

2014 EMAIL UNSUB BEST PRACTICES & AUDIT

Best Practices to Enhance Trust & Confidence
in Interactive Marketing



Online Trust Alliance

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EXECUTIVE SUMMARY

Email is a vibrant channel for marketers to connect with consumers on many fronts providing an important value exchange between consumers and industry. Marketing emails can range from promotional offers and shipping confirmations to user surveys and distributing information tailored to users' needs and interests. At the same time many consumers are faced with inbox overload ranging from spam and malicious email to excessive email not aligned to their interests.

Consumers often react negatively to email which they perceive as being irrelevant or sent too frequently. Today ISPs and mailbox providers are placing added weight on user engagement including open rates, click through and spam complaints. Combined with related anti-spam technologies, email authentication and heuristics, this data is used to make a determination on the placement of email into the user's inbox, junk, spam folder or outright blocking.¹ With these added considerations, it is more important than ever that marketers create a trustworthy unsubscribe mechanism for their recipients. The opt-out function should be easily discoverable, easy to operate and ensure a user's request to be removed from a list is completed without delay.

Recognizing a decade has passed since CAN-SPAM was signed into law and in response to ongoing concerns about email marketing practices, in May 2014 OTA issued a public call for comments soliciting input into email marketing and unsubscribe best practices with the goal to move beyond regulatory requirements to one of user-centric stewardship.^{2,3}

Reflecting feedback from submitters in North America, the European Union, New Zealand and Australia, OTA created a list of best practices and initiated a study evaluating their adoption focusing on the top 200 ecommerce brands. The objective is to benchmark unsubscribe practices and provide actionable advice to the marketing community. Third and most important is to aid consumers, empowering their ability to control their inbox, enhancing trust and confidence in email marketing.⁴

Based on OTA's research and unsub test criteria, 90% of the top ecommerce brands are in compliance with U.S. and Canadian unsubscribe regulatory requirements. Whereas 10% failed to have functional unsubscribe link or unsubscribe users within 10 business days. Surprisingly the audit revealed nearly 70% are significantly committed to user-centric best practices scoring 80% or better and 10% achieved 100% compliance with the top ten best practices (See page 12 for the list of Unsub Honor Roll recipients).

Brand owners and consumers alike should review these findings which in part reflect an organization's commitment to consumers. Combined with other security and privacy enhancing best practices as outlined in OTA's *2014 Online Trust Audit*,⁵ consumers should consider these findings when using online services, shopping and banking online.

OTA calls on the marketing community to support these practices, demonstrating a commitment to the long-term integrity of interactive marketing and enhance consumer trust. With a focus on the users' needs, the long-term benefits will be enhanced brand reputation, improved deliverability of legitimate email and resulting click-through. Combined the adoption of these best practices will help alleviate calls for added regulatory oversight while distancing legitimate marketers from spammers.

¹ <https://otalliance.org/resources/email-security>

² <http://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/can-spam-rule>

³ <http://www.canadianadvertisinglaw.com/anti-spam-law/> & <http://nnovation.com/blog/category/casl/>

⁴ The scope of this report is focused on first party marketers and did not delineate between "Senders" and "Initiators". In such cases separate links are a best practice as it allows a recipient to opt-out from the publisher/affiliate they desire OR opt-out from the actual brand because the user is not interested in the brand's products or services.

⁵ <https://otalliance.org/HonorRoll>

UNSUBSCRIBE BEST PRACTICES

UNSUBSCRIBE HONOR ROLL RECIPIENTS - Page 12

- 1. Opt-out copy and link should be "clear and conspicuous"** and not buried among long paragraphs of legal language. The opt-out should be visible from the last sentence of the body of the email, minimizing horizontal space between the end of the body copy and the link and a different color than the text helping to identify it as a link. The user should not be forced to download images in order to identify the unsubscribe link.
- 2. Use commonly understood terms such as "unsubscribe" or "opt-out"**. Avoid terms such as "Click here to Modify your Subscription Practices" as it may be perceived as an attempt to obfuscate the suppression link. These tactics tend to undermine brand trust and integrity. OTA recommends separate links which call out the key preference options by name even if the links all lead to the same preference page. For example the following terms can all be included in the footer of an email and lead to the same page: unsubscribe, change email address, reduce frequency or update profile.
- 3. Text should be easily read by recipients of all ages and on all devices.** As a general guideline, unsubscribe links should be no more than 2 points smaller than the body copy of the email and no smaller than 8 point font without requiring the user to move the mouse over the text to find the link. The font color should be readable with adequate contrast from the background, ideally in a different color and font family as the body copy.
- 4. Provide an easy mechanism to opt-out of all email,** not just the specific email program that they clicked the link on. As required by CAN-SPAM, if an advertiser or marketer has multiple email programs, they must have an option to opt-out of all email as well as the individual email campaigns and programs. Related best practices dictate that where third party publishers are undertaking the campaign, a second link unsubscribing from the publisher should be placed below the advertiser's link and should include a global opt-out request.
- 5. Use a link directing users to a combination preference center to unsubscribe, opt-down** or make other changes. Don't obfuscate the unsubscribe language or process. If you are using a web based page for suppression collection, consider offering options besides complete opt-out. However, do not require a user to log in with a password to change preferences; and be sure one of the preferences is a global opt-out. You can also offer an opt-down option by providing consumers the option to reduce the frequency of emails that they receive from your brand. Similarly, you may offer consumers the ability to choose when and how often to receive your emails - daily, weekly, bi-monthly or monthly. Consumers want to maintain a relationship with your brand, but maybe not on the frequency you want. Note it is recognized that small companies and low frequency senders may not have the scale or size to offer such options.
- 6. Eliminate the confusion generated by an unbranded unsubscribe web page.** Make it clear that visitors are in the right place. Include branding and links back to your home page and privacy policies.
- 7. Serve an unsubscribe confirmation web page.** Thank subscribers for participating in your program with a simple statement such as "We're sorry to see you leave our newsletter" and offer a (re) subscribe if they made a mistake. Do not send a confirmation email as it is a violation of CAN-SPAM and you risk further alienating consumers. Consider providing alternative channels for consumers to maintain a relationship with your brand such as Facebook, Twitter, YouTube, etc...

BEST PRACTICES (Continued)

- 8. Remove unsubscribes without delay.** While CAN-SPAM and CASL both allow up to 10 business days for suppressing mailings, OTA recommends users be removed and added to suppression lists as soon as possible. Why wait when a user has explicitly stated they do not want to receive your email? Waiting 10 days and sending another email will only reduce user engagement and possibly lead to an increase in spam complaints. Note Australia, New Zealand and other countries require businesses honor an unsubscribe request within five working days.
- 9. Include the “unsubscribe header”.** Senders should adopt the List-Unsubscribe mechanism within the header of each message as described in RFC 2369. Including a List-Unsubscribe header allows ISPs and automated unsubscribe services to easily identify your opt-out mechanism. Gmail, Microsoft, Yahoo and other leading ISPs and mailbox providers display an unsubscribe button to the user in the user interface when a List-Unsubscribe header is found. The use of this header will help reduce complaints because your recipients will be able to easily and reliably unsubscribe.
- 10. Learn from your mistakes.** Use consumer feedback to improve your email marketing program and help to reduce future opt-outs. A simple check box can be used to determine why customers are unsubscribing. Remember this cannot be required as it would violate CAN-SPAM. A common treatment is to present the comment boxes to the right of the opt-out option or on the confirmation page, but never send a follow up email asking why they unsubscribed. Allowing the customer to check all that apply can help you determine if their dissatisfaction results from the frequency, content, timing or other aspects of your email marketing program including practices by third party affiliates and publishers.

RELATED BEST PRACTICES (NOT SCORED)

- 1. Make unsubscribe links operative for a period of no less than 60 days** (CASL requires 60 days and CAN-SPAM specifies 30 days).
- 2. Testing & Feedback Loop Data (FBL).** FBL data provided by ISPs can help identify problems with your email campaigns that can drive unsubscribes and hurt deliverability. Test your campaign on a broad range of devices and platforms for optimal rendering. Look at the expectations that are being set at the point of collection to help ensure your program is meeting consumer expectations.
- 3. Secure email and all suppression lists.** As with all data, mailing lists can be exposed to loss, breaches or accidental transmissions. As lists typically include other data attributes, data loss incidents of such lists are increasingly subject to foreign, federal and state data breach legislation. Hashing and encryption should be considered to minimize the risk of list abuse, while aiding in maintaining security and integrity of all lists, including those “in motion” and “at rest”.
- 4. Create a mechanism for users to update their data.** Users may change their email and physical address but wish to retain their profile data. Knowing which state and country a user resides in will pay dividends in complying with evolving regulations.
- 5. Implement Email Authentication** to help protect your brand from spoofing and forgery. The combined use of SPF, DKIM and DMARC across all sub and parent level domains, helps to provide ISPs, mailbox providers and receiving networks the ability to detect malicious email and prevent it from being delivered to users’ mailboxes.

ANALYSIS

OTA compiled a list of best practices and initiated a study to evaluate the adoption of ten measurable best practices of the top 200 leading ecommerce brands. Through a consensus building process these practices were developed beyond those stipulated by the U.S. Federal Trade Commission's CAN-SPAM Act ⁶ and Canadian Anti-Spam Legislation (CASL). ⁷

OTA analysts signed up for newsletters on July 28th, including creating user accounts in 25% or 51 of the brands to test their email marketing practices. Providing a two-week period for receiving email, 99.5% of the brands sent at least one newsletter or communication including confirming subscription emails. Upon receiving the first newsletters, unsubscribe requests were initiated starting on August 6. Follow up unsubscribe request were submitted on August 15th and monitored through September 12, 2014.

For this research, brands were deemed in compliance by directly unsubscribing users from the link in the email (one-click), or by taking them to a preference center or landing page with the users email address pre-populated. Such preference centers allow users to select what lists to subscribe or unsubscribe to, providing that an option to opt-out of all email is clearly and prominently discoverable without having to scroll down the page. Results were segmented between the top 100 online retailers and the second 100, to evaluate possible differences in opt-out compliance and expediency between the largest retailers spanning Amazon.com with revenues of \$67.8 billion, to the Jones Group with revenues of \$118 million (primarily operating as Nine West).⁸

Of all brands tested, **69.8% implemented eight or more of the ten best practices and qualified for the Honor Roll** (See Figure 1 and Appendix). This is a very positive finding, demonstrating the vast majority of the largest ecommerce sites have moved beyond a compliance "mind-set" focusing on user-centric stewardship. **Disappointingly 10.1% violated CAN-SPAM and CASL by failing to honor an unsubscribe request within 10 business days or have a functional unsubscribe link within their emails.**

Of these non-compliant sites, approximately one-half continued to send email for an additional two weeks.⁹ In an effort to engage the non-complying brands which failed to honor multiple unsubscribe requests, OTA staff sent emails to the abuse and customer service departments advising them of the problem. Four responded, yet as of the publication of this report, two brands continue to send email daily. In addition to facing regulatory fines, such companies who repeatedly fail to honor unsub requests may find themselves on "black lists" which are broadly used by ISPs and receiving networks to help identify and block abusers and spammers. Related factors for a mailer to be placed on such black lists may include harvesting email addresses from suppression lists and other tactics without user consent.^{10, 11}

"Being relentless with customer care is one of the core values that defines Belk. Having an efficient, timely and reliable email unsubscribe process is more than a marketing practice to us. It is a way to deliver on our customer care commitment and always put the customer first."

Jon Pollack, EVP Marketing,
Sales Promotion & Commerce
at Belk

⁶ <http://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/can-spam-rule>

⁷ <http://www.canadianadvertisinglaw.com/anti-spam-law/> & <http://novation.com/blog/category/casl/>

⁸ Source: The Internet Retailer 2014 Top 500 Guide@, <http://www.internetretailer.com/top500/>

⁹ Additional unsub requests were re-submitted to eliminate the risk of a technical glitch impeding our unsubscribe requests.

¹⁰ http://en.wikipedia.org/wiki/Suppression_list

¹¹ Third party blacklists include <http://www.lashback.com/what-is-the-lashback-blacklist/> and <http://www.spamhaus.org/>

In addition, 4.8% of the 200 brands sent unsubscribe confirmation emails of which the majority attempted to persuade users to re-subscribe. While a simple confirmation email is generally not considered a compliance issue, any attempt to request a user to re-subscribe or to provide an incentive, may constitute a regulatory violation, even within the ten-day window. A best practice is to direct a user to a company branded opt-out page and / or preference center. Leading email experts agree there is little upside from sending unsub confirmation emails, and the downside can be far more significant, impacting a brand's reputation and increasing risk of consumer complaints and regulatory fines.

“Engaging and connecting with our customers relies on their trust and confidence on how we email, respect their privacy, honor their choices and secure their information. OTA’s best practices are an excellent road map for all marketers to adopt. They serve as the foundation of self-regulation which is critical to the long-term health of interactive marketing.”

Sal Tripi, Assistant Vice President, Digital Operations & Compliance, Publishers Clearing House

Of the 200 brands audited 10% realized perfect scores (adopting 10 of the 10 best practices), confirming the recommended practices were not onerous to adopt. These include AirCompressorsDirect.com, AmericanGirl.com, AnnTaylor.com, BassPro.com, Belk.com, BlueNile.com, BordenUSA.com, BonTon.com, Carters.com, CDW.com, Coach.com, CrateandBarrel.com, LivingSocial.com, NastyGal.com, NineWest.com, Northern Tool.com, SierraTradingPost.com, Staples.com, Sweetwater.com and TheBay.com (See Appendix for the complete listing).

Reviewing the individual best practices, the 1st 100 outscored the 2nd 100 in the use of preference centers / opt-down options and the use of commonly understood terms (See Figure 1). Conversely, the 2nd 100 outscored the 1st with a statistically significant delta in 4 of the 10 best practices. These included having a “clear & conspicuous notice”, using an “unsubscribe header”, “removing email addresses from the lists immediately” and asking for “customer feedback”. It is important to note that requests for feedback must occur after the unsub request and cannot be required.

AUDITED & SCORED BEST PRACTICES				
	1st 100	2nd 100	Delta	Total
Unsub Honor Roll - Scored 80% or Better	68.1%	71.6%	3.5%	69.8%
Easily read (size & color)	97.9%	95.8%	-2.1%	96.8%
Confirmation web-page	95.7%	94.7%	-1.0%	95.2%
Ability to opt-out of all email	93.6%	93.7%	-	93.7%
User preference center and or “opt-down option”	93.6%	88.4%	-5.2%	91.0%
Brand confirmation web-page	85.1%	86.3%	1.2%	85.7%
Commonly understood terms	89.4%	83.2%	-6.2%	86.2%
No delay on removal	78.7%	86.3%	7.6%	82.5%
Clear & conspicuous	73.4%	87.4%	14.0%	80.4%
Unsubscribe header	71.3%	80.0%	8.7%	75.7%
Optional customer feedback	21.3%	28.4%	7.1%	24.9%

Figure 1

The most striking observation was that only a quarter of the ecommerce brands (24.9%) requested optional user feedback asking why the user was unsubscribing. Failing to have a mechanism to receive user feedback is a lost opportunity to learn why a user is unsubscribing and use these insights for future program and user optimization. Through regular review of user reports, brands can optimize their email practices, reducing unsub rates and spam complaints. Equally concerning is the relatively low adoption of the unsubscribe header (75.7%), considering the ease of implementation and broad industry acceptance by leading ISPs and mailbox providers. The unsubscribe header provides enhanced capabilities for a user to safely unsubscribe. The absence of this header may be attributed to improper system configuration or feature enablement by a brand's email service provider. This underscores the need for marketers to work with their service providers and regularly perform testing to ensure proper configuration and regulatory compliance on an ongoing basis.

Contrary to assertions made prior to the audit through the public comment process, to date we have not observed any retargeting or sharing of our email addresses with third-parties. This status will require review and monitoring over the next 90 days.

MARKETING & SECURITY PRACTICES

OTA also tracked four related email marketing best practices including 1) sending a mailing to the user, 2) providing a promotional offer or discount, 3) requiring double opt-in and 4) sending a subscription confirmation immediately with an option to opt-out.

From a fraud and abuse perspective double opt-in helps prevent sign up abuse. Of the brands audited, only 7.8% sent a confirmation email requiring a user to click on a link to verify subscription intent. This low rate of adoption is attributed to the short-falls of double opt-in, also referred to as confirmed opt-in (COI) or round trip validation. The added steps include the risk of confirming email being classified as junk and frustrating users who often do not re-confirm due to perceived security risks and spear phishing exploits. As an alternative, OTA advocates marketers send confirming opt-in emails immediately, including clear language to the user thanking them for signing up, while providing a link to unsubscribe if the sign-up was in error.

While many marketers recognize the need to engage subscribers early and often, only 29% provided promotional offers on sign up. Consistent with the other best practices evaluated, the second 100 retailers outscored the 1st 100 by 12% (See Figure 2). Depending on the business model, this is an opportunity to develop and engage new customers, converting newsletter readers to loyal buyers.

RELATED MARKETING PRACTICES				
	1st 100	2nd 100	Delta	Total
Never received any email or newsletter	2.0%	2.0%	-	2.0%
Provided promo offer / discount on first email	23.0%	35.0%	12.0%	29.0%
Required double opt-in or confirmed opt-in	8.5%	7.4%	-1.1%	7.9%
Received confirmation email with opt-out option	87.2%	83.2%	-4.1%	85.2%

Figure 2

In addition to the unsubscribe and marketing best practices scored, OTA identified additional practices which are critical to help to protect consumers and their data. With the increase in data breaches and the rich data which is being appended to email lists, it is recommended files be encrypted or user names and passwords be hashed, for files in rest and in transit. Failure to adopt such security measures represents a potential legal risk for all organizations, small and large. Those that fail may find themselves being held accountable to regulatory authorities and plaintiff lawsuits.

In parallel to these best practices, all marketers should adopt leading protocols and standards to aid in the blocking of spoofed and forged email. OTA advocates all mailers adopt Sender Policy Framework (SPF), Domain Keys Identified Mail (DKIM) and Domain-based Message Authentication, Reporting & Conformance (DMARC) across all sub and parent level domains. By implementing these standards, receiving networks have the ability to detect malicious email and prevent them being delivered to the user's inbox.

Based on OTA's analysis released in August 2014 as part of the Email Integrity Report, 74% of the top 500 ecommerce brands have implemented both SPF and DKIM, yet only 6% have adopted DMARC, indicating the need for a renewed security and consumer protection focus. For more information visit <https://otalliance.org/EmailAudit>.

"Leading email marketers are doing their part to earn consumers' trust. They are distancing themselves from competition and spammers and taking steps to avoid barraging consumers with emails that are irrelevant to their interests. In doing so, they are protecting their brand reputation and fortifying their customer relationships. Now is the time for others to follow their leadership."

Craig Spiegle,
Executive Director & President
Online Trust Alliance

METHODOLOGY & LIMITATIONS

OTA's analysis focused on the top 200 ecommerce sites based on revenue as reported by *Internet Retailer Magazine*. This test ran for 45 days from July 28th through September 12th during the back-to-school season and may not account for seasonality where mailings may be more or less frequent. As this was an inaugural report, many key learnings were noted including the need to expand the sample size, added criteria and possible negative scoring for poor practices such as sending unsub confirmation emails.

Companies audited marketing practices, processes and service providers may have since been modified or changed. The listing of companies may not reflect their future practices or commitment to security and privacy safeguards. It is important to note that some of the best practices outlined may not be applicable for organizations in every sector or size.

Testing was completed using Microsoft Windows PCs running Windows 8.1, Microsoft Outlook 2013, and both Google Chrome and Internet Explorer. While this audit was not designed to specifically test mobile devices, the importance of these best practices are critical considering the device display size and usability limitations. Future research will include other criteria such as SSL encryption of preference centers and integration of email authentication standards and protocols. An update is planned to be conducted in approximately 60 days to test for working unsubscribe links and possible suppression list abuse.

Since publishing this report regulations may have changed and readers are encouraged to contact the appropriate regulatory authorities and legal advice for possible updates. As a cautionary note, in general regulations apply to where the consumer resides and not where a company may have a physical nexus. It is in the marketer's best interest to at a minimum annually re-validate the State / Province and Country a user resides in.

SUMMARY

This report reveals the majority of the largest ecommerce brands are adopting best practices above and beyond regulatory requirements and that the recommendations outlined by OTA are easy to adopt and maintain. Email service providers and marketers including those who contributed to this document are to be commended for their commitment to consumer empowerment. At the same time we remain concerned about the practices of outliers who failed to meet the minimum compliance requirements as well as the adoption of the majority of the OTA's prescribed best practices.

Maintaining consumer trust requires due diligence and an ongoing evaluation and monitoring of marketing and subscription practices. As the report supports, as a best practice all marketers need to continually test unsubscribe systems prior to initiating major email campaigns. Failure to do so was represented in over 10% of the brands, risking added regulatory oversight of their business practices. Many ISPs and mail box providers factor in these and related best practices into their scoring of email for inbox placement. Combined, these are major incentives for marketers to adopt these practices.

Demonstrating a commitment to consumer protection and self-regulation, trade groups should consider raising the bar and provide members incentives and recognition to implement these user-centric and security enhancing best practices.

To help ensure compliance and honor opt-out requests marketers should consider third-party compliance management programs and services. These services include email list suppression, list seeding, affiliate monitoring, list acquisition strategies and recipient feedback loops. To optimize their marketing practices brands may wish to consider related services including designing user engagement surveys, preference center design and employee training and testing. In addition, the report highlights the need to continually re-validate business and marketing practices for consistency with the brand's terms of use and respective privacy policy regarding the use and sharing of email addresses and online tracking data.

In summary we have a shared responsibility to improve the integrity of the email channel, including providing feedback from the marketing and ISP community. OTA is encouraged by the collaboration of some of the leading trade organizations and their willingness to support these best practices.

With an expanded commitment to consumer choice, notice and control of their inboxes and personal data, consumers will realize increased trust, while industry will reap the rewards of increased innovation and long-term health of the email and interactive marketing industry.

As marketers prepare for the Holiday season they would be best advised to critique their practices from the consumer's point-of-view. Now is the time to optimize and align their campaigns to the way consumers want to read, want to communicate and how they want to shop.

To submit comments or suggestions, email editor@otalliance.org

"Users depend on email every day for work and their personal lives. As a major email box provider with over 400 million users and as an email marketer, Microsoft recognizes it is increasingly important that marketers adopt discipline and unsubscribe practices to maximize their mail deliverability and their brand reputation. There is no reason why marketers cannot be adopting these best practices."

John Scarrow, General Manager, Safety Services
Microsoft Corporation

RESOURCES

REGULATORY

Australia -

Australian Communications and Media Authority (ACMA)
<http://www.acma.gov.au/Home/Industry/Marketers/Anti%20Spam>

Mandatory Unsubscribe Facility <http://www.acma.gov.au/Industry/Marketers/Anti-Spam/Ensuring-you-dont-spam/mandatory-unsubscribe-ability-ensuring-you-dont-spam-i-acma>

Canada's Anti-Spam Legislation (CASL) - Frequently Asked Questions about Canada's Anti-Spam Legislation <http://www.crtc.gc.ca/eng/com500/faq500.htm>

London Action Plan - Promoting international spam enforcement cooperation and address spam related problems <http://londonactionplan.org/>

New Zealand - Department of Internal Affairs - Anti-Spam Guidelines
http://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Services-Anti-Spam-Index?OpenDocument

United Kingdom - Information Commissioner's Office
http://ico.org.uk/for_the_public/topic_specific_guides/online/~/_media/documents/library/Privacy_and_electronic/Introductory/rules_on_email_marketing.ashx

U.S. Federal Trade Commission

CAN-SPAM Act: A Compliance Guide for Business
<http://www.business.ftc.gov/documents/bus61-can-spam-act-compliance-guide-business>

Complying with the CAN-SPAM Act (Video)
<http://business.ftc.gov/multimedia/videos/complying-can-spam-act>

How to Make Effective Disclosures in Digital Advertising -
<http://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-staff-revises-online-advertising-disclosure-guidelines/130312dotcomdisclosures.pdf>

INDUSTRY BEST PRACTICES

Summary of resources from industry and organizations committed to email and interactive marketing best practices and consumer empowerment.

<https://otalliance.org/resources/unsubscribe-resources>

Updates to this document may be found at <https://otalliance.org/unsubscribeBP>.

Related best practices are at <https://otalliance.org/best-practices/industry-best-practices>.

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Industry support includes supporting quotes from numerous organizations. For an update visit <https://otalliance.org/news-events/press-releases/unsubscribe-best-practices-moving-stewardship>

ABOUT ONLINE TRUST ALLIANCE (OTA)

The Online Trust Alliance (OTA) is a non-profit with the mission to enhance online trust and user empowerment while promoting innovation and the vitality of the Internet. Its goal is to help educate businesses, policy makers and stakeholders while developing and advancing best practices and tools to enhance the protection of users' security, privacy and identity. With OTA membership comes opportunities to help shape future legislation, bolster brand credibility with consumers and develop new best practices. OTA supports collaborative public-private partnerships, benchmark reporting, and meaningful self-regulation and data stewardship.

OTA is a 501(c)(3) tax exempt organization supported by donations and corporate underwriting. To learn more and support OTA, please visit <https://otalliance.org/donate>.

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APPENDIX - UNSUB HONOR ROLL

RECIPIENTS SCORING 80% OR BETTER - **BOLD INDICATES 100%**

1-800-Flowers.com
1SaleADay.com
Abercrombie.com
Abt.com
Aeropostale.com
AirCompressorsDirect.com
Amazon.com
AmericanGirl.com
Ancestry.com
AnnTaylor.com
Apple.com
Art.com
Avon.com
Barneys.com
BassPro.com
Beachbody.com
Belk.com
BestBuy.com
BeyondtheRack.com
Blair.com
BlueNile.com
BN.com
BodenUSA.com
BonTon.com
CafePress.com
Carters.com
CDW.com
Chicos.com
ChildrensPlace.com
Coach.com
Costco.com
CrateandBarrel.com
Crutchfield.com
Dell.com
DisneyStore.com
DrsFosterSmith.com
Eddie Bauer.com
eFollett.com
Etsy.com
Express.com
Fab.com
Fanatics.com
Fingerhut.com
FinishLine.com
FootLocker.com
FragranceNet.com
FreshDirect.com
FTD.com
GameStop.com
Gap.com
Gilt.com
GNC.com
Grainger.com
Hayneedle.com
HomeDepot.com
HSN.com
Hulu.com
ideeli.com
JCP.com
JCrew.com
JTV.com
JosBank.com
JPCycles.com
JustFab.com
Karmaloop.com
KateSpade.com
Kay.com
LampsPlus.com
LifeWay.com
LivingSocial.com
LLBean.com
LuLuLemon.com
Macys.com
MicrosoftStore.com
MLB.com
Monoprice.com
MSCDirect.com
MusiciansFriend.com
NastyGal.com
Netflix.com
NFLShop.com
Nike.com
NineWest.com
Nordstrom.com
NorthernTool.com
Oakley.com
OfficeDepot.com
OmahaSteaks.com
Onlineshoes.com
OpticsPlanet.com
OReillyAuto.com
OrientalTrading.com
Orvis.com
Overstock.com
Overtons.com
PCM.com
PotpourriGift.com
Rakuten.com
RalphLauren.com
REI.com
RestorationHardware.com
QVC.com
Scholastic.com
Sephora.com
ShoeBuy.com
ShoeDazzle.com
Shoes.com
Shop.com
ShopHQ.com
Shoplet.com
ShoppingHP.com
SierraTradingPost.com
StoreSony.com
Staples.com
Sweetwater.com
Talbots.com
TheBay.com
TheNorthFace.com
TheShoppingChannel.com
ThinkGeek.com
Tiffany.com.
TigerDirect.com
TireRack.com
ToryBurch.com
UnderArmour.com
UGGAustralia.com
VictoriasSecret.com
Vitacost.com
Walgreens.com
Walmart.com
Wayfair.com
YOOX.com