI Code of Conduct, which increases restrictions and obligations based on the sensitivity of the data used in interest-based advertising. Together, reasonable security controls and heightened self-regulatory obligations around the collection and use of data for interest-based advertising work to protect consumer privacy as companies innovate and develop new technologies, such as cross-device linking.

**Respectfully,  
The Network Advertising Initiative**