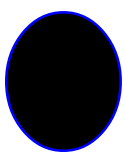
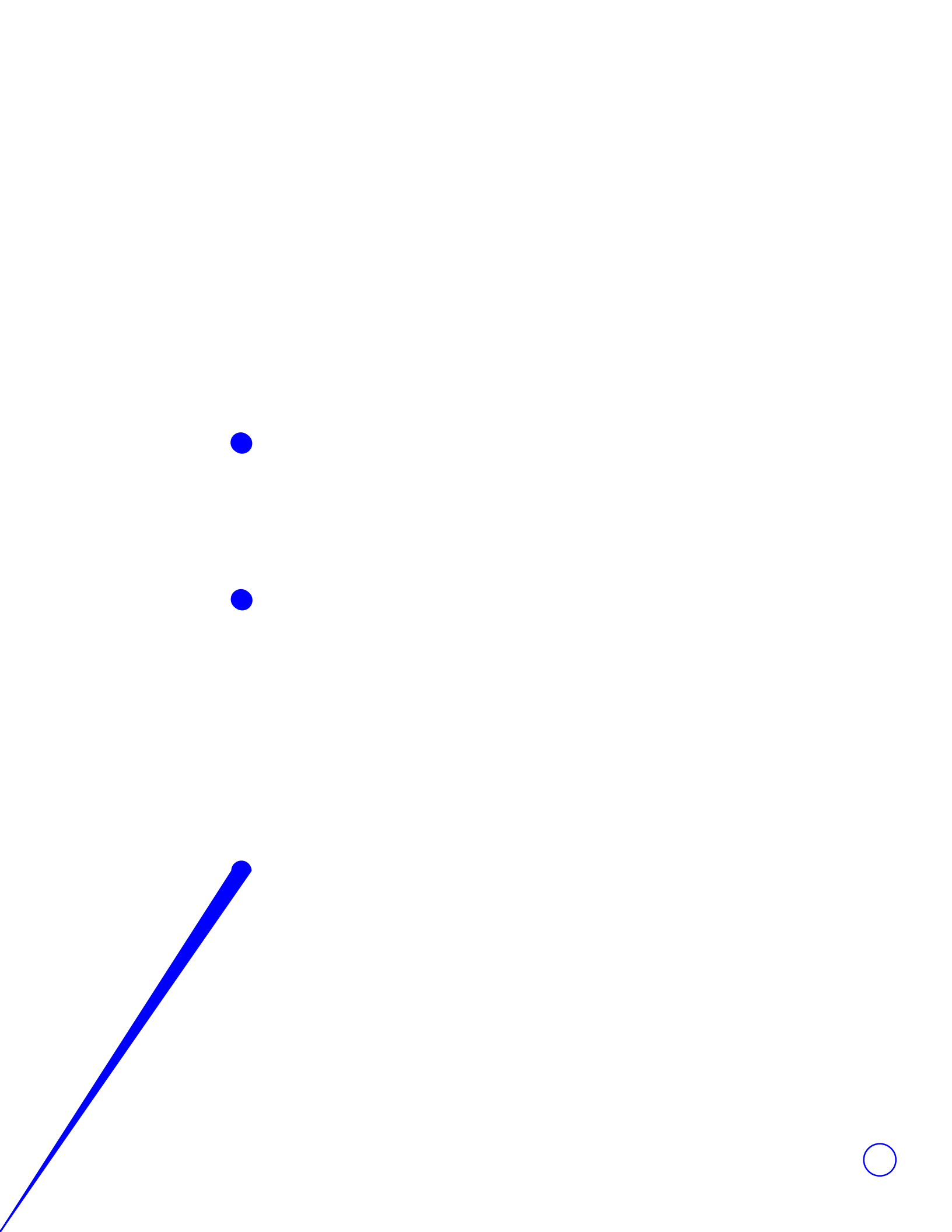


D T C

DISCLOSUR





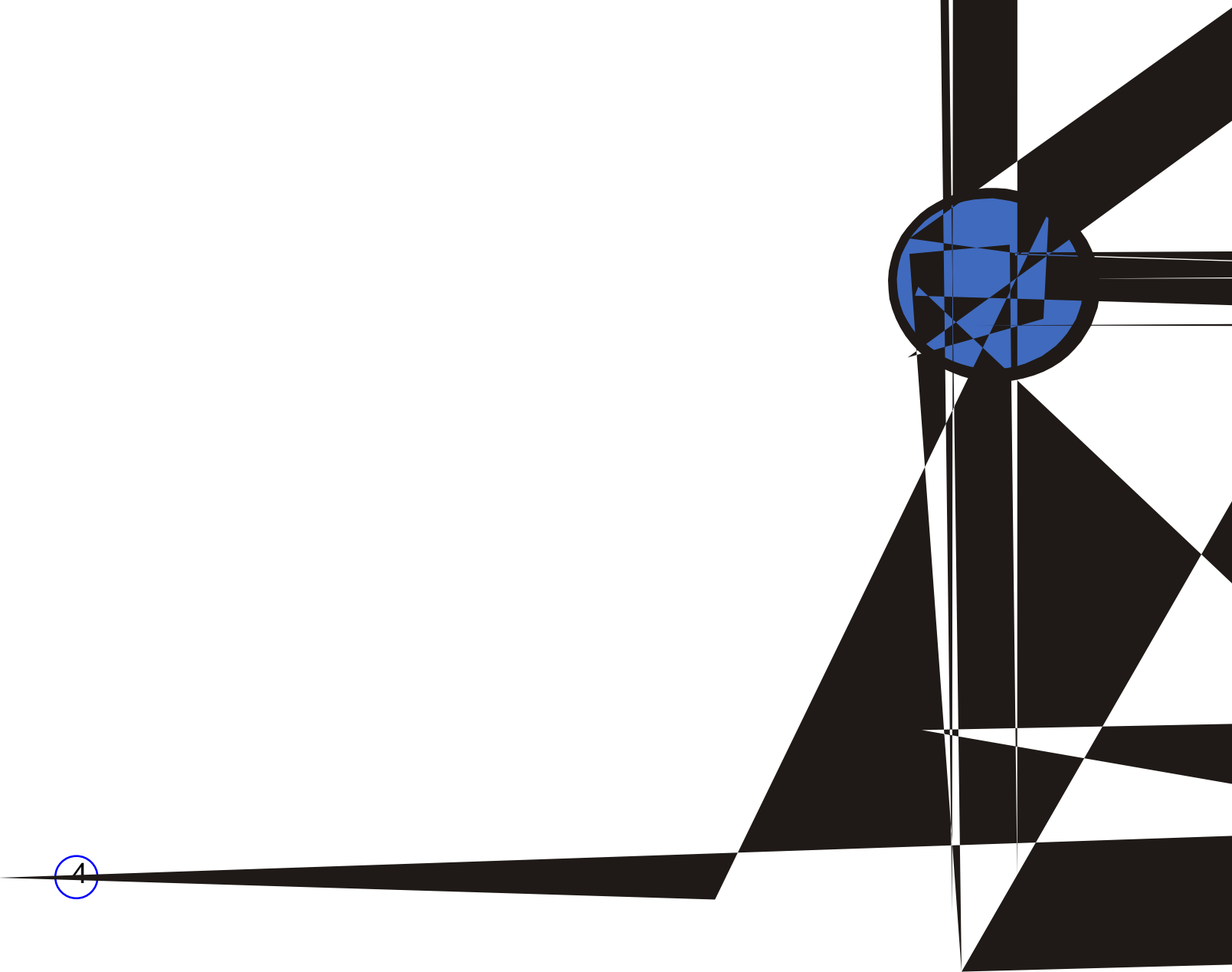


I. INTRODUCTION

Day in and day out, businesses are going online to advertise and sell their products and services. The Internet combines aspects of print, television, and radio advertising in an interactive environment, and while it presents a new and fast-paced experience for consumers, it also raises interesting—and occasionally complex—questions about the applicability of laws that were developed long before “dot com” became a household phrase.

The Federal Trade Commission has examined how its own consumer protection rules and guides apply to advertising and sales made via the Internet. This staff working paper discusses FTC requirements that disclosures be presented clearly and conspicuously, in the context of Internet advertisements. It also discusses how certain rules and guides apply to online activities, when the rule or guide refers to “written” ads or “direct mail” solicitations or requires notices to be sent to consumers.

The publication of this staff working paper follows a public comment period and a public workshop which was held to discuss the applicability of FTC rules and guides to online activities.¹ In evaluating how disclosures can be displayed clearly and conspicuously in online ads, the comments and workshop discussion focused specifically on disclosures required by the rules and guides. The same analysis that applies



- | whether items in other parts of the advertisement distract attention from the disclosure,
- | whether the advertisement is so lengthy that the disclosure needs to be repeated
- | whether disclosures in audio messages are presented in an adequate and cadence and visual disclosures appear for a sufficient duration, and
- | whether the language of the disclosure is understandable to the intended audience.

The following discussion uses these traditional factors to evaluate whether disclosures are likely to be clear and conspicuous in the context of online ads. In the online version of this booklet, the underlined hyperlinks link to mock ads. In the printed booklet, the circles in the margin correspond to mock ads in the appendix. Each mock ad presents a scenario to illustrate one or more particular factors.

Refer to Example Advertisers must consider all of the factors, however, and evaluate an actual disclosure in the context of the ad as a whole.

1. Proximity and Placement

A disclosure is more effective if it is placed near the claim it qualifies or other relevant information. Proximity increases the likelihood that consumers will see the disclosure and relate it to the relevant claim or product. For print ads, an advertiser might measure proximity in terms of whether the disclosure is placed adjacent to the claim, or whether it is separated from the claim by text or graphics. The same approach can be used for Internet ads. Web sites, however, are interactive and have a certain depth—with multiple pages linked together and pop-up screens, for example—that may affect how proximity is evaluated.

a. Evaluating Proximity in the Context of a Web Page

Some disclosures must be made when an ad contains a certain claim (often referred to as a “triggering claim”). On a Web page, the disclosure is more likely to be effective if consumers view the claim and disclosure together on the same screen. Even if a disclosure is not tied to a particular word or phrase, it is more likely that consumers will notice it if it is placed next to the

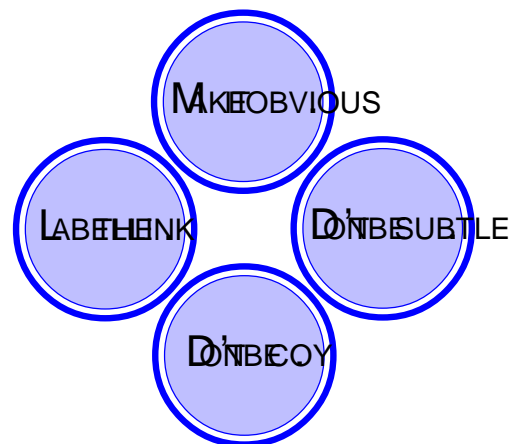


easily incorporated into the text, along with the claim. This placement increases the likelihood that consumers will see the disclosure and relate it to the relevant claim.

Under some conditions, however, a disclosure accessible by a hyperlink may be sufficiently proximate to the relevant claim. Hyperlinked disclosures may be particularly useful if the disclosure is lengthy or if it needs to be repeated (because of multiple triggers, for example). The key considerations for effective hyperlinks are:

- | the labeling or description of the hyperlink,
- | the consistency in the use of hyperlink styles,
- | its placement and prominence on the Web page, and
- | the handling of the disclosure on the click-through page.

Choosing the right label for the hyperlink. A hyperlink that leads to a





may be true of hyperlinks that simply say “disclaimer,” “more information,” “details,” or “terms and conditions.”



- Don't be subtle. Asterisks or other symbols by themselves may not be effective. Typically, they provide no clues about why the claim is qualified or the nature of the disclosure. In fact, consumers may view an asterisk or another symbol as just another graphic on the page. Even if a Web site explains that a particular symbol is a hyperlink to important information, consumers might miss the explanation, depending on where they enter the site and how they navigate through it.

Using hyperlink styles consistently allows consumers to know when a link is available. Although the text or graphics used to signal a hyperlink may differ among Web sites, treating hyperlinks inconsistently within a single site can increase the chances that consumers ~~will~~ notice—or click on—a disclosure hyperlink. For example, if hyperlinks usually are underlined in a site, chances are consumers wouldn't recognize italicized text as being a link, and could miss the disclosure.



Placing the link near relevant information and making it noticeable. The hyperlink should be proximate to the claim that triggers the disclosure so that consumers can notice it easily and relate it to the claim. Typically, this means that the hyperlink is adjacent to the triggering term or other relevant information. Consumers may miss disclosure hyperlinks that are separated from the relevant claim by text, graphics, blank space, or intervening hyperlinks. Format, color or other graphics treatment also can help to ensure that consumers notice the link. (See below for more information on prominence.)



Getting to the disclosure on the click-through page should be easy. The click-through page—that is, the page the hyperlink leads to—must contain the complete disclosure. The disclosure must be displayed prominently. Distracting visual factors, extraneous information, and many “click-away” opportunities to link elsewhere before viewing the disclosure can obscure an otherwise adequate disclaimer.



- Get consumers to the message quickly. The hyperlink should take consumers directly to the disclosure. They shouldn't have to search a click-through page or go to other pages for the information. In addition, the disclosure should be easy to understand.
- Assessing the effectiveness of a hyperlink disclosure is important. Tools are available to allow advertisers to evaluate the effectiveness of disclosures through hyperlinks. For example, advertisers can monitor click-through rates—how often consumers click on a hyperlink and view the click-through page—for accurate data on the efficacy of the hyperlink. Advertisers also can evaluate the amount of time visitors spend on a certain page, which may indicate whether consumers are reading the disclosure.

- | Don't ignore your data. If hyperlinks are not followed, another method of conveying the required information would be necessary.

c. Using High Tech Methods For Proximity and Placement

Disclosures may be displayed on Web sites in many ways. For example, a disclosure may be placed in a frame that remains constant even as the consumer scrolls down the page or navigates through another part of the site. A disclosure also might be displayed in a window that pops-up or on interstitial pages that appear while another Web page is loading. New techniques for displaying information are being unveiled all the time. But there are special considerations for evaluating whether a technique is appropriate for providing required disclosures.

- | Don't ignore technological limitations. A scrolling marquee—information that scrolls through a box on a Web site—may display differently depending on the type of browser a consumer uses. Similarly, some browsers or information appliances may not support or display frames properly, so a disclosure placed in one portion of the frame may not be viewable. Certain Internet tools may overcome this limitation by determining if a consumer's Web browser can view frames and if not, serving a page that is formatted differently. Without such tools, advertisers should be concerned about whether a required disclosure will appear; if it won't, they should choose different ways to communicate the disclosure.
- | Recognize and respond to characteristics of each technique. Some consumers may miss information presented in a pop-up window or on an interstitial page if the window or page disappears and they are unable or unaware of how to access it. Others may inadvertently minimize a pop-up screen by clicking on the main page and may not know how to make the pop-up screen reappear. There may be ways to

d. Displaying Disclosures Prior to Purchase

Disclosures must be effectively communicated to consumers before they make a purchase or incur a financial obligation. Disclosures are more likely to be effective if they are provided in the context of the ad, when the consumer is considering the purchase. Where advertising and selling are combined on a Web site, disclosures should be provided before the consumer makes the decision to buy, say, before clicking on an “order now” button or a link that says “add to shopping cart.”

- 1 Don't focus only on the order page. Some disclosures must be made in connection with a particular claim or product. Consumers may not relate a disclosure on the order page to information they viewed many pages earlier. It also is possible that after surfing a company's Web site, some consumers may decide to purchase the product from the company's “bricks and mortar” store. Those consumers would miss any disclosures placed only on the order ps any d



- | Don't bury it. The prominence of the disclosure also may be affected by other factors. A disclosure that is buried in a long paragraph of unrelated text would not be effective. The unrelated text detracts from the message and makes it unlikely that a consumer would notice the disclosure or recognize its importance. Even though the unrelated information may be useful, advertisers must ensure that the disclosure is communicated effectively.

3. Distracting Factors in Ads

The clear and conspicuous analysis does not focus only on the disclosure itself. It also is important to consider the entire ad. Elements like graphics, sound, text or even hyperlinks that lead to other pages or sites, may result in consumers not noticing, reading or listening to the disclosure.

- | Don't let other parts of an ad get in the way. On television, moving visuals behind a text message make the text hard to read and may distract consumers' attention from the message. Using graphics online raises similar concerns: flashing images or animated graphics may reduce the prominence of a disclosure. Graphics on a Web page may not undermine the effectiveness of a disclosure. It is important, however, to consider all the elements in the ad, not just the text of the disclosure.

4. Repetition

It may be necessary to disclose important information more than once in an advertisement to convey a non-deceptive message. Repeating a disclosure makes it more likely that a consumer will notice and understand it. Still, the disclosure need not be repeated so often that consumers would ignore it and that it would clutter the ad.

- | Repeat disclosures on lengthy Web sites, as needed, so consumers can access

5. Multimedia Messages

Internet ads may contain audio messages, video clips and other animated segments with claims that require qualification. As with radio and television ads, the disclosure should accompany the claim. In evaluating whether disclosures in these multimedia portions of online ads are clear and conspicuous, advertisers should evaluate all of the factors discussed in this paper and these special considerations:

- I For audio claims, use audio disclosuresThe disclosure should be in a volume and cadence sufficient for a reasonable consumer to hear and understand it. The volume of the disclosure can be evaluated in relation to the rest of the message, and in particular, the claim. Of course, consumers who do not have speakers, appropriate software, or appliances with audio

IV. PERSONS WHO APPLY CERTAIN BUSINESS RULES AND GUIDES

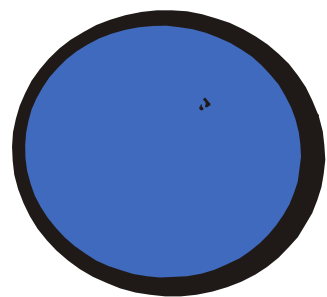
ACTIVITIES

A. It's Not Just Paper Anymore

Some Commission rules and guides use certain terms—such as “written,” “writing” and “printed”—that connote words or information on paper. With the increasing use of computers and other electronic devices, that meaning is changing. In addition, thanks to email, businesses are no longer limited to using traditional communications vehicles like mail or the telephone to comply with rule or guide requirements to notify consumers.

1. Rules and Guides that Use the Terms “Written,” “W

Many rules and guides use the terms “written,” “writing” and “printed,” but in different ways. Some apply to written ads or transactions, using the term written to



ENDNOTES

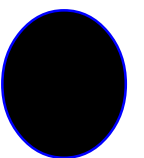
- ¹ The Commission initially requested written comment on a proposal that discussed how it would apply its rules and guides to online activities. 63 Fed. Reg. 24998 (May 6, 1998). After reviewing the comments, the Commission held a public workshop on May 14, 1999, to explore the issues further. 64 Fed. Reg. 14156 (Mar. 24, 1999) (announcing the workshop). Twenty-five groups, including businesses, trade associations and consumer organizations, participated in the workshop discussion. The focus of the workshop was an evaluation of how disclosures required by FTC rules and guides can be displayed clearly and conspicuously in Internet advertisements. A shorter session examined how terms such as “written,” “writing” and “printed” are used in FTC rules and guides and should be interpreted in light of the use of electronic media. Additional written comments were submitted after the workshop. The public comments and the workshop transcript are available at <http://www.ftc.gov/bcp/rulemaking/electmedia/index.htm> or from the FTC’s Consumer Response Center, 600 Pennsylvania Avenue, NW, Room 130, Washington, DC 20580.
- ² With the rules and guides, the content of the disclosure generally is prescribed. Thus, it was unnecessary to examine broader issues that might arise in examining advertising in general—for example, whether a disclosure is even necessary or what it should say.
- ³ This working paper, however, does not address disclosures required by regulations issued by the Federal Reserve Board: Regulation B, 12 C.F.R. Part 202; Regulation E, 12 C.F.R. Part 205; Regulation M, 12 C.F.R. Part 213; Regulation Z, 12 C.F.R. Part 226. This paper also does not address which country’s laws govern a particular transaction or sale. The FTC and other countries and organizations have been evaluating these issues and will continue to work cooperatively in this area. See <http://www.ftc.gov/bcp/icpw/index.htm> for more information about international issues.
- ⁴ The Commission’s authority covers virtually every sector of the economy, except for certain excluded industries, such as the business of insurance and banks.
- ⁵ The Commission issues rules pursuant to Section 5 of the FTC Act when it has reason to believe that certain unfair or deceptive acts or practices are prevalent in an industry. 15 U.S.C. § 57a(a)(1)(B). The Commission may seek civil penalties from any person or company that violates a rule “with actual knowledge or knowledge fairly implied on the basis of objective circumstances that such act is unfair or deceptive and is prohibited by such rule.” 15 U.S.C. § 45(m)(1)(A). The Commission also may seek redress for consumers. 15 U.S.C. § 57b(a)(1). In addition, the Commission promulgates rules pursuant to specific statutes, which are designed to further particular policy goals. The remedies available to enforce these rules vary.

- ⁶ Guides are “administrative interpretations of the laws administered by the Commission.” 16 C.F.R. § 1.5. Although the guides do not have the force and effect of law, the Commission may bring an enforcement action if a person or company fails to comply with a guide and engages in an unfair or deceptive practice in violation of the FTC Act.
- ⁷ The following rules and guides are included in this category: Guides for the Nursery Industry (16 C.F.R. Part 18); Guides for the Rebuilt, Reconditioned and Other Used Automobile Parts Industry (16 C.F.R. Part 20); Guides for the Jewelry, Precious Metals, and Pewter Industries (16 C.F.R. Part 23); Guides for Select Leather and Imitation Leather Products (16 C.F.R. Part 24); Tire Advertising and Labeling Guides (16 C.F.R. Part 228); Guides Against Deceptive Pricing (16 C.F.R. Part 233); Guides Against Bait Advertising (16 C.F.R. Part 238); Guides for the Advertising of Warranties and Guarantees (16 C.F.R. Part 239); Guides for the Household Furniture Industry (16 C.F.R. Part 250); Guide Concerning Use of the Word “Free” and Similar Representations (16 C.F.R. Part 251); Guides for Private Vocational and Distance Education Schools (16 C.F.R. Part 254); Guides Concerning Use of Endorsements and Testimonials in Advertising (16 C.F.R. Part 255); Guides Concerning Fuel Economy Advertising for New Automobiles (16 C.F.R. Part 259); Guides for the Use of Environmental Marketing Claims (16 C.F.R. Part 260); Rules and Regulations Under the Wool Products Labeling Act of 1939 (16 C.F.R. Part 300); Rules and Regulations Under Fur Products Labeling Act (16 C.F.R. Part 301); Rules and Regulations Under the Textile Fiber Products Identification Act (16 C.F.R. Part 303); Rule Concerning Disclosures Regarding Energy Consumption and Water Use of Certain Home Appliances and Other Products Required Under the Energy Policy and Conservation Act (“Appliance Labeling Rule”) (16 C.F.R. Part 305); Rule Concerning Automotive Fuel Ratings, Certification and Posting (16 C.F.R. Part 306); Labeling Requirements for Alternative Fuels and Alternative Fueled Vehicles (16 C.F.R. Part 309); Telemarketing Sales Rule (16 C.F.R. Part 310); Deceptive Advertising as to Sizes of Viewable Pictures Shown by Television Receiving Sets (16 C.F.R. Part 410); Retail Food Store Advertising and Marketing Practices (16 C.F.R. Part 424); Use of Prenotification Negative Option Plans (16 C.F.R. Part 425); Power Output Claims for Amplifiers Utilized in Home Entertainment Products (16 C.F.R. Part 432); Preservation of Consumers’ Claims and Defenses (16 C.F.R. Part 433); Mail or Telephone Order Merchandise Rule (16 C.F.R. Part 435); Credit Practices Rule (16 C.F.R. Part 444); Used Motor Vehicle Trade Regulation Rule (16 C.F.R. Part 455); Labeling and Advertising of Home Insulation (16 C.F.R. Part 460); Interpretations of Magnuson-Moss Warranty Act (16 C.F.R. Part 700); Disclosure of Written Consumer Product Warranty Terms and Conditions (16 C.F.R. Part 701); Pre-Sale Availability of Written Warranty Terms (16 C.F.R. Part 702); Informal Dispute Settlement Procedures (16 C.F.R. Part 703).
- ⁸ A rule or guide applies to online activities if its scope is not limited by how claims are communicated to consumers, how advertising is disseminated, or where commercial activities occur. As needed, the Commission will amend or clarify the scope of any particular rule or guide in more detail during its regularly scheduled



- ²⁸ For example, the Commission specifically amended the Textile Rules' requirement to disclose textile origin in "print" catalogs to clarify that these disclosures must be made in online catalogs as well. See 63 Fed. Reg. 7507 (Feb. 13, 1998) or <http://www.ftc.gov/os/1998/9802/textile.htm> for a discussion of the amendments to the Rules and Regulations Under the Textile Fiber Products Identification Act, 16 C.F.R. Part 303.
- ²⁹ 16 C.F.R. § 305.1(d).
- ³⁰ 16 C.F.R. §§ 305.2(m), 305.14.
- ³¹ Mail or Telephone Order Merchandise Rule, 16 C.F.R. § 435.1(b).
- ³² Rule Concerning Use of Prenotification Negative Option Plans, 16 C.F.R. § 425(a)(2).
- ³³ Disclosure of Written Consumer Product Warranty Terms and Conditions, 16 C.F.R. § 701.3, and Pre-Sale Availability of Written Warranty Terms, 16 C.F.R. § 702.3. According to the Rule Regarding Pre-Sale Availability of Written Warranty Terms, an alternative to making the warranty terms available prior to purchase is for sellers to provide information about how consumers may obtain the written warranty for free by mail. 16 C.F.R. § 702.3(c)(2).
- ³⁴ 16 C.F.R. § 310.6. The Telemarketing Sales Rule prohibits deceptive and abusive telemarketing practices. Among other things, it requires that certain information be disclosed in telemarketing calls. The scope of the Rule does not extend to transactions that take place entirely online. The sales transaction must involve a traditional voice telephone call. See 60 Fed. Reg. 30,406, 30,411 (June 8, 1995). In addition, in most situations, the Rule does not apply if a consumer calls a business in response to an advertisement. However, if a consumer calls a business in response to a "direct mail" advertisement, that call is subject to the Rule.
- ³⁵ The telephone call may be exempt from the Rule's coverage if the direct mail piece contains certain disclosures, such as the total cost to purchase the goods or services.
- ³⁶ Whether certain types of online ads, such as targeted banner ads or personalized solicitations on Web sites, constitute direct mail should be evaluated on a case-by-case basis.
- ³⁷ A small number of telemarketing transactions relating to specific types of goods or services are covered by the Telemarketing Sales Rule, regardless of

APPENDICES



The disclosure "imitation" needs to accompany the triggering term "pearl" so that consumers are not misled about the type of pearls being sold. The disclosure would not be as effective if it was separated from the word pearl or placed on a different page. The FTC's Guides for the Jewelry, Precious Metals, and Pewter Industries, 16 C.F.R. § 23.19, recognize this and advise that the disclosure "imitation" immediately precede the word pearl. In this situation, there is no reason to evaluate proximity differently in Internet ads than with other types of ads.

FTC FASHION JEWELRY

This ad contains visual cues that may indicate that more information is available. The vertical blue bar continues "below the fold" -- the end of the screen on the monitor -- and the text on the left column is continuous. A consumer who is already scrolling to read DJ Blackhand's endorsement, is also likely to see the disclosure that follows it.

Quick DDRIP

Stop the Waiting - Get in the Game

[Home](#) [How QD Works](#) [What Customers Say](#) [Experts](#) [Privacy Policy](#)

<p>Hi-speed Internet can now reach YOUR door.</p>	<p>Quick</p>
---	--------------

[Home](#)

[How QD Works](#)

[What Customers Say](#)

[Experts](#)

[Privacy Policy](#)

Some images are from "Corel Gallery Magic 200,000" by Corel Corporation

This ad must disclose that the diamond weights are not exact and that a 3/4 carat diamond may weigh between .70 and .84 carats. Because of the blank space between the textual description of the product and the disclosure, even consumers who scroll down the page will probably think that there is no more information to view and are likely to miss the disclosure.

FTC FASHION JEWELRY

3/4 Ct. Diamond Earrings

Retail Price	\$1365.00
-	
Our Low Price -	\$ 975.00

Although QuickDDRIP's advertised price is \$129.95, there are additional conditions and fees associated with purchasing the product, including obtaining a rebate and contracting for 2 years of QD Internet Service. The Internet Service contract itself has significant costs and conditions. Although the details about these additional fees and conditions are described on the click through page, their existence is properly disclosed on the same page as and adjacent to the price claim.

Quick DDRIP

Stop the Waiting - Get in the Game

[Home](#)

[How QD Works](#)

[What Customers Say](#)

[Experts](#)

[Privacy Policy](#)

Hi-speed
Internet can
now reach
YOUR door.

Quick DDRIP

Click-through page

Quick DDRIP

Stop the Waiting - Get in the Game

The disclosure "imitation" needs to accompany the triggering term "pearl" so that consumers are not misled about the type of pearls being sold. It is not difficult to incorporate this one word disclosure in the text of this ad.



FTC FASHION JEWELRY

Imitation Pearl Hoop Earrings

Retail Price	-	\$45.99
Our Low Price	-	\$29.99

Item#:	GRTDEAL	
Shipping Weight:		0.1 Lbs.

Lustrous imitation pearl hoop earrings. The highest quality imitation pearls fall delicately from these classically styled 14K gold hoops. The perfect fashion accessory for any occasion.

The hyperlink incorporates part of the required disclosure -- that diamond weights are not exact -- and indicates the information (about weight ranges) that the link leads to. The label notifies consumers about the type and importance of the information accessible by this link.



FTC FASHION JEWELRY

Diamond Weights are Not Exact
Click here for Weight Ranges.

3/4 Ct. Diamond Earrings

Retail Price - \$1365.00

Our Low Price - \$ 975.00

Item#: GRTDEAL

Shipping Weight: 0.1 Lbs.

Classic diamond solitaire earrings. Our sparkling round-cut diamonds are colorless and have only slight inclusions. Straight from the FTC's Washington DC diamond mines. Set in a stylish six-prong setting of 14 karat gold. The perfect fashion accessory for that special occasion.

This ad must disclose that the diamond weights are not exact and that a 3/4 carat diamond may weigh between .70 and .84 carats. Underlining the "3/4 carat" may indicate that it is a hyperlink, but it does not identify the relevance of the information it leads to. Consumers may expect to find additional information about "carats" or diamond weights generally, but not necessarily qualifying information.



FTC FASHION JEWELRY

3/4 Ct. Diamond Earrings

Retail Price - \$1365.00

Our Low Price - \$ 975.00

Item#: GRTDEAL

Shipping Weight: 0.1 Lbs.

Classic diamond solitaire earrings. Our sparkling round-cut diamonds are colorless and have only slight inclusions. Straight from the FTC's Washington DC diamond mines. Set in a stylish six-prong setting of 14 karat gold. The perfect fashion accessory for that special occasion.

This ad must disclose that DJ Blackhand was paid for his endorsement. The name "DJ Blackhand" is underlined to indicate that it is a hyperlink. Consumers may have different understandings about what this link leads to -- for example, biographical information about DJ or his picture -- and may see no reason to click on the link.



Quick DDRIP

Stop the Waiting - Get in the Game

Home	How QD Works	What Customers Say	Experts	Privacy Policy
<p>Hi-speed Internet can now reach YOUR door.</p>	<p>Quick DDRIP Download Decode Record Instant Play</p> <p>ORDER NOW</p>	<p>Make the Internet FUN again.</p>		

Quick DDRIP is the REVOLUTIONARY device that easily hooks up to your home computer and phone line.

Quick DDRIP uses a special processing chip, and proprietary compression, decoding and caching techniques, to manipulate and speed up data transmissions.

--D.J. Blackhand

[Home](#)

[How QD Works](#)

[What Customers Say](#)

[Experts](#)

[Privacy Policy](#)

Some images are from "Corel Gallery Magic 200,000" by Corel Corporation



Because many of the experiences described in the testimonials may not be typical of what consumers generally will experience with the product, a disclosure regarding this fact is needed. The hyperlink, "Disclaimer" does not indicate that the testimonial claims are qualified and does not indicate what consumers can expect to learn by clicking on it.

Quick DDRIP
Stop the Waiting - Get in the Game

-- Sam and Nancy, new parents in Tallahassee, FL

"Where can I invest? I've been sold since I saw a demonstration at the INTERNET NOW Conference. I bought one as soon as they came out and it more than lives up to the hype. No more problems with stop and start video feeds and I've never been "disconnected" from the Internet during a live event because of slow transmission speeds. Heck, I've never been disconnected during a download of a movie for that matter - which may be because movies download 8 times faster with Quick DDRIP than they did before."

-- Hugo P, Las Vegas, NV

"WHAT A CONCEPT! I've seen a lot of computer products, software and hardware in my day and the Quick DDRIP really delivers. I frequently listen to Blues radio stations on the Internet and have always had problems with fidelity and distortion. Not any more -- with QD's higher speeds, I get hi-fidelity, Dolby-quality sound at analog prices. And it's so fast and reliable!"

-- Skip J., audiophile, St Louis, MO

"Quick DDRIP is a life saver - its real time access to football games on the Internet is incredible. No more of those irritating jerky delays when I'm watching my favorite games (you know, where the missing frame is the part showing the completion of the pass) - and the picture is sharp enough to tell if the running back's foot was out of bounds when he caught that long pass (no instant replay needed!!) And the best part is I'm no longer limited to watching East Coast games broadcast on TV - but can keep up with the Big 12. (GO WILDCATS!!)"

-- Jerry W., transplanted K-State fan, Baltimore, MD

"Quick DDRIP outperforms the other equipment on the market. I listen to a lot of high fidelity symphonic recordings and I must say that Quick DDRIP really lives up to its reputation. I can download performances of the Berlin Symphony Orchestra off the Internet in just a few minutes and the sound quality is unbeatable. Without Quick DDRIP, I just didn't have the patience to wait for the entire symphony to download. Now there's a whole new world of music for me to explore!"

-- Curt D., music lover in Mobile, AL

Click-through page

Quick DDRIP

Stop the Waiting - Get in the Game

[Home](#)

[How QD Works](#)

[What Customers Say](#)

[Experts](#)

[Privacy Policy](#)

Important Information About Quick DDRIP's Performance

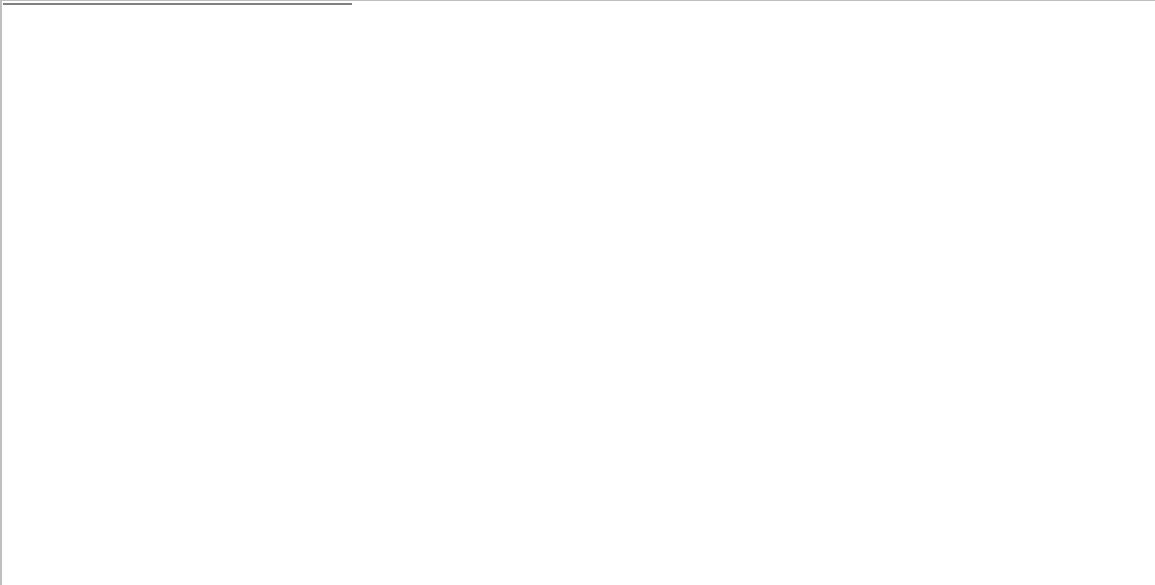
Speed Improvements and Audio/Video Quality will vary depending on your

Although this hyperlink indicates that more information is available, it does not indicate the importance of this information or the fact that it is related to the diamond weight. Consumers may believe, for example, that this link takes them to shipping and ordering information, rather than information about the diamond's weight.

This ad must disclose that DJ Blackhand was paid for his endorsement. The asterisk next to DJ's name does not suggest the importance and relevance of information that the link leads to. Because many consumers may easily miss the asterisk hyperlink, it is not clear and conspicuous.

Quick DDRIP
Stop the Waiting - Get in the Game

[Home](#) [How QD Works](#) [What Customers Say](#) [Experts](#) [Privacy Policy](#)



Quick DDRIP Gives You Unparalleled Internet Performance

- NO DELAY waiting for images to load -- Graphics-intensive Web pages load FAST!
- SPEEDY file downloads -- even huge files download in a fraction of the time it takes you now! Try it with your next online video purchase!
- ENHANCED streaming audio and video quality for live Web events!
- UNBELIEVABLY FAST "action" in online games!
- FAST DELIVERY of graphics for FANTASTIC virtual reality experiences!

Enjoy The Best Entertainment - All From Home

WATCH A FULL-LENGTH MOVIE ONLINE!

No more waiting in line for a ticket or for the rental. Find your favorite pay-per-view movies on the Web - and let QD do the rest. With QD, streaming pay-per-view movies start playing instantaneously -- Quick DDRIP's built in decoder sees to that!

CONCERT IN A CAN! Buy a VIRTUAL TICKET and go on a LIVE WEB CONCERT TOUR with the best musicians without ever leaving your home! And you won't believe the difference in audio and video quality over existing technology! Whether you are a movie buff or an audiophile, Quick DDRIP is technology made for you.

[Home](#)

[How QD Works](#)

[What Customers Say](#)

[Experts](#)

[Privacy Policy](#)

Some images are from "Corel Gallery Magic 200,000" by Corel Corporation



Quick DDRIP Gives You Unparalleled Internet Performance

- NO DELAY waiting for images to load -- Graphics-intensive Web pages load FAST!
- SPEEDY file downloads -- even huge files download in a fraction of the time it takes you now! Try it with your next online video purchase!
- ENHANCED streaming audio and video quality for live Web events!
- UNBELIEVABLY FAST "action" in online games!
- FAST DELIVERY of graphics for FANTASTIC virtual reality experiences!

Enjoy The Best Entertainment - All From Home

WATCH A FULL-LENGTH MOVIE ONLINE!

No more waiting in line for a ticket or for the rental. Find your favorite pay-per-view movies on the Web - and let QD do the rest. With QD, streaming pay-per-view movies start playing instantaneously -- Quick DDRIP's built in decoder sees to that!

CONCERT IN A CAN! Buy a VIRTUAL TICKET and go on a LIVE WEB CONCERT TOUR with the best musicians without ever leaving your home! And you won't believe the difference in audio and video quality over existing technology! Whether you are a movie buff or an audiophile, Quick DDRIP is technology made for you.

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Some images are from "Corel Gallery Magic 200,000" by Corel Corporation



The descriptive hyperlink in this ad is placed adjacent to the 3/4 carat diamond weight claim. This helps to ensure that consumers notice the link and relate it to the testimonial.



FTC FASHION JEWELRY

[Diamond Weights are Not Exact](#)
[Click here for Weight Ranges.](#)

3/4 Ct. Diamond Earrings

Retail Price - \$1365.00

Our Low Price - \$ 975.00

Item#: GRTDEAL

Shipping Weight: 0.1 Lbs.

Classic diamond solitaire earrings. Our sparkling round-cut diamonds are colorless and have only slight inclusions. Straight from the FTC's Washington DC diamond mines. Set in a stylish six-prong setting of 14 karat gold. The perfect fashion accessory for that special occasion.

This hyperlink may be easily missed by consumers because it is separated from the 3/4 carat claim and because it appears below blank space that suggests that there is no further information to view.



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The disclosure on the click-through page -- concerning DJ Blackhand's endorsement -- is included in the middle of unrelated text and large amounts of graphics. It is not obvious to a consumer who clicked to this page where the disclosure is and its relevance.



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Priced at just

\$129.95

+ Shipping and Handling
(\$9.95, 2 days shipping, \$.4.95 for 5 days shipping)

HOT HOT HOT!!!

Over 40,000 satisfied customers - and the numbers keep growing!

* D.J. Blackhand has been involved in the gaming world since he was 12 years old. After purchasing Quick DDRIP, he rapidly ascended the Wrath of Thor tournament levels to become the intergalactic champion several years running. D.J. loves all kinds of games and plays several hours daily. His interests also include playing with his Briard dog, Thunder, and running on the beach. QuickDDRIP, Inc. has paid D.J. Blackhand for his endorsement.



Reviewers in Web Surfer Pro , Families Online , and Moviemag.com are unanimous in their praise of QD:



The hyperlink on this page takes consumers to the top of the click-through page. The disclosure about diamond weights is provided in the middle of the page and consumers must scroll down to find this information. The hyperlink should bring consumers directly to the disclosure.

FTC FASHION JEWELRY

Diamond Weights are Not Exact
[Click here for Weight Ranges.](#)

FTC FASHION JEWELRY

JEWELRY INFORMATION

[Colored Gemstones](#)

[Pearls](#)

[Diamonds](#)

Colored Gemstones

Colored gemstones may be treated to enhance their color or durability. These treatments may not be permanent and the effects of some treatments may lessen or change over time.

You need to take special care of treated gemstones. Do not use ultrasonic cleaners or harsh solvents to clean your gemstone. Also, do not expose your gemstone to sudden, extreme changes in temperature.

Our gemstone rings are available in the standard sizes, 5 through 8. For an additional charge of \$2, you may order rings in other sizes. Please contact a customer service representative to place this special order.

Pearls

Natural or real pearls are made by oysters and other mollusks. Cultured pearls also are grown by mollusks, but with human intervention; that is, an irritant introduced into the shells causes a pearl to grow. Imitation pearls are man-made with glass, plastic, or organic materials. Because natural pearls are very rare, most pearls used in jewelry are either cultured or imitation pearls.

To clean your pearls, simply wipe them with a soft, dry cloth. You should not use any commercial cleaners for your pearls.

Diamonds

Diamond weights are stated in "carats." A carat is equal to 200 milligrams (or 1/5 gram). A carat is divided into 100 points. Therefore, a .25 carat diamond may be referred to as a

25-point diamond.

Diamond weights may not be exact. For us to offer you these low FTC prices, we sell our diamonds in size ranges. The following chart shows the range of weight for each size diamond.

1/10 ct. can range from .09 to .11 carat
1/8 ct. can be .11 to .13 carat
1/7 ct. can be .13 to .15 carat
1/6 ct. can be .15 to .17 carat
1/5 ct. can be .18 to .22 carat
1/4 ct. can be .21 to .29 carat
1/3 ct. can be .30 to .36 carat
½ ct. can be .45 to .59 carat
5/8 ct. can be .59 to .67 carat
3/4 ct. can be .70 to .84 carat
7/8 ct. can be .85 to .95 carat
1 ct. can be .95 to 1.10 carat
1 1/4 ct. can be 1.20 to 1.29 carat
1 ½ ct. can be 1.45 to 1.55 carat
1 3/4 ct. can be 1.70 to 1.82 carat
2 ct can be 1.95 to 2.05 carat

This disclosure appears as scrolling text when viewed with one browser, Microsoft Explorer, but it may not appear when viewed with another browser, Netscape.

Quick DDRIP

Stop the Waiting - Get in the Game

Quick DDRIP Gives You Unparalleled Internet Performance

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SEE WHAT OUR SATISFIED CUSTOMERS HAVE TO SAY ABOUT QUICK DDRIP

"This product is AWESOME!!!!!!!!!!!!!! I like the Internet again. Speeds are up by 90-95%. Now, I'm downloading from the Web in much less than 1/16 the time, which is important in my line of work. The install was flawless and now, so are my downloads. Thanks Quick DDRIP !"

– AlphaGeek, Silicon Alley ;^)

"My elderly father has had trouble reading ever since cataract surgery two years ago. I've tried sending him books on tape, but it was always a cumbersome process and I was never sure if he'd like my selections. We tried downloading audio books from the Internet, but the process took FOREVER. Last month I sent him the Quick DDRIP and he's never been happier. He has instant (well, about 10 to 15 minutes as opposed to an hour or more before) access to digital quality sound recordings of all his favorites, and new releases too. Now Mom is threatening to move his LazyBoy to the PC."

-- Evelyn M., concerned daughter in Detroit, MI

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-- Joe H., Movie Buff in Dubuque, IA

"Quick DDRIP is amazing! I converted the home video of my son's birth to a digital file and sent it via email to all the relatives. Almost all of them had problems downloading the attached video file. But my Mom has a QD unit. Thanks to QD, she was able to download the whole 9 hours of my son's delivery in less than a half hour, and then watch it just as if she was there. And we've got more video files on the way - baby's first smile, his first bath, his first visit from grandma, his first trip to the doctor, his first bottle from daddy,"

-- Sam and Nancy, new parents in Tallahassee, FL

"Where can I invest? I've been sold since I saw a demonstration at the INTERNET NOW Conference. I bought one as soon as they came out and it more than lives up to the hype. No more problems with stop and start video feeds and I've never been "disconnected" from the Internet during a live event because of slow transmission speeds. Heck, I've never been disconnected during a download of a movie for that matter - which may be because movies download 8 times faster with Quick

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-- Hugo P, Las Vegas, NV

"WHAT A CONCEPT! I've seen a lot of computer products, software and hardware in my day and the Quick DDRIP really delivers. I frequently listen to Blues radio stations on the Internet and have always had problems with fidelity and distortion. Not any more -- with QD's higher speeds, I get hi-fidelity, Dolby-quality sound at analog prices. And it's so fast and reliable!"

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"Quick DDRIP is a life saver - its real time access to football games on the Internet is incredible. No more of those irritating jerky delays when I'm watching my favorite games (you know, where the missing frame is the part showing the completion of the pass) - and the picture is sharp enough to tell if the running back's foot was out of bounds when he caught that long pass (no instant replay needed!!) And the best part is I'm no longer limited to watching East Coast games broadcast on TV - but can keep up with the Big 12. (GO WILDCATS!!)"

-- Jerry W., transplanted K-State fan, Baltimore, MD

"Quick DDRIP outperforms the other equipment on the market. I listen to a lot of high fidelity symphonic recordings and I must say that Quick DDRIP really lives up to its reputation. I can download performances of the Berlin Symphony Orchestra off the Internet in just a few minutes and the sound quality is unbeatable. Without Quick DDRIP, I just didn't have the patience to wait for the entire symphony to download. Now there's a whole new world of music for me to explore!"

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Quick DDRIP


Stop the Waiting -
Get in the Game

Important Information About Quick DDRIP's Performance

Speed Improvements and Audio/Video Quality will vary depending on your individual computer equipment and phone line conditions. You should not expect to achieve results as good as those described.

The pop-up screen that contains the disclosure appears when you first access this page. If you click on another portion of the page, the pop-up window minimizes and disappears from the display area. The pop-up screen may not reappear if you re-access this page. Consumers may miss the disclosure, especially if they do not understand how to display a minimized pop-up window (by clicking on its button at the bottom of the screen).

Quick DDRIP
Stop the Waiting - Get in the Game



QuickDDRIP - POP-UP

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Because many of the experiences described in the testimonials may not be typical of what consumers generally will experience with the product, a disclosure regarding this fact is needed. Consumers visiting this site might read the testimonials, reach a conclusion about the product based on them, click on and review numerous other pages on the site, and then finally decide to buy the product. They therefore might not relate a disclosure placed on the ordering page to the claims on the testimonial page.

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Stop the Waiting - Get in the Game

[Empty box]

Click-through page

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Order Form

Name:	
Address:	
Address2:	
City:	
State:	
Zip Code:	
Telephone Home:	
Telephone Work:	
Quantity:	
Price:	\$
Tax:	
Total Price:	\$



The banner ad indicates that there are shipping and handling costs associated with receiving the "free" flowers. The actual costs are described on the click-through page.



The disclosure in this ad is placed in blue text, which contrasts with the background and helps make it stand out.



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-- Curt D., music lover in Mobile, AL

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Quick DDRIP
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Priced at just



\$129.95



+ Shipping and Handling
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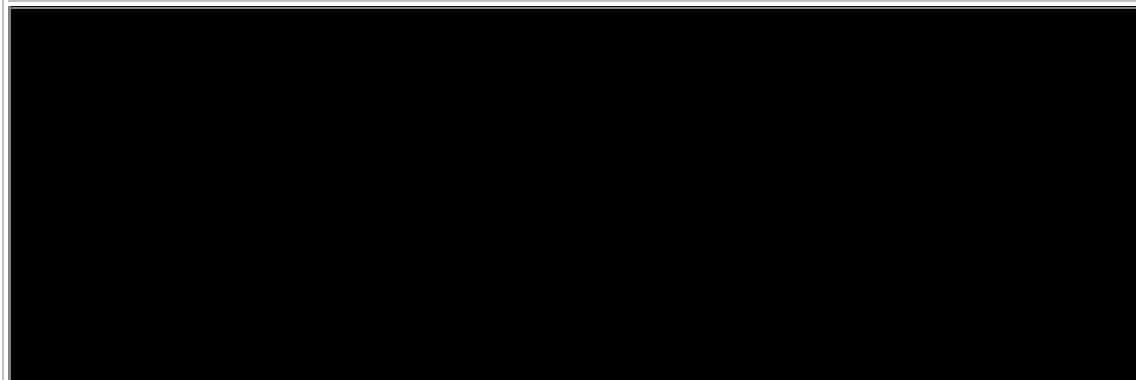
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