



Summary of Digital Transparency Task Force Final Report Edits

- Page 10: Adding an article to the last sentence on page 10, response two. Request Digital Disclosure Research, the Task Force addresses current law and any future gaps caused by new technology and practices by recommending the Legislature commission a study to examine whether different styles of on-advertisement disclaimers could be more effective in providing voters information about who is paying for digital campaign advertisements.
- Page 10: Adding an auxiliary verb to the last line of page 10, response four. In Recommendation 3: Request Digital Disclosure Research, the Task Force attempts to addresses current law and any future gaps caused by new technology and practices by recommending the Legislature commission study to examine whether different styles of on-advertisement disclaimers, including the use of iconography or click-through content, could be more effective in providing voters information about who is paying for the digital campaign advertisements.
- Page 12, C.: These costs assume manual upload from the Committee and possible interface with platforms such as Facebook and Google.
- Page 13, paragraph one: Third, current databases operated by private platforms are subject to the private sector's commitments to Congress and applicable state law where it exists. Outside of that, the public sector has discretion as to what the database contains and displays and whether to continue to offer political ads in certain jurisdictions in the future.
- Page 15, paragraph one: The State of Maryland has been one of the first to mandate the platforms keep an archive and while they have seen a positive impact on voters and transparency, it's important to note both Facebook and Google do not host political ads in the State because their systems are incompatible with the law's requirements.
- Page 16: Delete a subsection within recommendation two. Section 1.g.i. should be removed from the recommendations. In effect, "Inputs supplied by the committee to a platform or entity for distribution of each advertisement; including age, gender, geographic location, and any other targeting criteria selected and paid for by the committee," would be removed from the recommendation.
- Page 18 – 19: The reference to community review should be clarified throughout the report. Community Review is mentioned in Recommendation Two, 4.c. and then further detailed in Recommendation Three.

- Page 24: Update the section summarizing Google’s presentation:

Representatives from Google, including Alea Mitchell, presented an overview of their political advertising products and transparency report.

Google Ads is a self-service ad platform used by advertisers of all sizes for an almost limitless range of products and services. Advertisers choose what ads will display, determine a budget, and place bids depending on where and when they want their ads to appear. Advertisers can create multiple ad formats including search, display, and video ads.

Ms. Mitchell went through setting a budget, creating a responsive display ad, previewing the ads, and creating sub-assets.

Google Ads Terms and Policies describe what ads are and are not allowed on their platform. They remove ads that violate their policies and act against bad advertisers. In 2020, they blocked and removed 3.1 billion ads for violating their policies and suspended nearly 1.7 million advertiser accounts using a combination of automated and human review.

Advertisers that wish to run election ads are required to undergo a verification process which verifies their identity and eligibility to run election ads, according to different regional requirements. Following verification, election ads include a “paid for by” disclaimer with the verified advertiser name and appear in a publicly available and searchable Transparency Report. The report generally includes a copy of the ad and various statistics about the ad, including the approximate associated spend, the dates and times it ran, and the targeting used. Election ads are restricted to targeting by age, gender, location, and contextual placement.

- Page 28, 1. Assumption 3: The Archive designed to provide an open Application Programming Interface (API) which allows to interface with third party platforms to receive advertisement data and transmit it to the FPPC on behalf of the committee
- Page 29, 2.: This information would be solely in the possession of the committee and its vendors, with support from the platforms.