

WHAT THE FTC FINAL RULE MEANS FOR REVIEWS AND TESTIMONIALS: A SIX-PART SERIES

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The Federal Trade Commission (FTC) has published a long anticipated Final Rule on the Use of Consumer Reviews and Testimonials that prohibits certain practices the FTC deems misleading or deceptive, provides additional guidance and examples as to what activities may cross the line, and arms the FTC to take enforcement action and seek substantial penalties. These rules impact any company that offers products online that are accompanied by customer reviews.

BCLP has published a six-part series that takes an in-depth look at each of the areas addressed by the rule:

- [Part 1](#) summarizes the Final Rule, in comparison with the FTC's proposed rulemaking.
- [Part 2](#) explores the boundaries of the rule's ban on fake reviews.
- [Part 3](#) explains what the rule means for incentivized reviews.
- [Part 4](#) analyzes the implications for so-called insider reviews, and review suppression.
- [Part 5](#) explains the rule's ban on fake indicators of social media and fake review websites.
- [Part 6](#) considers potential FTC enforcement and penalties.

For questions or more information, or to schedule a client webinar, contact the authors listed, [Merrit Jones](#), Co-Leader of BCLP's [Retail & Consumer Products Sector](#), and BCLP partner [David Schwartz](#), former Lead Investigative Attorney with the FTC. For more information on BCLP's Marketing & Advertising Team, click [here](#).

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