DISPOSITION
DATE: May 30, 2012

INQUIRY

The Online Interest-Based Advertising Accountability Program (Accountability Program) initiated a formal inquiry to determine whether Facilitate Digital Holdings Limited (Facilitate Digital or the company) was engaged in online behavioral advertising (OBA), and if so, whether the company’s OBA practices were in compliance with the Self-Regulatory Principles for OBA (OBA Principles). The Accountability Program also questioned whether the company’s opt-out mechanism complied with the industry standard duration of five years.

Facilitate Digital represented that it is not currently engaged in OBA. The company stated it would nonetheless change its opt-out from its current one year duration to the industry standard of five years by May 10, 2012. However, the Accountability Program has checked the duration of the opt-out cookie, and as of this writing it has not been changed to five years.
As to the company’s representation that it is not currently engaged in OBA, our inquiry developed no information to the contrary. Therefore the Accountability Program is closing the case administratively. If we find that the company is engaging in OBA activity in the future without compliance with the OBA Principles, we will open a new inquiry or take other appropriate action.

Facilitate Digital chose not to participate further in the inquiry process.

DISPOSITION

Administratively closed based on Facilitate Digital’s representation that it is not engaged in OBA.

Genie Barton
Vice President and Director
Online Interest-Based Advertising Accountability Program and Mobile Marketing Initiatives