

**To:** U.S. Federal Trade Commission

**Date:** August 30, 2017

**Re:** 16 CFR Part 316; CAN-SPAM Rule: Rule Review; Request for Public Comments; Project No. R711010

- The FTC should evaluate the value of technical approaches for mechanically processing opt-out instructions, such as those defined by the IETF's RFC 8058, and encourage their use as appropriate.
- The current ten days opt-out period is too long. The FTC should consider making it a week or less.
- We realize that the FTC cannot change the text of CAN SPAM, but we note that an opt-in rather than opt-out rule, as in the European Union and Canadian laws, would be far more effective.

Respectfully submitted,

[SIGNATURE]

/s/

---

*Jerry Upton*

*Executive Director*

*Messaging, Malware and Mobile*

*Anti-Abuse Working Group*

*781 Beach Street, Suite 302*

*San Francisco, California 94109*

<https://www.m3aawg.org>