



FEDERAL ELECTION COMMISSION

Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Office of the Commission Secretary^{VFV}

DATE: July 12, 2022

SUBJECT: AO 2022-14 (Goggle LLC) Comments

Attached are 29 individual comments for AO 2022-14 (Goggle LLC).

Attachment

RECEIVED

By Office of the Commission Secretary at 2:44 pm, Jul 12, 2022

From: [MK Yenkochic](#)
To: [AQ](#)
Subject: Google Request - Pilot Program
Date: Monday, July 11, 2022 11:51:45 AM

Dear FEC:

Not a good idea.

From: [Bruce Ernst](#)
To: [AQ](#)
Subject: Re: Google request to let political committees avoid spam filters
Date: Monday, July 11, 2022 11:52:13 AM

No, just NO!

You have the right to free speech as long as you're not dumb enough to actually try it. The Clash.

From: [Debra Henry](#)
To: [AQ](#)
Subject: NO to Political Junk Mail
Date: Monday, July 11, 2022 12:24:49 PM

Please **DO NOT approve** the sending of unsolicited political mail to Gmail accounts.

Thank you.

Respectfully,
Debra Henry

From: [Emily Roberts](#)
To: [AO](#)
Subject: Please keep strong guidelines on political email
Date: Monday, July 11, 2022 2:25:01 PM

I saw an article (link below) that Google has asked the federal government to ease spam filters around political email. I wanted to share my opinion that I think we need more stringent controls around political email, not less. Political groups in the United States are buying and selling consumer emails without permission. I know this because my email has been sold many times over by democrats in states where I do not vote and cannot impact the outcome of elections. It's a constant battle of unsubscribing. These emails are incendiary and sometimes misleading and always asking for money. I think consumers deserve as much protection as possible from this in their inboxes and would ask that we continue to hold a high bar for political email so that consumers aren't constantly harassed with requests for donations.

<https://electionlawblog.org/?p=130557>

Thank you for hearing my perspective.

-Emily Roberts
Washington State

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Emily Roberts



From: [Anne Freiermuth](#)
To: [AQ](#)
Subject: NO to Google campaign ad pilot program
Date: Monday, July 11, 2022 2:30:55 PM

NO to Google's request to do a pilot program where campaign ads go to people's inboxes and not their spam filters.

Anne Freiermuth
California

From: [Jaeann Tschiffely](#)
To: [AQ](#)
Subject: Political email
Date: Monday, July 11, 2022 5:28:10 PM

Please do not allow political email to bypass your filters. If I wish to see political email I can sign up for it and mark it not spam. There is a system for this. Please let it work.

Regards,
Jaeann Tschiffely

Sent from my iPhone

From: [REDACTED]
To: [AO](#)
Subject: Advisory Opinion 2022-14
Date: Tuesday, July 12, 2022 8:57:21 AM

I attempted to use your website to leave this comment but gave up.

I strongly oppose Advisory Opinion 2022-14 in which Google requested waiving of spam filters for political emails.

I urge you to reject this request. My two email boxes - including a gmail account - are straining under the weight of unsolicited political spam emails. No matter what I do, and I am working with a tech expert from Verizon to reduce such spam, nothing works.

Kathryn Nocerino

From: [Joel Neely](#)
To: [AQ](#)
Subject: Advisory Opinion Request 2022-14 (Google LLC)
Date: Tuesday, July 12, 2022 6:49:10 AM

I have just become aware of the request indicated above (2022-14), and write this to express my concerns and objections in the strongest possible terms.

Unsolicited emails ("spam"), as well as other forms of unsolicited communications via telephone calls and text messages, represent an escalating assault on an individual citizen's ability to enjoy peace and quiet at home, free of interruption by parties acting for their own interests.

Others more qualified than I have written persuasively on the corrupting influence of money on the public political process. Unlimited access to the email in-boxes of millions of persons is an asset of significant monetary value, allowing participants in the business of promotion to leverage greatly their financial resources.

While they may have a legal right to "freedom of speech", there is no guarantee of audience stated in the constitution. And the right of the individual to choose NOT to receive their communications should be protected even more vigorously—as in many other cases in which the government exists to protect the individual and the powerless from the intrusions of the well-funded.

I urge you to reject any attempt of technology to further intrude on the right of individuals to be protected from unsolicited communications, especially those dealing with political advertisement.

Thank you.
Joel Neely
A concerned citizen

From: [Eugene Brusin](#)
To: [AQ](#)
Subject: AO 2022-14
Date: Tuesday, July 12, 2022 9:38:41 AM

Dear MS/Sir;

Please deny this attempt by Google to flood our inboxes with political ads that they make money by selling the mail lists.

It is called "SPAM" for a reason, if Google is allowed to do this, what about the other companies using this ruling to add their paid for political messages to your email inbox. It would be like open your email and find a thousand "political" messages for you to read, because the spam filter could not delete them.

If you give this request by Google permission to go ahead, email will soon grind to a stop, because once allowed it will be open season on filling up your inbox with "important" messages from whomever Google and others have sold your information to.

Bad Idea Deny this request

Regards

Eugene Brusin

From: [Thomas Sicard](#)
To: [AQ](#)
Subject: Comment to Google's Request for Opinion on Pilot Program
Date: Tuesday, July 12, 2022 8:40:03 AM

Dear FEC,

No one needs even one more unsolicited email. Political emails are the worst.

So, obviously, I am against allowing Google to "ease spam filters" for political emails. Just say no.

Thanks!

Thomas Sicard

From: [Bruce.Filgate](#)
To: [AQ](#)
Subject: do not allow political campaign spam into our email boxes -- too much spam already thanks!
Date: Tuesday, July 12, 2022 8:16:24 AM

From: [kb](#)
To: [AQ](#)
Subject: Do not allow to Gmail ease its Gmail spam filters - block all political filters
Date: Tuesday, July 12, 2022 9:45:03 AM

With all due respect, please do not allow to Gmail ease its Gmail spam filters - please make them block all political BS.

I am a Psychologist and my patients, particularly the elderly are being bombarded already by this things and other trash that Gmail lets through.

Many patients are getting extremely upset by the overwhelming amount of political BS they already receive on their Gmails.

Some niavely believe the "world" as they know/knew it is coming to an end if they do not send \$\$\$ immediately.

Others, younger patients are just becoming more angry and depressed by all this bombardment.

Please do not let this happen.

From: [Heather H](#)
To: [AQ](#)
Subject: Google and Political Spam
Date: Tuesday, July 12, 2022 9:26:08 AM

This is a plea to NOT grant Google's request to unleash spam political mail on our citizenry.

It's bad enough that if I make a contribution to ANYONE then every political hack in the country hounds me for money. But we are drowning in unwanted, unsolicited garbage mail. I spend longer each morning deleting unwanted (and often bullying) items than I do reading valid email from family and friends.

Using personal junk/spam filters is helpful, but it's a bit of a task of whack-a-mole.

Please consider, not just the inconvenience to people like me, but the dangers to seniors who are not tech savvy, and often respond to email because they think they have to. This would be devastating.

From: [Mary Repetti](#)
To: [AO](#)
Subject: Google email Spam filter parameters
Date: Tuesday, July 12, 2022 10:51:18 AM

Attn: FEC ao@fec.gov

I would like to express my concerns with the changes proposed to Google email accounts. While G-mail Spam filters do not stop all spam, they do stop some. And I do not want more spam! I already get an inordinate number of Ads in the Promotion folder that I am not interested in and have not requested.

Google does give me the option to select "Stop seeing this ad". Unfortunately, using that feature seems to increase the frequency of products from those companies being advertised to me--and I have not requested or provided access to my email with the majority of these companies.

I already get enough unsolicited political mailings (and phone calls) that I worry about the effects on our climate from all the mail that goes directly to re-cycling or the landfill. I do not want to have unwanted emails in addition to regular mail!

Sincerely

Mary Lou (Repetti) Ni Maire



From: [Daniel, Nancy](#)
To: [AQ](#)
Subject: Google spams
Date: Tuesday, July 12, 2022 7:58:58 AM

NO TO POLITLITAL SPAMMING AND SCAMS, NO TO GOOGLE

Nancy Daniel
Rental Processor

Centralized Rental Office

Allstate Insurance Company

[REDACTED]

[REDACTED]

From: [James Lamb](#)
To: [AQ](#)
Subject: Google's end run
Date: Tuesday, July 12, 2022 12:03:09 AM

Please don't let politicians have a free pass out of the spam folder. They've earned their placement by their bad behavior. They should have to play by the rules if they want out of the spam folder.

My personal anecdotes:

- (1) California Secretary of State has sold/lost/given the email address I used on their site to lots of politicians and charities. The email mostly goes to spam because that's where it belongs because I never signed up for it.
- (2) I donated to a Democratic hopeful in a past election. She didn't win, but she shared the email address I gave her website with lots of other Democrats who think that I'm someone with money to burn on all their campaigns. Those emails go to spam, as they should.
- (3) Lowermybills.com went out of business. The email address I gave that website has gone everywhere. I never agreed to receive emails from any of those other people who bought or stole the email address.

Politicians should focus on proper address acquisition, double-opt-in, list hygiene, not sharing lists and removing non-engaged addresses, as well as properly signing their emails with DKIM, DMARC, etc.

One former president uses multiple ESPs to try to avoid the spam filter.

Don't give politicians the ability to ruin email for all of us.

From: [Rashida Boyd](#)
To: [AQ](#)
Subject: Google's Political Party Committee Proposal
Date: Monday, July 11, 2022 6:25:11 PM

To Whom It May Concern:

I have recently read about the proposal Google recently filed to let political committees avoid spam filters and wanted to send my comments on the matter.

I am a long-time, generally happy Google user, and received this very email address back when gmail was still in its limited pilot stage. As it is now, I regularly have to unsubscribe from political PACs and candidate newsletters that I did NOT sign up to receive. Even when I unsubscribe, they will send unsolicited texts or just simply not respect my request and continue to email me until I block them. I cannot imagine how bad this will be if you approve this proposal.

For the love of all things holy, PLEASE do NOT approve this. ~85% of all emails are spam ([source](#)) as it is now, and Americans received a whopping 6.7 billion political messages in 2021 alone ([source](#)). That's not including calls or texts.

I do not need more unsolicited political emails. I mean, who does? Do you?? Again, I think I speak on behalf of the majority of Americans in saying that we don't want more political ads. We are fully capable of reaching out to candidates we support on our own. I don't care that Google wants to make more money. Please stop this.

Thank you,
Rashida

From: [Cindy](#)
To: [AQ](#)
Subject: Google's request regarding political emails
Date: Tuesday, July 12, 2022 8:45:57 AM

NO! Very bad idea! My 76-year-old father gets inundated with a dozen political emails now. My email is constantly flooded with political spam. This is a very very very bad idea!

Cindy

Cynthia Dallis
Office Manager
Jose Carballo Architectural Group, PC



From: [Lorraine OMalley](#)
To: [AQ](#)
Subject: New ruling
Date: Tuesday, July 12, 2022 9:49:39 AM

Dear Sirs

I vehemently object to Google's proposal to allow political emails to bypass my SPAM folder! If anything deserves to be called span, it is this!

Lorraine O'Malley

From: [REDACTED]
To: [AO](#)
Subject: NO more political spam.
Date: Tuesday, July 12, 2022 8:55:50 AM

NO more political spam. Please do not allow political spam to bypass filters.

Thank you, Wayne.

From: [Amanda Krauss](#)
To: [AQ](#)
Subject: NO on Google's requested campaign ad pilot program
Date: Monday, July 11, 2022 8:17:59 PM

NO to Google's request to do a pilot program where campaign ads go directly to people's inboxes and disregard the established spam filters.

By doing this, Google makes a unilateral decision to cripple its own email management features, thereby overriding the stated preferences of its users and substituting the desires of specific advertisers

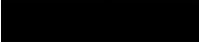
Furthermore, it has expressed its intention to use the findings from this pilot to override users' settings in further, non-political cases, arguing against any democratically-driven or altruistic motives for this pilot.

Speaking as someone who works in tech, product development, and security: this pilot proposal, and Google's intentions, are unconscionable.

This pilot actively harms users of the product, and especially harms those users who are less technically savvy. Furthermore, it will allow the further spread of disinformation, and enable the continuing erosion of democratic processes.

Sincerely,
Amanda Krauss, PhD

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Amanda Krauss, PhD
User Experience Researcher and Digital Strategist


From: [B.C](#)
To: [A.O](#)
Subject: NO POLITICAL SPAM PLEASE!
Date: Tuesday, July 12, 2022 9:37:22 AM

This ruling would allow any crackpot trying to get elected to spout any nonsense they want.
Please say no to this ruling request!

From: [Jon Sappington](#)
To: [AQ](#)
Subject: NO to political emails
Date: Tuesday, July 12, 2022 9:01:50 AM

I say NO to allowing more political emails. My yahoo account already gets a dozen political emails a day, all garbage and full of half truths...that means lies! I don't need Gmail doing the same. These crook politicians and their groups waste enough of wealth without asking for more or polluting the thoughts of more weak-minded individuals.

Sincerely,
Jon Sappington

From: [JEAN WILSON](#)
To: [AQ](#)
Subject: political ads
Date: Tuesday, July 12, 2022 8:39:51 AM

PLEASE stop this from being approved. We do not need to be bombarded with more ads. It's infuriating, invasive and does nothing to further legitimate causes.

PLEASE protect us and our privacy.

Jeani

I shall pass through this world but once.

Any good, therefore, that I can show to any human being, let me do it now.

Let me not defer nor neglect it, for I shall not pass this way again.

From: [Jeanette Woodburn](#)
To: [AQ](#)
Subject: Political Bias in Algorithm Sorting Emails Act of 2022
Date: Monday, July 11, 2022 9:11:27 PM

To Whom It May Concern;

I am writing in opposition to the Political Bias in Algorithm Sorting Emails Act of 2022. In my opinion as a professional who works in the email space, I find this bill ridiculous and an attempt to address the wrong problem with political emails. frankly, more political email belongs in the spam folder:

- It is rare for the recipient to have opted into the sender's lists, or to have indicated any desire to receive communications from them at all
- Subject lines and content are often sensationalist
- The Sender ID is often not connected directly to the actual organization sending the email (and using that email as a vehicle for raising funds)

These issues are even more problematic on SMS, which adds the indignity of the recipient being forced to PAY for the spam they're receiving.

Instead of attempting to inflict even more spam on inboxes, how about simply expanding CAN-SPAM to include political emails?

Respectfully,
Jeanette Woodburn
Marketing Operations and Email Professional

From: [Denise Higgins](#)
To: [AQ](#)
Subject: Political Spam
Date: Tuesday, July 12, 2022 10:00:42 AM

Dear FEC,

I cannot be more emphatic than to yell at the top of my lungs - PLEASE, PLEASE, DO NOT OPEN THE FLOOD GATES TO POLITICAL SPAM EMAILS. I am not an anomaly in that I currently receive emails from all over the US for candidates asking for funds and "updating" me on their policies. They are from states I do not and have never resided in and are not federal congressional positions. I was receiving over 10 emails per day from just one ex-president asking for money. It took months to finally get all the various emails chains blocked. I still receive these emails even if I unsubscribe. As you are, I am sure, aware that even unsubscribing is risky endeavor!

Heart felt sincerely,
Denise Higgins
Lincoln, CA

From: [Daniel, Nancy](#)
To: [AQ](#)
Subject: Recall: Google spams
Date: Tuesday, July 12, 2022 7:59:59 AM

Daniel, Nancy would like to recall the message, "Google spams".

From: [Meghan Ede](#)
To: [AQ](#)
Subject: Say NO to Google campaign ad pilot program
Date: Monday, July 11, 2022 6:34:07 PM

"political campaign ad" can be hard to define. Many are, in fact, spam - requests for donations to dubious causes that aren't really related to political campaigns.

See Trump's "Campaign ads" that are flat out requests for money to "pay for legal fees", which is not campaign-related, and we all know simply means he will pocket the money.

Furthermore, donation lists are shared extensively and while one may have agreed to fund one campaign, one will receive mountains of email on many other campaigns and causes, in which one has no interest.

Political campaign ads should be treated as other email, and go through spam filters (also checked against one's contacts and white/black lists).

Thank you.

Meghan Ede
Monterey, California

From: [Gary and Victoria Runge](#)
To: [AQ](#)
Subject: spam political emails
Date: Tuesday, July 12, 2022 8:29:21 AM

Please do not approve Google's request to not treat political emails as spam. In today's world we email users receive hundreds of spam emails weekly. Most of us do not want political emails requesting money or spouting obvious disinformation or even truths. We are bombarded daily with these from all the media already.

Approving this request would clog our inboxes with with even more spam. I don't want to receive these and would never react to one of these to send any money.
Gary Runge