



October 17, 2017

**Craig Federighi**  
**SVP of Software Engineering**  
**Apple**

**RE: Safari browser update inhibits online UX research and audience measurement**

On behalf of the Insights Association<sup>1</sup> and the Marketing Research and Intelligence Association (MRIA),<sup>2</sup> the leading nonprofit associations for the North American marketing research and analytics industry, we write to share the industry's concerns that Apple's new Safari 11 browser's Intelligent Tracking Prevention arbitrarily limits the use of (and in the case of the Associations' membership, contravenes consent-based, opt-in user control over) cookies and other website data. Intelligent Tracking Prevention will cause a severe and almost insuperable problem for online marketing research and analytics, including consent-based online audience measurement and user experience research, which are essential measures upon which modern brands and organizations (including Apple) depend to operate their businesses.

We agree with Apple that the "success of the web as a platform relies on user trust," just as the success of online marketing research and analytics depend on the trust of research participants. However, rather than empowering consumers (research participants) to make their own decisions on whether or not they wish to be tracked, and how web data and cookies are used, Safari 11's Intelligent Tracking Prevention turns control over to arbitrary and opaque algorithms and processes.

For brands and organizations, the inability to measure audiences and conduct advertising effectiveness studies leaves them with little recourse than to expend significant resources to create artificial environments that simulate reality online and deploy other inefficient tactics to secure a semblance of measurement. When an Apple spokesman discussed the changes in web data management with *AdWeek*,<sup>3</sup> he implied that the only purpose for cross-site tracking was for "ad retargeting, which is how ads follow people around the Internet." That does a remarkable disservice to the complexity of the online data ecosystem, which cannot thrive without research and analytics, including audience measurement and advertising effectiveness research.

Intelligent Tracking Prevention can operate in a manner that is contrary to consumer (research participant) choices. Consider John Wilander's post on Apple's WebKit blog: "Let's say Intelligent Tracking Prevention classifies example.com as having the ability to track the user cross-site. What happens from that point? If the user has not interacted with example.com in the last 30 days, example.com website data and cookies are immediately purged and continue to be purged if new data is added. However, if the user interacts with

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<sup>1</sup> The Insights Association's membership includes both marketing research and analytics companies and organizations, as well as the researchers and research departments inside of non-research companies and organizations. Inspired by the January 2017 merger of CASRO and MRA, the Insights Association helps empower intelligent business decisions as a voice, resource, and network for the companies and individuals engaged in this important work. <http://www.insightsassociation.org>

<sup>2</sup> The Marketing Research and Intelligence Association (MRIA) is a Canadian not-for-profit association representing all aspects of the market intelligence and survey research industry, including social research, competitive intelligence, data mining, insight, and knowledge management. Members include practitioners, small to large research houses, and the many buyers of research services. <https://mria-arim.ca>

<sup>3</sup> <http://www.adweek.com/digital/every-major-advertising-group-is-blasting-apple-for-blocking-cookies-in-the-safari-browser>

example.com as the top domain, often referred to as a first-party domain, Intelligent Tracking Prevention considers it a signal that the user is interested in the website and temporarily adjusts its behavior.”<sup>4</sup>

Under Intelligent Tracking Prevention, cookies are no longer useable in a 3rd-party context (data from a site other than the one being visited) after a single day while cookies and website data are purged altogether in 30 days. This means that a research or analytics company no longer may be able to discern cross-site visitation or exposure to advertising, which are key inputs for website measurement and ad effectiveness research studies. This will have a devastating impact on the ability to conduct such research and will reduce the sample size for studies that use research tags and demographic data from a social media site to track ads or content. If a user hasn't logged into the social media site within 24 hours of being exposed to such a tagged ad or piece of content, the user will not be counted. There is no known technical workaround for this issue.

It is extremely troubling that, regardless of the fact that research respondents consent and opt-in to share their cross-site exposures and behaviors, Intelligent Tracking Prevention negates that consumer choice and opt-in and the long-standing collaboration between consumers and the research and analytics industry.

Intelligent Tracking Prevention has an even more severe impact on our industry's systems for keeping track of opt-out, many of which are cookie-based. Intelligent Tracking Prevention removes opt-out cookies after a short period of time, effectively opting users back in to measurement or tracking without their consent.<sup>5</sup> Such a change is a huge setback for consumer privacy online.

Mr. Federighi, you told *TechCrunch* that the browser update is “not about blocking ads,” but merely protecting consumers' privacy while the web continues to operate the same as always.<sup>6</sup> Unfortunately, that does not appear to be the case. Without the insights provided by robust online marketing research and analytics, you are forcing companies to fly blind without the ability to measure and verify. Meanwhile, users of the Safari browser have lost much of their ability to opt out of tracking and control their own privacy.

Decision-makers from all sectors, and around the world, rely on online marketing research and analytics to inform their decisions. While we strongly support consumer protection initiatives, we have deep concerns that Intelligent Tracking Prevention will be a disservice to the conduct and results of market research and analytics, leading to a lack of unbiased representative data that could spawn poor and inaccurate business decisions. Results that are not properly reflective of consumers or the targeted audience could be at best misleading, or at worst, wrong.

The Insights Association and MRIA strongly urge that Apple reconsider these changes. Please contact us at your earliest opportunity so that our experts may work with Apple to identify alternative approaches that can further consumer privacy and choice without limiting established, essential online market research and analytics practices.

Sincerely,

Howard Fienberg  
Director of Government Affairs  
Insights Association

Kara Mitchelmore  
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<sup>4</sup> <https://webkit.org/blog/7675/intelligent-tracking-prevention/>

<sup>5</sup> Research and analytics companies may be able to protect themselves legally to some extent by noting in their privacy policies that user opt-out may not function with Safari 11, but regulators will not look kindly on this for long.

<sup>6</sup> <https://techcrunch.com/2017/06/05/apple-adds-a-tracker-blocker-to-desktop-safari/>