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UNIVERSITY

November 15, 2007

Lydia Parnes, Director  
Bureau of Consumer Protection  
Federal Trade Commission  
600 Pennsylvania Avenue, N.W.,  
Washington, D.C. 20580

Dear Ms. Parnes,

I am writing on behalf of myself and my colleagues Professors Robert Larose and Richard Enbody. We are a group of researchers funded by the National Science Foundation, Cyber Trust program, who have studied consumer online privacy and security for several years. We would like to comment on some issues raised in your conference on Behavioral Marketing.

Our research has focused on the development of a social-psychological approach to understanding how and why consumers protect themselves online from the many threats to informational privacy. In the process, we have also examined the value of self-regulatory programs such as third party online certifications and privacy policies. Our research points to the need for more explicit privacy policy language that is not only more noticeable and clear, but explains the link between disclosure behaviors and potential negative consequences for the consumer. In addition, while third party certifications appear valuable on the surface, because privacy policies are hidden, lengthy, and notoriously indecipherable, consumers over-rely on third party certifications and in inappropriate ways. Consumers misinterpret what the seals communicate about the privacy practices of a participating website and are likely to consider those sites to not engage in the collection and dissemination of personal information.

Thus, it is critical that privacy policies be revamped. We strongly suggest that a program of research should be undertaken prior to making additional recommendations. Furthermore, the research should be performed by known social scientists using sound theoretical principles and directions for assessing the effects of any proposed changes.

We offer our research findings to the commission with the hopes that they will help guide the continued policy and regulatory discussions. A list of citations to our work appears in a file attached with this letter. Copies of our work appear at our website <http://www.msu.edu/~isafety>. We hope that you will find value in our perspective and that we can offer input on these issues as the commission develops a new paradigm for Fair Practice Standards that can serve all stakeholders.

Sincerely,

Nora J. Rifon

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Department of Telecommunication

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Recent Publications and Papers:

- Robert LaRose, Nora J. Rifon and Richard Enbody (forthcoming), "Promoting Personal Responsibility for Internet Safety," *Communications of the ACM*, in press.
- Doohwang Lee, Robert LaRose and Nora J. Rifon (forthcoming), "Keeping the Network Safe: A Model of Online Protection Behavior," *Behaviour & Information Technology*, in press.
- Robert LaRose and Nora J. Rifon (2007), "Promoting i-Safety: Privacy Warning Boxes, Privacy Seals and Online Privacy Behavior," *The Journal of Consumer Affairs*, Vol. 41, No. 1, Summer, 127-149.
- Robert LaRose, Nora J. Rifon and Richard Enbody (2007), "Keeping Families Safe Online," *Family Research Initiative White Paper Series*, in press.
- Robert LaRose and Nora J. Rifon (2006), "Your Privacy is Assured – of Being Disturbed: Web sites with and Without Privacy Seals," *New Media and Society*, 8, December, 1009-1029.
- Nora J. Rifon, Robert LaRose and Sejung Marina Choi (2005), "Your Privacy is Sealed: Effects of Privacy Seals on Trust and Personal Disclosures," *Journal of Consumer Affairs*, Vol. 39, No. 2, Winter, 337-360.
- Nora J. Rifon, Robert J. LaRose, and Melissa L. Lewis (2007). Resolving the Privacy Paradox: Toward a Social-Cognitive Theory of Consumer Privacy Protection. Under review at *Journal of Public Policy & Marketing*.
- Christina B. Wirth, Nora J. Rifon, Robert J. LaRose, and Melissa L. Lewis (2007), Promoting Teenage Online Safety with an i-Safety Intervention Enhancing Self-Efficacy and Protective Behaviors, under review for *Public Policy & Marketing*.
- Robert LaRose, Nora J. Rifon, and Christina Wirth (2007), "Online Safety Begins with You and Me," *International Communication Association*, San Francisco.
- Nora J. Rifon and Robert LaRose (2007), "Putting the "I" Back in i-Safety," *Trusted Computing, Cyber-Trust PI meeting*, January 29, Atlanta, GA.
- Nora J. Rifon, Robert LaRose, Timothy Levine, and Richard Enbody (2007), "A Model of Online Consumer Deception Detection: How to Hook Phish," *AMA Marketing & Public Policy*, Washington, D.C.
- Elizabeth Taylor Quilliam, Nora J. Rifon, Robert LaRose and Les Carlson (2007), "Losing My Good Name: Teens, Online Privacy, and Identity Theft," *AMA Marketing & Public Policy*, Washington, D.C.
- Elizabeth Taylor Quilliam, Nora J. Rifon, and Robert LaRose (2006), "Protecting Household Online Privacy: Who is the First Line of Defense?" *Proceedings of the American Marketing Association*.

- Elizabeth Taylor Quilliam and Nora J. Rifon (2005), "Teens and Online Privacy," *American Marketing Association's Annual Marketing & Public Policy Conference*, Washington, DC, May 14.
- Nora J. Rifon and Elizabeth Taylor Quilliam (2005), "Consumer Perceptions of Online Safety," *International Communication Association, Communication and Technology Division*, New York, NY, May 28.
- Robert LaRose, Nora J. Rifon and Rebecca Hayes (2005), "Network Security Begins at Home: Changing Consumer Behavior for i-Safety," *Trusted Computing, Cyber-Trust PI meeting*, Irvine, CA. Sept. 26.
- Robert LaRose, Nora J. Rifon, Doohwang Lee, and Xin Liu (2005), "Online Safety Strategies: A Content Analysis and Theoretical Assessment," *International Communication Association Communication, and Technology Division*, New York, NY, May 28.
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- Nora J. Rifon (forthcoming), "Citizen Expectations of Information Privacy in State Government," *Government Information Quarterly*, in press
- Nora J. Rifon, Carrie Hammerman, and Jeff Williams (2003), "Privacy and the Role of the Internet for the Citizens of Michigan: Implications for Consumers, Citizens, and Government," *Cyberstate.org White Paper*.
- Nora J. Rifon (2000). *Consumer Privacy: A Review and Policy Implications*. Report to State of Michigan Attorney General Jennifer Granholm.