



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Office of the Secretary

December 16, 2024

Ben Winters
Consumer Federation of America
1620 I Street, NW
Washington, DC 20006

Re: *In the Matter of Rytr LLC, Matter No. 232-3052*

Dear Mr. Winters:

Thank you for your comment regarding the Federal Trade Commission's ("FTC" or "Commission") proposed consent agreement in the above-titled proceeding against Rytr LLC ("Rytr"). Your comment, filed on behalf of the Consumer Federation of America, Electronic Privacy Information Center (EPIC), and the National Consumers League (NCL), discusses important issues, and we have given it serious consideration.

This proceeding involves Rytr's marketing of one of its artificial intelligence ("AI") writing tools. According to the complaint, by design, this tool allowed users to generate, with almost no input, thousands of detailed and genuine-sounding reviews for a given product. Those reviews would not have reflected a real consumer's experience and would thus have been fake if posted online thereafter. The proposed consent order bans Rytr from advertising, marketing, promoting, or offering for sale any "review or testimonial generation service," defined as any service dedicated to, or advertised, promoted, or offered as generating consumer or customer reviews or testimonials.

Your comment expresses support for this matter and recommends certain changes to the proposed consent order. You point to the order's prohibition on "Review or Testimonial Generation Services" and ask the Commission to impose "more comprehensive remedies." Specifically, you suggest requiring Rytr to "enact moderation practices that restrict output when users submit prompts that are clearly written to facilitate the practice of bulk review generation." The Commission believes that the prohibition on "Review or Testimonial Generation Services" is appropriately broad relative to the allegations and reasonably covers not just the particular tool at issue but also other tools that Rytr dedicates to, or markets for, the generation of reviews or testimonials.

The Commission believes the proposed order offers substantial protections to consumers. The Commission has placed your comment on the public record, pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Decision and Order in the above-titled proceeding in final form without any modifications. The final Decision and Order

and other relevant materials are available from the Commission's website at <http://www.ftc.gov>.
Thank you again for your comment.

By direction of the Commission, Commissioners Holyoak and Ferguson dissenting.

April J. Tabor
Secretary



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December 16, 2024

Marc Rotenberg, Executive Director
Merve Hickok, President
Christabel Randolph, Associate Director
Sophie Nyombe, Law Fellow
Bhawna Motwani, Law Clerk
Center for AI and Digital Policy
1100 13th Street, NW, Suite 800
Washington, DC 20005

Re: *In the Matter of Rytr LLC, Matter No. 232-3052*

Dear Mr. Rotenberg:

Thank you for your comment regarding the Federal Trade Commission's ("FTC" or "Commission") proposed consent agreement in the above-titled proceeding against Rytr LLC ("Rytr"). Your comment discusses important issues, and we have given it serious consideration.

This proceeding involves Rytr's marketing of one of its artificial intelligence ("AI") writing tools. According to the complaint, by design, this tool allowed users to generate, with almost no input, thousands of detailed and genuine-sounding reviews for a given product. Those reviews would not have reflected a real consumer's experience and would thus have been fake if posted online thereafter. The proposed consent order bans Rytr from advertising, marketing, promoting, or offering for sale any "review or testimonial generation service," defined as any service dedicated to, or advertised, promoted, or offered as generating consumer or customer reviews or testimonials.

Your comment expresses support for this matter and recommends certain changes to the proposed consent order. Specifically, you ask for the definition of "Review or Testimonial Generation Service" to be amended to include "AI-based and automated tools designed to generate or manipulate consumer reviews or testimonials." The Commission believes that the current definition is sufficiently broad as written and reasonably covers not just the particular tool at issue but also other tools that Rytr dedicates to, or markets for, the generation of reviews or testimonials. You also request that the agency require Rytr to conduct impact assessments of its AI services and "maintain records on the training data pertaining to its AI model." The Commission believes that such order provisions would go beyond the scope of this matter.

The Commission believes the proposed order offers substantial protections to consumers. The Commission has placed your comment on the public record, pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Decision and Order in the above-titled proceeding in final form without any modifications. The final Decision and Order

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Thank you again for your comment.

By direction of the Commission, Commissioners Holyoak and Ferguson dissenting.

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Office of the Secretary

December 16, 2024

Justin Brookman, Director, Technology Policy
Matt Schwartz, Policy Analyst
Grace Gedye, Policy Analyst
Consumer Reports
101 Truman Ave.
Yonkers, NY 10703

Re: *In the Matter of Rytr LLC, Matter No. 232-3052*

Dear Mr. Brookman:

Thank you for your comment regarding the Federal Trade Commission's ("FTC" or "Commission") proposed consent agreement in the above-titled proceeding against Rytr LLC ("Rytr"). Your comment discusses important issues, and we have given it serious consideration.

This proceeding involves Rytr's marketing of one of its artificial intelligence ("AI") writing tools. According to the complaint, by design, this tool allowed users to generate, with almost no input, thousands of detailed and genuine-sounding reviews for a given product. Those reviews would not have reflected a real consumer's experience and would thus have been fake if posted online thereafter. The proposed consent order bans Rytr from advertising, marketing, promoting, or offering for sale any "review or testimonial generation service," defined as any service dedicated to, or advertised, promoted, or offered as generating consumer or customer reviews or testimonials.

Your comment expresses support for this matter and includes an analysis of how the Commission's legal theories are appropriate given the facts alleged in the complaint. We appreciate your support of the complaint and the order.

The Commission believes the proposed order offers substantial protections to consumers. The Commission has placed your comment on the public record, pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Decision and Order in the above-titled proceeding in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission, Commissioners Holyoak and Ferguson dissenting.

April J. Tabor
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December 16, 2024

Bonnie Patten, Executive Director
Laura Smith, Legal Director
Eliza Duggan, Staff Attorney
Truth in Advertising, Inc.
984 Main St.
Branford, CT 06405

Re: *In the Matter of Rytr LLC, Matter No. 232-3052*

Dear Ms. Patten:

Thank you for your comment regarding the Federal Trade Commission's ("FTC" or "Commission") proposed consent agreement in the above-titled proceeding against Rytr LLC ("Rytr"). Your comment discusses important issues, and we have given it serious consideration.

This proceeding involves Rytr's marketing of one of its artificial intelligence ("AI") writing tools. According to the complaint, by design, this tool allowed users to generate, with almost no input, thousands of detailed and genuine-sounding reviews for a given product. Those reviews would not have reflected a real consumer's experience and would thus have been fake if posted online thereafter. The proposed consent order bans Rytr from advertising, marketing, promoting, or offering for sale any "review or testimonial generation service," defined as any service dedicated to, or advertised, promoted, or offered as generating consumer or customer reviews or testimonials.

Your comment expresses support for this matter and includes an analysis of how the Commission's legal theories are appropriate given the facts alleged in the complaint. We appreciate your support of the complaint and the order.

The Commission believes the proposed order offers substantial protections to consumers. The Commission has placed your comment on the public record, pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Decision and Order in the above-titled proceeding in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission, Commissioners Holyoak and Ferguson dissenting.

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Office of the Secretary

December 16, 2024

Paul Lekas
Senior Vice President, Global Public Policy & Government Affairs
Software & Information Industry Association (SIIA)
1620 I Street NW, Suite 501
Washington D.C. 20005

Re: *In the Matter of Rytr LLC, Matter No. 232-3052*

Dear Mr. Lekas:

Thank you for your comment regarding the Federal Trade Commission's ("FTC" or "Commission") proposed consent agreement in the above-titled proceeding against Rytr LLC ("Rytr"). Your comment discusses important issues, and we have given it serious consideration.

This proceeding involves Rytr's marketing of one of its artificial intelligence ("AI") writing tools. According to the complaint, by design, this tool allowed users to generate, with almost no input, thousands of detailed and genuine-sounding reviews for a given product. Those reviews would not have reflected a real consumer's experience and would thus have been fake if posted online thereafter. The proposed consent order bans Rytr from advertising, marketing, promoting, or offering for sale any "review or testimonial generation service," defined as any service dedicated to, or advertised, promoted, or offered as generating consumer or customer reviews or testimonials.

Your comment criticizes this matter and recommends that the Commission not proceed with it. Among other things, you argue that the Commission's action reflects an attempt to hold a company liable under the FTC Act merely for offering a service that others *could* use to deceive consumers. The complaint alleges, critically, that the service can quickly generate an unlimited number of detailed and genuine-sounding reviews with minimal input, and it provides several examples of subscribers who used it to generate hundreds or thousands of reviews for certain products or companies. More specifically, the complaint alleges that 24 subscribers generated over 10,000 reviews each, that 114 subscribers generated over 1,000 reviews each, and that one subscriber generated reviews for specific garage door repair companies all over the country. The complaint and order are narrowly focused on the facts of the case; neither reflects a conclusion that any company simply offering review generation services would be violating the FTC Act.

The Commission believes the proposed order offers substantial protections to consumers. The Commission has placed your comment on the public record, pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Decision and Order in the above-titled proceeding in final form without any modifications. The final Decision and Order

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Thank you again for your comment.

By direction of the Commission, Commissioners Holyoak and Ferguson dissenting.

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WASHINGTON, D.C. 20580

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December 16, 2024

Jai Ramaswamy
Chief Legal Officer
Andreessen Horowitz
2865 Sand Hill Road
Menlo Park, California 94025

Re: *In the Matter of Rytr LLC, Matter No. 232-3052*

Dear Mr. Ramaswamy:

Thank you for your comment regarding the Federal Trade Commission's ("FTC" or "Commission") proposed consent agreement in the above-titled proceeding against Rytr LLC ("Rytr"). Your comment discusses important issues, and we have given it serious consideration.

This proceeding involves Rytr's marketing of one of its artificial intelligence ("AI") writing tools. According to the complaint, by design, this tool allowed users to generate, with almost no input, thousands of detailed and genuine-sounding reviews for a given product. Those reviews would not have reflected a real consumer's experience and would thus have been fake if posted online thereafter. The proposed consent order bans Rytr from advertising, marketing, promoting, or offering for sale any "review or testimonial generation service," defined as any service dedicated to, or advertised, promoted, or offered as generating consumer or customer reviews or testimonials.

Your comment criticizes this matter and recommends that the Commission not proceed with it. Among other things, you argue that the Commission's action reflects an attempt to hold a company liable under the FTC Act merely for offering a service that others *could* use to deceive consumers. The complaint alleges, critically, that the service can quickly generate an unlimited number of detailed and genuine-sounding reviews with minimal input, and it provides several examples of subscribers who used it to generate hundreds or thousands of reviews for certain products or companies. More specifically, the complaint alleges that 24 subscribers generated over 10,000 reviews each, that 114 subscribers generated over 1,000 reviews each, and that one subscriber generated reviews for specific garage door repair companies all over the country. The complaint and order are narrowly focused on the facts of the case; neither reflects a conclusion that any company simply offering review generation services would be violating the FTC Act.

The Commission believes the proposed order offers substantial protections to consumers. The Commission has placed your comment on the public record, pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Decision and Order in the above-titled proceeding in final form without any modifications. The final Decision and Order

and other relevant materials are available from the Commission's website at <http://www.ftc.gov>.
Thank you again for your comment.

By direction of the Commission, Commissioners Holyoak and Ferguson dissenting.

April J. Tabor
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WASHINGTON, D.C. 20580

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December 16, 2024

Carl Holshouser, Executive Vice President
TechNet
1420 New York Avenue NW, Suite 825
Washington, D.C. 20005

Re: *In the Matter of Rytr LLC, Matter No. 232-3052*

Dear Mr. Holshouer:

Thank you for your comment regarding the Federal Trade Commission's ("FTC" or "Commission") proposed consent agreement in the above-titled proceeding against Rytr LLC ("Rytr"). Your comment discusses important issues, and we have given it serious consideration.

This proceeding involves Rytr's marketing of one of its artificial intelligence ("AI") writing tools. According to the complaint, by design, this tool allowed users to generate, with almost no input, thousands of detailed and genuine-sounding reviews for a given product. Those reviews would not have reflected a real consumer's experience and would thus have been fake if posted online thereafter. The proposed consent order bans Rytr from advertising, marketing, promoting, or offering for sale any "review or testimonial generation service," defined as any service dedicated to, or advertised, promoted, or offered as generating consumer or customer reviews or testimonials.

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The Commission believes the proposed order offers substantial protections to consumers. The Commission has placed your comment on the public record, pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Decision and Order in the above-titled proceeding in final form without any modifications. The final Decision and Order

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By direction of the Commission, Commissioners Holyoak and Ferguson dissenting.

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WASHINGTON, D.C. 20580

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December 16, 2024

[Anonymous]

Dear [anonymous]:

Thank you for your comment regarding the Federal Trade Commission's ("FTC" or "Commission") proposed consent agreement in the above-titled proceeding against Rytr LLC ("Rytr"). Your comment discusses important issues, and we have given it serious consideration.

This proceeding involves Rytr's marketing of one of its artificial intelligence ("AI") writing tools. According to the complaint, by design, this tool allowed users to generate, with almost no input, thousands of detailed and genuine-sounding reviews for a given product. Those reviews would not have reflected a real consumer's experience and would thus have been fake if posted online thereafter. The proposed consent order bans Rytr from advertising, marketing, promoting, or offering for sale any "review or testimonial generation service," defined as any service dedicated to, or advertised, promoted, or offered as generating consumer or customer reviews or testimonials.

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