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November 12, 2017

Federal Election Commission
Office of General Counsel - Policy Division
999 E Street, N.W.
Washington, D.C. 20463

To whom it may concern:

I am the founder and CEO of MCCI Corporation (www.mcci.com), a system software company. I have over forty years of experience in computing, and in running businesses. I hold fifteen US and sixteen international patents in systems and software. I chair the committee of the USB-IF Device Working group that develops standards for connecting telecoms devices to computers USB, and I was the principle author and inventor behind the "Network Control Model" specification, which is used by many high-speed LTE modems to connect with computers. I am on the board of the Wireless Technology Association (<http://www.wirelesstechnologyassociation.org/>), a 501(c)(3) focusing on telecoms technology and policy issues. I am also the initiator and chairman of the board of The Things Network New York (<https://thethings.nyc>), a 501(c)(3) that is deploying a Lo-RaWAN-based public wireless network for the Internet of Things in New York City.

I believe my experience qualifies me to comment on the technical aspects of this requirement. My company, MCCI, has a strong interest in telecoms regulations, because we are affected by the regulatory climate. I further have a responsibility to my employees to comment on matters that clearly have a bearing on the social environment in the United States.

It is obviously of value for political advertisements to be unambiguously traceable by the reader back to the organizations that place them. It seems that the only argument against is an argument of convenience on the part of the organizations that deliver the ads. These arguments seem to be based either on the cost of compliance, or the aesthetic effects of compliance.

Neither argument has merit.

The cost of compliance is obviously not an issue. The marginal cost of using the communication channel to deliver the disclaimer is negligible. The other costs of compliance (reporting, etc.) can be estimated based on the experience of other media. Other media have been complying with disclosure requirements, and there is no evidence that this compliance is onerous. There have been no recent claims from other media that they should be exempted, even though advertising revenues for other media have been shrinking (making them more sensitive to cost). Online advertising is growing, and can easily bear the burden of compliance.

The aesthetic effects of compliance are trivially mitigated. Who doesn't know how to click on a link in an ad? The simple provision of a short word, like "ad", or "paid", with a hyperlink to a page giving the details, would be enough. One can even imagine an emoticon, or a special symbol (perhaps even a "\$") that is hyperlinked. It seems obvious that organizations as creative as the social media companies could comply without significantly effecting presentation aesthetics.

Even if presentation aesthetics could not be mitigated, the presentation (in written form) will be less disruptive than the verbal disclaimers used in TV and radio advertising. Readers of online ads will get used to it, but will immediately be able to track material back to its source.

The benefits of traceability are obvious, and are proven. Because of this, the FEC already requires disclaimers for other media. The FEC should require this for all ads, regardless of the medium of delivery.

If you have any questions, please contact me.

Best regards,

A handwritten signature in blue ink that reads "Terrill M. Moore". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Terrill M. Moore

CEO

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