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**I. INFORMATION NEEDING CORRECTION: PRESCREEN OPT-OUT DISCLOSURE FINAL RULE**

**A. “Probative Evidence” Statement**

**Correction Needed**

< ... *The Commission believes that the survey provides probative evidence of the comparative effectiveness of the three versions it tested (“current,” “improved,” and “layered”).* ... *The survey does not provide the Commission with a reliable basis for assessing the comparative effectiveness of the three versions it tested (“current,” “improved,” and “layered”).*

**FTC Information Quality Guideline Violations**

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### The Need for Random Sampling

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**The Office of Management and Budget** OM guidance for  
preparing the Performance Education, and Education, and  
**Avoidance of Unreliable Statistical Studies** rule

*The statistical laws that permit inference from a sample to a population assume complete coverage, complete response, and random selection. If any of these conditions are not met, then inferences cannot be demonstrated to be valid. Thus, for example, “quota samples” cannot produce results that can be generalized to the universe of study*

The OM guidance rule

*If the agency is seeking to implement a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study, the Supporting Statement needs to explain why.<sup>13</sup>*

*This guideline intends generally to prohibit statistical*

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<sup>13</sup> The Office of Management and Budget, the Performance Education, and Education, and  
preparing guidance, discussed the survey design process.

<sup>14</sup> The Performance Education, and Education, and  
the Performance Education, and Education, and

the Performance Education, and Education, and

*with published caveats or adjustments based on untested assumptions do not satisfy this guideline.*

The OM guidance is intended to be non-proprietary and to be used by all members of the public. The Commission is committed to transparency and to providing the public with the information it needs to make informed decisions. The Commission will continue to work with the public to improve the quality of its decision-making process.

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The Commission's general policy is to provide the public with the information it needs to make informed decisions. The Commission will continue to work with the public to improve the quality of its decision-making process.

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The Office of Management and Enterprise Performance, Department of Education, is pleased to announce the following:

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**TESTS OF STATISTICAL SIGNIFICANCE**

- Tests are based on probability theory and must be used for analysis only when the data are from a probability sample
- Not appropriate to use on haphazard or quota samples<sup>21</sup>

**Thomas Gschwend, University of Mannheim,** n n i, c e d c, ng  
e, o ge t, d, i, o, g p e a t e, e p r o c e e

*In general it is neither clear according to statistical theory how to compute a standard deviation, nor how to estimate standard errors or whether there is any other way to systematically assess the expected variability in quota sampling. Significance testing is only appropriate in probability samples.*

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E. Footnote 37

Corrections Needed

- < *The results reported in the FRB Prescreen Report indicate that a layered notice may be a very effective means to ensure that consumers who open prescreened solicitations will see the prescreen disclosure.* *The results reported in the FRB Prescreen Report provide no basis for believing that a layered notice may be an effective means to ensure that consumers who open prescreened solicitations will see the prescreen disclosure.*
- < *Thus, a layered notice seems more likely to be seen by the majority of consumers who open prescreened solicitations.* *There is no basis for concluding that a layered notice is more likely to be seen by the majority of consumers who open prescreened solicitations.*

FTC Information Quality Guideline Violations

- < Accuracy Objectivity Balance Clarity Conciseness Correctness Timeliness Usefulness Understandability Verifiability Accessibility Privacy Security Reliability Consistency Transparency Accountability Responsiveness Proportionality Minimization Retention Deletion Portability Control Notice Consent Choice Opt-Out Opt-In Withdrawal Disclosure Access Security Integrity Confidentiality Accuracy Objectivity Balance Clarity Conciseness Correctness Timeliness Usefulness Understandability Verifiability Accessibility Privacy Security Reliability Consistency Transparency Accountability Responsiveness Proportionality Minimization Retention Deletion Portability Control Notice Consent Choice Opt-Out Opt-In Withdrawal Disclosure Access Security Integrity Confidentiality

Discussion

- < *The prescreened notice does not create a layered notice, any type of disclosure, or any type of effectiveness concerning the consumer's effectiveness of any type of notice. The prescreened notice does not create a layered notice, any type of disclosure, or any type of effectiveness concerning the consumer's effectiveness of any type of notice. The prescreened notice does not create a layered notice, any type of disclosure, or any type of effectiveness concerning the consumer's effectiveness of any type of notice.*
- < *The prescreened notice does not create a layered notice, any type of disclosure, or any type of effectiveness concerning the consumer's effectiveness of any type of notice. The prescreened notice does not create a layered notice, any type of disclosure, or any type of effectiveness concerning the consumer's effectiveness of any type of notice.*

g nce r e c r r on y e e e y r e e p e a e e n d c e



**F. §642.1 (a)**

**Correction Needed**

< ↓ e r e en 4 *This part implements section 213(a) of the Fair and Accurate Credit Transactions Act of 2003...* ↓ ● d e c o r e c e d , ● r e 4 *The Federal Trade Commission has been unable to demonstrate the development of an Enhanced Opt Out disclosure notice meeting the 'simple and easy to un-293.52 -15-2(i)-2(os)-1(u)-4(r)-1(e)4( n,*

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## FTC Information Quality Guideline Violations

- < The opening of Quality Information on the Synovate study is provided to the public in a way that is not intended to be a source of information for the public. The information is provided to the public in a way that is not intended to be a source of information for the public.
- < The opening of Quality Information on the Synovate study is provided to the public in a way that is not intended to be a source of information for the public. The information is provided to the public in a way that is not intended to be a source of information for the public.

## Discussion

- < The opening of Quality Information on the Synovate study is provided to the public in a way that is not intended to be a source of information for the public. The information is provided to the public in a way that is not intended to be a source of information for the public.
- < The opening of Quality Information on the Synovate study is provided to the public in a way that is not intended to be a source of information for the public. The information is provided to the public in a way that is not intended to be a source of information for the public.

## II. INFORMATION NEEDING CORRECTION: SYNOVATE STUDY

### A. "Inform FTC Decision-Making" Statement

#### Correction Needed

- < The opening of Quality Information on the Synovate study is provided to the public in a way that is not intended to be a source of information for the public. The information is provided to the public in a way that is not intended to be a source of information for the public.

consumers about their options.” *The results of this study cannot be inferred to a larger population.*

### FTC Information Quality Guideline Violations

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**III. INFORMATION NEEDING CORRECTION: HASTAK REPORT**

**A. Methodology**

**Correction Needed**

- < The Methodology section of the report needs to be corrected, not due to the error, “The Synovate methodology did not conform to sound statistical and research methods.”

**FTC Information Quality Guideline Violations**

- < Objectivity The phrase “on the one hand” and “on the other hand” are used to present two opposing views of the same issue. The phrase “on the one hand” is used to present a positive view of the issue, and the phrase “on the other hand” is used to present a negative view of the issue.

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The Office of Management and Budget, Department of Education, Commission on the Future of the U.S. Education System, “The Synovate Methodology Did Not Conform to Sound Statistical and Research Methods,” Report No. 10-001, (Washington, DC: U.S. Government Printing Office, 2010).

## Discussion

- < no determination of significance can be applied to the results regarding how effectively the layered notice communicated the message that consumers have the right to opt out of receiving prescreened offers. The layered notice did not communicate the message that consumers have the right to opt out of receiving prescreened offers more effectively than the current version of the notice. The layered notice did not communicate the message that consumers have the right to opt out of receiving prescreened offers more effectively than the current version of the notice.

## **B. “Significantly More Effective” Statements**

### Correction Needed

- < In the report, “These results show that the layered version communicated significantly more effectively than the current version the message that consumers have the right to opt out of receiving prescreened offers.” No determination of significance can be applied to the results regarding how effectively the layered notice communicated the message that consumers have the right to opt out of receiving prescreened offers.”

### FTC Information Quality Guideline Violations

- < The report of Q. The layered notice did not communicate the message that consumers have the right to opt out of receiving prescreened offers more effectively than the current version of the notice. The layered notice did not communicate the message that consumers have the right to opt out of receiving prescreened offers more effectively than the current version of the notice.

## Discussion

- < A significant finding of the report is that the layered notice did not communicate the message that consumers have the right to opt out of receiving prescreened offers more effectively than the current version of the notice. The layered notice did not communicate the message that consumers have the right to opt out of receiving prescreened offers more effectively than the current version of the notice.
- < The report of Q. The layered notice did not communicate the message that consumers have the right to opt out of receiving prescreened offers more effectively than the current version of the notice. The layered notice did not communicate the message that consumers have the right to opt out of receiving prescreened offers more effectively than the current version of the notice.

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**Discussion**

< The Federal Trade Commission (FTC) did not conduct a general  
pre-screening of contractors for deceptive practices. They do not produce  
the list of contractors on which they do not conduct a pre-screening.  
The FTC's proposed rule would require the FTC to conduct a pre-screening  
of contractors for deceptive practices.

< The proposed rule would require the FTC to conduct a pre-screening  
of contractors for deceptive practices. The proposed rule would require the  
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The proposed rule would require the FTC to conduct a pre-screening of  
contractors for deceptive practices. The proposed rule would require the  
FTC to conduct a pre-screening of contractors for deceptive practices.

On your agenda, the FTC will ensure that the selected contractors screen potential  
respondents on a set of demographic characteristics that will result in a  
representative sample. The FTC will not ensure that the selected contractors  
screen potential respondents on a set of demographic characteristics that will  
result in a representative sample.

**B. Description of Study Methodology – 1**

**Correction Needed**

< The FTC will ensure that the selected contractors screen potential  
respondents on a set of demographic characteristics that will result in a  
representative sample. The FTC will not ensure that the selected contractors  
screen potential respondents on a set of demographic characteristics that will  
result in a representative sample.

## FTC Information Quality Guideline Violations

< http://www.ftc.gov/ftc/quality The Federal Trade Commission (FTC) is committed to providing accurate and reliable information to consumers. The FTC's Information Quality Guideline (IQR) is a set of principles that governs the way the FTC collects, reviews, and disseminates information. The IQR is designed to ensure that the information the FTC provides is accurate, reliable, and unbiased. The IQR is a key component of the FTC's commitment to transparency and accountability.

## Discussion

< A http://www.ftc.gov/ftc/quality person, the FTC is committed to providing accurate and reliable information to consumers. The FTC's Information Quality Guideline (IQR) is a set of principles that governs the way the FTC collects, reviews, and disseminates information. The IQR is designed to ensure that the information the FTC provides is accurate, reliable, and unbiased. The IQR is a key component of the FTC's commitment to transparency and accountability.

< http://www.ftc.gov/ftc/quality The FTC is committed to providing accurate and reliable information to consumers. The FTC's Information Quality Guideline (IQR) is a set of principles that governs the way the FTC collects, reviews, and disseminates information. The IQR is designed to ensure that the information the FTC provides is accurate, reliable, and unbiased. The IQR is a key component of the FTC's commitment to transparency and accountability.



**FTC Information Quality Guideline Violations**

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**Discussion**

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### VI. CORRECTING INFORMATION: THE FISH AND WILDLIFE SERVICE PRECEDENT

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