OTA
Online Trust Alliance

October 28, 2012

To: Nick Doty, W3C
    Jan Schallaböck, ICPP

Re: W3C Workshop Call for Papers – Do Not Track & Beyond

The Online Trust Alliance submits the following for consideration for participating at theW3C workshop being held on November 26-27, 2012

Background
The Online Trust Alliance's (OTA) mission is to enhance online trust, while promoting innovation and the vitality of the internet. OTA is a non-profit organization representing the broad ecosystem with supporters and sponsors based in the US, Canada, EU, Singapore, Latin America and Australia. As a "voice of reason" OTA's goal include:

- Developing a pragmatic and holistic view of the issues and tradeoffs incorporating the long-term aggregate view of impact to consumers, commerce and society.

- Help educate businesses, policy makers and stakeholders while developing and advancing best practices and tools to enhance the protection of users' security, privacy and identity.

- Supports collaborative public-private partnerships, benchmark reporting, meaningful self-regulation and data stewardship.

OTA has working on the concept of do not track since proposed by the Center for Democracy & Technology. Subsequently OTA has submitted papers and / or testimony to the FTC, Commerce Department, FCC, White House and ICANN. OTA has participated in briefings and listening sessions contributing to the White House Privacy Bill of Rights and Commerce Department Privacy white paper.

Review the progress self-regulatory efforts, OTA believes the status quo is no longer acceptable, and both sides must move toward the center. OTA believes we must appreciate the long-term impact of the absence of user notice and control of the collection, use, sharing and retention of their online data. At the same time there is a significant void in the appreciation of the value users receive from the data exchange which funds the content and services they consume.

Historically the interactive marketing and advertising industries have faced similar challenges. For example in the absence of regulation, the industry deployed technical counter measures which today are on-by default and embraced by nearly every browser and ISP. These include popup blockers and disabling of links and images from unknown senders in email to anti-phishing filters. While admittedly they impact legitimate advertising and marketing, can result in false positives and were disruptive to their operations and practices, industry has evolved and prospered.

Interest in the Workshop - Specific to the workshop, OTA proposes a review of the potential techniques and scenarios which may evolve from the deployment of DNT. We suggest a review of the browser adoption curve and review of potential scenarios that may result over time, from both the support and lack of support for DNT. A partial list could include default adoption of third party cookies blocking, dynamic block lists and integrated ad-blocking mechanisms. In addition we propose an examination of scenarios sites may deploy in response to DNT and the pros and cons from the user, publishers and advertisers perspective. These may include redirecting users to limited content sites, driving site visitors to subscription models, serving more ads on a page, to posting popup notices their site does not support DNT.

I look forward to continued participation with W3C and others to advance privacy enhancing technologies and practices while promoting innovation and the value users receive from advertising supported services,

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