

September 26, 2022

Federal Trade Commission  
Office of the Secretary  
600 Pennsylvania Avenue NW, Suite CC-5610 (Annex B)  
Washington, DC 20580

*Electronically via: [www.regulations.gov](http://www.regulations.gov)*

**Re: Request for Extension of Time to File Comments, Federal Trade Commission;  
Advance Notice of Proposed Rulemaking for Trade Regulation Rule on Commercial  
Surveillance and Data Security; 87 Fed. Reg. 51273; Docket ID No. 2022-17752  
(August 22, 2022)**

To Whom It May Concern:

The undersigned organizations request that the Federal Trade Commission (“FTC”) extend the deadline for filing comments on the Advance Notice of Proposed Rulemaking for Trade Regulation Rule on Commercial Surveillance and Data Security (“ANPR”) that was published in the Federal Register on August 22, 2022. The ANPR seeks to develop a record to establish a rule that would fundamentally alter the modern economy. As such, the FTC should base the development of a proposed rule on the highest quality and most complete record possible. Specifically, we request a 60-day extension of the comment deadline from October 21, 2022 to December 20, 2022.

Additional time would permit the undersigned organizations to understand and evaluate more thoroughly the voluminous number of questions and considerations put forth by the FTC. The ANPR seeks information, research, and experiential data about almost all aspects of the modern data-driven economy, and it does so through a procedure the FTC has rarely used for such an expansive and vaguely defined purpose. More time is required for all stakeholders, including the undersigned organizations, to provide the detailed comments and information that the FTC is requesting, including comments on the various economic impacts of a potential regulation, the multiple alternatives available to the FTC, and the significant (and potentially negative) downstream impacts of sweeping regulations on commercial data practices for consumers, businesses, and the American economy.

Thank you for considering this request.

Sincerely,

American Advertising Federation  
American Escrow Association  
ANA  
Association of Test Publishers  
Association of Washington Business  
Business Roundtable  
Consumer Data Industry Association

Council for Responsible Nutrition  
FMI-Food Marketing Association  
Insights Association  
National Association of Federally-Insured Credit Unions  
National Business Coalition on E-Commerce & Privacy  
PACE  
Privacy for America  
Real Estate Service Providers Council  
Retail Industry Leaders Association  
Security Industry Association  
Software & Information Industry Association  
The 4As  
U.S. Chamber of Commerce