

**Office of the Assistant Secretary for Communications and Information and
NTIA Administrator**

National Telecommunications & Information Administration
U.S. Department of Commerce
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Washington, D.C. 20230

Introduction:

Thank you very much for seeking comment on Developing the Administration's Approach to Consumer Privacy (Docket No. 180821780-8780-01). We at Datawallet commend the Administration for taking privacy seriously and for seeking to create an optimal regime for it. We understand how complicated both the technology and the policies around these issues are, and we appreciate you taking input from the public.

About Datawallet:

Datawallet exists to make data privacy and ownership work for both individuals and companies. There is a massive shift happening in the data world with new regulations and public outcries over data misuse. The walls around the "Walled Gardens" that keep data within large tech players are getting higher as the enterprises who actually sell products to consumers find it harder and harder to get data to fuel their marketing. Datawallet fixes this problem by empowering individual consumers to take back control of their data (social, e-commerce, etc.) and aggregate their data in a Sovereign Datawallet that they control. This ethically sourced, single source deterministic data set is incredibly valuable to marketers. Each user permissions access to their data to brands for specific purposes in return for compensation through the Datawallet exchange. This empowers the brand to have a much deeper understanding of the consumer, their needs and wants. Therefore, with Datawallet, users control their data and get paid for it, while businesses have better access to data than they do today. Datawallet also enables users to move their data between services (such as music, etc.) so they don't have to rebuild the personal history that fuels recommendations every time they switch platforms. By building our company, we are showing the world that there is a better way by which both individuals and enterprises can benefit from data privacy and data ownership.

Our Approach to Consumer Privacy:

We agree with many of the principles and goals you have laid out and believe that data ownership needs to be a key principle for the administration's approach to data privacy. An asset's creator should have ownership of that asset and be able to profit from it. A craftsperson has a right to sell what they create, and an author has rights over his or her intellectual property. Similarly, everyone who creates the data online that large online platforms and data brokerages profit from should have a right to own and control that data. Yet the data creators today have no power over their data and no way to make money from it.

Data ownership, when users can control and profit, will not only benefit the producers of data (everyone who uses the internet), but also the businesses who consume data. Those companies are at the mercy of the large platforms now, but with data ownership could have access to quality data directly from consumers. On a broader scale, data is the fuel that feeds the AI-driven economy, and the United States is in a global race for AI dominance. We live in a free society where we will not force people to give up their data; we need people to be empowered to allow that data to be used for productive purposes.

Feedback on NTIA's Approach to Consumer Privacy:

To ensure data ownership and to enable the U.S. to be a leader in AI, data ownership needs to be a guiding principle of U.S. government policy. We see data ownership as being the right of a person to

download their data in a readable format. Based on the NTIA's approach to consumer privacy, we have detailed our comments and prescriptive ideas below.

- When evaluating a national approach to consumer privacy, we recommend considering the language of the California Consumer Privacy Act for guidance: “A business that receives a verifiable consumer request from a consumer to access personal information shall promptly take steps to disclose and deliver, free of charge to the consumer, the personal information required by this section. The information may be delivered by mail or electronically, and if provided electronically, the information shall be in a portable and, to the extent technically feasible, in a readily useable format that allows the consumer to transmit this information to another entity without hindrance.” While we understand that there would be debate about what size businesses would be required to allow these downloads, and how often they would have to provide it (we want as close to on-demand as possible), **there must be a high-level principle of a right to data download to assert your control over this asset which is rightly yours.**
- We support that this RFC reflects the spirit of data ownership within its contents, and that transparency is the first guiding principle; however, we would recommend consider whether that transparency should also take into account people being able to see what data is kept on them by downloading it. The current document states “Access and Correction. Users should have qualified access personal data that they have provided, and to rectify, complete, amend, or delete this data.” We believe that statement also implies the right to download your data to see what has been collected and what is being stored..
- Overall, we approve of the majority of content in this document and are very supportive of harmonization standards. We are heartened to see a government interest in privacy research, and we would encourage the government to examine what new economies and industries can be built around data privacy and ownership.

Conclusion

We look forward to working in partnership with the National Telecommunications & Information Administration on a thoughtful, comprehensive consumer privacy approach in the future, and appreciate the opportunity to provide comment on this RFC. We believe that by mandating data ownership—and by extension data portability—the United States can establish itself both as a leader on privacy and as a leader in a new economy based on data ownership and data portability.

Sincerely,

Datawallet, Inc.

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