



LEADERSHIP AND
MARKETING EXCELLENCE

April 11, 2016

Ms. Marlene H. Dortch. Secretary
Federal Communications Commission
445 12th St., SW, Room TW-A325,
Washington, D.C. 20554

Re: WC Docket No. 16-106

Dear Ms. Dortch:

On behalf of the Association of National Advertisers, I write regarding the above-referenced Notice of Proposed Rulemaking (NPRM) released by the Commission on April 1, 2016.

This NPRM, which consists of 147 pages in the Federal Register, contains numerous proposed requirements with potentially complex impacts regarding the privacy of collected and user data. Commissioner Rosenworcel mentioned in her oral remarks during the Commission's consideration of this matter that there are more than 500 questions raised in the NPRM. Yet the timetable for the filing of initial comments is limited to a mere 57 days from the release of the Notice. For groups like the ANA with an extremely broad and diverse membership, being able to receive full and thoughtful input and then to respond to the NPRM's questions will take time and careful consideration.

Because the potential implications of the NPRM for advertising and marketing interests are significant and far-reaching, they require sufficient and thoughtful analysis. However, the timeline provided by the Commission does not permit such analysis to be adequately concluded. Therefore, ANA requests that the Commission extend the time period for the filing of comments by an additional 60 days, until July 26, 2016.

Please do not hesitate to contact me if you have questions about this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel L. Jaffe', is written over a white background.

Daniel L. Jaffe
Group Executive Vice President, Government Relations