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Remarks of Bureau of Consumer Protection Director Samuel Levine

As Prepared for Delivery¹

BEUC: The European Consumer Organisation

To Empower, Not to Weaken: Rethinking Consumer Protection in the Digital Age

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Thank you for inviting me to this important conference. I know Chair Khan greatly enjoyed meeting BEUC and TACD colleagues in Brussels earlier this year, and I'm happy to be here continuing our relationship with civil society across the Atlantic.

“Rethinking consumer protection in the digital age” is the theme of our conference, and I think it's an apt one. The Federal Trade Commission has been around for more than 100 years, and while our mission to safeguard fair markets and protect consumers has been a constant, there have been moments in our history when the agency has rethought how we approach our work. The rise of the digital economy may prove to be one such inflection point, and I think to understand it we need to look back to the last major shift, four decades ago.

¹ I wish to thank Elisa Jillson for her substantial assistance in preparing these remarks. The views expressed here are my own and do not necessarily represent the views of the Federal Trade Commission or any Commissioner.

The history of the FTC in the early 1980s was in many ways a microcosm of what was happening in the United States more broadly, as Ronald Reagan and a new breed of economic thinkers took power in Washington. These champions of neoclassical economics ushered in a fundamental shift in how we view markets and government's role in them.

I see that shift most crisply articulated in the FTC's 1980 Policy Statement on Unfairness,² which articulates when the agency will use its authority to challenge harmful business practices as "unfair." Here's a key line from that statement:

Normally we expect the marketplace to be self-correcting, and we rely on consumer choice – the ability of individual consumers to make their own private purchasing decisions without regulatory intervention – to govern the market. We anticipate that consumers will survey the available alternatives, choose those that are most desirable, and avoid those that are inadequate or unsatisfactory.³

The statement goes on to acknowledge that certain sales techniques can inhibit consumer choice, and therefore be challenged as unfair.⁴ But the core assumptions in this statement are noteworthy: first, that marketplaces can essentially self-regulate and, second, that consumers themselves are in the best position to avoid harm by evaluating products and services on their own.

² FTC Policy Statement on Unfairness (Dec. 17, 1980), appended to *International Harvester Co.*, 104 F.T.C. 949, 1070 (1984).

³ *Id.*

⁴ Notwithstanding this assertion, the FTC brought few unfairness actions in the years after issuing the Policy Statement. See J. Howard Beales III, Director, Bureau of Consumer Protection, Federal Trade Commission, *The FTC's Use of Unfairness Authority: Its Rise, Fall, and Resurrection* § II, The Marketing and Public Policy Conference (May 30, 2003), <https://www.ftc.gov/news-events/news/speeches/ftcs-use-unfairness-authority-its-rise-fall-resurrection> (noting that "[s]ubsequent to the codification of the unfairness test, however, the Commission showed extreme reluctance to assert its unfairness authority").

There is no doubt that there is truth here. Competitive, well-functioning markets generate massive benefits for consumers, as well as for workers and honest businesses. But four decades on, I think it is time to reexamine whether these are assumptions we can rely on.

For example, it seems self-evident that our experience since 1980 has exposed the folly that markets do not require meaningful oversight. Deregulation in the U.S. in the 1980s contributed to a Savings and Loan crisis and then a recession,⁵ just as the failure of federal banking regulators to crack down on predatory mortgage lending contributed in the early 2000s to the deepest recession since the Great Depression.⁶

I suppose it can be argued that these disasters in fact proved the statement right – markets corrected themselves. But these corrections caused devastation for countless families, and massive taxpayer bailouts were required in both instances. In my view, it makes no sense for the government – charged with protecting the public – to sit on the sidelines, allowing consumer harms to accrue, in the belief – or the hope – that the market will eventually correct itself.

Stated more simply: If these crises were what was meant by markets being “self-correcting,” I think we can do better.

⁵ See generally, Richard Barton, *Upending the New Deal Regulatory Regime: Democratic Party Position Change on Financial Regulation*, Cambridge Univ. Press Online (Sept. 2, 2022), <https://www.cambridge.org/core/journals/perspectives-on-politics/article/upending-the-new-deal-regulatory-regime-democratic-party-position-change-on-financial-regulation/9F57E3F55E1ACBB4E80D3ABA87AE0403>; Rebel A. Cole, et al., *Deregulation Gone Awry: Moral Hazard in the Savings and Loan Industry*, in A.F. Cottrell et al. (ed.), *The Causes and Costs of Depository Institution Failures*, pp. 29-73 (1995), available at <https://ssrn.com/abstract=1293468> (“A financial debacle of such proportions is a testament to the power of moral hazard in a market characterized by high leverage and limited liability.”).

⁶ See generally Alan White et al., *The Preemption Effect: The Impact of Federal Preemption of State AntiPredatory Lending Laws on the Foreclosure Crisis*, Univ. of North Carolina (2012), <https://communitycapital.unc.edu/research/the-impact-of-federal-preemption-of-state-antipredatory-lending-laws-on-the-foreclosure-crisis/>.

I'll spend the rest of my remarks focusing on the second assumption embedded in the 1980 Policy Statement – that consumers can largely protect themselves by carefully evaluating different products and services. No doubt, there are areas where this may be true. But in today's digital economy, it is simply illogical to put the onus on *individuals* to appreciate the implications of this enormously complex ecosystem, an ecosystem powered by massive data collection and often arcane technology.⁷ I'll touch briefly on four areas where the digital economy is generating persistent harm to consumers: commercial surveillance, proliferation of algorithms with unintended consequences, review manipulation, and dark patterns. I'll discuss how the FTC under Chair Khan is working to tackle these challenges by reimagining and reinvigorating our tools rather than relying on economic assumptions that have failed us in the real world.

Surveillance

Let's start by discussing commercial surveillance. Today, the collection, aggregation, and onward disclosure of personal data underpins nearly every transaction in our economy. This pervasive commercial surveillance – and this surveillance-based economy – impose very real costs on individuals, including financial harm,⁸

⁷ Developments in behavioral economics also cast doubt on economic assumptions that rely on rational consumer decision-making. See Christine S. Wilson, Oral Remarks at Open Federal Trade Commission Meeting, Sept. 15, 2022, https://www.ftc.gov/system/files/ftc_gov/pdf/wilson-oral-remarks-open-commission-meeting-9-15-2022.pdf (citing Richard H. Thaler & Cass R. Sunstein, *NUDGE: THE FINAL EDITION* (2021) and noting that “the rational economic actor model has limits”).

⁸ Press Release, *FTC Charges Data Brokers with Helping Scammer Take More Than \$7 Million from Consumers' Accounts*, FTC (Aug. 12, 2015), <https://www.ftc.gov/news-events/news/press-releases/2015/08/ftc-charges-data-brokers-helping-scammer-take-more-7-million-consumers-accounts>.

discrimination against protected classes,⁹ exploitation of children,¹⁰ and a chilling effect on our ability to exercise our civil liberties.¹¹ And as the Transatlantic Consumer Dialogue recently noted, not everyone is affected equally – communities of color, people with disabilities, and other historically underserved groups are particularly threatened.¹²

There are also enormous costs to our society in general, including to critical infrastructure, our political and religious liberties, and our social cohesion.

In the United States, the traditional approach to combatting these harms has been notice and choice – providing consumers with notice of what information is being collected, and a choice as to whether they want to continue engaging with the service. This approach accords with the 1980 Policy Statement – the view that consumers, armed with the right information, can protect themselves.

⁹ See FTC, *Combatting Online Harms Through Innovation: Report to Congress*, at 43-45 (June 16, 2022), https://www.ftc.gov/system/files/ftc_gov/pdf/Combating%20Online%20Harms%20Through%20Innovation%3B%20Federal%20Trade%20Commission%20Report%20to%20Congress.pdf [hereinafter “*Combatting Online Harms Report*”]; PrivacyCon 2021, FTC, Transcript at 19, https://www.ftc.gov/system/files/documents/public_events/1582978/transcript_privacycon-2021_part_1.pdf; PrivacyCon 2020, FTC, linking to Ziad Obermeyer, et al., *Dissecting racial bias in an algorithm used to manage the health of populations*, Science (Oct. 24, 2019), https://www.ftc.gov/system/files/documents/public_events/1548288/privacycon-2020-ziad_obermeyer.pdf.

¹⁰ See, e.g., Press Release, *FTC Takes Action Against Company Formerly Known as Weight Watchers for Illegally Collecting Kids’ Sensitive Health Data*, FTC, Mar. 4, 2022, <https://www.ftc.gov/news-events/news/press-releases/2022/03/ftc-takes-action-against-company-formerly-known-weight-watchers-illegally-collecting-kids-sensitive>; Press Release, *Video Social Networking App Musical.ly Agrees to Settle FTC Allegations That it Violated Children’s Privacy Law*, FTC, Feb. 27, 2019, <https://www.ftc.gov/news-events/news/press-releases/2019/02/video-social-networking-app-musically-agrees-settle-ftc-allegations-it-violated-childrens-privacy>.

¹¹ See e.g., Zak Doffman, *Black Lives Matter: U.S. Protestors Tracked By Secretive Phone Location Technology*, FORBES (June 26, 2020), <https://www.forbes.com/sites/zakdoffman/2020/06/26/secretive-phone-tracking-company-publishes-location-data-on-black-lives-matter-protesters/?sh=762325444a1e>.

¹² Trans Atlantic Consumer Dialogue, TACD Resolution on Banning Surveillance-Based Advertising, Doc. No. DIGI 01/22, 1 June 2022, <https://tacd.org/wp-content/uploads/2022/06/20220601-TACD-Surveillance-based-Ads-Resolution-FINAL.pdf>.

It should be clear by now that this approach is inadequate. Even if notices were perfectly understandable (a rare feat¹³), they may – and often do – simply inform consumers that the company collects anything and everything it can, and can do with it whatever it wants. And the entity giving notice oftentimes is only one of dozens or even hundreds of companies that are collecting, aggregating, and monetizing data behind the scenes.¹⁴

To be clear, notice is indispensable: we fully expect companies to be transparent about how they are collecting consumers’ information. But a privacy regime that relies on notice alone places too much burden on consumers, who don’t have the time or expertise to review lengthy privacy notices for every app, service, or device,¹⁵ or to digest that complex information¹⁶ – especially when companies routinely change these notices at will.

Choice is similarly plagued by paradox. The “choice” of whether to accept a company’s one-sided terms of service to forego the service altogether is not a choice at all. It’s unlikely that anyone here is going to opt out entirely of booking an airline reservation, conducting a job

¹³ Lorrie Faith Cranor, *Necessary but Not Sufficient: Standardized Mechanisms for Privacy Notice and Choice*, 10 J. ON TELECOMM. & HIGH TECH. L. 273, 273-74 (2012) (“[A] consensus has emerged that privacy policies are poor mechanisms for communicating with individuals about privacy. These policies are long, complicated, full of jargon, and change frequently.”).

¹⁴ Kristin Cohen, *Location, health, and other sensitive information: FTC committed to fully enforcing the law against illegal use and sharing of highly sensitive data*, FTC Business Blog (July 11, 2022), <https://www.ftc.gov/business-guidance/blog/2022/07/location-health-other-sensitive-information-ftc-committed-fully-enforcing-law-against-illegal-use>, citing FTC, *Data Brokers: A Call For Transparency and Accountability: A Report of the Federal Trade Commission* (May 2014), <https://www.ftc.gov/system/files/documents/reports/data-brokers-call-transparency-accountability-report-federal-trade-commission-may-2014/140527databrokerreport.pdf>.

¹⁵ See Cranor, *supra* note 13 at 274 (“If an individual were to read the privacy policy at every website she visited even once per year, she would spend, on average, an estimated 244 hours per year reading privacy policies.”).

¹⁶ See Brooke Auxier, et al., *Americans and Privacy: Concerned, Confused and Feeling Lack of Control Over Their Personal Information*, PEW RES. CTR. (Nov. 15, 2019), <https://www.pewresearch.org/internet/2019/11/15/americans-and-privacy-concerned-confused-and-feeling-lack-of-control-over-their-personal-information/>.

search, or connecting with friends and colleagues on social media. Consumers should not need to choose between living in the digital economy *or* protecting their privacy.¹⁷

Even when consumers do have a real choice, our surveillance economy has made companies very good at using emerging tools of deception to shape – or, more accurately, twist – what “choices” we make. For example, I’ll discuss in a few minutes how companies are using “dark patterns” and fake reviews to manipulate or trick consumers.¹⁸ And we’re seeing the use of algorithms that fail to address – or sometimes even promote – inflammatory or fraudulent content.¹⁹

To respond to these challenges, the FTC is using every available tool to limit harmful commercial surveillance. This summer, for the first time in our history, we launched a rulemaking to seek public input on commercial surveillance practices²⁰ – an initiative that we hope lends momentum to Congress’s efforts to pass comprehensive privacy legislation. Rulemakings take time, but in the meantime, we are also laser-focused on preventing some of the worst harms stemming from surveillance. Last month, we brought suit in federal court against a leading data aggregator, who we alleged sold precise geolocation information that could reveal a person’s visit to a health clinic, worship at a church, synagogue, or mosque, or stay at an

¹⁷ Daniel Solove, *The Myth of the Privacy Paradox*, 89 GEO. WASH. L. REV. 1, 29 (2021) (“In one survey, 81% of respondents said that they had at least once ‘submitted information online when they wished that they did not have to do so.’ People often are not afforded much choice or face a choice between two very bad options.”).

¹⁸ FTC Staff Report, *Bringing Dark Patterns to Light* (Sept. 2022), <https://www.ftc.gov/news-events/news/press-releases/2022/09/ftc-report-shows-rise-sophisticated-dark-patterns-designed-trick-trap-consumers> [hereinafter “FTC Staff Dark Patterns Report”].

¹⁹ Combatting Online Harms Report, *supra* note 9 at 10 n. 25.

²⁰ Press Release, *FTC Explores Rules Cracking Down on Commercial Surveillance and Lax Data Security Practices*, FTC, Aug. 11, 2022, <https://www.ftc.gov/news-events/news/press-releases/2022/08/ftc-explores-rules-cracking-down-commercial-surveillance-lax-data-security-practices>.

addiction recovery center.²¹ We are also strengthening the remedies we seek in our law enforcement actions, including the FTC’s first-ever data minimization requirement,²² a first-ever requirement to offer consumers multifactor authentication options,²³ and a first-ever requirement to destroy any algorithms trained on data illegally collected from children.²⁴ The FTC is making clear that companies cannot violate our privacy with impunity.

Unfair Algorithms

Another set of harms closely tied to the surveillance economy are those generated by unfair algorithms. Many of these algorithms are powered by the very data collection we nominally “consent” to on a daily basis.

If the assumptions embedded in the 1980 Policy Statement are to be credited, we might see the proliferation of artificial intelligence as an unmitigated good that should continue unchecked, because, surely, the market will ensure benevolent use of AI. The report the FTC just issued on *Combating Online Harms Through Innovation* tells a very different story: how unfettered use of algorithms can result in harms to consumers, including discrimination against protected classes and exposure to reams of incendiary and fraudulent content.²⁵ How are

²¹ Press Release, *FTC Sues Kochava for Selling Data that Tracks People at Reproductive Health Clinics, Places of Worship, and Other Sensitive Locations*, FTC, Aug. 29, 2022, <https://www.ftc.gov/news-events/news/press-releases/2022/08/ftc-sues-kochava-selling-data-tracks-people-reproductive-health-clinics-places-worship-other>.

²² Press Release, *FTC Takes Action Against CafePress for Data Breach Cover Up*, FTC, Mar. 15, 2022, <https://www.ftc.gov/news-events/news/press-releases/2022/03/ftc-takes-action-against-cafepress-data-breach-cover>.

²³ *See id.*; *see also* Press Release, *FTC Charges Twitter with Deceptively Using Account Security Data to Sell Targeted Ads*, FTC, May 25, 2022, <https://www.ftc.gov/news-events/news/press-releases/2022/05/ftc-charges-twitter-deceptively-using-account-security-data-sell-targeted-ads>.

²⁴ Press Release, *FTC Takes Action Against Company Formerly Known as Weight Watchers for Illegally Collecting Kids’ Sensitive Health Data*, FTC, Mar. 4, 2022, <https://www.ftc.gov/news-events/news/press-releases/2022/03/ftc-takes-action-against-company-formerly-known-weight-watchers-illegally-collecting-kids-sensitive> [hereinafter “Kurbo Press Release”].

²⁵ E.g., *Combating Online Harms Report*, *supra* note 9 at 43-48.

consumers supposed to evaluate and navigate these opaque processes, as the 1980 Policy Statement would presume? The answer, of course, is they cannot. As the EU considers the important fairness considerations underlying the AI Act,²⁶ I know that this is top of mind for many of you. And it is top of mind for the FTC under Chair Khan, as shown by our recent work not only on this report, but also in enforcement actions like *Kurbo*²⁷ and *Everalbum*,²⁸ which prevented companies from using ill-gotten data to feed their algorithms.

Fake Reviews

Another persistent problem that challenges the assumptions of the 1980s is deceptive online reviews. Deceptive and fake reviews deeply distort online commerce. They can confuse and deceive consumers and can cheat honest businesses who don't rely on fake reviews, but are forced to compete with those who do. And these ill effects can be amplified on ecommerce platforms whose algorithms promote products that are nominally well-reviewed.

This plague of fake reviews is another rebuke to the assumptions embedded in the Policy Statement. First, it is clear that online marketplaces are not up to the task of governing themselves. Indeed, while platforms claim they are doing everything they can to root out this problem, fake reviews continue to proliferate, and I believe this scourge is fueled by the incentives platforms create through their algorithms and business models. And second, it is self-

²⁶ Proposal for a Regulation of the European Parliament and of the Council, Laying Down Harmonised Rules on Artificial Intelligence (Artificial Intelligence Act), COM(2021) 206 final (21 Apr. 2021), <https://artificialintelligenceact.eu/the-act/>.

²⁷ Kurbo Press Release, *supra* note 24.

²⁸ Press Release, *California Company Settles FTC Allegations It Deceived Consumers about use of Facial Recognition in Photo Storage App*, FTC, Jan. 11, 2021, <https://www.ftc.gov/news-events/news/press-releases/2021/01/california-company-settles-ftc-allegations-it-deceived-consumers-about-use-facial-recognition-photo>.

evident that consumers cannot “survey the available alternatives” and “choose those that are most desirable” when the marketplace is shot through with misinformation.

To address these distortions, the FTC is working to increase deterrence not only against fake reviews but also deceptive testimonials and review suppression. Last year, deploying a new strategy, we issued more than 700 Penalty Offense Notices warning firms that they could face significant penalties for engaging in deceptive review practices.²⁹ And when companies engage in such practices, we take aggressive action. Last year we secured a \$4.2 million judgment against Fashion Nova for engaging in alleged review suppression.³⁰ This year, we obtained penalties and redress totaling \$3.5 million against a seller of contact lenses that posted reviews by compensated reviewers masquerading as independent users.³¹ And just last month, we joined with six states to sue the rental platform Roomster, which we charged with polluting its site with fake reviews.³² As we work to confront this scourge, we are learning from our partners overseas who are at the forefront of this work.³³

Dark Patterns

²⁹ Press Release, *FTC Puts Hundreds of Companies on Notice about Fake Reviews and Other Misleading Endorsements*, FTC, Oct. 13, 2021, <https://www.ftc.gov/news-events/news/press-releases/2021/10/ftc-puts-hundreds-businesses-notice-about-fake-reviews-other-misleading-endorsements>.

³⁰ Press Release, *Fashion Nova will Pay \$4.2 Million as part of Settlement of FTC Allegations it Blocked Negative Reviews of Products*, FTC, Jan. 25, 2022, <https://www.ftc.gov/news-events/news/press-releases/2022/01/fashion-nova-will-pay-42-million-part-settlement-ftc-allegations-it-blocked-negative-reviews>.

³¹ Press Release, *Vision Path, Inc., Online Seller of Hubble Lenses, Settles Charges it Violated the Contact Lens Rule and FTC Act to Boost Sales*, FTC, Jan. 28, 2022, <https://www.ftc.gov/news-events/news/press-releases/2022/01/vision-path-inc-online-seller-hubble-lenses-settles-charges-it-violated-contact-lens-rule-ftc-act>.

³² Press Release, *FTC, States Sue Rental Listing Platform Roomster and its Owners for Duping Prospective Renters with Fake Reviews and Phony Listings*, FTC, Aug. 30, 2022, <https://www.ftc.gov/news-events/news/press-releases/2022/08/ftc-states-sue-rental-listing-platform-roomster-its-owners-duping-prospective-renters-fake-reviews>.

³³ See, e.g., Press Release, *Protecting consumers from misleading reviews: 55% of screened websites violate EU law*, European Comm’n, 20 Jan. 2022, https://ec.europa.eu/commission/presscorner/detail/en/ip_22_394; Press Release, *CMA to investigate Amazon and Google over fake reviews*, U.K. Competition & Mkts. Auth., June 25, 2021, <https://www.gov.uk/government/news/cma-to-investigate-amazon-and-google-over-fake-reviews>.

The last persistent problem I'll highlight are dark patterns, the subject of a recent FTC staff report, "Bringing Dark Patterns to Light."³⁴ As the FTC's report – and BEUC's recent report on dark patterns – explains, dark patterns are design practices that trick or manipulate users into making choices they would not otherwise have made, including around their privacy.³⁵ Our report, like the CMA's report on online choice architecture, identifies different types of dark patterns and lays out important design principles to avoid them.³⁶

The proliferation of digital dark patterns collides head-on with the assumptions in the 1980 Policy Statement. Simply put, relying on companies to voluntarily abandon deceptive practices is not a viable strategy, given how these practices can fuel profits. Nor can we count on consumers to protect themselves from techniques that are often scientifically engineered to manipulate them.³⁷ We don't expect consumers to evaluate for themselves whether their food is laden with toxins, and we shouldn't expect them to fend for themselves when it comes to digital tricks and traps.

The FTC under Chair Khan is aggressively cracking down on these dark patterns, making clear that the responsibility for preventing harm rests with firms, not consumers. Earlier this month, for the first time, we alleged that a major firm – Credit Karma – deployed digital dark patterns to trick consumers into believing they'd been preapproved for credit, when they had not

³⁴ FTC Staff Dark Patterns Report, *supra* note 18.

³⁵ *Id.* at 2; BEUC, "Dark Patterns" and the EU Consumer Law Acquis: Recommendations for better enforcement and Reform (2022), https://www.beuc.eu/sites/default/files/publications/beuc-x-2022-013_dark_patterns_paper.pdf.

³⁶ FTC Staff Dark Patterns Report, *supra* note 18; U.K. Competition & Mkts. Auth. Discussion Paper, *Online Choice Architecture: How digital design can harm competition and consumers* (Apr. 2022), https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1066524/Online_choice_architecture_discussion_paper.pdf.

³⁷ *See* Wilson Remarks, *supra* note 7 at 5.

been.³⁸ Notably, the FTC’s settlement will compensate consumers whose time may have been wasted by these practices – a recognition that consumers can suffer in ways that are not limited to direct monetary loss. The FTC’s order also requires Credit Karma to maintain for 20 years records of A/B testing, clickstream analysis, and similar evidence of how their design choices play to consumers, which will help ensure the company does not deploy deceptive design going forward.

As with commercial surveillance, AI, and fake reviews, the FTC is making clear that we will not stand by idly as harms from dark patterns proliferate.

Conclusion

I have discussed four areas of particular concern for the FTC, but this is far from an exhaustive list. Across the board, our approach has been to re-think, re-tool, re-fashion, but also to build on the important policy and enforcement work that the agency has done for decades. We are doing so in a cleareyed way that relies not on rosy assumptions about self-correcting markets, but on rigorous analysis of where harms exists and how we can confront them.

We know that we are not alone. We greatly value continued dialogue with civil society organizations like BEUC, and the work that you have undertaken on behalf of consumers. We also value continued dialogue with our transatlantic government partners, who are confronting many of the same consumer protection issues we are. To that end, earlier this year, we launched an informal dialogue on consumer protection with Commissioner Reynders.³⁹ That dialogue is

³⁸ Press Release, *FTC Takes Action to Stop Credit Karma From Tricking Consumers With Allegedly False “Pre-Approved” Credit Offers*, FTC, Sept. 1, 2022, <https://www.ftc.gov/news-events/news/press-releases/2022/09/ftc-takes-action-stop-credit-karma-tricking-consumers-allegedly-false-pre-approved-credit-offers>.

³⁹ Joint press statement by Didier Reynders, Commissioner for Justice of the European Commission and Lina Khan, Chair of the United States Federal Trade Commission, Information Dialogue on Consumer Protection, Mar. 30,

addressing many of the topics I've discussed, and I know it's just one of many ways we are working together to confront emerging threats to consumers. I look forward to continuing this critical conversation in the months and years to come. Thank you.

2022, https://www.ftc.gov/system/files/ftc_gov/pdf/Joint%20FTC-EC%20Statement%20informal%20dialogue%20consumer%20protection%20issues.pdf.