

June 29, 2022

The Honorable Lina M. Khan
Chair
Federal Trade Commission
600 Pennsylvania Ave NW,
Washington, DC 20580
lkhan@ftc.gov

The Honorable Alvaro Bedoya
Commissioner
Federal Trade Commission
600 Pennsylvania Ave NW,
Washington, DC 20580
abedoya@ftc.gov

The Honorable Rebecca Kelly Slaughter
Commissioner
Federal Trade Commission
600 Pennsylvania Ave NW,
Washington, DC 20580
rslaughter@ftc.gov

The Honorable Noah Joshua Phillips
Commissioner
Federal Trade Commission
600 Pennsylvania Ave NW,
Washington, DC 20580
nphillips@ftc.gov

The Honorable Christine S. Wilson
Commissioner
Federal Trade Commission
600 Pennsylvania Ave NW,
Washington, DC 20580
cwilson@ftc.gov

Dear Chair Khan, Commissioner Bedoya, Commissioner Slaughter, Commissioner Phillips, and Commissioner Wilson:

On behalf of the Spanish Language Disinformation Coalition (“SLDC”), which consists of civil rights, Latino leadership, and consumer advocacy organizations, we write to thank the Federal Trade Commission (“FTC”) for proceeding in its [Advanced Notice of Proposed Rulemaking](#) (“ANPRM”) under Section 18 of the Federal Trade Commission Act, to “curb lax security practices, limit privacy abuses, and ensure that algorithmic decision-making does not result in unlawful discrimination.” In order to protect consumers the FTC must use this opportunity to minimize the collection, use, and sharing of our behavioral and demographic data and establish clear rules to prevent discriminatory and harmful data practices.

Internet platforms thrive based on business models which employ extractive data practices to collect, distribute, and leverage users’ personal information across their services. Such business models subject our communities to disinformation, hateful content, extremism, calls for violence, conspiracy theories, and other dangerous content to enhance engagement, and use selective advertising in a discriminatory fashion, all for their financial gain. These problems have been well-documented by [Congress](#), external research entities, and civil society writ large.¹ The problem has become so prevalent that it directly impacts the civil and economic opportunities of communities such as Latinx.

¹Minority Staff of S. Comm. on Foreign Relations, 115th Cong., Rep. on Putin’s Asymmetric Assault on Democracy in Russia and Europe: Implications for U.S. National Security (Comm. Print 2018).

The targeting of the Latinx community demonstrates the need for FTC rules protecting people from fraud, scams and abusive data practices. While we can see some progress from platforms on English-language content, it's common for Spanish-language posts that clearly violate the platform's community standards to stay up for months despite being flagged by organizations like ours. Online entities' failure to comply with their own stated policies, guidelines, and terms of service is a deceptive practice in any case, and when it results in failure to remove harmful and fraudulent content and claims in languages other than English that deceptive practice specially harms the individuals and communities that speak those languages.

If platforms are allowing false unsubstantiated content on their platforms, that is likely violating FTC's prohibition on deceptive practices. The FTC oversees artificial intelligence (AI), algorithms, and technology when it discriminates by race, religion, or other protected classes. Therefore, we are pleased the FTC has initiated an ANPRM to protect consumers from online harms in the digital economy by specifying acts or practices that are unfair or deceptive.

We thank the FTC for using its rulemaking authority to begin the process to establish meaningful rules that prevent deceptive unfair practices targeting Latinx on online platforms and marketplaces, to prevent privacy data abuses and the spread of fraudulent information for financial gain. If you require additional information or have any questions, please do not hesitate to contact Elizabeth Rodriguez at castilloassiatant@nhmc.org or (626) 792-6462. Thank you in advance for your attention to this request.

Sincerely,

Florida Watch
Free Press
Fundamedios
Global Project Against Hate and Extremism
Hispanics in Philanthropy
League of United Latin American Citizens
National Hispanic Media Coalition
New York University Cybersecurity for Democracy