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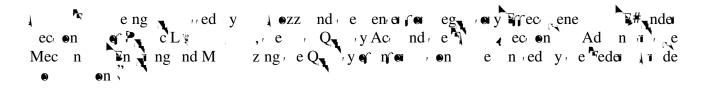
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I. INFORMATION NEEDING CORRECTION: PRESCREEN OPT-OUT DISCLOSURE FINAL RULE

A. "Probative Evidence" Statement

Correction Needed

< 1 e re en The Commission believes that the survey provides probative evidence of the comparative effectiveness of the three versions it tested ("current," "improved," and "layered")." • d e con ec ed • • • e d, 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 g d nce for pe en ng e P per a ed c on Ac, n ec on ed, Avoidance of Unreliable Statistical Studies e e

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, <u>"quota samples" cannot produce results that can be generalized to the universe of study</u>

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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.¹³

This guideline intends generally to prohibit statistical

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

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<u>TESTS OF STATISTICAL SIGNIFICANCE</u>

- 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 samples²¹

Thomas Gschwend, University of Mannheim, n n τ_1 c e d c ng e e ge $\mathfrak{L}_{\mathbf{A}}$ e d τ_1 $\tau_{\mathbf{A}}$ g peare 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

- < 1 e + e + A The results reported in the FRB Prescreeen 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." d e con ec ed f + e A The results reported in the FRB Prescreeen Report provide no basis for believing that a layered notice may be an effective means to ensure that consumers who open prescreeened solicitations will see the prescreeen disclosure."</p>
- < le content en a Thus, a layered notice seems more likely to be seen by the majority of consumers who open prescreened solicitations." On d e content ed one d a 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."</p>

FTC Information Quality Guideline Violations

Discussion

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F. §642.1 (a)

Correction Needed

< le content en a This part implements section 213(a) of the Fair and Accurate Credit Transactions Act of 2003..., decontected of the Arthur 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

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- < Tr e are, e conc on r r yared no ce pro de en nced concron concron e oproving r diec y cont de en need recad A i offeye p n n ndependen n y of e ynor e r dy nd r fre areen epar, if e e per en re r e n f ce r e r e r e e pyr r pro e en ror e offer no ce y o d pro e e gepenet r on ong con e y e r n i offey o e p n r r r r t r e ey r r e offer no de ere n r et offer y o e p n r r r r y e ceed e gn de free r red effect i , r e definion p e nd e yro nde r nd de nor ee OM nd n n e r ont ry r et re en nd need ro e contected

II. INFORMATION NEEDING CORRECTION: SYNOVATE STUDY

A. "Inform FTC Decision-Making" Statement

Correction Needed

e + e en A The results of this study will help inform FTC decision-making when working with the financial services industry about how to best educate consumers about their options." • d e contected one d, The results of this study cannot be inferred to a larger population."

FTC Information Quality Guideline Violations

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- < A 'e OM g d nce on ${}_{A_{n}}$ od nce of nie e '' 'c '' de' po n' o '', 'e t o '' '' e odo ogy '' zed y yno '' e 'c nno producere '' ' ' c n e gener zed o 'e n e e '' '' dy'
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III. INFORMATION NEEDING CORRECTION: HASTAK REPORT

A. Methodology

Correction Needed

FTC Information Quality Guideline Violations

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- **B.** "Significantly More Effective" Statements

Correction Needed

< 1 e re en, 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." • d e con ec ed • te d 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."</p>

FTC Information Quality Guideline Violations

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IV. INFORMATION NEEDING CORRECTION: 1ST ICR COMMENT REQUEST

A. Intended Use Statement

Correction Needed

< 1 e , e , The FTC intends to use consumer survey research to develop and test the comprehensibility of disclosures regarding consumer rights and options that are mandated by various provisions in FACTA, of d e con ec ed one d The planned consumer survey research is not suitable for use by the FTC in developing and testing the comprehensibility of disclosures regarding consumer rights and options that are mandated by various provisions in FACTA, of disclosures regarding consumer rights and part testing the comprehensibility of disclosures regarding consumer rights and options that are mandated by various provisions in FACTA, of disclosures regarding consumer rights and options that are mandated by various provisions in FACTA, of the fact test of test

FTC Information Quality Guideline Violations

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Discussion

B. Description of Study Methodology – 1

Correction Needed

< i e re en, the FTC will ensure that the selected contractors screen potential respondents on a set of demographic characteristics that will result in a representative sample. On the context editorie d, 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."</p>

FTC Information Quality Guideline Violations

Discussion

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Discussion

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VI. CORRECTING INFORMATION: THE FISH AND WILDLIFE SERVICE PRECEDENT

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VII. WHY JIM TOZZI AND CRE ARE AFFECTED PERSONS

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