

June 8, 2009

U.S. Department of Homeland Security  
Privacy Office  
Washington, DC 20528  
*Submitted via the Federal eRulemaking Portal*

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The Washington, D.C., office of Fleishman-Hillard International Communications appreciates the opportunity to submit comments in response to the U.S. Department of Homeland Security's Federal Register Notice, dated April 13, 2009 (DHS-2009-0020), regarding government use of social media and relevant privacy/transparency issues.

Fleishman-Hillard is a global, full-service strategic communications firm operating 80 offices in 60 cities around the world. Fleishman-Hillard's Washington, D.C., office serves as a major hub for the firm's digital practice, providing federal agencies and private-sector clients with a comprehensive array of digital solutions, including social media strategy, creative Web site design and technical development, and online marketing campaigns to blend new and traditional media into single, open communications platforms.

President Obama's open government initiative recognizes that the way we communicate online has radically altered the way we live and work. A working definition of social media, in fact, can be seen as speaking to the heart of an open democracy: the democratization of information, transforming people from readers into content publishers through interaction and collaborative mechanisms around topics of common interest.

Federal agencies, departments, branches, and funded organizations are being challenged to use new technology and open government to reach the public. Although it is no secret that digital technology has changed the way we communicate, it is perhaps not as widely understood why some organizations succeed online and others fail — and why the rewards of engagement in new technology and media outweigh the risks.

DHS is right to consider how government's use of social media can support more "openness" while still adhering to the Department's culture of privacy protection and ensuring public trust. Recognizing the unique communications environment in which government and DHS operate, Fleishman-Hillard supports the use of social media as an important public and internal communications channel — one that is both effective and within the bounds of required privacy safeguards.

The fact is that digital media already plays a crucial role in shaping a voice for government, business, public interest organizations and individuals, their “brands,” and their issues. Social media’s open conversations and audience engagement are powerful tools in building bridges to public understanding of and participation in government.

Traditional methods of communication are no longer the sole means of reaching government’s audiences. Moreover, they often are not the most effective. What was once a distinct line between “traditional” and “new” media has blurred while creating new and exciting ways for government to engage constituent communities.

For example, another government department with its own privacy challenges is considered successful in its integration of social media to achieve communications goals and objectives. This department has utilized social media platforms such as blogs and podcasts to create two-way information flow with online-specific influencers who, in turn, disseminate department information and content to a broader audience. *In other words, this department uses social media to initiate a conversation with the public itself rather than waiting for third parties, such as traditional journalists, to translate the information first.* The department’s perspective can be paraphrased as follows: “We are the authority on our topic. Therefore, we must use social media to disseminate, in a cost-effective manner, our information and begin conversations about our areas of expertise rather than waiting — or expecting — third parties to do so.”

One of the most compelling features of social media is that it allows people to adapt content and experience to their own needs. Using various social media tools, the public is increasingly participating in government in a way that is most convenient to them. As reported by the Pew Internet and American Life Project, 74 percent of Americans use the Internet, and 89 percent of them use the Internet as their primary source of information. More than half of Internet users have visited a local, state, or federal government Web site at least once. It is crucial that government agencies provide content and applications for Internet users via methods with which they are comfortable.

The challenge is for DHS and other agencies to adapt these essentials (and best practices) of social media engagement to government’s unique communications environment:

- **Develop Social Media Expertise.** On the Internet as in life, people gravitate toward shared or common interests, forming deep connections and robust communities through online interactions. The multitude of online communications channels and platforms is especially evident when it comes to social media, a definition so broad that it covers everything from blogs and interactive videos to Google maps and social networks (such as Facebook).

Because each community in the social media landscape is unique, a diverse set of experts on those communities is required to successfully execute a communications plan. Government should work to deepen or develop focused, dedicated online-community expertise; it is equally important to convene with experts on how best to utilize the many privacy filters and disclosure functions available on social media sites. Intra-agency and interagency cooperation and sharing of best practices will

contribute to overall expertise while bringing to government's efforts the efficiencies, relevancy, and freshness that are hallmarks of successful social media efforts.

- **Integrate Digital and Offline Priorities.** An integrated strategic communications approach by government should clearly reflect an understanding that, although digital expertise and strategy are important, an open government campaign will be most successful if they are used to complement offline efforts. The Obama administration has already embraced this idea with Web sites such as *www.recovery.gov*, an interactive site that allows Americans to see how, when, and where tax dollars are being spent.

When a department participates in an open government initiative, it is not enough to merely appoint a task force to study social media. The development and implementation of a strategic digital plan will significantly enhance the initiative. Essential to such strategic digital communications planning is review of an department's policies on personnel access to new media sites. As noted, government and DHS operate in a unique communications environment, with privacy, security, access and other issues exclusive to the federal sector. Nevertheless, if government means to use social media to truly engage in dialogue with the public, it will need to develop solutions for open access.

- **Collaborate and Converse With Citizens.** Social media offers government an unprecedented opportunity to speak to its constituents. At the same time, constituents have an ever-increasing opportunity to voice their opinions to government through online channels. This type of dialogue is only valuable, however if government is listening as well as speaking. Once government's voice is amplified through the participatory power of digital and social media, it paves the way for engaging in substantive conversations. Such dialogue increases the value of strategic communications planning by positioning government as an authentic voice and trusted collaborator.

Developing the aforementioned digital community expertise will help government establish a conversation with its citizenry. Moreover, it will increase the comfort level of department personnel using digital communications tools, as well as the department's ability to ensure that privacy and transparency requirements are met.

- **Be Transparent and Offer Value.** Online dialogue works best when all the parties exchange valuable information and engage in an honest and good-faith conversation or debate. If government develops an online presence, but then — based solely on its own legal or resource concerns — fails to respond to a question or engage in a dialogue, online audiences will perceive it as a less-than-legitimate player in the debate. On the other hand, online communities will see value in a government that actively seeks to share useful information.

Congress has indicated that it intends to update the 1974 Privacy Act to include electronic and other communication platforms not contemplated by the original statute. Changes to the 1974 Act will impact government's use of social and other electronic-based media, and much of the external debate on the issue will take place online. As the seat of the first statutorily required federal agency Privacy Office, DHS is in an excellent position to contribute its expertise to the debate and to help inform Congress' development of possible changes to the Act.

The United States promotes a participatory government in which all of its citizens can contribute. In order to reach constituent communities who go to the Internet for their information, however, government must deliver content and news through the online media used by these communities.

Even taking into account the government's unique communications environment and restrictions, there is substantial evidence that government use of social media channels is not only possible: it is also effective, and should be pursued.

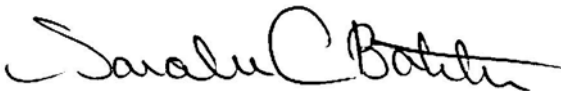
Respectfully submitted,



William R. Pendergast  
Senior Vice President and Senior Partner,  
General Manager



Daniel M. Horowitz  
Executive Vice President and Senior Partner



Saralee C. Boteler  
Senior Vice President and Senior Partner