

ANALYSIS OF PROPOSED CONSENT ORDER TO AID PUBLIC COMMENT  
In the Matter of Carrot Neurotechnology, Inc., File No. 142 3132

The Federal Trade Commission ("Commission") has accepted, subject to final approval, an agreement containing a consent order as to Carrot Neurotechnology, Inc., Adam Goldberg, and Aaron Seitz (hereafter "respondents").

The proposed consent order ("order") has been placed on the public record for 30 days for receipt of comments by interested persons. Comments received during this period will become part of the public record. After 30 days, the Commission will again review the order and the comments received, and will decide whether it should withdraw the order or make it final.

This matter involves the respondents' advertising for the Ultimeyes software application. The Commission's order, including that it: improves the vision of users,

Part I prohibits any representation that a

advertising, promoting, offering for sale, selling, or distributing such program, or service.

Part VI provides the respondents will pay an equitable monetary payment of \$150,000 and contains other provisions related to the payment.

Part VII requires the respondents to provide sufficient customer information to administer redress.

Part VIII contains recordkeeping requirements for advertisements and substantiation relevant to representations covered by Parts through III , as well as order acknowledgments covered by Part IX.

Parts IX through XI require the respondents to deliver a copy of the order to officers, employees, and representatives having managerial responsibilities with respect to the order's subject matter to notify the Commission of changes in corporate structure that might affect compliance obligations and file compliance reports with the Commission.

Part XII provides that, with exceptions, the order will terminate in two years.

The purpose of this analysis is to facilitate public comment on the order, and it is not intended to constitute an official interpretation of the complaint or, order modify the order's terms in any way.