



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Serena Viswanathan  
Associate Director

January 25, 2022

VIA EMAIL

Alex Goode  
Chief Executive Officer  
GoSite, Inc.

Dear Mr. Goode:

The Federal Trade Commission is interested in how companies collect, moderate, and publish online customer reviews to ensure that they accurately reflect feedback received about products and services.

Consumers who rely on such reviews deserve to get a true and accurate picture of what other consumers think. Operators of websites or platforms that feature reviews should have processes in place to ensure that this happens and should be transparent about their practices. Doing so is important for establishing consumer trust and avoiding potentially deceptive conduct that would violate Section 5 of the FTC Act.

One of our concerns is when companies take improper steps to avoid collecting or publishing negative reviews. Examples may include asking for reviews only from those likely to leave positive ones, preventing or discouraging submission of negative reviews, subjecting negative reviews to greater scrutiny, refusing to publish negative reviews, or otherwise not treating positive and negative reviews equally.

Your website includes the following description of how clients can use GoSite's review tool: "You can also send review requests to specific, happy customers to help counteract a negative review and improve your ratings. To prevent negative reviews from posting in the first place, GoSite's review tool has a built-in filter, which allows you to respond to negative reviews privately—through email—rather than having customers post publicly." The provision or use of either one of these functionalities would violate the FTC Act if it results in a misleading impression about what consumers think about a product or service.

You should review your policies and practices to ensure that you are neither engaging in any improper step described above nor providing clients with the means to do so. Pursuant to this review, you should terminate any services that allow for or result in consumer deception.

Please acknowledge your receipt of this letter by sending an email to the following attorneys in my division, who are also available to answer any questions you may have: Michael Atleson at [matleson@ftc.gov](mailto:matleson@ftc.gov) and Amber Lee at [alee5@ftc.gov](mailto:alee5@ftc.gov). Thank you.

Very truly yours,

SERENA  
VISWANATHAN

Digitally signed by SERENA  
VISWANATHAN  
Date: 2022.01.24 15:08:08 -05'00'

Serena Viswanathan  
Associate Director  
Division of Advertising Practices



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Serena Viswanathan  
Associate Director

January 25, 2022

VIA EMAIL

Christina Martinez, CEO  
Grade Us, LLC

Dear Ms. Song:

The Federal Trade Commission is interested in how companies collect, moderate, and publish online customer reviews to ensure that they accurately reflect feedback received about products and services.

Consumers who rely on such reviews deserve to get a true and accurate picture of what other consumers think. Operators of websites or platforms that feature reviews should have processes in place to ensure that this happens and should be transparent about their practices. Doing so is important for establishing consumer trust and avoiding potentially deceptive conduct that would violate Section 5 of the FTC Act.

One of our concerns is when companies take improper steps to avoid collecting or publishing negative reviews. Examples may include asking for reviews only from those likely to leave positive ones, preventing or discouraging submission of negative reviews, subjecting negative reviews to greater scrutiny, refusing to publish negative reviews, or otherwise not treating positive and negative reviews equally.

Your Grade.us website describes your Review Funnel Layouts as follows: "Choose from a variety of segmented layouts that guide happy customers to the review sites important to you and recover unhappy customers before they share a negative experience publicly." The provision or use of either one of these functionalities would violate the FTC Act if it results in a misleading impression about what consumers think about a product or service.

You should review your policies and practices to ensure that you are neither engaging in any improper step described above nor providing clients with the means to do so. Pursuant to this review, you should terminate any services that allow for or result in consumer deception.

Please acknowledge your receipt of this letter by sending an email to the following attorneys in my division, who are also available to answer any questions you may have: Michael Atleson at [matleson@ftc.gov](mailto:matleson@ftc.gov) and Amber Lee at [alee5@ftc.gov](mailto:alee5@ftc.gov). Thank you.

Very truly yours,

SERENA  
VISWANATHAN

Digitally signed by SERENA  
VISWANATHAN  
Date: 2022.01.24 16:19:48 -05'00'

Serena Viswanathan  
Associate Director  
Division of Advertising Practices



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Serena Viswanathan  
Associate Director

January 25, 2022

VIA EMAIL

Rick Stollmeyer  
Co-founder and Executive Chairman  
Mindbody, Inc.

Dear Mr. Stollmeyer:

The Federal Trade Commission is interested in how companies collect, moderate, and publish online customer reviews to ensure that they accurately reflect feedback received about products and services.

Consumers who rely on such reviews deserve to get a true and accurate picture of what other consumers think. Operators of websites or platforms that feature reviews should have processes in place to ensure that this happens and should be transparent about their practices. Doing so is important for establishing consumer trust and avoiding potentially deceptive conduct that would violate Section 5 of the FTC Act.

One of our concerns is when companies take improper steps to avoid collecting or publishing negative reviews. Examples may include asking for reviews only from those likely to leave positive ones, preventing or discouraging submission of negative reviews, subjecting negative reviews to greater scrutiny, refusing to publish negative reviews, or otherwise not treating positive and negative reviews equally.

Your website indicates that clients can build their online reputations by “automatically prompting [their] best customers to leave a review” on the clients’ own websites or through Google, Facebook, or other social review sites. The provision or use of this functionality would violate the FTC Act if it results in a misleading impression about what consumers think about a product or service.

You should review your policies and practices to ensure that you are neither engaging in any improper step described above nor providing clients with the means to do so. Pursuant to this review, you should terminate any services that allow for or result in consumer deception.

Please acknowledge your receipt of this letter by sending an email to the following attorneys in my division, who are also available to answer any questions you may have: Michael Atleson at [matleson@ftc.gov](mailto:matleson@ftc.gov) and Amber Lee at [alee5@ftc.gov](mailto:alee5@ftc.gov). Thank you.

Very truly yours,

SERENA  
VISWANATHAN

 Digitally signed by SERENA  
VISWANATHAN  
Date: 2022.01.24 16:20:49 -05'00'

Serena Viswanathan  
Associate Director  
Division of Advertising Practices



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Serena Viswanathan  
Associate Director

January 25, 2022

VIA EMAIL

Samuel Brown, CEO  
Oggvo, LLC

Dear Mr. Brown:

The Federal Trade Commission is interested in how companies collect, moderate, and publish online customer reviews to ensure that they accurately reflect feedback received about products and services.

Consumers who rely on such reviews deserve to get a true and accurate picture of what other consumers think. Operators of websites or platforms that feature reviews should have processes in place to ensure that this happens and should be transparent about their practices. Doing so is important for establishing consumer trust and avoiding potentially deceptive conduct that would violate Section 5 of the FTC Act.

One of our concerns is when companies take improper steps to avoid collecting or publishing negative reviews. Examples may include asking for reviews only from those likely to leave positive ones, preventing or discouraging submission of negative reviews, subjecting negative reviews to greater scrutiny, refusing to publish negative reviews, or otherwise not treating positive and negative reviews equally.

Your website indicates that clients can use your services to “keep [their] valuable reputation under lock and key with a proven system that surveys dissatisfied clients so [they] can handle the situation,” and “capture unhappy clients before they do irreparable damage.” The provision or use of any such functionality would violate the FTC Act if it results in a misleading impression about what consumers think about a product or service.

You should review your policies and practices to ensure that you are neither engaging in any improper step described above nor providing clients with the means to do so. Pursuant to this review, you should terminate any services that allow for or result in consumer deception.

Please acknowledge your receipt of this letter by sending an email to the following attorneys in my division, who are also available to answer any questions you may have: Michael Atleson at [matleson@ftc.gov](mailto:matleson@ftc.gov) and Amber Lee at [alee5@ftc.gov](mailto:alee5@ftc.gov). Thank you.

Very truly yours,

SERENA  
VISWANATHAN

Digitally signed by SERENA  
VISWANATHAN  
Date: 2022.01.24 16:21:40 -05'00'

Serena Viswanathan  
Associate Director  
Division of Advertising Practices



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Serena Viswanathan  
Associate Director

January 25, 2022

VIA EMAIL

Chuck Goetschel, CEO  
Rallio

Dear Mr. Goetschel:

The Federal Trade Commission is interested in how companies collect, moderate, and publish online customer reviews to ensure that they accurately reflect feedback received about products and services.

Consumers who rely on such reviews deserve to get a true and accurate picture of what other consumers think. Operators of websites or platforms that feature reviews should have processes in place to ensure that this happens and should be transparent about their practices. Doing so is important for establishing consumer trust and avoiding potentially deceptive conduct that would violate Section 5 of the FTC Act.

One of our concerns is when companies take improper steps to avoid collecting or publishing negative reviews. Examples may include asking for reviews only from those likely to leave positive ones, preventing or discouraging submission of negative reviews, subjecting negative reviews to greater scrutiny, refusing to publish negative reviews, or otherwise not treating positive and negative reviews equally.

Your website includes the following description of your REVV service:

“Our platform generates a quick post-sale text survey to your customers so they can provide feedback about their experience in your store. Customers who respond positively are prompted to leave a review and linked directly to that store’s Google, Facebook, or Yelp page. . . . If a customer responds to your survey with a rating of 3 or below, they will be prompted to leave a comment and request further assistance. Your team is alerted via email of the poor experience, and the customer can be contacted directly before they post a negative social review about your company!”

The provision or use of any such functionalities would violate the FTC Act if it results in a misleading impression about what consumers think about a product or service.

You should review your policies and practices to ensure that you are neither engaging in any improper step described above nor providing clients with the means to do so. Pursuant to this review, you should terminate any services that allow for or result in consumer deception.

Please acknowledge your receipt of this letter by sending an email to the following attorneys in my division, who are also available to answer any questions you may have: Michael Atleson at [matleson@ftc.gov](mailto:matleson@ftc.gov) and Amber Lee at [alee5@ftc.gov](mailto:alee5@ftc.gov). Thank you.

Very truly yours,

SERENA  
VISWANATHAN

Digitally signed by SERENA  
VISWANATHAN  
Date: 2022.01.24 15:06:58  
-05'00'

Serena Viswanathan  
Associate Director  
Division of Advertising Practices



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Serena Viswanathan  
Associate Director

January 25, 2022

VIA EMAIL

Nitin Duggal, CEO  
Adentro, Inc.

Dear Mr. Duggal:

The Federal Trade Commission is interested in how companies collect, moderate, and publish online customer reviews to ensure that they accurately reflect feedback received about products and services.

Consumers who rely on such reviews deserve to get a true and accurate picture of what other consumers think. Operators of websites or platforms that feature reviews should have processes in place to ensure that this happens and should be transparent about their practices. Doing so is important for establishing consumer trust and avoiding potentially deceptive conduct that would violate Section 5 of the FTC Act.

One of our concerns is when companies take improper steps to avoid collecting or publishing negative reviews. Examples may include asking for reviews only from those likely to leave positive ones, preventing or discouraging submission of negative reviews, subjecting negative reviews to greater scrutiny, refusing to publish negative reviews, or otherwise not treating positive and negative reviews equally.

Your website describes your Reputation Builder tool as follows: “Unlike other platforms, Adentro sends negative feedback ... directly to you so that you can resolve the issue through a one-to-one relationship with your customer. Positive feedback is encouraged to be shared on merchant-friendly social sites like Google, TripAdvisor and Facebook!” The provision or use of either one of these functionalities would violate the FTC Act if it results in a misleading impression about what consumers think about a product or service.

You should review your policies and practices to ensure that you are neither engaging in any improper step described above nor providing clients with the means to do so. Pursuant to this review, you should terminate any services that allow for or result in consumer deception.

Please acknowledge your receipt of this letter by sending an email to the following attorneys in my division, who are also available to answer any questions you may have: Michael Atleson at [matleson@ftc.gov](mailto:matleson@ftc.gov) and Amber Lee at [alee5@ftc.gov](mailto:alee5@ftc.gov). Thank you.

Very truly yours,

SERENA  
VISWANATHAN

Digitally signed by SERENA  
VISWANATHAN  
Date: 2022.01.24 16:18:01 -05'00'

Serena Viswanathan  
Associate Director  
Division of Advertising Practices



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Serena Viswanathan  
Associate Director

January 25, 2022

VIA EMAIL

James F. Rogers  
Chief Legal Officer and Secretary  
DR Media Holdings, LLC

Dear Mr. Rogers:

The Federal Trade Commission is interested in how companies collect, moderate, and publish online customer reviews to ensure that they accurately reflect feedback received about products and services.

Consumers who rely on such reviews deserve to get a true and accurate picture of what other consumers think. Operators of websites or platforms that feature reviews should have processes in place to ensure that this happens and should be transparent about their practices. Doing so is important for establishing consumer trust and avoiding potentially deceptive conduct that would violate Section 5 of the FTC Act.

One of our concerns is when companies take improper steps to avoid collecting or publishing negative reviews. Examples may include asking for reviews only from those likely to leave positive ones, preventing or discouraging submission of negative reviews, subjecting negative reviews to greater scrutiny, refusing to publish negative reviews, or otherwise not treating positive and negative reviews equally.

The DealerRater website states: "Bad reviews happen to everyone, but DealerRater is the only platform that gives you a second chance to make a first impression. You'll have an opportunity to respond privately and offer resolution to negative feedback before the review gets posted." The provision or use of this functionality would violate the FTC Act if it results in a misleading impression about what consumers think about a product or service.

You should review your policies and practices to ensure that you are neither engaging in any improper step described above nor providing clients with the means to do so. Pursuant to this review, you should terminate any services that allow for or result in consumer deception.

Please acknowledge your receipt of this letter by sending an email to the following attorneys in my division, who are also available to answer any questions you may have: Michael Atleson at [matleson@ftc.gov](mailto:matleson@ftc.gov) and Amber Lee at [alee5@ftc.gov](mailto:alee5@ftc.gov). Thank you.

Very truly yours,

SERENA VISWANATHAN  Digitally signed by SERENA  
VISWANATHAN  
Date: 2022.01.24 16:18:58 -05'00'

Serena Viswanathan  
Associate Director  
Division of Advertising Practices



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Serena Viswanathan  
Associate Director

January 25, 2022

VIA EMAIL

Raymond Wolfgang Weisberg, CEO  
EyeRate Inc.

Dear Mr. Weisberg:

The Federal Trade Commission is interested in how companies collect, moderate, and publish online customer reviews to ensure that they accurately reflect feedback received about products and services.

Consumers who rely on such reviews deserve to get a true and accurate picture of what other consumers think. Operators of websites or platforms that feature reviews should have processes in place to ensure that this happens and should be transparent about their practices. Doing so is important for establishing consumer trust and avoiding potentially deceptive conduct that would violate Section 5 of the FTC Act.

One of our concerns is when companies take improper steps to avoid collecting or publishing negative reviews. Examples may include asking for reviews only from those likely to leave positive ones, preventing or discouraging submission of negative reviews, subjecting negative reviews to greater scrutiny, refusing to publish negative reviews, or otherwise not treating positive and negative reviews equally.


Your website describes how clients can use EyeRate's "review requesting system" to "increase positive online reviews" and "resolve negative feedback before it gets posted." It states that a business should ask customers to rate the business from 1-5 stars and then "[d]irect 4-star and above raters to your online review profiles" but "[a]sk 3-star and below raters to leave feedback before directing them to" those profiles. You argue that this strategy is effective because, after leaving feedback, "most negative star raters will not take the time to post an online review." The provision or use of this functionality would violate the FTC Act if it results in a misleading impression about what consumers think about a product or service.

You should review your policies and practices to ensure that you are neither engaging in any improper step described above nor providing clients with the means to do so. Pursuant to this review, you should terminate any services that allow for or result in consumer deception.

Please acknowledge your receipt of this letter by sending an email to the following attorneys in my division, who are also available to answer any questions you may have: Michael Atleson at [matleson@ftc.gov](mailto:matleson@ftc.gov) and Amber Lee at [alee5@ftc.gov](mailto:alee5@ftc.gov). Thank you.

Very truly yours,

SERENA  
VISWANATHAN

 Digitally signed by SERENA  
VISWANATHAN  
Date: 2022.01.24 15:04:16 -05'00'

Serena Viswanathan  
Associate Director  
Division of Advertising Practices



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Serena Viswanathan  
Associate Director

January 25, 2022

VIA EMAIL

George Bilbrey, CEO  
Signpost Inc.

Dear Mr. Bilbrey:

The Federal Trade Commission is interested in how companies collect, moderate, and publish online customer reviews to ensure that they accurately reflect feedback received about products and services.

Consumers who rely on such reviews deserve to get a true and accurate picture of what other consumers think. Operators of websites or platforms that feature reviews should have processes in place to ensure that this happens and should be transparent about their practices. Doing so is important for establishing consumer trust and avoiding potentially deceptive conduct that would violate Section 5 of the FTC Act.

One of our concerns is when companies take improper steps to avoid collecting or publishing negative reviews. Examples may include asking for reviews only from those likely to leave positive ones, preventing or discouraging submission of negative reviews, subjecting negative reviews to greater scrutiny, refusing to publish negative reviews, or otherwise not treating positive and negative reviews equally.

The Signpost website offers to “[m]ake it easy for happy customers to write reviews about your business on sites that matter” and “[g]et constructive feedback offline to protect your online reputation and company brand.” It is unclear how you accomplish such results, but if these functionalities result in a misleading impression about what consumers think about a product or service, their provision or use would violate the FTC Act.

You should review your policies and practices to ensure that you are neither engaging in any improper step described above nor providing clients with the means to do so. Pursuant to this review, you should terminate any services that allow for or result in consumer deception.

Please acknowledge your receipt of this letter by sending an email to the following attorneys in my division, who are also available to answer any questions you may have: Michael Atleson at [matleson@ftc.gov](mailto:matleson@ftc.gov) and Amber Lee at [alee5@ftc.gov](mailto:alee5@ftc.gov). Thank you.

Very truly yours,

SERENA VISWANATHAN Digitally signed by SERENA  
VISWANATHAN  
Date: 2022.01.24 16:23:34 -05'00'

Serena Viswanathan  
Associate Director  
Division of Advertising Practices



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Serena Viswanathan  
Associate Director

January 25, 2022

VIA EMAIL

Shannon Hernandez  
General Counsel and Corporate Secretary  
Reputation.com, Inc.

Dear Ms. Hernandez:

The Federal Trade Commission is interested in how companies collect, moderate, and publish online customer reviews to ensure that they accurately reflect feedback received about products and services.

Consumers who rely on such reviews deserve to get a true and accurate picture of what other consumers think. Operators of websites or platforms that feature reviews should have processes in place to ensure that this happens and should be transparent about their practices. Doing so is important for establishing consumer trust and avoiding potentially deceptive conduct that would violate Section 5 of the FTC Act.

One of our concerns is when companies take improper steps to avoid collecting or publishing negative reviews. Examples may include asking for reviews only from those likely to leave positive ones, preventing or discouraging submission of negative reviews, subjecting negative reviews to greater scrutiny, refusing to publish negative reviews, or otherwise not treating positive and negative reviews equally.

Your website indicates that clients can use customer survey software to “create unique survey paths based on responses.” It is unclear what these “unique survey paths” involve, but if these functionalities result in a misleading impression about what consumers think about a product or service, their provision or use would violate the FTC Act.

You should review your policies and practices to ensure that you are neither engaging in any improper step described above nor providing clients with the means to do so. Pursuant to this review, you should terminate any services that allow for or result in consumer deception.

Please acknowledge your receipt of this letter by sending an email to the following attorneys in my division, who are also available to answer any questions you may have: Michael Atleson at [matleson@ftc.gov](mailto:matleson@ftc.gov) and Amber Lee at [alee5@ftc.gov](mailto:alee5@ftc.gov). Thank you.

Very truly yours,

SERENA VISWANATHAN  Digitally signed by SERENA  
VISWANATHAN  
Date: 2022.01.24 16:22:41 -05'00'

Serena Viswanathan  
Associate Director  
Division of Advertising Practices