

Douglas Waterman

**RE: Agency Information Collection Activities; Proposals, Submissions, and Approvals:
Generic Clearance for Collection of Qualitative Feedback on Agency Service Delivery**

Thank you for the opportunity to comment on the proposed renewal of your collection activities pursuant to OMB requirements under the PRA. The agency-public interactions that are facilitated through this program are, unquestionably, of incredible value to the FTC and its customers. I am in favor of the renewal of these programs under the PRA, however, pursuant to Section 3506(c)(2)(A) of the PRA, comments are invited on, among other things, “ways to enhance the quality, utility, and clarity of the information collected.” Listed among the ways that information is collected are “Small discussion groups” and “Focus Groups of customers, potential customers, delivery partners, or other stakeholders.” I wish to express concern about potential flaws in these two methods and provide possible solutions to those problems.

First, small group discussions and responses are subject to the prejudices induced by the pressure for group conformity. As a prime example, experiments conducted by Solomon Asch in the 1950's found that individuals were willing to deny evidence set before them when that evidence seemed to conflict with the belief of a group. Any assessment of FTC conduct that is run through a small group will suffer from this effect, with each expressed opinion compounding on the previous opinions, potentially skewing, substantially, the information gathered from the group. Therefore, it is highly advisable that the FTC take steps to minimize the pressure to conform to the group to ensure that the opinions expressed are true representations of the individuals rather than a skewed representation of the group.

Second, over a period of group interaction, the actions and opinions of the group will be influenced and aligned by the previous actions of and opinions expressed by the group. This concept is often referred to as Structuration Theory. Much in the way expressed in the previous section, unless the individuals running the small group discussion for the FTC proactively set metes and bounds for the group interaction and discussion, a toxic group dynamic may arise, organically, potentially damaging the effectiveness of the group discussion and the information received. Therefore, in small group discussions and focus groups, it is highly advisable that the FTC define the parameters of the group discussion to ensure the most efficacious results.

Lastly, along the same lines, groups are subject to the dangers of Groupthink. This is the idea that when individuals come together, they operate under the assumption that the group possesses certain qualities that, in reality, the collection of the group's individuals do not possess. For example, groups often believe that they are infallible, that they possess an inherent morality, that proffered opinions are held unanimously within the group, and groups tend to apply increased pressure on those who disagree. Therefore, it is highly advisable that the FTC maintain careful control of the developing group dynamic and steer the group away from the dangerous assumptions associated with Groupthink.

In summary, in any instance where group discussion is used as a method of data collection, there are a number of hazards that loom in the murky water of group dynamics. While these hazards should not deter the FTC from utilizing its full arsenal of data collection methods, it is necessary that the FTC approach group discussion with a well informed awareness of the pitfalls inherent in such collection methods. In this comment, I have mentioned a scant sampling of the possible problems with group discussions and the theories addressing those problems. However, this area of communication has been subjected to consistent and rigorous scrutiny, and there is a wealth of easily accessible information at the disposal of the FTC to hone the efficiency of the data gathered during group discussions. As I have said, I encourage the FTC to utilize the tools available to it to gather the most useful and unbiased data possible, and I appreciate the opportunity to offer this advice.

With warm regards,

Douglas Waterman