MEMORANDUM

TO: The Commission

FROM: Office of the Commission Secretary $\angle C$

DATE: July 11, 2022

SUBJECT: AO 2022-14 (Google LLC) 48 Individual Comments

Attached are 48 individual comments on AO 2022-14 (Google LLC).

Attachment



By Office of the Commission Secretary at 1:16 pm, Jul 11, 2022

From:
To:
AO

Subject: AO 2022-14 (Google LLC) - No to Campaign ad pilot Program.

Date: Saturday, July 9, 2022 4:16:48 PM

Request you deny Google's request to do a pilot program where campaign ads go to peoples inboxes and not through their spam filters.

Sincerely,

Audrean Beecher

From: <u>Caleb Hearth</u>

To: <u>AO</u>

 Subject:
 AO 2022-14 (Google LLC)

 Date:
 Saturday, July 9, 2022 3:29:18 PM

Regarding the below, **absolutely not.** Campaigns should produce content that is of value and high quality sufficient to not be sent to spam by filters, just like every other sender. If they can't, they shouldn't get special treatment.

On July 6, the Commission made public an advisory opinion request by Google. The requestor asks whether it may provide a free and non-partisan pilot program to test certain design features in its email product to authorized candidate committees, political party committees, and leadership political action committees. The Commission will accept written comments on the request during the 10-day period following the publication of the request (no later than July 11) and must issue a response no later than 60 days after the receipt of the complete advisory opinion request, that is, by August 30, 2022.

 From:
 Katie H

 To:
 AO

 Subject:
 AO 2022-14

Date: Saturday, July 9, 2022 3:55:57 PM

Hard pass. Please do not allow Google to open up Pandora'a Box on the people by allowing campaign/political emails to bypass spam filters. FEC should be strengthening regulations that protect Americans and our elections & not loosening the reigns. Campaign/political emails bypassing spam will make it a lot easier for bad actors to slip into people's inboxes (people who never signed up for these mailing lists in the first place!) with highly emotionally charged messages trying to illicit a reaction to take advantage of voters (especially older Americans or less tech savvy individuals).

The onus should not be on the individual user to mark spam as spam. There is no way users can be effective enough to manually review and report spam, when there are billions of spam messages sent! BILLIONS!

FEC should protect us, protect our inboxes. FEC has been feckless for years, not fulfilling it's explicit regulatory purpose.

The FEC has teeth - use them.

Do what is right. Do not approve this pilot for Google.

Best regards.

Neil Quinlan From: To:

Subject:

AO Ban politicians spam Sunday, July 10, 2022 6:55:58 PM Date:

Sent from my iPhone

From:
To:
AO

Subject: Comment for Google's Request for Opinion on Pilot Program

Date: Saturday, July 9, 2022 4:21:41 PM

To whom it may concern,

I am writing to urge the committee to oppose approval of Google's pilot program to allow political emails to bypass spam filters.

A blog, <u>Daring Fireball</u>, has a great write-up outlining the faulty reasoning behind the request. The issue is, namely, that Republican emails ARE spammier in their content than Democratic emails.

The Republican argument is that Gmail (and all other email providers — but Gmail is the biggest in the U.S.) ought to flag Republican and Democratic emails as spam in equal measure, and if Republican emails are flagged more frequently, it's prima facie evidence that Google is biased against Republicans. It's like a basketball team that plays rough and *commits* a lot more fouls than their opponent but yells and screams that the refs are biased against them because more fouls are *called* against them. The refs aren't biased if the team they flag for more fouls actually commits more fouls. And a spam filter isn't biased if one party's emails are more spammy and thus more likely to be flagged as spam.

Allowing all political emails to bypass spam filters is, among other things, a security risk. Imagine: A malicious actor could register to run for office and then it would guarantee that their emails were exempt from spam filters.

In addition, it would make everyone's lives worse. It's hard enough to keep up with political email spam!

Please recommend against Google implementing this policy.

Thank you,
Zack Katz
Leverett, Massachusetts
Founder and President, Katz Web Services, Inc.

From: Thomas Beard

To: <u>AO</u>

Subject: Comment on allowing Google to bypass spam filters for political ads/campaign donations

Date: Monday, July 11, 2022 9:02:15 AM

Swamp my inbox with political spam if you want me to switch to my Yahoo account full time. I'm not married to your service.

Thomas Beard

From: <u>Anne Mitchell</u>

To: AO

Subject: Comment to Google"s Request for Opinion on Pilot Program

Date: Saturday, July 9, 2022 2:47:33 PM

Dear FEC,

Google is asking for the FEC's opinion on whether Google can institute a pilot program which allows the email sent to Gmail users from political candidates and campaigns to bypass Google's spam filters, and instead be delivered directly to their users' inboxes, allowing their users to determine whether or not they consider the email to be spam.

On the one hand, Google is of course free to do whatever they want with Gmail (within limits) as it is their service. It has always been the case that ISPs have wide latitude in making email delivery decisions.

On the other hand, given what is going on with the Jan 6 investigation, and how campaign email is potentially directly implicated (as may be the conduit, Salesforce), it seems a very bad time indeed to give candidates and campaigns such a free pass (for which, I have no doubt, Google will ultimately be charging). It seems doubly so if they are not going to also give a similar spam filtering bypass to others.

That said, of course, one can argue that the spam filtering of political email by an organization which delivers email to billions of people, and which is so wholly intertwined and entangled with various government agencies is, in and of itself, suppression of political speech, and that is certainly one of the specters hanging over this request.

Part of the technical and institutional problem here is that political email has _always_ been seen as a pariah among the email receiving industries (inbox providers, ISPs, spam filters, etc.) because so much of it is *actually* spam, meaning people being put on a mailing list without their request, let alone consent. I have zero doubt that you yourselves have received this political spam, because everybody has. While Google is no doubt reacting to recent events, and recent charges of partisan favoritism in their filtering algorithms, opening up the floodgates to their users' inboxes, and making their 1.5billion users bear the brunt of the massive amount of political spam that is sent, in order to assuage partisan disgruntlement, is not the best way to address these charges. (I have thoughts on what is the best way, however Google has not thought to ask me.)

I am in a unique position here to understand the entire picture, as I am the one who founded the email deliverability industry, I have authored Federal legislation dealing with spam, and I am the CEO of the first email reputation certification program in the industry (since 2003).

If I can be of *any* assistance whatsoever to the Commission, please do not hesitate to ask.

Kind regards,

Anne

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Anne P. Mitchell, Attorney at Law

CEO Institute for Social Internet Public Policy

Author: Section 6 of the CAN-SPAM Act of 2003 (the Federal anti-spam law)

Board of Directors, Denver Internet Exchange

Dean Emeritus, Cyberlaw & Cybersecurity, Lincoln Law School

Prof. Emeritus, Lincoln Law School

Chair Emeritus, Asilomar Microcomputer Workshop

Counsel Emeritus, eMail Abuse Prevention System (MAPS)

From: Matt Morain

To: AO

Subject: Comment to Google"s request for opinions on a pilot program

Date: Sunday, July 10, 2022 5:10:02 PM

Dear FEC --

As described in its request to your organization, Google wants to "launch a pilot program for authorized candidate committees, political party committees, and leadership political action committees" that would ensure the emails of accepted committees "will not be affected by forms of spam detection to which they would otherwise be subject."

This is a surefire way to turn people OFF to getting more engaged in the political process at a crucial time when we need a more aware and participating electorate. Please halt all further explorations of Google's request and pilot program, for the good of democracy.

Thank you,
-Matt Morain
Raleigh, NC

From: Joel M Snyder

Sent: Sunday, July 10, 2022 3:35 PM

To: AO

Cc:

Subject: Comments on Advisory Opinion Request 2022-14 (Google LLC)

Good Day.

I urge the FEC to provide an AO to Google in this matter which CONFIRMS the permissibility of the proposed pilot program.

BACKGROUND AND RATIONALE:

My company, Opus One, does a monthly anti-spam efficacy test (this month marks our 200th consecutive test) of all of the major enterprise-focused products and some smaller players as well. Google, because it doesn't sell anti-spam service to enterprises other than bundled as part of their collaboration tools, isn't part of our testbed.

The data we have collected about political mass emails changed dramatically between 2016 and 2020. We saw lots of permission-based mailings during the 2016 season. But for beginning before the 2020 campaign season, something changed and we observe that all political parties (national committees, PACs, and candidates) were cross-pollinating mailing lists and dropping the requirement for permission before adding you to a fundraising list.

It was directly observed that if one donated directly or made contact with a candidate or office-holder's own web site, irrespective of party, the email address provided would soon show up, without opting in, in fundraising appeals from candidates from the same party all over the country.

The end result is a bunch of unsolicited commercial email that many in the anti-spam business (including Google) would consider spam showing up in our testing.

We observe different behaviors from different anti-spam vendors, not correlated with HQ location or company size. In some cases, anti-spam vendors mark this commercial unsolicited email as spam, which is the commonly accepted behavior. In other cases, anti-spam vendors seem to be giving a "pass" to political fundraising appeals and are NOT marking these as spam.

While "Big Tech" has been accused of having a liberal bias, the reality is that the choice to mark political fund raising appeals as spam or not does not seem to be focused on one party or the other: there is NO pattern that indicates that the Rs or the Ds are being targeted any differently.

I believe that the Google proposal would put the control of whether this email is considered spam or not back into the hands of the end user, which is where it belongs.

This gets anti-spam vendors out of the business of marking as spam ("censoring") or or ignoring ("not censoring") political fundraising.

Instead, by providing a simple framework as proposed in their AO request, they set the rules of the road and allow the end user to make a final decision about whether any single stream of political email (invariably fund raising according to our data) is to be marked as spam or not.

For this reason, I strongly recommend that the FEC offer an AO that CONFIRMS that the Google proposal is acceptable.

Sincerely,

Joel Snyder, PhD Senior Partner, Opus One (additional contact info provided below)

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Joel M Snyder,
Senior Partner, Opus One Phone: +
jms@Opus1.COM

https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.opus1.com%2Fjms&data=05%7C01%7Cao%40fec.gov%7C0fa590df1eb34efe654708da62ab5a15%7Cee91fa706c9d45e0bb084a355de91010%7C0%7C1%7C637930785345493144%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTil6lk1haWwiLCJXVCI6Mn0%3D%7C1000%7C%7C%7C&sdata=7scXMApi0WX%2BDrgUCqR2CPsvSTh9qpnfh2pmq04s9HM%3D&reserved=0

From: Gina Reynolds

To: <u>AO</u>

Subject: DO NOT SEND CAMPAIGN INFO TO MY EMAIL

Date: Saturday, July 9, 2022 8:28:09 PM

I am an attorney and get hundreds of important work emails every day. That does not include the personal emails necessary to take care of my mom who is in a care facility.

I donate to the candidates that I want to donate to and do not want any more campaign literature coming through my inbox.

Gina H Reynolds Sent from my iPhone From: <u>Clayton Light</u>

To: <u>AO</u>

Subject: Gmail political spam

Date: Monday, July 11, 2022 10:51:30 AM

Please keep the current restrictions in place. It's certain that the editors at Google will allow emails with a political bent they agree with while censoring others. This is already a major problem in online news causing further polarization in our culture.

Thank you,

Clayton Light

 From:
 eBiz Market, LLC

 To:
 AO; PNWCatchAll

Subject: Gmail spam filters RE political candidates and committees

Date: Monday, July 11, 2022 10:16:09 AM

Attachments: image.png

To the FTC division supposedly taking note of consumer opinion regarding political Gmail filter bypass,

What we, the consumers, want regarding Big Tech is moot. I know this is abundantly clear among IT technicians. It matters not! Google doesn't need the FTC's approval on how they operate.

In fact, the FTC should dedicate more of its resources to Big Tech gouging, unsafe and/or unfair and dangerous business practices.

Thank you for your service.

Signed,

A frustrated technician!

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"But few Americans are aware of this pending case. And a deadline for public comment is fast approaching with little publicity from Google or the FEC on the case — or its implication for consumers." -Business Insider

https://www.businessinsider.com/google-political-emails-spam-public-comment-fec-ruling-2022-7



Kelly Guzman eBiz Market, LLC www.ebizmarket.net



https://www.businessinsider.com/google-political-emails-spam-public-comment-fec-ruling-2022-7

CC: Inland Pacific Northwest Construction

From: <u>kathryn workman</u>

To: <u>AO</u>

Subject: Google and Gmail

Date: Sunday, July 10, 2022 5:01:35 PM

I am absolutely opposed to giving Google permission to allow political information and solicitations to flow through unfettered. I am already inundated with unwanted emails, many of them political. I sincerely do not want more, especially from the myriad of political people and entities that I consider offensive or disturbing.

I am very literate and read political information daily. If I want additional information, I contact or sign up for emails from the sources I want.

Thank you, Kathryn Workman From: <u>kaufmaned</u>

To: AO

Subject: Google bypassing spam filters
Date: Sunday, July 10, 2022 9:32:46 AM

DO NOT ALLOW Google to bypass spam filters with its advertising.

Edward A. Kaufman

 From:
 Tim Egg

 To:
 AO

Subject: Google case on political ads **Date:** Monday, July 11, 2022 9:16:59 AM

To Whom It May Concern:

I oppose any changes to Google spam filters, allowing political ads and emails to reach my Inbox. If the requested change is made, consumers and Google customers will suffer from a flood material they have worked hard to avoid for years!

Sincerely, Thomas Grinnan

--

Sent from my typewriter Tom Grinnan From: <u>Valorous Owl</u>

To: AO

Subject: Google moving Campaign Ads out of Spam to regular inbox

Date: Saturday, July 9, 2022 7:30:34 PM

To whom it may concern,

I do not want email ads outside of my spam folder unless I choose to move them. They are spam, that is why they are in there. I do not want whatever campaign ads are going through out of my spam folder. I do not want Google to unilaterally make that decision. Having the ability to, and being forced to do my own research on campaigning politicians is my own right. I do not want google to spoon feed me whatever politician they are backing. This decision could negatively impact elections going forward simply because it would make the voter's choice easier to make with the assumption that Google is making the "correct choice" for them without the need for research, and further google's own politics rather than the consumer's individual politics. Please do not allow Google's request for a program allowing them to put campaign ads in the direct inbox without it being an OPT-IN only option. I do not want this. This to me would be worth never using google products or programs again. Thank you for your time.

A concerned Citizen,

S Emrich



Virus-free. www.avg.com

From: <u>Dennis Farranto</u>

To: <u>AO</u>

Subject: google political emails

Date: Sunday, July 10, 2022 10:06:31 PM

My opinion is ... let a political email go to the "inbox" and not the "spam" box ... BUT every single political organization that sends out an email MUST HAVE in plain sight and easy to read letters a "BLOCK THIS EMAIL ADDRESS" link that can be clicked on similar to an "unsubscribe" link.

Thank You, Dennis Farranto

From: Jeff Glueck
To: AO

Cc: <u>jeffrey glueck</u>
Subject: Google spam request

Date: Monday, July 11, 2022 8:41:35 AM

Dear FEC

Please accept this as my public comment regarding Google's request for a favorable advisory on its proposal to exempt political emails from its promotions or spam filters.

Politicians have exemptions which are self serving from opt in rules that apply to all other industries. A single donation can put one on dozens of Sms and email lists of other groups receiving contact information by trade or sale and there is no universal opt out on sale of such lists for political entities as there is in california for commercial data brokers.

Given google evidently seeks political favor (and to avoid Flack of bias in its filters, the same thing) from this anti consumer sop at a time it has antitrust legislation and cases before the government.

The fec should call this a political donation because that's what it is. Please save Americans from more spam and misinformation at a time given the January 6 hearings that democracy is at risk.

Jeff Glueck CEO salvo health Former co founder of Hawkfish a political ad agency Vice chairperson of Friends of the Earth US

Alll expressed opinions are my own and do not reflect official positions of my organizations

Sent from my iPhone

 From:
 d ervin

 To:
 AO

Subject: Google wants to ease its Gmail spam filters for political candidates and committees

Date: Sunday, July 10, 2022 3:54:23 PM

No Please do not allow this awful idea to proceed. Google and Facebook/Meta have ruined everything internet, and I wish at least one of my governments' agencies would have the guts to curtail their overreach. To stop Google specifically in this matter would be a nice first step.

US taxpayer, US Army veteran, and Google victim of 20+ years

Elijah Lipschutz From:

To: Subject:

AO Google Saturday, July 9, 2022 3:44:23 PM Date:

NO to Google sending political ads to inboxEs

Sent from my iPhone

From: <u>Jim Daugherty</u>

To: <u>AO</u>

Subject: Google's request for an opinion on Pilot Program to allow political email to bypass its spam filters.

Date: Sunday, July 10, 2022 4:25:10 PM

Dear FEC.

Please do not approve Google's request for a pilot program to allow political emails to bypass their spam filters. We are already inundated with political messaging on every platform we use. There is no letup. not even after elections. We need very much less political messaging, not more.

Thank you,

James Daugherty

From: <u>Jay Hennigan</u>

To: <u>AO</u>

Subject: Google"s plan to bypass spam filters for politicians

Date: Saturday, July 9, 2022 4:24:04 PM

I am opposed to this. Political spam is rampant. Politicians have exempted themselves from the TCPA resulting in huge volumes of annoying robocalls and texts.

They have even exempted themselves from the Do-Not-Call list.

Please, make it MORE difficult for politicians to continue this abusive trend, not less.

If you are going to do anything, do the opposite of this proposal. Ban all bulk, unsolicited political email.

From: Bob Krause

To: <u>AO</u>

Subject: I'm strongly against political spam **Date:** Monday, July 11, 2022 9:31:25 AM

Nobody, most especially politicians, should allowed to get through my email spam filters.

I'm **strongly** against the FEC allowing political emails to get through anybody's spam filters.

- Bob Berkeley, CA From: Jenna Paglia
To: AO
Subject: Just say no

Date: Monday, July 11, 2022 9:29:24 AM

I urge you to not allow google/alphabet to provide lists to political parties/campaigns/PACs/etc. Americans are already subjected to enough divisive rhetoric. Do not bombard us in our inboxes. These lists can be used to spread false and thus harmful information to an unaware public. It can and will be masked as credible sources despite anY regulations for fine print to state otherwise. The subject is read, bait clicked and the footer ignored. This is damaging and intrusive. Once this is allowed it is a slippery slope to stripping away our privacy from those who buy and sell our identifies.

Jenna Paglia Chelan, WA From: Susan Rainey

To: AO

Subject: Keep political emails filtered

Date: Monday, July 11, 2022 8:51:44 AM

Dear FEC,

Please do not allow political emails to bypass spam filtering. It is difficult enough to unsubscribe to organizations that "legally bought" your email address. There are so many PACs and extraneous groups that abuse email, the thought of opening up the spam filter process is horrifying.

Their subject lines make it sound like the world will explode if you don't donate money immediately. It's hard enough to just sift through to those emails essential for doing business these days.

Please keep political emails filtered.

Thank you, Susan Rainey



Susan Rainey
Yellow Dog Design Works

Email | Website | Map to Studio

From: Ryan Munsey

To:

Subject: No political email to my inbox please **Date:** Monday, July 11, 2022 9:41:03 AM

Please consider this my official comment:

I do not want to receive unsolicited emails of any kind, including political emails.

Ryan Munsey

High Performance Coach and Advisor

Author: F*ck Your Feelings

Online Training: Master Your Mind Academy

www.ryanmunsey.com
Instagram: @ryanmunsey_

The information contained in this email is not medical advice.

From: <u>Elena Simon</u>

To: <u>AO</u>

Subject:NO to Google Ad Program.Date:Saturday, July 9, 2022 3:54:48 PM

If I filter a politicians email spam or their terrible email doesn't make it thru Gmail's filters, let it stay that way. And shame on y'all for literally giving public comment the weekend to chime in.

From: Barb Haber
To: AO

Subject:NO to google campaign ad pilot programDate:Sunday, July 10, 2022 2:55:18 AM

I am writing to urge you to say NO to google's request to do a pilot program where campaign ads go directly to inboxes without being screened by their spam filter. The overwhelming majority of these political emails are spam requests for funds. Please deny this request.

Barb Haber, Kailua Kona, Hawaii.

Frances Gonzalez From:

To:

AO NO to Google campaign ad pilot program Saturday, July 9, 2022 4:00:00 PM Subject: Date:

NO to Google's request to do a pilot program where campaign ads go to people's inboxes and not through their spam filters.

Laurie Larson AQ NO to Google campaign ad program Saturday, July 9, 2022 3:58:19 PM Screenshot 2023-07-09 at 3.55 35 PM ppe

Subject: NO to Google campaign ad pilot program.



NO to Google's request to do a pilot program where campaign ads go to people's inboxes and not through their spam filters.

From: <u>Curtiss Grymala</u>

To:

Subject: NO to Google campaign at pilot program **Date:** Saturday, July 9, 2022 10:55:55 PM

The Google campaign ad pilot program is an absolutely terrible idea. Campaign ads are solicitations, and should only be received when requested. Any solicitation that arrives in my inbox that's not something I explicitly requested is spam. Please do not approve this program. Thank you.

Sent from Yahoo Mail on Android

From: <u>Istvan Molnar</u>

To: <u>AO</u>

Subject: No to Google pilot

Date: Saturday, July 9, 2022 4:57:20 PM

Please do not allow Google implement the proposed policy for political ads. I should be allowed to have a voice on how and when I want to receive political ads over the internet.

Sincerely, Istvan Molnar

Sent from my iPhone

Deborah Edwards-Onoro From:

To:

AO NO to Google"s pilot program to send campaign ads to inbox Saturday, July 9, 2022 4:16:18 PM Subject:

Date:

No to Google's pilot program to send campaign ads to inbox, not spam filters.

From: Pat Shotzbarger

To: <u>AO</u>

Subject: No ToGoogle campaign ad pilot project **Date:** Saturday, July 9, 2022 6:26:33 PM

NO to Googles request to do a pilot program where campaign ads go to my inbox and not through my Spam filter instead.

I DO NOT want to be solicited for money or support or be put on any political mailing list without my express interest or permission. Many of these communications are SCAMS and full of lies.

Maybe I need to switch email providers.

Patricia Shotzbarger Pennsylvania Sent from my iPad From: Bauer, Steven J.

To: <u>AO</u>

Subject: Opinion. On 2022-14

Date: Saturday, July 9, 2022 4:05:16 PM

This should not be allowed since this then allows registered senders to send email that is delivered without filtering. Not all political groups seem to follow the rules when they should. Also, their email list are many times do not have permission from the receiver to send the email.

Steve

Get Outlook for iOS

From: <u>Celeste Makrevis</u>

To:

Subject: Oppose Political email without Filters **Date:** Saturday, July 9, 2022 4:01:09 PM

Aloha folks,

I would like to register my <u>strong</u> opposition to Google being able to bypass filters with spam political email messages.

Please DO NOT ALLOW THIS TO HAPPEN! Celeste

 From:
 Deb Wake

 To:
 AO

Subject: Opposed to google bypassing spam filter **Date:** Monday, July 11, 2022 10:08:19 AM

Hello,

I oppose allowing candidate emails to bypass spam filters and go directly into my inbox. I own several Gmail accounts. One primary inbox, that I use most, averages @80 emails every day. I need all the spam filter-help I can get to manage the barrage.

Thanks,
Deb Wake

From: marcy ho-sing-loy

To: AO

Subject: Please disapprove googles request to promote political spam

Date: Sunday, July 10, 2022 4:14:11 PM

As a user of gmail, I am writing during the public comment period to urge a no decision on Google's proposal to "launch a pilot program for authorized candidate committees, political party committees, and leadership political action committees" that would ensure the emails of accepted committees "will not be affected by forms of spam detection to which they would otherwise be subject."

There is already a significant uptick in political adds this year, and regardless of party or candidate they all exasperate divisiveness and hate. We need fewer of these messages not more!

Thank you Martha Ho-Sing-Loy

Richard Makrevis From:

To:

AO Please Google No Polical Ads in our email Saturday, July 9, 2022 3:00:32 PM Subject: Date:

From: Mary McKenna

To: AO

Subject: PLEASE no political email allowed in GMAIL Date: Monday, July 11, 2022 9:16:29 AM

Please do not allow the Google request for political email: "will not be affected by forms of spam detection to which they would otherwise be subject."

The filters really must stay on. I rely on my gmail. I can't be bombarded by political emails.

Thanks,

Mary McKenna



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From: geoff kloske
To: AO

Subject: Political emails

Date: Monday, July 11, 2022 9:15:11 AM

Please do not allow google or anyone else to relax their spam filtering to allow me to be bombarded with unwanted political ads. This is not in the public interest. The potential dangers and liabilities to consumers are clear.

Political actors simply haven't earned this indulgence and it would be incredibly short sighted of the FEC to grant them.

Geoffrey Kloske

 From:
 Tom Gerber

 To:
 AO

Subject: Political spam and filters

Date: Sunday, July 10, 2022 2:41:49 PM

Freedom of speech does not mean the right to impose unwanted speech on others. There is no right to do that. Spam filters should provide the option of filtering all unwanted messaging. No rational reason that that does not apply to political messaging. It could be fairly said that political messaging might be the most unwanted messaging.

Tom Gerber

From:
To:
AO

Subject: Political Spam

Date: Sunday, July 10, 2022 4:25:31 PM

Please do not allow political candidates and/or political parties to bypass my spam filters. It is bad enough that they gave themselves a pass on ROBOCALLS but now emal as well. Come on. Please don't permit this to happen as well.

Thank you. William Coleman

Edinboro, Pa.

Sent from Mail for Windows

 From:
 Jeff Baker

 To:
 AO

Subject: ruling on Google political email spam **Date:** Monday, July 11, 2022 10:28:12 AM

Writing to provide my input after reading this article on Google's request to allow political emails to bypass spam filters.

https://www.businessinsider.com/google-political-emails-spam-public-comment-fec-ruling-2022-7? nr_email_referer=1&utm_source=Sailthru&utm_medium=email&utm_content=10_things_tech&ut m_campaign=Post%20Blast%20sai:%20Inside%20Twitter%20as%20Elon%20Musk%20nixes%20deal %20to%20buv%20company&utm_term=10%20THINGS%20IN%20TECH%20SEND%20LIST

I am opposed to such a decision. Please do not give Google the green light to do this. This appears to be a transparent attempt by Google to trade privacy for money; as such it's pretty sickening.

There's a good reason why these organizations fear their messages ending up in spam folders. It's because they're not informative. They do little to nothing to advance genuine discussion of the merits of various candidates. In fact, their volume drowns out and dilutes attention from much more useful political dialog.

Please take this small step of rejecting Google's request, and prevent yet another case of the river of money polluting our democratic process.

Regard

From: <u>Natalee Roan</u>

To: <u>AO</u>

Subject: Say NO to AO 2022-14

Date: Saturday, July 9, 2022 2:23:48 PM

I am writing concerning AO 2022-14 regarding Google's request to skip spam filters for political campaign emails.

This is a HORRIFIC idea - My 85 year-old mother gets over 20 emails A DAY from political campaigns - each one screaming that if she doesn't give today, it will be the end of the USA as we know it. They are all from legitimate campaigns, but **not one of them is Opt-in** - meaning they are the very definition of SPAM. These emails are adding to the political divide by using tactics that are designed to literally scare people into giving donations and severely contributing to our political divide.

I can't think of anything worse for our democracy than allowing these emails to proliferate by not sending them through SPAM filters - Treat them as the SPAM they are!

Natalee Roan Seattle, WA
 From:
 Joe Wills

 To:
 AO

Subject: Stop ALL SPAM

Date: Sunday, July 10, 2022 3:06:26 PM

I want you to know that political spam as well as all spam is unwanted. Please take measures to block all spam, including political spam.

Joe Wills Dallas Center, IA

Get Outlook for iOS

Jeriel Acosta From: To:

Subject: Date:

AO Thoughts on spam Sunday, July 10, 2022 4:36:52 PM

Dear FEC,

Google is asking for the FEC's opinion on whether Google can institute a pilot program which allows the email sent to Gmail users from political candidates and campaigns to bypass Google's spam filters, and instead be delivered directly to their users' inboxes, allowing their users to determine whether or not they consider the email to be spam.

On the one hand, Google is of course free to do whatever they want with Gmail (within limits) as it is their service. It has always been the case that ISPs have wide latitude in making email delivery decisions.

On the other hand, given what is going on with the Jan 6 investigation, and how campaign email is potentially directly implicated (as may be the conduit, Salesforce), it seems a very bad time indeed to give candidates and campaigns such a free pass (for which, I have no doubt, Google will ultimately be charging). It seems doubly so if they are not going to also give a similar spam filtering bypass to others.

That said, of course, one can argue that the spam filtering of political email by an organization which delivers email to billions of people, and which is so wholly intertwined and entangled with various government agencies is, in and of itself, suppression of political speech, and that is certainly one of the specters hanging over this request.

Part of the technical and institutional problem here is that political email has _always_ been seen as a pariah among the email receiving industries (inbox providers, ISPs, spam filters, etc.) because so much of it is *actually* spam, meaning people being put on a mailing list without their request, let alone consent. I have zero doubt that you yourselves have received this political spam, because everybody has. While Google is no doubt reacting to recent events, and recent charges of partisan favoritism in their filtering algorithms, opening up the floodgates to their users' inboxes, and making their 1.5billion users bear the brunt of the massive amount of political spam that is sent, in order to assuage partisan disgruntlement, is not the best way to address these charges. (I have thoughts on what _is_ the best way, however Google has not thought to ask me.)

I am in a unique position here to understand the entire picture, as I am the one who founded the email deliverability industry, I have authored Federal legislation dealing with spam, and I am the CEO of the first email reputation certification program in the industry (since 2003).

If I can be of *any* assistance whatsoever to the Commission, please do not hesitate to ask.

Kind regards,

From: <u>David Hubbard</u>

To: AO

Subject: Too much Political email spam **Date:** Sunday, July 10, 2022 3:25:25 PM

Dear FEC,

There is already too much political email spam. In this divisive time where lies are regularly crammed down the public's throat and our legislators and representatives are without ethics. We need NO more political spam!

Take care,

David A. Hubbard, retired public servant.