

Analysis of Proposed Consent Order to Aid Public Comment
In the Matter of Rytr LLC, File No. 232-3052

The Federal Trade Commission (“Commission”) has accepted, subject to final approval, an agreement containing a consent order from Rytr LLC (“Rytr”).

The proposed consent order (“proposed order”) has been placed on the public record for thirty days for receipt of comments by interested persons. Comments received during this period will become part of the public record. After thirty days, the Commission will again review the agreement and the comments received and will decide whether it should withdraw from the agreement and take appropriate action or make final the agreement’s proposed order.

This matter involves Rytr’s marketing and offering for sale an artificial intelligence “writing assistant” service intended to generate unlimited content for consumer and customer reviews and testimonials. Subscribers to the Rytr service, which uses generative artificial intelligence, can quickly and easily generate unlimited written content for a variety of “Use Cases.” One of these Use Cases was the “Testimonial & Review” Use Case, which Rytr began offering in April 2021.

According to the Commission’s proposed complaint, the review generation service generated reviews that would almost certainly be false for the users who copied them and published them online. In many instances, the resulting reviews featured details that would deceive potential consumers deciding to purchase the service or product described. The proposed complaint asserts that at least some of Rytr’s subscribers utilized the service to produce hundreds and, in some cases, thousands of reviews.

The proposed complaint alleges that Rytr provided the means and instrumentalities to its users and subscribers to generate written content for consumer reviews that was false and deceptive. The complaint also alleges that Rytr engaged in an unfair business practice by offering a service that was intended to quickly generate unlimited content for consumer reviews and created false and deceptive written content for consumer reviews.

The proposed order contains provisions designed to prevent Rytr from engaging in these and similar acts and practices in the future.

Provision I bans Rytr from advertising, promoting, marketing, offering for sale, or selling any service dedicated to or advertised, promoted, or offered as generating consumer or customer reviews or testimonials.

Provisions II through VI of the proposed order contain reporting and compliance provisions. Provision II mandates that Rytr acknowledge receipt of the order, distribute the order to principals, officers, and certain employees and agents, and obtain signed acknowledgments from them. Provision III requires Rytr to submit compliance reports to the Commission one year after the order’s issuance and submit notifications when certain events occur. Under Provision IV, Rytr must create certain records for twenty years and retain them for five years. Provision V provides for the FTC’s continued compliance monitoring of Rytr’s activity during the order’s

effective dates. Finally, Provision VI provides the effective dates of the order, including that, with exceptions, the order will terminate in 20 years.

The purpose of this analysis is to facilitate public comment on the proposed order. It is not intended to constitute an official interpretation of the complaint or proposed order, or to modify in any way the proposed order's terms.