



October 6, 2022  
Federal Trade Commission  
Office of the Secretary  
600 Pennsylvania Avenue NW, Suite CC-5610 (Annex B)  
Washington, DC 20580

**Re: Request for Extension of Time to File Comments, Federal Trade Commission; Advance Notice of Proposed Rulemaking for Trade Regulation Rule on Commercial Surveillance and Data Security; 87 Fed. Reg. 51273; Docket ID No. 2022-17752 (August 22, 2022).**

*Submitted Electronically*

To the Commission:

NTCA–The Rural Broadband Association (NTCA) hereby submits this Request for Extension of Time to File Comments in the above-captioned proceeding. NTCA represents approximately 850 small, locally operated rural broadband providers and is also the parent entity of Services Management Corporation, a subsidiary that provides administrative management including health and retirement benefits services to members of the not-for-profit NTCA. Accordingly, NTCA’s interest in the instant proceeding arises from several perspectives, including its representation of small businesses, internet service providers, and its work in the financial and health services industries.

NTCA supports the similar request for extension of time submitted by the U.S. Chamber of Commerce, *et al.*, on September 24, 2022. NTCA concurs that a minimum of a 60-day extension is warranted given the breadth of issues covered in the Advance Notice of Proposed Rulemaking (ANPRM). The magnitude of issues contemplated by the ANPRM will require focused study, evaluation, and analysis of each of the major categories into which the 95 questions presented in the ANPRM fall.

In its research and advocacy, NTCA has highlighted the ever-expanding role of broadband in sectors that include, but are not limited to, agriculture, economic development, education, and healthcare. In addition to its analyses of use-cases for these technologies, NTCA also administers a leading industry cybersecurity program. NTCA is innately aware of and sensitive to the issues surrounding data collection and security, and moreover has participated actively in a diverse array of both government and industry efforts aimed at these issues.

With this perspective, NTCA submits that the vast expanse of issues contemplated by the 95 questions of the ANPRM, *many of which are broad and by definition themselves contemplate numerous unenumerated sub-questions*, warrant, *inter alia*, factual investigation of current

practices; modeling of potential alternatives; cost/benefit analyses; impact projections; and identification of potential or actual harms that Commission action endeavors to forestall. Included in these considerations are anticipated economic impacts as well as the potential effect of regulation on industry innovation. Given the nearly universal applicability across industry sectors that these rules could affect, a 60-day extension is warranted if only to *identify* the full scope of implications surfaced by the ANPRM.

Accordingly, and for these reasons, NTCA requests the Commission to extend for no fewer than 60 days the deadline to submit comments in the above-captioned proceeding.

Respectfully submitted,

Joshua Seidemann

s/Joshua Seidemann  
VP Policy and Industry Innovation