

FTC Audit Instructions

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FTC Audit Instructions including preparation, requirements and steps.

Change List	Section	Change
August 2021		Initial document creation
February 22, 2023	1.1	Updated team members
February 22, 2023	1.2.1	Deleted 5695L (canceled)
May 1, 2023	1.0	To requirements added VIZIO account and VIZIOgram
	1.1	Added Jeff Timmons/Beth Barcas for engineer release to team members
	1.2.1	Added config can not be PROD as must have device ID and advertising ID
June 5, 2023		OneTrust support not required for 2023 audit, required for 2025 audit.

1.0 Overview

FTC audit of privacy enforcement for VIZIO connected TVs is mandated per Section IV.B.1 of the appended Federal Trade Commission and New Jersey Stipulated Order for Permanent Injunction and Monetary Relief (“FTC Order”), effective as of February 14, 2017.

	Definition	Requirements
1	FTC privacy audit is every other year starting Aug 13, 2017 for 20 years.	Audit period if including the previous 2 years from the start date of the reporting period. <ul style="list-style-type: none">• Next audit period is August 14, 2023 and including all skus sold from August 14, 2021.
2	Privacy controls required for FTC Audit as of audit from August 2021	<ul style="list-style-type: none">• Privacy Policy and TOS for VIZIO and Google (OOBE) and Privacy Policy VIZIO (sidebar)• Viewing Data Notice• Product Registration opt-in/out

		<ul style="list-style-type: none"> Limited Ad Tracking Reset Ad ID Ad Replacement VIZIO account setup VIZIOgram
3	Additional privacy controls as new features added with privacy. Expected addition:	<ul style="list-style-type: none"> Ad tags used for ads within the content - pixel partners

1.1 Team Members

Team members that support preparation and completion of the FTC audit.

	Team Members	Department	Support
1	Christina Radocha and Thomas Kao	Legal	Leads team
2	Jackie Pham	Administrative Assistant	provides room and equipment
3	James Lee	Engineering	SOC test group to prevent update
4	Hubert Wong	Inscape	Resets Viewing Data
5	Omar Sedeque	Inscape	Spring Service
6	Greg Ferguson	IT	Registration and account setup data including email opt-in/out is stored in Salesforce. Credit card data is stored with payment gateway, Braintree.
7	Aaron Peart/Matthew Mucker/Nathan Ducasse	Software Engineering	One Trust tool - access live during audit
8	Jeff Timmons/Beth Barcas	Release Engineering	Config fixed to MP non-PROD level to include DID, Advertiser ID

1.2 Preparation

Several steps are required prior to FTC Audit.

1.2.1 Sku Selection and Setup

	Requirements	Details
1	<p>Determine skus required for testing for the 2 year audit period.</p> <ul style="list-style-type: none"> For the 2023 audit this includes TV's sold from 8/14/21 through 8/14/23 Expected skus by SOC are (bold is preferred year for testing): 	<ul style="list-style-type: none"> 5691 (2021, 2022) 5695 (2021) 5583 (2021, 2022) 5695S (2022) <p>2023 -L skus not available for sale until fall 2023 which is outside the scope.</p>

2	<p>Locate and setup 1 PVT sku for each SOC.</p> <ul style="list-style-type: none"> TV must be PVT for inclusion in test group (MP skus can't be added to test group) 	<ul style="list-style-type: none"> TV must be dedicated to this task until final FTC audit. TV selected for testing must be reset to the MP or FCS firmware. <ul style="list-style-type: none"> Early skus use FCS as connected skus always receives FCS at setup Later skus after the first FCS released can use MP. Locate MP/FCS version using NPI > product bulletin, enter ODM then MP and model. TV added to special SOC test group to prevent updates <ul style="list-style-type: none"> James Lee (software engineering) creates SOC firmware test group and adds skus by serial number After audit completed, TVs are removed from the test group. TVs added to a special release for config to prevent config and dlm updates <ul style="list-style-type: none"> Jeff Timmons (release engineering) creates special config and pushes After audit completed, TVs are removed from the special config Label TV's at top right with sku and SOC for easy identification during test To prevent power on of multiple TV's, IR remote must have a cover to focus the IR codes. Sticky over TV power IR receiver for easy removal at power on may help. Smaller sizes are preferred to ensure sufficient display room for all skus during audit.
3	<p>Skus cannot be in PROD config, must be in a special pre-MP config text group, typically a test group.</p>	<ul style="list-style-type: none"> FTC tests require confirmation that the Advertiser ID was properly reset by confirming the Advertiser ID in Extras. Config version in PROD which is customer facing, does not include Advertiser ID

1.2.3 Provide Skus to Inscape

	Requirement	Notes
1	To reset and test Viewing Data, provide Inscape the MAC address	<p>Provide list of MAC address by sku to Hubert Wong.</p> <p>Inscape tracks by MAC address not serial number.</p>
2	Confirm the the MAC address is valid	TV with invalid MAC address must be replaced.

1.2.4 Select App for Advertising Testing

	Requirement	Notes
1	Consult with Omar Sedeque (Inscape) on the best suited app to use for Limited Ad testing using the spring server app.	The suitable app will either have recently or not yet launched on the TV to avoid use from partners that could conflict the test results.

1.2.5 Locate Dedicated Space for Testing

	Definition	Requirements
1	Location space:	<ul style="list-style-type: none"> Sufficient space for all TVs to display in a row. Counter or tables with tablecloths for TV placement. Access to power for all TV's using power strips as needed. Seating in front of the TV's to accommodate up to 6 auditors and 3 VIZIO employees Another small table for taking notes used by VIZIO test administrator and assistants during both audit and setup.
2	Jackie Pham (executive assistant technology) can assist to secure a space and provide supplies including.	<ul style="list-style-type: none"> power strips tables tablecloths chairs.
3	VIZIO showroom and VIZIO-U used in the past.	

1.2.6 Trial Run

	Requirements	Details
1	Test Administrator holds trial runs for internal team.	<ul style="list-style-type: none"> Trial for legal review. Test Administrator practice.
2	Hubert must be available for Inscape confirmation of automatic reset and a new Inscape ID for the TV after Viewing Data selected in OOBÉ trial.	<ul style="list-style-type: none"> This is true if Accept or Decline selected for Viewing Data.
3	Omar must be available for Advertising testing.	
4	Software engineering must be available for confirming values in OneTrust	Aaron Peart or Matthew Mucker or Nathan Ducasse

1.3 Privacy Features Tested FTC Audit

The following are required for testing during the audit

	Requirement	Notes
1	OOBE: review Privacy Policy and TOS for VIZIO and Google.	

2	OOBE: confirm Viewing Data Notice	Hubert Wong (Inscape) resets and confirms value and provides images of Viewing Data testing results
3	OOBE: confirm Activity data saved correctly	Saved to TV. Aaron Peart/Matthew Mucker/Nathan Ducasse confirm saved to One Trust not required 2023, required 2025 audio
4	OOBE: Product Registration personal data and opt-in/out of emails from VIZIO.	Greg Ferguson (IT) can provide product registration included in account setup saved to Sales Force. Credit card data is stored with payment gateway, Braintree.
5	Post OOBE: review Activity Data Terms & Conditions	
6	Sidebar: confirm Privacy Policy is current.	
7	Sidebar: confirm Viewing Data <ul style="list-style-type: none"> Displays or not depending on TOS confirmation. Displays with correct setting. 	Hubert Wong (Inscape) confirms value concurs with that at Inscape.
8	Sidebar: confirm Advertising Reset Advertiser ID resets the ID.	
9	Sidebar: confirm Limited Ad Tracking is ON, then Ad Replacement does not display.	
10	Sidebar: confirm setting of On/Off for Limited Ad Tracking is reflected in the ads displayed in the content.	After launching Spring Serve app on laptop, launch a specified app and start content (currently iFood.TV)

1.4 Pre-Test Procedure

	Setup Steps	Notes
1	Unpair remotes, then reset TV to defaults.	
2	Login into Spring Serve	
3	Go to Google homer page, enter "My IP address". Google returns the IP.	Save the result of the IP address for auditor review of spring serve test.
4	Hubert, Omar and OneTrust engineer are on the call ready for the test.	OneTrust engineer: Aaron Peart or Matthew Mucker or Nathan Ducasse
5	Phone available for QR read to launch mobile app	
6	Provide overview to the auditors	<ol style="list-style-type: none"> Identify TV SOC's under test and that each TV will be tested with same steps Advise privacy audited <ol style="list-style-type: none"> OOBE Check of relevant settings in sidebar Setup and launch of VIZIOgram

		<p>d. Launch of content to confirm ads served up</p> <p>e. Check of versions in SmartCast Home Extras.</p> <p>3. Advise the test results provided after the audit include Inscape viewing data, registration data and Spring Serve Data.</p>
7	VIZIOgram preparation	Open FTC Album for pics shared in testing.

1.5 Audit Test Procedure

	Task	Steps
1		<p>Test areas</p> <ol style="list-style-type: none"> 1. Privacy Policy 2. Viewing Data 3. Activity Data 4. Ad Replacement 5. VIZIO Account Data using Mobile App (use my account, create a new one) 6. VIZIOgram <p>5695s = Living Room</p> <p>5695 = Family room</p> <p>5691 = Bedroom</p> <p>5583 = Game Room</p>
2	Advise Hubert of the sku under test.	
3	Power on TV	
4	Reset TV to defaults	
5	Hubert confirms Viewing Data reset to 0 (AKA never setup)	
6	OOBE: steps completed	<ol style="list-style-type: none"> 1. Language (Demo mode launch from KEY) 2. Pair Remote 3. Connect WiFi 4. DLM/platform Updates 5. Name TV
7	OOBE: Terms & Conditions page (auditors may take pics)	<ol style="list-style-type: none"> 1. Click on and review VIZIO TOS 2. Click on and review VIZIO privacy policy 3. Click on and review Google TOS 4. Click on and review Google privacy policy 5. Select Accept All.
8	OOBE: Viewing Data page	<ol style="list-style-type: none"> 1. Auditors may wish to read the contents 2. Click on and review Viewing Data Policy 3. Select Accept.

		4. At conclusion test Hubert provides hard copy of Viewing Data during test.
9	OOBE: registration page (last OOBE step) THIS IS SKIPPED if setup a VIZIO account	<ol style="list-style-type: none"> 1. Enter email, name and zip code as requested by auditors (take pic) 2. Check or uncheck marketing email as requested by auditors 3. At conclusion of test check Greg Ferguson can confirm account registration data matches the documented data entry.
10	SmartCast Home: Record the Advertiser ID from (for 16, Reset TV Advertiser ID).	<ol style="list-style-type: none"> 1. Go to Extras > About > Version Numbers 2. Under IDs note the AdvertiserId (32 bit hex number)
11	Sidebar: Confirm Viewing Data <ul style="list-style-type: none"> • TOS confirmed, then Viewing Data included and setting reflects previous selection. 	<ol style="list-style-type: none"> 1. Press MENU 2. Admin & Privacy > Viewing Data 3. Viewing Data displays and setting same as OOBE.
12	Sidebar: Reset TV to defaults again but during OOBE Skip TOS (Viewing Data does not display).	<ol style="list-style-type: none"> 1. TV defaults to HDMI-1.
13	Sidebar: Confirm Viewing Data. <ul style="list-style-type: none"> • TOS not confirmed during OOBE or from sidebar then Viewing Data does not display. 	<ol style="list-style-type: none"> 1. Press MENU 2. Admin & Privacy 3. Viewing Data not displayed.
14	Sidebar: Accept TOS/Viewing Data <ul style="list-style-type: none"> • WiFi or TOS skipped during OOBE. 	<ol style="list-style-type: none"> 1. Press MENU key > Network 2. TOS displays <ol style="list-style-type: none"> a. Confirm TOS displays correct links if no network setup or correct and current TOS for VIZIO and Google if connected but TOS not yet confirmed b. Select ACCEPT. 3. Viewing Data Displays <ol style="list-style-type: none"> a. Select ACCEPT. b. Press MENU key > Admin & Privacy > Viewing Data displays
15	Sidebar: Confirm Privacy Policy.	<ol style="list-style-type: none"> 1. Admin & Privacy > Privacy Policy 2. Confirm current data is reflected. This is particularly important for fielded skus.
16	Sidebar: Confirm Advertising settings.	<ol style="list-style-type: none"> 1. Confirm Limited Ad Tracking is Off 2. Change Limited Ad Tracking to On 3. Ad Replacement is hidden. 4. Select Reset TV Advertiser ID and complete reset. 5. Go to SmartCast Home > Extras > About > Version Numbers and confirm AdvertiserID has changed.

17	<p>Spring Serve: Confirm Limited Ad Tracking</p> <ul style="list-style-type: none"> Limited Ad Tracking is off then content serve targeted ad. 	<ol style="list-style-type: none"> From Spring Serve, enter recommended app for testing, e.g. iFood.TV Once opened click on wrench From Spring serve dashboard click on Incoming Requests On SC Home, open app, e.g. iFood.TV and start content If needed, click on Play In Spring Serve, the Ad Time stamps start Click on an ad time stamp. A URL with data opens Copy URL to a Document and save. <ol style="list-style-type: none"> Confirm URL matches My IP Confirm Model # Confirm LMT is 0 (aka Limited Ad Tracking is OFF) To confirm results are for TV under test, confirm in SC Home Extras/Versions/DID that advertiser ID matches Stop play of app content. Press MENU, go to Admin & Privacy > Advertising > Limited Ad Tracking and change to ON. Repeat play of content. Click on Ad Time Stamp with LMT of 1 (aka Limited Ad Tracking is ON). Copy URL to a document and save <ol style="list-style-type: none"> Confirm LMT is 1 (aka Limited Ad Tracking is ON) To confirm results are for TV under test, confirm in SC Home Extras/Versions/DID that advertiser ID matches
18	VizioGram	<ol style="list-style-type: none"> Setup from VIZIO mobile Send to TV. James sends to TV.