



UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
600 Pennsylvania Avenue NW  
WASHINGTON, D.C. 20580

Reenah L. Kim  
Bureau of Consumer Protection  
Division of Enforcement, Mailstop CC-9528

April 12, 2016

via U.S. and electronic mail (b)(6)

Edward Palmieri  
Robert Sherman  
Facebook Legal  
1155 F Street NW, Suite 475  
Washington, DC 20004

Re: *In the Matter of Facebook, Inc., Docket No. C-4365*

Dear Messrs. Palmieri and Sherman:

We write regarding Facebook's soon-to-be announced Account Kit product,

(b)(4); (b)(3):6(f)

Specifically, although the Account Kit interface links to Facebook's Terms and Data Use Policy, such links to lengthy and general documents are insufficient to disclose an unexpected use of personal information, such as the use of authentication data for advertising.<sup>1</sup> Adding a "Learn More" hyperlink is likewise insufficient. Furthermore, making the disclosures after consumers have provided their telephone number or email address likely creates deception.

From our recent discussions with you, we understand that, following your introduction of Account Kit at tomorrow's F8 developer conference, you will make it available to app developers. You stated that, (b)(4); (b)(3):6(f)

(b)(4); (b)(3):6(f)

<sup>1</sup> See, e.g., .com Disclosures: How to Make Effective Disclosures in Digital Advertising (March 2013), available at <https://www.ftc.gov/system/files/documents/plain-language/bus41-dot-com-disclosures-information-about-online-advertising.pdf>.

April 12, 2016  
page 2

We understand from our most recent teleconference that you are continuing to consider further possible changes to Account Kit. Please let us know promptly what you decide. Thank you.

Sincerely,  
/s/  
Reenah L. Kim