

Part One - Introduction and Glossary

I. Bloggers and Blogs - An individual who uses an online web publishing platform called a blog to publish written, audio, image, video and multimedia articles or posts. Individuals blog for different reasons from sharing a story, to attempting to sway the reader, to pointing out things and to pursuing an advocacy. The word Blog comes from the phrase Web Log and points to its origin and continuing use as log, journal or diary on the web. It might be noteworthy to point out that at the beginning all blogs were non-commercial and in fact majority of blogs still are semi-commercial and non-commercial.

Income Sources of Bloggers - (I think this section on income may not be necessary for now as it's not directly related to promos. Let's confine info for DTI to whatever is helpful to them re understanding blogger promos first. They might be overwhelmed)

- None
- Regular or Day Jobs
- Consultancy
 - Non-Blog related
 - Blog Related
- Freelance Work
 - Non-Blog related
 - Blog related
- Business
 - Non-Blog related
 - Blog related
- Blog
 - Advertising placement
 - Advertorial Posts
 - Direct Sale
 - Revenue from Click, text link or any other similar programs.

II. Blogs and Micro-Blogs - A number blogs are self-hosted, meaning the owners pay fees to have them hosted. Majority though are "homed" in platforms that offer free hosting like blogger, wordpress.com and others. There has also been the rise of variant blogs like microblogs, which are blog platforms that publish or post smaller size content --for example, Twitter only allows up to 140 characters per post. Another example of a micro-blog platform is Tumblr and Plurk.

III. The Different Types of Blogs

Blogs can be grouped based on **(1) form (2) focus (3) objective and (4) function** but based on Monetization or Income generation there are three kinds of blogs:

The Different Types of Blogs based on Income Generation

Commercial Blog - Blog used primarily to earn an income and/or for business purpose such as promotion, marketing or customer relations. Income source or model would include of any or a mixture of the following;

- Advertising placement
- Advertorial Posts
- Direct Sale
- Revenue from Click, text link or any other similar programs.

Semi-Commercial Blog - Blog that has evolved into or developed for commercial and non-commercial reasons. The blog runs promotional campaigns occasionally, but it is not the main thrust of it. The blogger may participate in brand-initiated activities, but income may or may not be the main motivation. Income source or model would include any or a mixture of the following:

- Advertising placement
- Advertorial Posts
- Direct Sale
- Revenue from Click, text link or any other similar programs.

Non-Commercial Blog - Blogger who uses his blog primarily not to earn income. This includes but not limited to personal group and organization blogs.

IV. Reasons why blogs have online contests, raffles or giveaways

- As part of a goodwill effort of the blog to its readers.
- As part of information or advocacy campaign of the blog.
- As part of the reader recruitment campaign of the blog.
- As part of the campaign to promote a **brand** of an individual, a company or an institution. (**Note:** the blogger is not always paid in such campaigns and nor do all bloggers accept payment)
- As part of the campaign to promote the CSR (Corporate social responsibility) Program or CHARITY WORKS OR ADVOCACY of an individual, a company or an institution. (**Note:** the blogger is not always paid in such campaigns, nor do all bloggers accept payment)
- **What about political campaigns?**
- Donations - *"have x followers we'll donate x amount to charity."*

V. Sources of prizes and giveaways

- Gifts or donations received by bloggers
- Items purchased by the blogger

- Items given through an advertising campaign of a company or a brand
- Items given for an advocacy or charity campaign
- Non-physical items given by a company (i.e. software license, domain, web hosting, etc)
- Personal items of the blogger

Note: The value of the prizes or giveaway vary in terms of monetary value but in most cases of high sentimental or value to the recipients.

Part Two - Points to Clarify

1. There are bloggers who just blog as a hobby, advocacy, self-expression, need to share info
2. There are bloggers who blog for money.
3. There are bloggers who conduct contests for goodwill and the prizes come out of their pocket.
4. There are bloggers who accept sponsorships for their blog contests.
5. There are bloggers who are paid to do sponsored posts (i.e. advertorials).
6. There are bloggers who collate contests they find online and blog about those contests.
7. There are bloggers who conduct contests with prizes they paid for.
8. Contests/promos run by bloggers have varying mechanics.
9. Any combination of the above (the hybrid blogger)

Comment: When meeting with DTI, I suggest we keep (some of) Part Three, Four off the table because “Questions” and “Scenarios” is the part where all the legal mumbo-jumbo will be thrown and let us be honest, nothing will come out of it if DTI already made an interpretation. That is best reserved for lawyers if we are going to even attempt to justify why it is unfair. It is best to present to DTI Part One and Two to inform them that not all blogs are out there to victimize the “Consumer” via running Giveaways. In short, not technically “stalling” DTI but we have to give the impression to them that the culture of bloggers is very diverse and majority of them are just looking for fun ways to express themselves.

If DTI will ask for examples, the best examples we could probably give are Charity Giveaways & Advocacy Groups (just be sure not to give them examples of Charity scams which is another issue). From Juned’s latest post on his website ([scroll down](#)), it seems that DTI has yet to act on releasing an official guideline. We do not even know if they are planning on releasing a guideline. It may be all just their interpretation in accommodating what was asked from them. **Please let no parties insist that they come out with one.** What DTI is currently expressing is their interpretation of the law. They are talking to us. They are not yet (unverified) imposing anything yet. So far they are not talking about strict enforcement. Yes they were asked about it (penalties, etc), of course they will answer with their usual government pitch. They are not the villain here.

The more we give them examples or scenarios (some entries in Part 3 & 4) the more they will to the best of their knowledge give their interpretation based on law. If we do not have a lawyer present this might actually make the situation worse.

Let it be a decent, informative and eye-opening meeting with DTI. DTI admitted they are having difficulty implementing the Consumer Act of the Philippines on certain websites (like Group Buying), did they ever come out with a guideline for that? DTI admitted that Group Buying sites are problematic (source: Social Media Contest PH), so far they never released an Official Guideline for Group Buying sites. And these are sites where actual money exchanged hands. Why no official or PUBLIC guideline? I also have this impression that they are indeed getting complaints from consumers with regards to Group Buying site scams/fail promotions (read some local group-buying issues via RTs & Google). Yet, DTI has never released an Official Statement as far as the public is concerned. So a big mistake for the upcoming meeting is for any group to ask for an Official Guideline or Statement from DTI with regards to Blog Giveaways.

If DTI does mention during the meeting that if you run a Blog Giveaway without a DTI permit you are violating a policy, we just keep quiet. No need to clarify, that is the official “unprinted” statement. You will not win debating about it. You can do a quick Google about the legalities of blog giveaways worldwide and unfortunately yes, Blog Giveaways are subject to laws governing their country or state regulations (Canada is one easy example). But regulated? A very gray area, so let us hope the DTI will keep it like that for now.

Anyone, as in ANYONE who wants DTI to heavily enforce this Blog Giveaways Permit is hurting the Filipino people who are not even using the Internet. Why? You will be doing a **disservice** to hundreds, maybe even thousands of Filipino people who are approaching DTI with legitimate Consumer Act concerns where monetary value actually took place. DTI might already have a huge backlog of Consumer Act Violation reports, we rather have DTI give their full effort to those. We, if not most prefer not to put any more burden to DTI workload by asking them to create a new guideline that they might enforce. We want DTI to assist those Consumer Act violations that are more immediate. DTI of course, cannot admit they do not have the manpower to go after Blog Giveaways Promotions. If you talk to them on an off-the-record basis it is possible they will agree that there are more pressing concerns than policy violations of Bloggers giving away their personal items.

We are not encouraging people to ‘game’ the DTI. I like to believe that DTI is doing the best they can, and if you keep asking for an Official Guideline they will give you one. What happened recently are just discussions, let’s keep it at that. Like posted in Part V #8, DTI may not be even planning to release an Official Guideline because the Joint Administrative Orders & Consumer Act already by **itself stands on its own**. And please do not raise the “Moral Highground” flag. Let us not be hypocrites and self-righteous. There are many laws/policies that are commonly violated every second; people announcing on Twitter the latest movie/TV series they are downloading/torrenting, having Multiply stores without the proper business permits, and I am sure there are advertising policy violations on some Facebook & Google Ads. But seriously,

a Blog Giveaway without a permit a moral issue?

One key approach is just ask the DTI what are the laws, regulations, policies that covers the Sales Promotion Permit. DTI then will give them to you. Then say something to the effect of “we will consult with the documents you provided us to check what actions we shall take when we will run Giveaways. If anything is unclear, we will check again with you.” That’s it. **Do not debate about it, don’t give examples, don’t give scenarios.**

Like a Chess game, we should only react based on how DTI is going through with this. **Let’s just hope no one will spoil this during the meeting.**

Part Three - Questions or Queries or Issues

1. What type of blogger activity is affected by the consumer act ? Which types of blogging activities are covered by Consumer Act, if any?
 - When was the Consumer Act drafted? Was it in the same year when the Consumer Act took effect (i.e. 1992)? Was it a time when the Philippine blogosphere was just in its infancy? Were the drafters of the Consumer Act knowledgeable about the blogosphere? Did they have the blogosphere specifically in mind when drafting the Consumer Act, or did they just assume that bloggers will fall under an umbrella term that may or may not be correct?
 - What are the permit and fee requirements?
2. Given the diversity of bloggers and blogs should not there be a more specific guidelines based on consultation with the blogger community as a whole ?
3. Commercial and semi-commercial blogger differ in income and then there are also the nature of the prizes and giveaways which at times non-commercial bloggers also give away; because of this should there not be specific guidelines to cover the different circumstances ?
4. For blogs recruited by brand/companies for advertising campaigns: should not the burden of securing the necessary permits be on the brand or the agency, like what is seen on TV and other media ? How will companies abroad who want to sponsor a contest secure a DTI permit?
5. For gifts or prizes to be given away what is covered and what is not ? Is there a value bracket or limit ? what if the item is a gift received by the blog, a second hand item or the commercial value is difficult to evaluate i.e. it is more of a high sentimental value than of a high commercial value, how would it be then ?
6. What are the exact legal terms DTI used to refer to “blogs” or “micro-blogs” in arriving at this policy? Does that legal term fall under the definition of a “blog” or “micro-blogs” when presented to court?
7. What are the legal terms in our current laws that specifically mention a “blog”, pertaining to a “blog” or something very close to it?
8. What legal steps should one take to challenge the DTI’s blog giveaway permit required

policy? Is the DTI agreeable to a status quo of only dealing with parties if there's a complaint or until a more defined and relevant Consumer Act is created?

9. Is anyone actually talking to the personalities involved in drafting the updated Consumer Act?
10. Are the current groups such as IMMAP, Digital Filipino Club & others willing to assist the blogging community if there are indeed legal steps available?
11. What are DTI's plan for enforcement? Did DTI ask for any help with accredited Internet agencies to stop the proliferation of No Permit Blog Giveaways? Are they planning on tapping current Internet associations (like IMMAP, Digital Filipino Club & others) to be deputized as enforcers? Will these Internet associations, if invited, be willing to be deputized?

Part Four - Scenarios

1. A company provides consumer goods to a blogger to be raffled off or given as a competition prize (e.g., make the funniest comment) to the blogger's readers. Does this raffle/competition need a DTI permit? If yes, who should apply for the permit, the blogger or the company?
2. A blogger has some personal items he/she wants to dispose of and decides to raffle it off or give it as a competition prize to the blogger's readers. Does this raffle/competition need a DTI permit?
3. A blogger runs a contest and specifically mentions that only people from a particular city/area is eligible to join. The source of the prize is a company or his/her own. The winner of the contest is determined by an electronic raffle. Does the blogger need to apply for a DTI permit?
4. If a blogger allows his/her blogs to be a place/channel (think a virtual dropbox) where contestants can join brand-initiated contests, but the winners are determined by the brand, does the blogger need to apply for a permit?
5. If a blogger use the terms "by joining this contest you are waiving your rights as a Consumer, and form a binding & contractual agreement with this blog as a 'blog contest participant' only, abiding by and accepting the rules of this blog * -with links to a more detailed Rules & Regulation of the contest, will you be able to legally 'word' your way out of DTI's policy? If a participant joined, and this takes a conscious effort (action on their part by a mouse click/keyboard interaction), he is then forming a contract with you. Maybe legal experts can check if a Contract supersedes a government policy (that was partly based on a 1992 law/Act where the medium/terms doesn't probably even exist yet).
6. Aren't blogs just the media for ad placement, advertorial posts, revenue from click, text link or any other similar programs? So if a blogger registers his/her blog as a business, what he/she is offering are actually online advertising services. So when a blogger who has a business registration holds a raffle contest to promote his/her blog through back

links, FB page likes, followers, etc., should it not be considered just as plain online advertising which does not need a DTI permit rather than a sales promotion? Also, since the online advertising services (the product of the business/blog) are not the ones directly being promoted but the medium (the blog) is, shouldn't the same be the case?

7. How about bloggers who ask fellow bloggers for small sponsorships for their contests? They shouldn't be required to apply for a permit.
8. If a blogger wants to hold a contest open to worldwide readers, does he/she need a permit? *Bloggers from other countries hold contests all the time and they do not need permits from their government.*

Part Five - Other Points of Discussion

If other groups are saying that perhaps it is time for the local blogging community to organize and get their act together, maybe it is also time to inform the "casual blogging community" about the organizations that are generally the ones who act as the community's direct contact to the government. As this issue has fueled the interest of many bloggers, this is an opportunity to give the community a general idea about these organizations and associations that might directly or indirectly affect their blogging experience. **Majority of the blogging community is watching now** so this is the perfect time to discuss this.

Update (after the IMMAP/Bloggers meeting 08/02): IMMAP mentioned that their initial discussions/clarifications with regards to ~~Blog Promotions~~ Facebook Promotions, was originally **only** between IMMAP members and DTI. It just so happen of course, that once DTI ruled that blogs are covered (when Digital Filipino started their discussions with DTI, updated as posted by Juned link below), even non-IMMAP member blogs are affected. This answers some of the critical items listed below. Items clarified by IMMAP officers has been strikethrough. Head of Digital Filipino Club didn't attend the meeting.

1. Who are the organizations that generally represent the local blogging community and what are the backgrounds of the members of these groups?
2. What were the actions of this group in past controversies about the local blogging community? This question is to show that we want to hear your positive contributions and not just the controversial/bad ones. The current general sentiment is that this issue was **mishandled** by indirectly influencing the DTI that there exists in the blogging community a practice that should actually be regulated.
3. Is it correct to say that the policy DTI is presenting about this issue was the JOINT DTI-DOH-DA ADMINISTRATIVE ORDER NO. 01 that was actually in effect since October 2008? Perhaps, certain addenda in reference to Department Administrative Order No. 10-02 Series of 2010 signed last February 2010. ~~If that is the case, DTI was silent about taking any action in enforcing the Sales Promotion Permit on Bloggers. There must be a catalyst that started this issue, we would like to know what. Perhaps a~~

~~sequence of events or exchanges that eventually lead to the very first time DTI stating that "bloggers are covered". This is important because the blogging community would like to know if the parties that coordinated with DTI are competent of carefully analyzing various policies that is detrimental to the generally accepted "good faith" practice of bloggers before meeting with policy makers.~~

4. Until now there are no official guidelines regarding "Blogs" giveaways. Are the groups such as IMMAP, the Digital Filipino Group and others actually helping DTI draft such guidelines when it is DTI's responsibility and work to draft their own?
5. ~~We would like to know what initiated the DTI to suddenly inform the public that Blogs are covered with regards to a permit. Actually DTI has yet (unverified) to make a public announcement. Did this confirmation originate from DTI, or was accidentally mentioned or clarified by certain groups with DTI? There is a big difference between a policy that is not being enforced, and a policy that will be enforced because it was clarified/asked/affirmed. Point of this is, we would like to know if there was a lack of discretion on this issue by the coordinating group. Clarified by IMMAP via @juned's posting.~~
6. Did the group that initially coordinated with DTI consult first with lawyers with regards to the Blog Giveaways Policy? Before and after? If yes, what were the impression of the lawyers?
7. ~~Some may find the series of inquiries confrontational but you have to admit they sound interesting. If the groups such as IMMAP, the Digital Filipino Club and others will be representing the community on future meetings about sensitive issues, we would like to know if they are indeed capable and competent in protecting the blogger's interest. Perhaps due diligence before presenting anything that will largely affect the general practice of the casual blogging community should be done. How would these groups rate themselves in handling this issue?~~
8. If the DTI is not planning to release an Official Guideline because the Administrative Orders stated *by itself already stands on its own*, will this coordinating group **insist** on DTI to release one? This is again important because we all know DTI has more important issues to deal with, it is quite unusual to spend it hunting down bloggers who don't even sell anything while other websites (especially auction sites trade) are regularly scamming consumers with iPad & iPhone contests. *For all we know, DTI doesn't really want to deal with this issue because of enforcement problems and spending their manpower handling other important issues thus the absence of a public statement, but certain groups keep bringing it up, clarifying, asking for a forum and insisting on getting an official statement for their own interests (to form associations, accreditation groups, etc).*
9. Did any members of this group (~~IMMAP~~, Digital Filipino Club, others) who are coordinating with DTI about a Blogger's Promotion Permit happen to receive, directly or indirectly, any kind of monetary value or in kind such as free board & lodging, plane fare, and others from any past activities? If yes, the blogging community would like to know which events/activities. (Because some are obviously acceptable, example: having a meeting, they offered you coffee, or maybe a candy, etc).
10. What are the past and current CONTRACTS/AGREEMENTS of this group (IMMAP,

Digital Filipino Club, others) with DTI?

11. ~~IMMAP— Internet and Mobile Marketing Association of the Philippines. Emphasis on "Marketing". Sales/Blog promotions is an example of Marketing. Local DTI accredited Marketing Associations are one of those who would **potentially** benefit if this policy is fully implemented. Does IMMAP have any intention to assist DTI in IMPLEMENTING the no permit no blog contest required policy? This is an ethics issue that the casual blogging community would like to know. * - as stated in the update, IMMAP was originally discussing this for their members only.~~
12. The Digital Filipino Club, one party who promoted the idea of a National Blogger's Association and a Registry of Online Contest Managers signed last 2010 a Memorandum of Agreement with DTI. This is the DTI-ECO and DigitalFilipino Club MOA (June 20, 2010). The MOA can be easily found via Google. Did parties of the Digital Filipino Club directly or indirectly receive compensation in monetary value or kind for the training or other conditions as stated in the MOA? Is having an MOA with DTI considered a conflict of interest that must ~~be noted~~ not be ignored? The passion of their head in pushing for this Blog Giveaways Permit is undeniably strong and noticeable on the Internet. * - as of present, Digital Filipino Club has yet to state anything about this matter. This could pose as a huge conflict of interest as Digital Filipino founder does consulting for DTI and is also a member of IMMAP. ** **Can IMMAP talk to Janet and ask her to inhibit?** She is already promoting on her postings the "Sales Promo Permit Process" even if DTI is still willing to discuss the issue with us. Masyadong excited?
13. The head of the Digital Filipino Club is also a DTI/CITEM E-Services Philippines E-Champion Award 2008 for Policy Development awardee. Emphasis on "Policy Development". DTI blogger's permit is an example of a Policy Development. Comments on possible ethics issue? * - as of present, Digital Filipino Club has yet to state anything about this matter.
14. Who would benefit the most if a Blog Giveaway Permit is required? Will it be the DTI? Will it be the consumers? Will it be the accredited Internet Marketing Associations & Groups? Scenario: Internet Marketing Groups will be deputized by DTI to process, collect and monitor Blog Giveaways fees/permits. In short, blogs will now be regulated.
15. IMMAP's stand/position is posted online: <http://immap.com.ph/message/>. Some notable highlights: Laws/Policies needs to be updated. Laws/Policies needs to shift to accommodate and grow a changed publishing and marketing environment.
16. The head of the Digital Filipino Club stand as posted on Social Media Contests PH site: Individuals, Bloggers, Businesses need a DTI Sales Position Permit even if there is no purchase required.
 - 8. What is your stand on the issue?

As the Consumer Act of the Philippines and the administrative orders are already in place, I can not just give a position based on personal bias. If that is what the law requires, I have no choice but to comply. As a citizen, what I can do best is to let interested folks know that this requirement exist and help in explaining it. Provide clarity rather than confuse as ignorance of the law excuses no one. -- **but it was not explained well and further confused the online community**

Did IMMAP and the Digital Filipino Club already discuss this issue among themselves? Both have different stands. One is to discuss and act with a progressive mindset, the other is enforcement.

As many observed in the blogging chatter, there is the perception that some parties involved in this issue are pushing their personal agenda. While for the sake of discussion whether true or not, this is a credibility issue that this blogging community must address via a statement or a consensus. How we can assure the blogging community that there are no conflicts of interest or ethics issues by these associations is something that must also be addressed while the majority of the blogging community is paying attention.

A move for Digital Filipino founder to step down from this issue as her involvement is already highly controversial and there seems to be a general lack of trust / tension between her and many community members and stakeholders from other industries.

Other miscellaneous notes (Please Keep it Clean and Mature)

EG Note:

I suggest not present this paper/proposal immediately to the DTI representative you are going to talk with during meeting and rather ask the DTI what is their policy and what are their plans. Giving them this document will give them an idea to implement something they are not well equipped for (take for example their memorandum order about the GCs don't have expiration date as establishments don't acknowledge this memo!) and DTI is doing nothing about it. We would rather not have a memorandum or policy issued than have one that will be useless. Since IMMAP and Digital Filipino admitted that the proposal was only for IMMAP members blogs **you are right that once DTI issued a ruling even non-IMMAP member blogs are affected** you should put this issue to rest as this will have a domino effect on many other things especially regulating blogs in the country.

Bloggers need to come up with a statement before the DTI meeting, preferably with the assistance of a lawyer. Other issues that this statement should include is to check Janette Toral's agenda. If it is true she is a partner of DTI she has to **inhibit** herself from the meeting considering the involvement she had with DTI, her possible conflicts of interest, her past agendas and her current stand.

Is Janette Toral going to the Aug. 3, 7-9pm meeting? A lot of bloggers want to have an open discussion with her. Especially now that we know that they are the party that mentioned to DTI about Blog Promotions.

Check out the latest posting about this issue - <http://bit.ly/p5z6YG>. Please read through everything before reacting. Posted on August 2, 2011 by Juned

IMMAP talked to DTI about Facebook Promotions.
Digital Filipino talked to DTI about blogs and blog promotions.
DTI has not closed the discussion yet, they are willing to sit down and talk.

Are bloggers covered under the E-commerce law? If yes, aside from the Consumer Act, we should also suggest a review of the current E-commerce law. Many of the things we do online does not involve any commerce at all. We now have Facebook, Twitter, G+ and others. We are not seeking a regulation for everything but it might be a good idea to get their side just for legal information.

It may be noted that a good point to discuss for legalities to this issue are Cigarette Companies in the Philippines. They run promotions on their website (giving away motorcycles) but there are conditions (must log-in/register). Cannot be verified if there's a DTI permit, but according to some participants there were none (google).

Also this is interesting:
<http://www.adobomagazine.com/global/module.php?LM=articles.level3&id=1193110171343>

Beginning July 2008, all forms of tobacco advertising in **mass media** shall be prohibited, except advertisements placed inside premises of point-of-sale retail establishments.

As per Philip Morris's Chris Nelson, "the important thing for us is the law allowed us to retain our ability to communicate and differentiate our brands to our adult consumers. The law still **permits** direct consumer contact through direct mail, **internet** and point-of-sale materials."

Does this mean Internet isn't mass media? Internet "Business" is not Mass Media if you google it, P. Yasay to Silvestro Bello DOJ Opinion, 1998, they might be referring to ISPs though and this might already been clarified by more updated laws/policies. -- *This is not really a DTI matter but something to do with the ad board rules and regulations.*

Facebook Promotions Guidelines

Some people didn't even know that there are certain guidelines you have to follow if you are going to run a Facebook Contest. I am actually more concern to follow this guidelines that the

DTI 'unofficial' guideline. Facebook can ban/remove your Facebook Page if you violate their guidelines. Good luck to have it reinstated if they do.

http://www.facebook.com/promotions_guidelines.php

Take note of #5.

#5 You must not use Facebook features or functionality, such as the Like button, as a voting mechanism for a promotion.

So if Facebook Page owners are running a “Like” contest, you are in violation of Facebook Promotion Guidelines. There is no need to consult the DTI.

Facebook promotions should be look at by the Facebook Page owner because if you believe the system can be gamed/cheated via "fake likes". Then don't do the promotion. We understand some big companies might want to get as much results as possible when they do ad campaigns but then these companies have to understand and study carefully if the contest system they want to run can be gamed/cheated.

A few months ago I was planning to run another Facebook Contest after not having contests on Facebook (within guidelines) for over a year. However, after studying the Facebook Guidelines and checking out the accredited/approved Apps on Facebook to run such contests, I didn't push through with the contest. You have to have a Third-Party App to run Facebook Contests within their guidelines. The Apps Facebook will require users to install is rated poorly (from 2.5/5.0 to 3.0/5.0 stars) and you will be hard-pressed to find other effective ones. Checking out the users review of the various approved "promotion" apps, most concerns were user privacy & possible gaming of the system. Of course, most contest joiners are not aware of this, even if they do, some do not read the "Terms of Service" of the apps they are to install. As a small business, I am more concern about the privacy and security of my potential participants/users over running a promotion that will put them at possible risk. I even tweet about this and apologized to my users why I am not inclined to run Facebook Promotions.

From: How the DTI Online Permit Scandal progressed, July 29, 2011

<http://rico.mossesgeld.com/2011/08/how-the-dti-permit-online-scandal-progressed-july-29-2011/>

Another source of the outrage (at least among many local bloggers) was what Toral proposed with her assertion (now deleted): that an “idea suggested by a fellow blogger is for an association to cover us and negotiate with the government [on the behalf of bloggers] to carry out its own permit system.” That statement alone left many observers skeptical, certain that Toral was trying to revive her **failed attempt to create a Philippine Bloggers’ Association**.

Radio Giveaways, happens all the time. Some for sure didn't get DTI permits. Concert tickets, etc.
