

MICHIGAN STATE
U N I V E R S I T Y

July 8, 2016

Federal Communications Commission
445 12th Street SW, Washington, DC 20554

RE: Study Submitted To: "Protecting the Privacy of Customers of Broadband and Other Telecommunications Services," WC Docket No. 16-106

To Whom It May Concern:

Enclosed please find a copy of a new study I recently co-authored with Dr. Anne Oeldorf-Hirsch entitled "The biggest lie on the internet: Ignoring the privacy policies and terms of service policies of social networking services." The study, currently under peer review, demonstrates the extent to which individuals ignore privacy policies and terms of service policies when engaging with social networking services. While numerous studies have previously addressed the extent to which users understand policies and how long it might take to read policies, little evidence previously existed demonstrating empirically that users often ignore these policies. The results suggest that the 'notice and choice' privacy model does not adequately provide the necessary deliverables to ensure protections. Transparency and access are terrific places to start, but terrible places to finish. More needs to be done to ensure that users are aware of what they are agreeing to, and protected from threats associated with data sharing and data use, especially when it comes to eligibility decision-making.



**College of
Communication
Arts & Sciences**

**Department of
Telecommunication,
Information Studies,
& Media**

404 Wilson Road
Room 409
East Lansing, MI
48824

517-355-8372
Fax: 517-355-1292
tisminfo@msu.edu
<http://tism.msu.edu>

Here is a copy of the study abstract:

This paper addresses 'the biggest lie on the internet' with an empirical investigation of privacy policy (PP) and terms of service (TOS) policy reading behavior. An experimental survey ($N=543$) assessed the extent to which individuals ignore PP and TOS when joining a fictitious social networking site, NameDrop. Results reveal 74% skipped PP, selecting 'quick join.' For readers, average PP reading time was 73 seconds, and average TOS reading time was 51 seconds. A regression analysis revealed information overload as a significant negative predictor of reading TOS upon signup, when TOS changes, and when PP changes. Qualitative findings further suggest that participants view policies as nuisance, ignoring them to pursue the ends of digital production, without being inhibited by the means. Implications were revealed as 98% missed NameDrop TOS 'gotcha clauses' about data sharing with the NSA and employers, and about providing a first-born child as payment for SNS access.

Please feel free to contact me, should you require any further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan A. Obar".

Jonathan A. Obar, PhD
Research Associate, Quello Center for Telecommunication Management and Law
Michigan State University
obar@msu.edu