

Federal Communications  
Commission

**FCC**



**MUNUC 36**

Model United Nations at the University of Chicago

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EST. 1989

MUNUC

## CHAIR LETTERS

Dear Delegates,

Welcome to MUNUC 36, and the FCC! This year, our committee will tackle two important issues: broadband access for underserved communities, and consumer protection against false advertisements. Given how our society circles around social media, and the internet in--most of you will find these topics to be highly compelling and relevant to your daily lives. Therefore, I can't wait to see how this nature of communication will be used in conversations to address committee issues.

How rude of me to not have introduced myself first--not adequately "communicative" for the FCC. My name is Daniela (or just Dani), I am a second year at The College majoring in Chemistry, and this is my second year staffing for MUNUC! I am also involved with CHOMUN, our collegiate level conference. Funny enough, this year me and Tim are running two committees together for both conferences, so be prepared for the best duo of the UChicago MUNiverse. Outside of MUN, I serve as a board member for the Indigenous Student Association, and Quest+ for FGLI students on campus. When not in any of these groups, you will find me in the basement of the chemistry lab I conduct research with.

Due to the social relevance that this committee brings, I can sense that you will be both hilarious and seriously pro-active at the same time. Effective communication is only at place when everyone is able to engage in it; and when we aren't being swayed by companies to change our behaviors. Truthfully, I have every reason to believe that you will make this a fun and exciting committee, and Tim and I are thrilled to see the insane ideas you will bring to our table. See you soon at MUNUC 36!

Kindly,

Daniela A. Santillan-Enriquez

Chair, Federal Communications Commission

[dsantillane@uchicago.edu](mailto:dsantillane@uchicago.edu)

EST. 1989

MUNUC

Dear Delegates,

I extend a warm welcome to you for MUNUC 36! My name is Timothy Lu, he/him, and I am going to be your chair for the FCC. Dani and I are beyond excited to see you tackle two critical, real-world issues: making sure everybody can benefit from an interconnected world and focusing on consumer protections against broadcasters and broadband companies that enable false advertising!

Unlike Dani, I know my manners and I'll introduce myself first. I'm a second-year in the College majoring in Economics and Public Policy, and this is my second year being a part of the wonderful experience that is MUNUC! I am also running a ChoMUN (our collegiate conference) committee with Dani, and you can bet we're going to be the dynamic duo of UChicago MUN. Last year, I was an assistant chair for the Ad Hoc committee of MUNUC and for the Democracy for Dummies committee for ChoMUN, and I'm also involved with UChicago's traveling MUN team. Other than MUN, I serve on the Undergraduate Student Government as the Vice President of Advocacy, and the club (non-varsity) fencing team. I'm from Canada and love talking about how it's better than the USA, and in my free time I'm pretty much just sleeping or talking.

I'm excited to see the energy you'll bring to the committee and can't wait to see all of your theatrical speeches, diplomacy, and crazy backroom arcs! Most importantly, I'm excited to see you guys grow as delegates as you learn about yourselves and global issues as the weekend goes on (very cheesy, I know).

Dani and I can't wait to meet all of you and see the best committee of MUNUC 36 unfold, and I hope it's filled with creativity and respect. Don't be afraid to reach out if you have any questions, and see you all soon!

Sincerely,

Timothy Lu

Chair, Federal Communications Commission

[timlu@uchicago.edu](mailto:timlu@uchicago.edu)



## HISTORY OF COMMITTEE

The Federal Communications Commission, or FCC, was created on June 19, 1934, by the Communications Act of that year. Although it began as a replacement for the Federal Radio Commission, by necessity its authority and jurisdiction increased over time, now directly overseeing the regulation of communications via radio, television, wire, satellite, and cable throughout the United States, and adjacent U.S. territories.<sup>1</sup>



*Figure 1. FCC 1937<sup>2</sup>*

One of the commission's earliest important reports was the "Report on Chain Broadcasting" in 1940 that set out to break the monopoly that

<sup>1</sup> About FCC | What we do. Federal Communications Commission, n.d. <https://www.fcc.gov/about-fcc/what-we-do>.

<sup>2</sup> Ewing, Harris. "Federal Communications Commission. Washington, D.C., Oct. 6. A New Picture of the Federal Comm. Commission, Headed by the New Chairman Frank McNinch, Formerly Chairman of the Federal Power Commission; Left to Right, Seated: Eugene O. Sykes, Frank McNinch, Chairman Paul A. Walker, Standing; Left to Right; T.A.M. Craven, Thad A. Brown, Norman S. Case, and George Henry Payne. 10/6/37." Still image, 1937. <https://www.loc.gov/pictures/item/2016872420/>.

broadcasting companies had over networks with little to no limits. This report set guidelines limiting the amount of time and the number of days that a network can broadcast to ensure that networks do not monopolize the entire air time of its affiliate network.<sup>3</sup> This would ultimately lead to the breakup of the National Broadcasting Company (NBC), kickstarting the FCC's long and storied history in its work to regulate communications throughout the United States.



*Figure 2. FCC Chairman James Lawrence Fly who led the creation of the "Report on Chain Broadcasting"<sup>4</sup>*

In 1996, the FCC would have a similarly impactful effect on the economy with the Telecommunications Act of 1996 after the breakup of AT&T, which worked to increase

<sup>3</sup> HathiTrust. "Report on Chain Broadcasting." Accessed September 24, 2023. <https://hdl.handle.net/2027/mdp.39015026285083?urlapp=3Bseq=101>.

<sup>4</sup> Harris-Ewing Collection. James Lawrence Fly, Commissioner of the FCC Speaks with Reporters in This Crop of a Wire Service Photo. 29 Nov. 1939.

competition in the radio industry as well as the telephone service industry. The guidelines provided by the act would then be implemented by the FCC.

The FCC's modern goals have diversified from simply maintaining wire and radio services to now promoting competition, innovation, and investment in critical communications infrastructure such as **broadband** services and facilities, and ensuring a robust and competitive market.<sup>5</sup> The FCC works to ensure that the above goals are fulfilled to maintain a connected America and protect consumers. For example, the FCC manages radio frequency assignments to maintain order on the airwaves and enforces regulations to protect the privacy and rights of consumers. One of the hallmark achievements of the FCC was the 2003 establishment of the 'Do Not Call Registry', which has since helped countless people avoid spam telemarketing.

As a result of its decades-long history and the increase of communication outlets spearheaded by the growth of technology and related-issues, the FCC was prompted to create individual Advisory Committees.<sup>6</sup> These committees are in charge of providing federal departments and

agencies with the information necessary to move forward with policies and programs. Since 1972, the advice given by these advisory committees has sought to be objective and accessible to the public, as per the Federal Advisory Committee Act (FACA). Particularly relevant to this year's committee will be the work of the Communications Equity and Diversity Council, which works to bring broadband access to all communities in the United States, as well as the Consumer Advisory Committee which works to represent consumer issues.<sup>7</sup> As the modern communications landscape becomes more complex, the FCC's role becomes ever more crucial in ensuring equitable access to critical technologies and protecting consumers.

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<sup>5</sup> "Federal Communications Commission (FCC) | USA.gov." Accessed September 24, 2023. <https://www.usa.gov/agencies/federal-communications-commission>.

<sup>6</sup> About FCC | Advisory Committees. Federal Communications Commission, n.d. <https://www.fcc.gov/about-fcc/advisory-committees-fcc>.

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<sup>7</sup> Ibid.

# TOPIC A: EXPANDING BROADBAND ACCESS FOR UNDERSERVED COMMUNITIES

## Statement Of The Problem

Being connected is one of the key components of modern life, closing not only physical gaps like distances between people through infrastructure projects, but also in reducing social and informational distance, helping address factors of inequality like access to economic opportunity and access to information. For this reason, internet access has become increasingly important in the present day, as it transitions from being a new technological marvel to a fact of life—and perhaps even a human right.<sup>8</sup> Broadband is a kind of internet access that is both high-speed and permanent, as opposed to older technologies such as dial-up internet. To be classified as broadband, requirements include a connection with a download speed of at least 25 megabits per second (Mbps) for downloading and 3 Mbps for uploading.<sup>9</sup> Because of its increased reliability,

broadband has become a staple in the lives of many around the globe as billions of people rely on it for as diverse a range of services as web browsing, video streaming, online conferencing, remote learning, and cloud-based media. The pandemic has only exacerbated the impacts of the “digital divide”, with ever-more services and functions shifting to an online format.

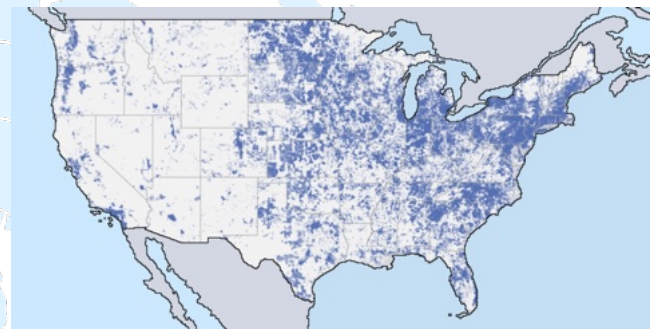


Figure 3. Wireless Broadband Availability 2012.

*Note this map may be overstating availability<sup>10</sup>*

Unfortunately, this increasing list of the applications of internet technology means that those without it are left behind, leading to a widening “digital divide” between those with and those without access to broadband internet, particularly in historically marginalized and **underserved communities**. According to the most recent Broadband Deployment Report from the FCC, at the end of 2019 almost 15

<sup>8</sup> The internet and human rights. Accessed August 23, 2023. [https://www.article19.org/data/files/annual\\_reports\\_and\\_accounts/Oral\\_Statement.pdf](https://www.article19.org/data/files/annual_reports_and_accounts/Oral_Statement.pdf).

<sup>9</sup> General | Types of Broadband Connection. Federal Communications Commission, n.d. <https://www.fcc.gov/general/types-broadband-connections>;

“How Fast Is Broadband? | BroadbandUSA.” Accessed September 24, 2023. <https://broadbandusa.ntia.doc.gov/about-us/frequently-asked-questions/how-fast-broadband>.

<sup>10</sup> File:US Wireline Broadband 31Dec2012.Tiff - Wikipedia. 31 Aug. 2013, [https://commons.wikimedia.org/wiki/File:US\\_Wireline\\_Broadband\\_31Dec2012.tiff](https://commons.wikimedia.org/wiki/File:US_Wireline_Broadband_31Dec2012.tiff).

million Americans lacked high-speed broadband service, with a disproportionate amount in disadvantaged urban, and especially rural, areas—places that often overlap significantly with those who could most benefit from the internet’s ease of economic and informational access.<sup>11</sup>

However, the issue of expanding broadband access to underserved communities is not an easy one. One primary issue is the economics of installing broadband infrastructure—for example, in remote areas, broadband providers may be unwilling to install high-grade infrastructure for areas that are sparsely-populated or where it may be particularly costly to create such infrastructure.<sup>12</sup> A second issue can be that broadband might simply be unaffordable to those who desire it, posing a financial barrier for low-income households. In fact, a 2015 survey found that more than half of people who lacked broadband access indicated that it was at least partially due to the cost, not to mention the price of having access to devices such as computers and smartphones.<sup>13</sup> Finally, individuals may be

reluctant to adopt broadband due to a lack of digital literacy and skills. A recent report by the National Skills Coalition found that nearly a third of workers in the US lack foundational digital skills, meaning that even when accessible, these individuals may not be able to take full advantage of broadband access.<sup>14</sup>

As the world continues to progress at an ever-more-rapid pace, it becomes more and more important to ensure that all people have access to reliable broadband internet. The internet has become a major factor of opportunity in the world, from economic activity to education to information access. Given the disproportionate impacts the digital divide has on rural and underserved communities, it is crucial to prioritize equitable broadband access as socioeconomic inclusion and development.<sup>15</sup>

## History Of The Problem

For most of us, broadband is an essential part of our life—helping us with our homework, doubts, and boredom. Broadband networks were introduced in the 1950s as tools for research.<sup>16</sup>

<sup>11</sup> About FCC | What we do. Federal Communications Commission, n.d. <https://www.fcc.gov/about-fcc/what-we-do>.

<sup>12</sup> D’mello, Anasia. “No Service: The Big Problem with Rural Broadband.” VanillaPlus - The Global Voice of Telecoms IT (blog), March 30, 2022. <https://www.vanillaplus.com/2022/03/30/68851-no-service-the-big-problem-with-rural-broadband/>.

<sup>13</sup> Wormald, Benjamin. “3. Barriers to Broadband Adoption: Cost Is Now a Substantial Challenge for Many Non-Users.” Pew Research Center: Internet, Science & Tech (blog), December 21, 2015. <https://www.pewresearch.org/internet/2015/12/21/3-barriers-to-broadband-adoption-cost-is-now-a-substantial-challenge-for-many-non-users/>.

<sup>14</sup> Bergson-Shilcock, Amanda. “The New Landscape of Digital Literacy: How Workers’ Uneven Digital Skills Affect Economic Mobility and Business Competitiveness.” National Skills Coalition, May 2020.

<sup>15</sup> “Observations on Past and Ongoing Efforts to Expand Access and Improve Mapping Data.” June 2020. <https://www.gao.gov/assets/gao-20-535.pdf>.

<sup>16</sup> “Types of Broadband Connections,” Federal Communications Commission, accessed June 26, 2023,



For this reason, the original networks were only used by certain government entities, as well as university and collegiate research groups that could afford the new novelty. Given the heavy use of networks by the military, the Defense Advanced Research Projects Agency (DARPA), an agency concerned with protecting the technology advancements of the U.S military, became heavily involved in the sharing, modernizing, and research of broadband networks. Nevertheless, these initial networks were very rudimentary, and not at all what we know as the internet today. For example: one of the main issues that early broadband experienced was the fact that none of the networks were connected to one another. By the 1970s, several individuals brought forward the idea of connecting all individual networks together in order to better collaborate—and communicate—with one another. Upon this new call to action, DARPA decided to take matters into their own hands, and launched a project that would revolutionize online communication as we know it: the modernization of internal networks.

With connected networks, and all the new fascinating tools the internet had to offer—commercialization of the internet as a service was expected. Just as DARPA was researching how to modernize in the 1970s,

commercial network packets were introduced to the market. Soon enough, the 80s and 90s saw the evolution of broadband access from a research tool into a commodity. Therefore, broadband began to expand towards areas populated by affluent households and institutions that could afford the service. As such, broadband access became more common within highly populated areas—of high economic prospect—leaving small villages, towns, and underserved communities behind. Although high-speed internet is thought of as a necessity, this unequal expansion of broadband has left a significant portion of the population without complete access.

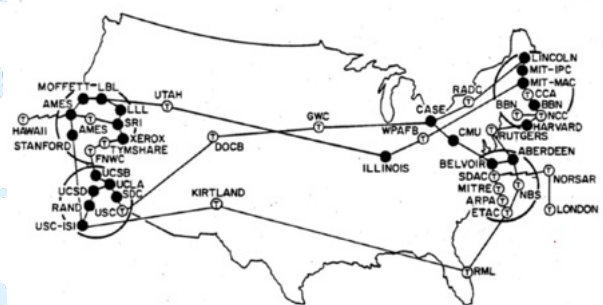


Figure 4. Arpanet (preliminary internet) access points in 70s<sup>17</sup>

<https://www.fcc.gov/general/types-broadband-connections>.

<sup>17</sup> GMS, Semaforo. English: Arpanet Points in the 70s. 4 Jan. 2022. Own work, Wikimedia Commons, [https://commons.wikimedia.org/wiki/File:Arpanet\\_the\\_1970s.png](https://commons.wikimedia.org/wiki/File:Arpanet_the_1970s.png).

It is estimated that almost one-third of all cities still lack broadband access.<sup>18</sup> The major reasons behind broadband inequality are commonly attributed to poor budgeting, wrong business models due to a “one-size-fits-all” mentality, struggle to secure adequate funding, and the failure to maximize their program’s value. As well as the rising prices of broadband services, the communities that are affected by this issue are mostly Black, Latine, or Indigenous communities—which are more likely to come from low-income households without the means to support the expenses of broadband service.<sup>19</sup> In later years, this issue has expanded when it comes to the recurring shift to online-exclusive services. For example, amidst the COVID-19 pandemic, a wide array of healthcare, education, and services transformed to be broadband dependent. As a result, the broadband-exclusive issue has evolved into a greater deprivation of rights, and additional obstacles for underserved communities—which might have already been struggling to receive the aforementioned broadband dependent services.

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<sup>18</sup> “Broadband Models for Unserved and Underserved Communities.” US Ignite and Altman Solon, June 26, 2023.

[https://www.us-ignite.org/wp-content/uploads/2020/07/USIgnite\\_Altman-Solon\\_Whitepaper-on-Broadband-Models\\_FINAL\\_7-9-2020.pdf](https://www.us-ignite.org/wp-content/uploads/2020/07/USIgnite_Altman-Solon_Whitepaper-on-Broadband-Models_FINAL_7-9-2020.pdf).

<sup>19</sup> Marshall, Brandeis. “How Broadband Access Advances Systemic Equality: ACLU,” American Civil Liberties Union, February 24, 2023, <https://www.aclu.org/news/privacy-technology/how-broadband-access-hinders-systemic-equality-and-deepens-the-digital-divide>.

In wake of these issues, the FCC has created fully accurate **broadband maps** that seek to create market pressures on internet providers to improve their coverage. The new maps will also help policymakers more accurately target investments to expand broadband to unserved and underserved areas and close the digital divide.<sup>20</sup> Additionally, a variety of non-profit and governmental organizations have come together to scheme what types of investments or implementations will be most effective at tackling broadband inequality. For example: alliances of private investors with the government and the FCC itself, or programs to incentivize communities to fight for their right to broadband access.

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## Past Actions

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The Federal Communications Commission has long been strongly committed to expanding broadband access to reach all Americans for many years, even starting as early as 1985. The FCC launched the Lifeline program to help ensure that all Americans could benefit from phone service and the myriad benefits it could bring, such as access to jobs, close ones, and emergency services.

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<sup>20</sup> Rosenworcel, Jessica. “The New Broadband Maps Are Finally Here,” Federal Communications Commission, November 18, 2022, <https://www.fcc.gov/news-events/notes/2022/11/18/new-broadband-maps-are-finally-here>.

The program was later modernized in 2015—recognizing the same benefits of increased internet access, the FCC decided to update it to suit the modern age and include broadband access in the Lifeline program along with the phone service initially outlined in 1985.<sup>21</sup> The Lifeline program particularly focuses on ensuring that internet access remains affordable to the lowest-income earners in America.

Other actions taken by the FCC that didn't involve broadband but created large changes in the state of communications include the Report on Chain Broadcasting that largely democratized the radio and broadcasting industries allowing for more competition in these spaces.<sup>22</sup> This allowed for larger companies like NBC to be broken apart to enable further and promote competition to help improve customer experience. This shows that there is precedent for drastic action taken by the FCC in order to create changes the committee deems necessary.

Later on, in 2009, a National Broadband Plan was created to detail their ambitions and plans not only for the expansion of the national broadband network, but also outline their hopes for future innovation and development in the

field.<sup>23</sup> The third goal of the plan states, “every American should have affordable access to robust broadband service, and the means and skills to subscribe if they so choose.” The plan also provides specific strategies to ensure that underserved communities, such as rural areas and tribal lands, are not left behind such as by engaging with local stakeholders and recognizing indigenous autonomy when working to expand broadband infrastructure.

In 2011, the FCC worked to establish the Connect America Fund, which works to help ensure that consumers in rural, remote, or high-cost areas are still able to access broadband at a reasonable price by helping to subsidize some of the costs of deployment for the carrier companies taken from the federal Universal Service Fund.<sup>24</sup> Most recently, in 2021, the FCC established the Emergency Broadband Benefit Program in response to the unique challenges posed by the pandemic. The EBB Program serves to provide subsidies to qualifying low-income households (with extra earmarked for those on tribal lands) until either the fund is expended or until six months after the end of the Public Health Emergency declared regarding the COVID

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<sup>21</sup> Wheeler, Tom,. “A Lifeline for Low-Income Americans.” A Lifeline for Low-Income Americans, <https://www.fcc.gov/news-events/blog/2015/05/28/lifeline-low-income-americans>.

<sup>22</sup> HathiTrust. “Report on Chain Broadcasting.” Accessed September 24, 2023. <https://hdl.handle.net/2027/mdp.39015026285083?urlappend=%3Bseq=101>.

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<sup>23</sup> Connecting America: The National Broadband Plan. FCC, <https://transition.fcc.gov/national-broadband-plan/national-broadband-plan.pdf>.

<sup>24</sup> Universal Service for High Cost Areas - Connect America Fund. FCC, <https://www.fcc.gov/general/universal-service-high-cost-areas-connect-america-fund>.

pandemic, scheduled to fall in November 2023.<sup>25</sup>

As with the other FCC programs described thus far, the main focus of the EBB was to address costs for the lowest earners in America.

## Possible Solutions

As new technologies emerge, being connected will only become ever-more important and so the FCC must redouble its efforts to expand broadband access to all Americans. Past initiatives like the CAF and EBB have laid a strong foundation, and it is crucial that any future solutions also continue prioritizing broadband access as an extension of socioeconomic development as a key part of educational advancement, healthcare outcomes, and commerce. These solutions need to take into account the importance of inclusion when it comes to closing the digital divide that threatens to further marginalize underserved communities.<sup>26</sup> Solutions should focus around the extension, expansion, and maintenance of broadband infrastructure, the affordability of

broadband networks, and the enhancement of digital literacy in the general population.

## Rural And Underserved Areas

On the first focus area of insufficient infrastructure, initiatives should focus on encouraging the development of broadband networks in rural and underserved areas, such as those which network providers may not deem profitable. Potential ways to encourage development in these areas include offering incentives to providers like tax credits or subsidies to help offset the costs of expansion to these hard-to-reach areas.<sup>27</sup> In addition, partnerships between the public and private sectors could help combine resources, expertise, and investment to expand digital infrastructures, focusing on including local stakeholders to ensure that no interest group gets left behind and to prevent the disenfranchisement of marginalized communities.<sup>28</sup> It may also be helpful to look to the international stage to expand broadband access, possibly working towards global standards for broadband and network infrastructure while sharing knowledge on best practices and technical

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<sup>25</sup> Emergency Broadband Benefit Program. FCC Wireline Competition, <https://www.fcc.gov/emergency-broadband-benefit-program>.

<sup>26</sup> “Executive Order on Advancing Racial Equity and Support for Underserved Communities through the Federal Government.” The White House, January 21, 2021. <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>.

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<sup>27</sup> Kruger, Lennard. Congressional Research Service, [https://www.everycrsreport.com/files/20030220\\_RL30719\\_1331b32c322d1d5b3ec732e9384263269bc5bc4a.pdf](https://www.everycrsreport.com/files/20030220_RL30719_1331b32c322d1d5b3ec732e9384263269bc5bc4a.pdf).

<sup>28</sup> “Public-Private Partnerships: Financing for Broadband Infrastructure.” BNY Mellon, <https://www.bnymellon.com/us/en/insights/all-insights/public-private-partnerships-financing-approaches-for-broadband-infrastructure.html>.

expertise, which would be useful for both leading and learning nations.<sup>29</sup>

## Economic Initiatives

On the second focus area of affordability and digital literacy, it could be useful to extend subsidy programs like the EBB (Emergency Broadband Benefit) whose deadlines are nearing to increase the affordability of broadband access. Importantly, the cost of broadband for low income households can be a great barrier to access, and this commission should be focussed on finding solutions to remove or lower the effect of said barrier. This can be done in multiple ways, such as through collaboration with broadband providers or by instituting price caps. With either of these methods—or a number of other methods—it is important to consider the side effects of the methods employed. For example, the institution of price caps will anger broadcast providers, whereas an increase in subsidy programs could anger tax-payers.

## Digital Literacy

When it comes to digital literacy, there is a pressing need to ensure that all Americans develop the necessary skills to navigate the digital world properly. This could include providing training programs to teach critical digital skills or

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<sup>29</sup> UN Press. “International Cooperation, National Action Can Spur Digital Transformation, Delegates Hear, as Second Committee Takes Up Information Technology.” <https://press.un.org/en/2022/gaef3568.doc.htm>.

developing, maintaining, and distributing online resources and tools that can easily be understood and used.<sup>30</sup> Improving digital literacy helps protect those most vulnerable to deceptive practices and facilitates ease of access to online resources for those that need it most. Digital literacy impacts other FCC issue areas by leveling the playing field for those striving to achieve economic mobility or enhanced education in rural or underserved communities.

## Bloc Positions

In the current climate where broadband access has become an important aspect of our lives, it should come as no surprise that there are many groups attempting to expand it. The most obvious example of this lies in recent FCC efforts to expand access. However, it is important to not ignore the amount of non-profit organizations that have rallied to make this issue widespread and at the forefront of political choices. Additionally, a lineup of private investing and manufacturing entities have made rounds to partner with government agencies to offer additional resources.

As members of the FCC, delegates should be informed of the perspectives of these interest groups to consider how the policies they advocate

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<sup>30</sup> Strategies and Recommendations for Promoting Digital Inclusion. FCC, <https://docs.fcc.gov/public/attachments/DOC-342993A1.pdf>.

for can affect the rest of the United States. Delegates need not adopt the policy positions of these groups and are encouraged to be creative with their solutions.

## Telecommunications Industry

The federal government has often worked to fund or create programs in partnership with private sector companies to increase broadband deployment. In most cases, companies are tasked with providing additional infrastructure resources and in exchange, the government agencies may provide incentives to these companies. For example, from 2009 through 2017, the **telecommunications industry** made capital investments of about \$795 billion, including investments in broadband infrastructure. However, to avoid funding areas where broadband service is already deployed, the FCC and other agencies share data to outline the regions in which broadband service deployment should be prioritized. The telecommunications industry has consistently lobbied against progress on addressing the digital divide, with more than \$234 million being spent on lobbying the 116th Congress (2019-2021).<sup>31</sup> Thus the industrial interests on these issues may not align with the FCC on many of its approaches to expanding

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<sup>31</sup> “New Report: How Lobbying and Political Influence By Broadband Gatekeepers Has Shaped The Digital Divide.” Common Cause, July 19, 2021. <https://www.commoncause.org/press-release/new-report-how-lobbying-and-political-influence-by-broadband-gatekeepers-has-shaped-the-digital-divide/>.

access, so delegates should consider what role corporate interests should play in the future of broadband.

## Non-Profit Organizations

Non-profit organizations have played an elemental role in bringing awareness to the necessity to expand broadband access. Besides rallying, these organizations also perform activities such as: connecting consumers to low-cost plans available to them to lobbying for federal funding, refurbishing and distributing donated equipment, and general advocacy.<sup>32</sup> Many of these organizations seek to make broadband generally affordable and accessible to all regardless of socioeconomic status. As members of the FCC, delegates should consider the role nonprofits that provide tech resources to underserved communities should play in the future—whether it is by actively providing resources or by being phased out to make way for a state-sponsored solution.

## Sustainable Development And Digital Inclusion Lobbyists

Similar to non-profit organizations, a lot of lobbying groups have emphasized the importance of long-term sustainability and resilience of broadband infrastructure in underserved areas.

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<sup>32</sup> Supan, Joe. “Digital Divide: Organizations That Are Helping Bridge the Gap.” Allconnect, February 2, 2022. <https://www.allconnect.com/blog/organizations-addressing-the-digital-divide/>.

That is, ensuring that the infrastructure has come to stay, and not to fill a quota. In addition, they also have spoken up on the issue of bridging the digital divide that comes with infrastructure expansion. They might be interested in applying digital literacy programs, creating community centers with broadband access, and digging into the use of future-proof technologies to adapt the evolving needs of digital and infrastructural broadband.

### American Voters

Many Americans—around 56% of voters—consider broadband access to be a right according to a poll conducted by Data For Progress.<sup>33</sup> These poll numbers seem to suggest that a majority of the American population not only consider broadband access to be vitally important, but also that it shouldn't be considered a utility whose cost should be dictated by the free market, as implied by the choices provided to the respondents. Furthermore, according to the same organization, many Americans are in support of the Tennessee Valley Authority, a federal government owned electric utility company. Furthermore, on November 7th of this year, Texans voted in support of a broadband infrastructure vote by a large margin suggesting that broadband access is an issue that a majority

of voters seem to agree on.<sup>34</sup> Note that polling data may not be accurate, and the American public may easily be influenced according to developments in culture, politics, or the industry.

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<sup>33</sup> Data For Progress. "Voters Support Investments In Broadband Services," August 23, 2022. <https://www.dataforprogress.org/blog/2022/8/23/voters-support-investments-in-broadband-services>.

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<sup>34</sup> 12newsnow.com. "Voters Say Yes to Supporting Broadband Infrastructure across Texas as Proposition 8 Passes," November 8, 2023. <https://www.12newsnow.com/article/news/politics/elections/texas-proposition-8-results/502-fef42ee1-fd47-4118-a2ae-0f28a80b72eb>.

## Glossary

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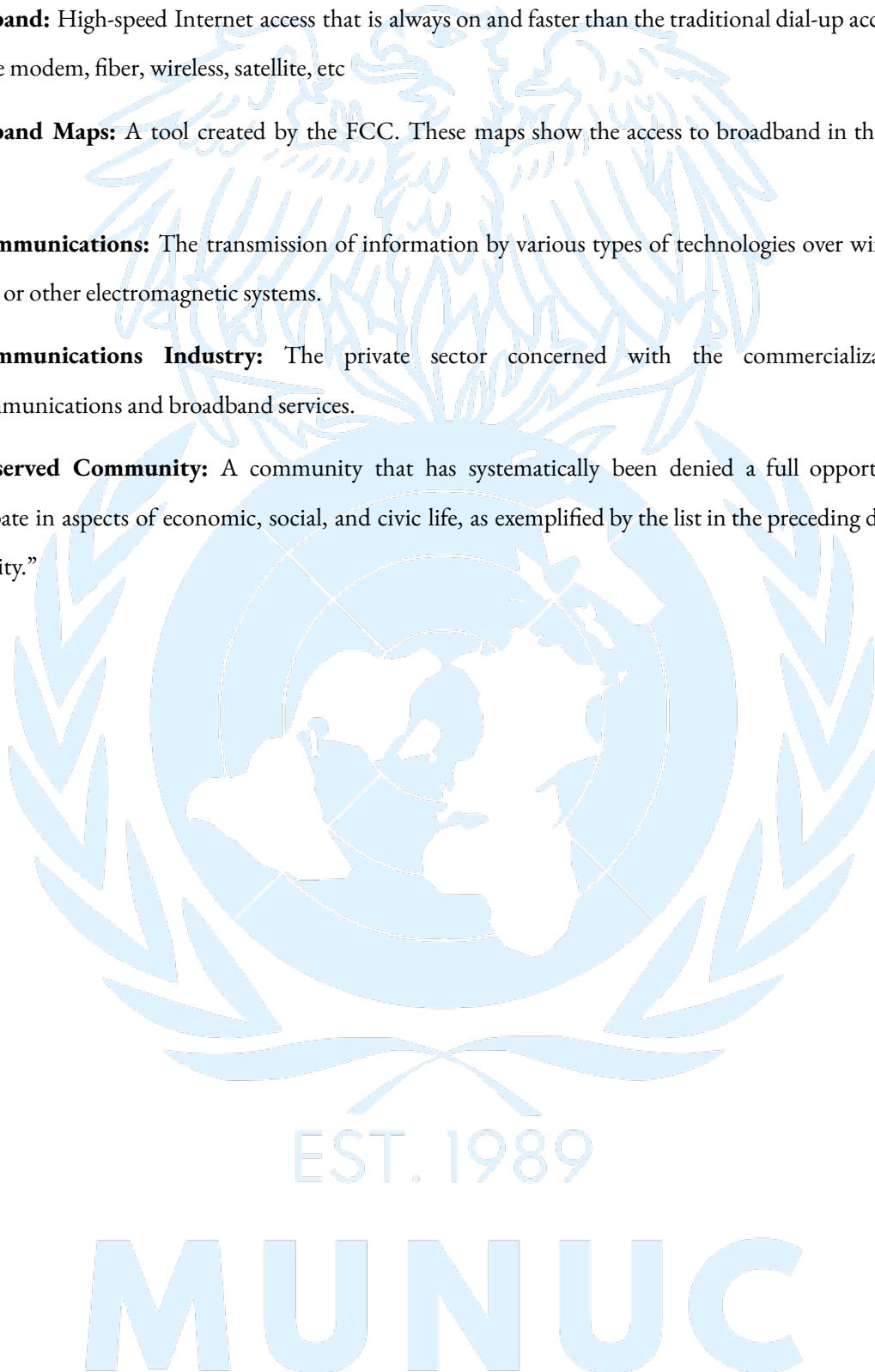
**Broadband:** High-speed Internet access that is always on and faster than the traditional dial-up access, such as: cable modem, fiber, wireless, satellite, etc

**Broadband Maps:** A tool created by the FCC. These maps show the access to broadband in the United States.

**Telecommunications:** The transmission of information by various types of technologies over wire, radio, optical, or other electromagnetic systems.

**Telecommunications Industry:** The private sector concerned with the commercialization of telecommunications and broadband services.

**Underserved Community:** A community that has systematically been denied a full opportunity to participate in aspects of economic, social, and civic life, as exemplified by the list in the preceding definition of “equity.”





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## TOPIC B: ENSURING CONSUMER PROTECTIONS AGAINST FALSE ADVERTISING

### Statement Of The Problem

**Advertising** has become an inseparable part of the landscape of today's global economy, as the primary connection between companies and consumers. As a result, advertising can be nigh-impossible to escape, impacting billions across the globe near-constantly, such as physical billboards, commercials on the radio or TV, unskippable YouTube ads, and website pop-ups. The main job of advertising is to shape consumer behavior, particularly when it comes to how they spend their money. Therefore, **false advertising**—when companies misrepresent their products or services to unsuspecting consumers in order to get those consumers to make a purchase—has long been a key issue of interest and will continue to be in the future.

As of right now, there is a worrying lack of comprehensive, general-purpose consumer protections against false advertising. Although the FCC is not directly or wholly responsible for the fight against false advertising, given its more general role of regulating communications in a wide variety of media, it does have a role to play in this important issue.<sup>35</sup>

False advertising takes many shapes and can fall under many different categories - it can be deceptive imagery, exaggerated or fabricated claims, or hidden fees and false endorsements.<sup>36</sup> All these can lead a consumer to make a choice they would not otherwise have made with their money. Although such false information can sometimes be the result of accidental oversights, it is impossible to deny that it is all-too-common for false advertising to be a systematic and deliberate decision made to support one's operations, ultimately often the consequence of factors like aggressive economic competition or even political pressure to succeed.

Furthermore, as the number of social media platforms continues to explode and online marketing grows exponentially, consumers become ever-more-vulnerable to false advertising. A recent report by the **Federal Trade Commission (FTC)** found that online platforms were the most common place that consumers encountered false advertising, largely on social

<sup>35</sup> "What we do" Federal Communications Commission. August 14, 2023.  
<https://www.fcc.gov/about-fcc/what-we-do>.

<sup>36</sup> "False Advertising Under Consumer Protection Laws." Justia, 28 Nov. 2018,  
<https://www.justia.com/consumer/deceptive-practices-and-fraud/false-advertising/>.

media platforms.<sup>37</sup> The growth in the number and use of social media platforms makes it easier for advertisers not only to reach wide audiences, but also to use, and unfortunately get away with, using deceptive marketing tactics. As a consequence, it is possible that those who are more active on social media platforms may be disproportionately likely to encounter, and fall prey to, false advertising.

The process of implementing effective consumer protections against false advertising has many challenges that must be overcome. Firstly, the advertising industry itself is inherently dynamic and fast-paced, meaning it is difficult to implement and enforce any new regulations before they become outdated - in a field where success means innovating new methods and techniques, it can be a challenge to keep updating existing laws at a pace that is fast enough to keep up with ongoing innovation. Furthermore, given the global nature of digital advertising, it can be difficult to work out jurisdictional issues since advertisers can easily reach a global audience, even while themselves operating in regions with lax consumer protection laws, not to mention questions over whether one can even prosecute the transmission, not the origination, of false

advertising.<sup>38</sup> Advertising practices have become more and more advanced over time, using psychological techniques and new technologies like targeted algorithms to influence consumers, often without their knowing.<sup>39</sup> This has only made the job of identifying what constitutes false advertising more difficult, both legally and ethically.

However, despite all the challenges, the importance of establishing comprehensive consumer protections against false advertisements remains a key concern. False advertising erodes the integrity of the free and open marketplace, damaging trust between consumers and companies, and leaving innocent people vulnerable to emotional and financial damage. As a result, regulatory bodies like the FCC must work promptly and effectively in tandem with industry stakeholders to define, detect, and deter false advertising practices in order to ensure a fair, transparent, and ethical marketplace, preserving the trust and welfare of consumers.

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<sup>37</sup> “Bad Ads on Social Media: FTC Asks Platforms about Their Screening Policies.” Federal Trade Commission, 22 Mar. 2023, <https://www.ftc.gov/business-guidance/blog/2023/03/bad-ads-social-media-ftc-asks-platforms-about-their-screening-policies>.

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<sup>38</sup> Cooper, Jon. “Transmission Jurisdiction: The power to adjudicate false advertising on the internet”. Accessed August 14, 2023. <http://osaka.law.miami.edu/~fromkin/seminar/papers/cooper.htm>.

<sup>39</sup> “The Algorithms Behind Digital Advertising.” New America, <http://newamerica.org/oti/blog/algorithms-behind-digital-advertising/>. Accessed 3 Oct. 2023.

## History Of The Problem

Advertising is defined as the promotion of a product or service through the use of paid announcements. These usually range from newspaper clippings, television infomercials, flyers, social media promotional content, and more. Although we might think of advertising as a relatively new phenomenon, there is proof that the practice was well established as far back as the Roman Empire. For example, it might be easy to believe that using celebrity figures to promote an item to a wider audience is something akin to the 20th century. However, toys and other merchandise found in the city bearing the names of famous athletes were found in the relics of Pompeii—preserved by the explosion of Mount Vesuvius.<sup>40</sup>

In America, advertising was brought on as a by-product of colonization. Advertising practices had long been established in the Old World, namely in the Elizabethan era where posters and illustrations would be seen plastered in the walls to draw attention to quaint services of the era.<sup>41</sup>

When the colonies were established, it was just natural that these advertising practices would find their way into the so-called New World as well.

From there on, advertising evolved with the

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<sup>40</sup> Osei-Hwere, Enyonam, and Patrick Osei-Hwere. “History of Advertising.” Media Communication Convergence and Literacy. Accessed July 21, 2023. <https://oer.pressbooks.pub/mediacommunication/chapter/history-of-advertising/>.

<sup>41</sup> <https://muse.jhu.edu/article/594485>

colonies and—and beyond the colonies—as time passed; going from flyers, drawings, and people standing in corners, and transforming into such things as radio, television...and farther down the line, social media posts, videos, and billboards. With such history behind, it is no surprise that the practice would have developed negative aspects throughout history, specifically false advertising.

False advertising, much as the name suggests, is the act of publishing, broadcasting, or otherwise publicly distributing an advertisement that contains an untrue, misleading, or deceptive representation or statement which was made knowingly or recklessly and with the intent to promote the sale of property, goods, or services to the public.<sup>42</sup> Some of the first manifestations of false advertising occurred throughout the Civil War, where corporations would exaggerate the effects of their products to improve sales.<sup>43</sup> From there on, the practice became so widespread that it ignited an energetic truth-in-advertising movement in 1911—which initiated legislation and established organizations to combat dishonest business advertising. By 1914 the Federal Trade Commission Act, which states that

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<sup>42</sup> “False Advertising Definition & Meaning.” Merriam-Webster. Accessed July 21, 2023. <https://www.merriam-webster.com/legal/false%20advertising>.

<sup>43</sup> “Advertising Fraud.” Encyclopædia Britannica. Accessed July 23, 2023. <https://www.britannica.com/money/topic/advertising-fraud>.

false advertising is a form of unfair and deceptive commerce, went into effect. Despite these precautions, advertisers still find ways to deceive consumers in ways that are legal, or technically illegal.<sup>44</sup> These range from made up scientific claims, exaggerated or non-existent benefits, and more.



Figure 5. Advertisement calling arsenic (an element toxic to humans) safe for use<sup>45</sup>

<sup>44</sup> “History of False Advertising.” History Of False Advertising - 1525 Words | Internet Public Library. Accessed July 23, 2023. <https://www.ipl.org/essay/History-Of-False-Advertising-FJ8BCH32PG>.

<sup>45</sup> Independent, The Helena. English: November 9, 1889 Newspaper Advertisement for “Arsenic Complexion Wafers” in The Helena Independent Newspaper, Helena, Montana, U.S. 9 Nov. 1889. (November 9, 1889). “A Woman’s Face is Her Fortune (advertisement)”. The Helena Independent: 7., Wikimedia Commons, [https://commons.wikimedia.org/wiki/File:18891109\\_Arsenic\\_complexion\\_wafers\\_-\\_Helena\\_Independent.png](https://commons.wikimedia.org/wiki/File:18891109_Arsenic_complexion_wafers_-_Helena_Independent.png).

For example, in 2014 the energy drink Redbull—and its parent company—went under fire for unbacked claims that the drink could boost concentration and reading abilities, as per their slogan “Red Bull gives you wings.”<sup>46</sup> Many other companies have endured a similar experience: Olay, Activia, Kellogg, etc. However, nowadays false advertising has transcended the realms of regular corporate brands, and into the world of phone apps and social media. For example, in 2016 the makers of popular brain-training app Luminosity faced serious backlash over exaggerated claims that the app could prevent Alzheimer’s disease, as well as aiding players to perform better at school.

Most recently, TikToker Mikayla Nogueira uploaded a video reviewing mascara—and faced a tidal wave of backlash online as people accused her of wearing fake lashes to amplify the mascara’s effects, thereby providing inauthentic advice.<sup>47</sup> The latter is particularly problematic due to its malicious nature. As social media becomes a major outlet for advertisements, consumers are most vulnerable to being conned into buying

<sup>46</sup> Heilpern, Will. “18 False Advertising Scandals That Cost Some Brands Millions.” Business Insider. Accessed July 23, 2023. <https://www.businessinsider.com/false-advertising-scandals-2016-3>.

<sup>47</sup> II, Moises Mendez. “TikTok Mascara Drama Raises Questions about Authenticity.” Time, January 27, 2023. <https://time.com/6250881/mikayla-nogueira-mascara-fake-eyelashes/>.

products based on false claims. Cases like this raises the question on how new mediums like social media, in which influential creators (influencers) can create advertising content that portrays itself as the genuine thoughts of not a corporate entity, but rather a person just like you. However, due to the new and unorthodox nature of social media, finding ways to properly regulate advertising on the platforms has proven to be a problem.

## Past Actions

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The FCC has been a key player in the fight against false advertising, using its regulatory powers to help safeguard consumer rights by ensuring that media and communication remain honest and open.

One prime example of the FCC's dedication to consumer protection against false advertising is the Communications Act. Dating all the way back to 1934, the Communications Act is a comprehensive piece of legislation which actually created the FCC from the previous FRC (Federal Radio Commission). It covers a broad swathe of topics, from regulating telecoms carriers, managing cable communications, and maintaining the public interest. Particularly, Section 201(b) of the Communications Act was designed to counter false advertising, stating, "All charges, practices, classifications, and regulations for and in connection with such communication

service, shall be just and reasonable, and any such charge, practice, classification, or regulation that is unjust or unreasonable is hereby declared to be unlawful."<sup>48</sup> This section has proven invaluable by allowing the FCC to take action against false advertising when it comes to companies employing misleading or unjust advertising practices.

A significant recent example of Section 201(b) in action came in 2015, when the FCC fined AT&T \$100 million for misleading consumers about its unlimited mobile data plans. The FCC found that AT&T had intentionally slowed down the data speeds of consumers with unlimited data plans, a practice known as 'throttling.' The issue was that AT&T did not adequately inform its customers about this practice, and as such made misleading claims about its unlimited data service. This immense fine was one of the largest ever suggested by the FCC and marked a victory in its commitment to consumer protection.<sup>49</sup>

In 2016, the FCC went after Comcast for charging customers for services and equipment that they never authorized or otherwise

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<sup>48</sup>"Communications Act of 1934" Federal Communications Commission. Accessed August 14, 2023.

<https://transition.fcc.gov/Reports/1934new.pdf>

<sup>49</sup> "Notice of Apparent Liability for Forfeiture and Order" Federal Communications Commission, June 17, 2015. Accessed August 14, 2023.

<https://docs.fcc.gov/public/attachments/FCC-15-63A1.pdf>



affirmatively requested, a predatory practice known as “negative option billing”. The FCC fined Comcast \$2.3 million on the basis that such practices were unjust and unreasonable according to Section 201(b). This fine, although far smaller than the fine against AT&T, showcased the continued commitment of the FCC to protect consumers from deceptive business practices.<sup>50</sup>

As well, in 2009 Congress worked with the FCC to adopt the Truth in Caller ID Act as an amendment to the 1934 Communications Act to combat ‘spoofed’ text messages and calls.<sup>51</sup> ‘Spoofing’ is a form of false advertising when nefarious actors intentionally manipulate their caller ID information to mislead or trick consumers as to who they really are, such as pretending to be a more well-established entity to build trust; for example, a scammer spoofing their caller ID to appear as a local bank to gather financial information.<sup>52</sup> This Act extended consumer protection to address new mediums and new technologies, highlighting the FCC’s

adaptability and resolve to keep up with the evolving technological and advertising landscape.

Overall, the FCC has been a strong defender of consumer rights against false advertisement through its enforcement of such Acts as Section 201(b) of the Communications Act, or the Truth in Caller ID Act. In doing so, the FCC has fought against deceptive advertising and related practices such as making deceptive marketing claims, unjust billing practices, and fraudulent communication schemes. The FCC’s past actions underscore a steadfast commitment to consumer protection against false advertising both in the past as well as a continued effort to adapt with changing times, technologies, and tactics.

## Possible Solutions

As technology continues to change and develop, the FCC must change alongside it to ensure robust protection against false advertising. The past actions of the FCC, such as the Communications Act and the Truth in Caller ID Act, have provided a strong foundation. It is essential that future strategies adapt to the ever-evolving nature of advertising, especially when it comes to social media advertising. The FCC could also expand regulatory oversight and work on enhancing consumer awareness and education on how to identify and avoid false advertising tactics.

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<sup>50</sup> FCC. “Comcast To Pay \$2.3 Million After Subscribers Complain Of Billing For Services & Equipment They Never Ordered.” <https://docs.fcc.gov/public/attachments/DOC-341621A1.pdf>.

<sup>51</sup> “S.30: Truth in Caller ID Act of 2009” U.S. Congress, 2009. Accessed August 14, 2023. <https://www.congress.gov/bill/111th-congress/senate-bill/30>

<sup>52</sup> “Caller ID Spoofing” Federal Communications Commission. Accessed August 14, 2023.

[https://www.fcc.gov/sites/default/files/caller\\_id\\_spoofing.pdf](https://www.fcc.gov/sites/default/files/caller_id_spoofing.pdf)

The first clear priority is to address the ever-changing, and growing, role of social media in advertising. In an era where social media has become a primary means of communication and interaction, as social media continues to diversify into different platforms and niches, and as social media harvests more and more of users' data, its use as a marketing tool has grown exponentially.<sup>53</sup> As a result, they have become a breeding ground for false advertising, particularly given the rapid-paced and brief nature of social media. The FCC must decide how to work with social media companies, either with or against, to implement more stringent policies when it comes to advertising and monitoring content, as well as to develop a more effective response system when consumers report false advertising.

When it comes to expanding regulatory oversight, although the FCC's jurisdiction is limited to communications, it could nonetheless work to attempt to extend its areas of oversight to include new and emerging marketing platforms, especially those outside of traditional media channels. It is crucial for the FCC to stay ahead of the curve by exploring proactive, rather than only reactive, measures. For example, the FCC could create special bodies or task forces focused on exploring and understanding new advertising channels, negotiating with major players in the

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<sup>53</sup>“Social Media Marketing (SMM): What It Is, How It Works, Pros and Cons.” Investopedia, <https://www.investopedia.com/terms/s/social-media-marketing-smm.asp>. Accessed 3 Oct. 2023.

industry to find solutions that work for both consumers and corporations, and adopting the appropriate regulatory frameworks.

It is also key that the FCC tackle the issue of false advertising from another angle, that of preventative work by working with the general public. The FCC could work to develop and deploy comprehensive public awareness campaigns about false advertising, in order to educate consumers to help them identify deceptive ads, understand their rights, and more. This could be well-complemented by digital literacy programs to provide training and resources on safe and responsible online behaviors, something that grows ever-more-critical in the digital age. A precedent already exists with the FCC already deploying consumer outreach strategies with its Affordable Connectivity Program.<sup>54</sup> In order to counter false advertising well however, the commission should consider how best to target and administer these educational programs to protect those who are most vulnerable and create a lasting change in the way customers interact with advertising.

Finally, it is important to understand that the FCC does not work in a vacuum. It would be very worthwhile to partner with other federal agencies, such as the Federal Trade Commission

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<sup>54</sup>“ACP Consumer Outreach Toolkit” Federal Communications Commission. Accessed August 14, 2023. <https://www.fcc.gov/acp-consumer-outreach-toolkit>

(FTC) to combine resources and efforts to protect consumers.<sup>55</sup> The FCC could also reach out to agencies in other countries or other international bodies to harmonize and strengthen advertising and regulatory standards. Collaboration could be a key component of taking a uniform approach to addressing false advertising and enhancing cross-border cooperation when false advertising schemes cross defined borders where jurisdiction becomes murky.<sup>56</sup>

As the world moves at an ever-faster pace and the digital era continues to evolve and unfold, the FCC's work in protecting consumers against false advertising has to remain robust, dynamic, and proactive. It is essential that potential solutions must not only reflect existing challenges, but also actively reach to help address and prevent future issues before they arise.

## Bloc Positions

Given the widespread phenomena of advertising, different groups have sought out different

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<sup>55</sup> "FCC-FTC Consumer Protection Memorandum of Understanding" Accessed August 14, 2023.

[https://www.ftc.gov/system/files/documents/cooperation\\_agreements/](https://www.ftc.gov/system/files/documents/cooperation_agreements/)

151116ftfcc-mou.pdf

<sup>56</sup> "International Agreements" Federal Communications Commission. Accessed August 14, 2023.

<https://www.fcc.gov/general/international-agreements>

approaches and interests to the problem. For example, while some might want to completely tighten advertising regulations, others will find that just increasing consumer transparency will do the trick. The information below serves as a reference point for delegates to inform their policy in regard to ensuring consumer protections against false advertising. Please do not feel pressured into adopting any, or all of these groups. They merely serve as further background on the efforts being made in the United States to tackle this issue.

## Government Officials Or Agencies

False advertising has lately been at the forefront of several government moves—as consumer protection has come to be better understood as a right. Several government officials and various agencies that collaborate with the FCC have long advocated for stricter regulations and increased oversight to prevent false advertising as a whole. A lot of these have proposed the creation of specialized divisions within the FCC to monitor and investigate false advertising claims, increase transparency, and among other things.<sup>57</sup> Some agencies with special interest in false advertising include the FTC, which has worked to enforce

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<sup>57</sup> Ritchie, John Newman & Amy, and Staff in the Bureau of Competition & Office of Technology. "Bureau of Competition." Federal Trade Commission, October 27, 2021. <https://www.ftc.gov/about-ftc/bureaus-offices/bureau-competition>.

Truth-in-Advertising laws which ensure that advertising is truthful and statements are backed by scientific evidence.<sup>58</sup>

## Private Industry

Although a lot of companies engage in false advertising and other consumer damaging endeavors—others have chosen to ensure consumer protections as means of ensuring a positive public image to increase their profitability and competitiveness.<sup>59</sup> Keeping that in mind, consumer protection policies, laws and regulations guarantee that consumers trust businesses, and are therefore in the best interest of most industries.

This reality of free markets does incentivize companies to maintain a positive public image when it comes to false advertising, but the potential benefits of deceptive advertising is still achieved by companies through the practice of astroturfing.<sup>60</sup> This involves the creation of a

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<sup>58</sup> Federal Trade Commission. “Truth In Advertising,” August 5, 2013. <https://www.ftc.gov/news-events/topics/truth-advertising>.

<sup>59</sup> “Why is consumer protection important?” Association of Southeast Asian Nations, Accessed Aug 14, 2023, <https://www.aseanconsumer.org/cterm-consumer-protection/why-is-consumer-protection-important>

<sup>60</sup> “Ripping Up the Astroturf: Regulating Deceptive Corporate Advertising Methods | Iowa Law Review - The University of Iowa.” Accessed November 25, 2023. <https://ilr.law.uiowa.edu/print/volume-105-issue-1/ripping-up-the-astroturf-regulating-deceptive-corporate-advertising-methods>.

Non-Profit or marketing company to use the illusion of grassroots advocacy to disseminate misleading and sometimes false information. Through methods such as these, even if companies support truth-in-advertising laws as a way of ensuring their credibility, deceptive advertising is still commonplace among these same companies. As such, delegates should consider how modern day deceptive advertising operates, and how to formulate policy while acknowledging private interests.

## Non-Profit Organizations

Many believe that ensuring consumer protection is a conjoined effort from both advertisers and consumers. For that reason, non-profit organizations have maintained that it is essential to promote initiatives that educate consumers on how to recognize and avoid false advertising. This can be through the use of educational campaigns, workshops, online resources, etc. However this work can't be alone, and in most situations will require collaborations with government agencies and the advertisers themselves. As members of the FCC, delegates should consider the role of Non-Profit organizations in the future of advertising, especially as it relates to mechanisms through which the public can be educated.

## Glossary

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**Advertising:** The promotion of a product or service through the use of paid announcements.

**False Advertising:** Promoting misleading marketing with the intention to deceive a target audience into purchasing goods or services.

**Federal Trade Commission (FTC):** An independent agency of the United States government whose principal mission is the enforcement of civil antitrust law and the promotion of consumer protection.



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## CHARACTER ROSTER

### Commissioners

- Brendan Carr, Commissioner
- Geoffrey Starks, Commissioner
- Nathan Simington, Commissioner
- Anna M. Gomez, Commissioner

### Consumer And Governmental Affairs Bureau

Develops and implements consumer policies. Partners with state, local, and tribal governments to implement policy.

- Alejandro Roark, Bureau Chief
- Bambi Kraus, Chief of Office of Native Affairs and Policy
- Suzanne Singleton, Chief of Disability Rights Office
- Lyle Ishida, Chief of Consumer Affairs and Outreach Division

### Media Bureau

Promotes innovation in media. Develops and implements policy for the media industry including television and radio.

- Holly Saurer, Bureau Chief
- Maria Mullarkey, Policy Division Chief. Works to promote competition in video programming and resolves disputes.
- Albert Shuldiner, Chief of Audio Division (Radio)
- Radhika Karmarkar, Chief of Industry Analysis Division. Conducts proceedings regarding media ownership

### Enforcement Bureau

Primarily responsible for enforcement of FCC regulations.

- Loyaan A. Egal, Chief
- Kristi Thompson, Chief of Telecommunications Consumer Division



- Patrick McGrath, Chief of Investigations and Hearings Division

### **Wireline Competition Bureau**

Responsible for ensuring broadband access.

- Trent Harkrader, Bureau Chief
- Jodie Griffin, Division Chief of telecommunications access policy Division
- Jodie May Donovan, Division Chief of Competition Policy Division
- Gil Strobel, Division Chief of Pricing Policy Division

### **Public Safety and Homeland Security Bureau**

Responsible for ensuring access to vital resources like 911, first responder communication, and emergency alerting.

- Debra Jordan, Bureau Chief
- Erika Olsen, Acting Chief, Cybersecurity and Communications Reliability Division
- Justin Cain, Chief Operations and Emergency Management Division

### **Wireless Telecommunications Bureau**

Develop and enforce policy for licensing of wireless services.

- Joel Taubenblatt, Bureau Chief
- Blaise Scinto, Chief of Broadband Division

### **Office of Economics and Analytics (OEA)**

Develops use of economic models and data science for commission policy making.

- Guila McHenry: Chief of OEA
- Kenneth Lynch: Chief of Industry Analysis of OEA

### **Office of Engineering and Technology (OET)**

Deals with new emerging technologies.

- Ronald Repasi: Chief Engineer of OET
- Ira Keltz: Deputy Chief
- Michael Ha: Chief of Policy and Rules Division of OET

- Martin Doczkat: Chief of Electromagnetic Compatibility Division.

## Office of General Counsel

Provides legal advising.

- Jane Hinckley Halprin, Administrative Law Judge
- P. Michele Ellison: General Counsel
- Karen Onyeije: Deputy General Counsel
- Sarah Citrin: Deputy Associate General Counsel, Litigation Division

## Office of Inspector General

Independent entity to stop fraud abuse and misconduct in FCC programs.

- Sharon Diskin: Inspector General
- Sophila Jones: Assistant Inspector General, Audit Division

## Office of International Affairs (OIA)

Responsible for engaging with foreign and international regulatory bodies.

- Ethan Lucarelli, Chief of Office of International Affairs
- Jared Carlson, Deputy Chief of OIA
- David Hu, Chief of Global Strategy and Negotiation Division of OIA

## Office of Legislative Affairs (OLA)

Liaison to Congress. Ensures lawmakers understand FCC actions and provides information regarding their regulatory decisions.

- Brian Moulton, Director of OLA
- Jill Pender, Chief Legislative Policy Counsel
- Rebecca Brown, Attorney Advisor

## Office of Managing Directors (OMD)

Responsible for Commission administration.

- Mark Stephens, Managing Director
- Vanessa Lamb, Chief of Performance & Program Management Division
- Allen Hill, Chief Information Officer

### **Office of Media Relations (OMR)**

Responsible for disseminating public information and relationships with news media.

- Paloma Isabel Perez, Director
- Will Wiquist, Deputy Director
- Katie Gorscak, Senior Communications Advisor

