



IoT Providers Should Heed FTC Authority, *Daily Journal*, by Mark Mao & Sheila Pham

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The "Internet of things," or IoT, sometimes called the "Internet of everything," includes the movement of networks from mere computer servers and work stations, to more everyday consumer objects and things capable of connecting the users and devices via the Internet. Such smart devices currently in circulation include thermometers, cameras, refrigerators, washers and dryers and televisions.

Data collectors can obtain rich contextual history on device users because IoT devices can connect to other portable devices such as mobile phones and wearables with social network applications installed. The data from these devices gives clues as to the consumers' geographical location at different times, their habits, and their preferred products and services.

Currently, there appears to be scant legal guidance for the development of IoT. However, recent Federal Trade Commission actions give clues about what organizations should keep in mind as they develop their IoT products and services.

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The high-end hospitality industry has long envisioned a customized experience for their clients. IoT brings this dream closer to reality. But the FTC will likely seek to regulate all things "cyber" through its Article 5 enforcement powers under the FTC Act.