

**ADVERTISING SELF-REGULATORY COUNCIL/COUNCIL OF  
BETTER BUSINESS BUREAUS**

***ONLINE INTEREST-BASED ADVERTISING ACCOUNTABILITY PROGRAM***

**FORMAL REVIEW**

Case Number: 13-2012

COMPANY:

Facilitate Digital Holdings Limited

CHALLENGER:

Online Interest-Based  
Advertising Accountability Program

**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.

A handwritten signature in black ink, appearing to read "Genie B.", with a stylized flourish at the end.

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