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In response to the Interactive Ad Bureau's release of the Standard Ad Unit Portfolio Draft can call for public comments, Online Trust Alliance (OTA) submits the following comments and recommendations. OTA is a global non-profit working to make the Internet more trustworthy and resilient by developing and advancing best practices to enhance online trust and integrity while promoting innovation and vitality in the online marketplace. As a member-supported coalition, OTA includes technology leaders, consumer marketers, social networks, ecommerce, ad technology providers, publishers, financial and insurance institutions, government agencies and non-governmental organizations.

Over the past decade, OTA has worked closely with leaders in the advertising supply chain, including publishers, advertisers and ad networks to increase the trust of online advertising. Reflecting increased consumer distain for online advertising and usage of ad blockers, OTA recently released a white paper entitled "A Vision for Trustworthy Adverting". In this paper OTA calls for an inclusive and holistic approach to address key issues impacting industry, publishers and most importantly the user experience.¹

OTA recognizes online advertising is an economic engine that fuels a wide range of services which society depends on. In order to realize the benefits of an ad supported internet we must address the breakdown of consumer trust. Improvements in user experience alone do not mitigate other rising issues such as risks from ad-delivered malware ("malvertising"), threats to privacy from aggressive tracking and deception from click-bait headlines and non-transparent native content. The issues must be addressed including all stakeholders and an emphasis on putting the consumer first.

OTA invites and encourages the IAB to come together not only with publishers, marketers and ad technology providers, but also with the consumer voice and subject matter experts in security and privacy. If we can achieve consensus, the benefits will be threefold: we can prevent further erosion of the advertising-funded business model, keep regulation at bay and enhance brand value through consumer trust.

¹ See OTA Vision <https://otalliance.org/Vision>

OTA applauds the emphasis on user experience and control outlined in the draft standards. OTA strongly supports:

- User initiated audio, video, ad expansion, etc.
- Avoidance of disruptive/invasive components such as pop-ups; auto-expansion; hover as click; expansion over content; auto-play video; auto-play audio; forced countdown
- Standardization of user controls such as presence and location of close capability and access to volume/play controls throughout duration of ad
- Actions to address user data and performance issues with file size, number and load limits

Beyond these general principles, however, a few sections raised questions/issues.

Page 8, key topics include levels without clarity on how these were derived or the impact they may have.

- a) Max limit 30% on CPU usage during host-initiated execution – how was the upper limit of 30% CPU determined and how does this level relate to actual observed CPU usage currently?
 - The proposed limit is above current levels. CPU usage limit must be set low enough to positively improve user experience.
- b) Minimum ad file submission lead time 6 days before campaign start – how was this minimum determined and how does this compare to typical lead times currently observed?
 - OTA agrees lead times should allow publishers appropriate controls on file/placement quality and security (such as malware scanning recently recommended by TAG), but should not be so long as to impair marketer creativity/engagement with consumers.
- c) Max of 10 host-initiated file requests – how was this determined and what are implications for improved user experience?
 - OTA recommends that the focus be on user experience in terms of load times, data usage, etc. In these areas, the type and size of the files may have more impact than the raw number of file requests.
- d) Reduce file weights additional 30% for slow internet connections (3G or lower) – how was this reduction level determined, is it enough and how should marketers implement for campaigns which span multiple connection speeds?
 - Wide global variations mean relatively slow internet speeds are a reality for many users (especially internationally) and it is critical that ad creative decisions appropriately recognize connection limitations. OTA recommends an emphasis on connection performance as a priority for all creative.

On page 11, some guidance appears inconsistent with other recommendations in the document:

- e) Interstitials - forced countdown is listed here as “not recommended.” This conflicts with page 12 where Forced Countdown is listed as “must not be used.”
 - OTA strongly supports prohibiting forced countdown.
- f) The section on allowed auto-play video (in non-video content) seems to conflict with prior guidance against auto-play video. The statement “Video may be played by the ad without user initiation when it does not significantly impact the user’s cost of consuming content” This seems to conflict with prior statements that video must be user-initiated.
 - OTA supports that video in non-video content must be user-initiated.

Additional Recommendations

OTA recommends user feedback mechanisms be added to the proposed standards for all ads. Similar to the proposed standards for a close button, the feedback button should be clear and visible as soon as the ad content is rendered and should be placed in a standardized location. When clicked, the feedback button should provide the user with the ability to

- Leave positive or negative feedback about the specific ad displayed
- Leave positive or negative feedback about ads on the displayed website

Native advertising

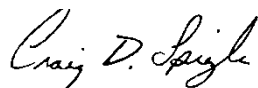
OTA supports IAB efforts to help establish Native ads standards but more must be done to address the wide range of terminology and resulting consumer confusion including the sponsoring brand name as a required asset type for each ad placement. As discussed in OTA's 2016 Native Advertising Transparency Report, the lack of standards in disclosure terminology, ad unit presentation and other factors continue to increase consumer distrust.² Compounded by the click bait headlines and fake news sites, IAB has a significant responsibility and opportunity to help curb these practices.

Privacy & Data Collection Controls

Privacy controls and respect for user settings appear to have been omitted from this document. OTA encourages IAB to embrace user privacy settings in regarding to the tracking and collection of their online behavior. As the DAA principles do not fully address privacy controls regarding data collection and sharing, OTA believes IAB must include the honoring of Do Not Track settings. In the absence of respect for privacy, the promise of trustworthy advertising will not be realized.

Thank you for the opportunity to comment on the proposed 2017 portfolio. We look forward to working with the IAB along with all stakeholders to continue enhancing trust in our connected world.

For more information on the Online Trust Alliance and our Advertising & Content Integrity working group, please visit <https://otalliance.org/>.



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² OTA 2016 Native Advertising Report <https://otalliance.org/Native>