

May 21, 2025

The Honorable Andrew N. Ferguson
Chairman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

**RE: Comments of ACT | The App Association to the Federal Trade Commission
Request for Public Comment Regarding Technology Platform Censorship**

Dear Chairman Ferguson:

ACT | The App Association appreciates the opportunity to submit views to the Federal Trade Commission (FTC) in response to its request for information regarding technology platform censorship.¹

The App Association represents small business innovators and startups in the software development and high tech space located across the United States.² As the world embraces mobile technologies, our members create the innovative products and services that drive the global digital economy by improving workplace productivity, accelerating academic achievement, and helping people lead more efficient and healthier lives, which today represents an economy worth more than \$1.8 trillion annually and that provides over 6.1 million American jobs.³

As the FTC analyzes how competition has shaped the state of the online platform market, we urge you to consider the importance of curated online marketplaces (COMs) in enabling the development of the thriving app economy. Today's leading COMs enable micro, small, and medium-sized businesses (MSMEs) to fairly and securely access broader markets at lower costs and with greater efficiency. In general, MSMEs in the app economy choose to distribute software and hardware through COMs to the extent they provide an advantage in three areas: 1) Immediate access to global markets and consumers; 2) Built-in consumer trust in the COM and in the businesses distributing through it; and 3) Offloading overhead costs to free up resources to focus on the core aspects of the business. COMs today compete with each other to provide the best versions of these services – vetting for data stewardship and privacy, cybersecurity risk mitigation, intellectual property dispute resolution, and disability access functionality support, among others – so as to attract the best apps to their stores.

¹ https://www.ftc.gov/system/files/ftc_gov/pdf/P251203CensorshipRFI.pdf.

² ACT | The App Association, *About*, available at <http://actonline.org/about>.

³ ACT | The App Association, *State of the U.S. App Economy: 2023*, <https://actonline.org/wp-content/uploads/APP-Economy-Report-FINAL-1.pdf>.

These benefits are critical for MSMEs in the app economy. They enable our members to compete with companies of all sizes and reach customers across the United States and around the world. However, many of the competition policies under consideration both in the United States and around the world would disrupt COMs' ability to provide these benefits, dismantling the services and capabilities that small businesses rely on today to compete. If efforts to restrict content moderation capabilities have the effect of prohibiting COMs from removing bad actors such as apps distributing malware or infringing on another app's intellectual property, the competitive engine powering the app economy would be disrupted. Instead, we urge the FTC to pursue policies that would bolster competition among COMs and lead to improved products and services for MSMEs and the consumers they serve.

The App Association appreciates the FTC's consideration of the above views. We urge the Commission to avoid taking measures that would degrade the foundations of today's thriving app economy.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Scarpelli", with a stylized flourish at the end.

Brian Scarpelli
Senior Global Policy Counsel

Chapin Gregor
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