



Coalition for Integrity

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Federal Election Commission
Attn: Neven F. Stipanovic
999 E Street, NW
Washington, DC 20463

RE: Comments on Notice 2018-06, Internet Communications Disclaimers

Dear Mr. Stipanovic:

The Coalition for Integrity respectfully submits these comments in response to the Commission's Advanced Notice of Proposed Rulemaking (ANPRM) 2018-06, "Internet Communication Disclaimers and Definition of 'Public Communications.'" The Coalition for Integrity is a non-profit, non-partisan organization, which works in coalition with a wide range of individuals and organizations to combat corruption and promote integrity in the public and private sectors.

We applaud the Commission's renewed effort to expand the requirement for disclosure of who pays for online political ads. The Internet has become a primary source of political campaigning, much of it carried out anonymously. This allows anyone to widely distribute misleading and false ads with no accountability. As political ads move from platforms to internet-based outlets, including the myriad kinds of social media, the disclaimer rules must keep pace.

Whichever alternative the Commission chooses, the ultimate goal is accountability for the content and transparency of the funding source. To that end, the Coalition urges the Commission to require all forms of internet campaign advertising to be accompanied with a disclaimer as to the funding source behind the ad. With many forms of social media, a political ad may be transmitted and retransmitted such that a viewer would have no idea that it is paid advertising. At a minimum, the Commission should require "Paid for by . . ." in letters of sufficient size to be readable by the viewer with a link to fuller disclosure.

The Coalition urges the Commission to move as expeditiously as possible to promulgate disclaimer rules that reflect the new media for campaigning and provide for accountability and transparency for voters.

Respectfully submitted,

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