

The Local Review Generation and Response Playbook

How to ask for reviews, answer them, and escalate the bad ones without gating, incentives, or fakes, written against the FTC consumer review rule and Google's contributor policy.

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01

What the rules actually prohibit, and where they differ

Two rulebooks apply, and they are not the same size. The Federal Trade Commission's Trade Regulation Rule on the Use of Consumer Reviews and Testimonials, codified at 16 CFR Part 465, targets fake or false reviews, buying reviews conditioned on sentiment, undisclosed insider reviews, businesses presenting controlled sites as independent, review suppression, and fake social media indicators. It is federal law with civil penalties attached, and it applies to the business whether or not a review platform notices anything. Google's contributor policy is a platform rule. It cannot fine you, but it can remove reviews, and, in our view, repeated breaches put the profile at risk.

The difference matters on incentives. The FTC's published questions and answers say the rule does not prohibit giving incentives for reviews, as long as there is no express or implied requirement that the review express a particular sentiment, and that incentives should be disclosed where a reader would otherwise not know. Google's policy, as we read it, goes further and covers reviews posted in exchange for money, products, or services; confirm the current wording. Following the federal floor is not enough on Google. A discount, a raffle entry, or a free service for a review is the thing to remove from the process, even where federal law might tolerate it.

Review gating is the other gap. Part 465 does not use the word and, per the FTC's questions and answers, contains no specific prohibition on asking only customers you think are happy. The FTC says that practice could still violate the FTC Act, and the rule does bar misrepresenting that displayed reviews reflect most or all submitted reviews when reviews are being suppressed based on rating or negative sentiment. Google's policy, as we read it, also discourages selective solicitation. Read the current text of the rule and the policy before you build the flow, because both can change, and have your own counsel review anything customer-facing. This guide is operational advice, not legal advice.

Practice	FTC rule (16 CFR Part 465)	Google contributor policy	Recommendation
Asking every customer for a review	Allowed	Allowed	Do this, same message to everyone
Sending only satisfied customers the Google link	No specific ban in the rule, but the FTC says it could violate the FTC Act; misrepresenting "all or most reviews" is barred	Selective solicitation is discouraged (confirm current text)	Do not do this
Paying or rewarding for a review	Allowed only if not tied to sentiment; disclosure expected	Prohibited (confirm current text)	Do not offer anything

Practice	FTC rule (16 CFR Part 465)	Google contributor policy	Recommendation
Staff, family, or friends writing reviews	Insider reviews need clear disclosure of the relationship	Conflict-of-interest content is restricted (confirm current text)	Do not post them
Buying reviews from a service	Buying fake or false reviews is prohibited	Prohibited (confirm current text)	Never
Legal threats to remove a review	Unfounded or groundless threats to suppress a review are prohibited	Use the flagging tool	Flag, do not threaten

02

A request flow that treats every customer the same

The compliant version of a review request is boring on purpose. The same message goes to every customer who completed a job, from the same trigger, with the same link. The trigger is a job status in your CRM or field-service tool, such as "completed and paid", not a satisfaction score. Nothing in the flow looks at sentiment before deciding who gets the link. If you also run a private feedback channel, such as a reply-to address in the message, offer it to everyone alongside the public link rather than as a fork that sends unhappy customers away from Google.

Timing is a judgement call, and the right answer differs by trade. A reasonable default is to send the request when the customer has seen the result and had a chance to confirm it works, which is the same day for a plumbing repair and probably a few days later for a roofing job or a kitchen remodel. Send one reminder if there is no reply, three to five days later, and then stop. A third message starts to read as pressure, and pressure produces the kind of rushed, emotional review you would rather not publish under your name.

Use the direct review link from the profile's dashboard, not a link to your own page that asks for a rating first. A short text works better than email for most service businesses because it opens on the phone the customer already has in hand. Messaging rules still apply to the text itself, which is covered in the missed-call text-back guide. Add a QR card for in-person jobs, handed over by the technician at the door, with the same neutral wording.

- Trigger: job marked complete in the CRM, not a survey score
- Audience: every completed job, no filter on sentiment or on whether a complaint was logged
- Channel: one text, one optional reminder, then nothing further
- Content: a plain ask, the direct review link, and the same private contact line for everyone
- Never include a discount, entry, gift, or any promise tied to posting

Send one reminder if there is no reply, three to five days later, and then stop.

03

Replying: write for the next reader, not the reviewer

Most people who read your replies are prospects deciding whether to call, and they are reading the reply to a one-star review more closely than the five-star ones. That changes the job. The goal of a negative-review reply is to show how the business behaves when something goes wrong, in three or four sentences, without arguing the case in public. State what you understand happened, say what you are doing about it, and give a direct way to continue offline. Do not reveal customer details, job addresses, or anything covered by a confidentiality duty, even to defend yourself. Confirming someone was a customer can itself be more than they would want public.

Positive reviews need a reply too, but not a fresh essay each time. Thank the person, name the specific job or tech if the review does, and stop. Templates help a team keep the tone steady across locations, as long as each reply picks up at least one real detail from the review. Replies that repeat the same sentence forty times are easy to spot, and they signal a business that does not read its reviews. Keep promotional language, phone numbers inside the reply body, and keyword lists out of them. Google may moderate replies as well as reviews, so a reply that includes prohibited content may be held back.

Reply timing is a service-level choice. A same-business-day target for negative reviews and a same-week target for positive ones is a sensible starting point, written down with a named owner, as the multi-location profile guide recommends. Treat those numbers as a recommendation to adjust, not an industry benchmark.

Situation	Reply shape	Avoid
Positive, specific	Thank them, name the job or person they mentioned, one line	A pasted generic paragraph
Positive, no text	Short thanks, no more than one sentence	Fishing for a longer review
Negative, fair complaint	Acknowledge the specific problem, state the fix, give a direct contact	Defensive explanations, blaming the customer
Negative, disputed facts	Neutral tone, say you could not find the job, ask them to get in touch	Quoting their account details or calling them a liar
Suspected fake or competitor	Flag for policy violation first; reply briefly and factually if at all	Accusing the reviewer publicly

04

Escalation, flagging, and what not to do about a bad review

Some reviews should not get a templated reply. Route these to a manager before anything is posted: allegations of injury, property damage, or illegal conduct; reviews that name a technician; reviews that mention a lawsuit, a claim, or a regulator; and reviews that look coordinated, such as several new accounts posting similar text on one day. The escalation owner decides between a reply, a flag, and a private call to the customer, and logs the decision so the next person does not repeat the discussion. Where a safety or legal exposure is possible, bring in whoever handles your insurance or counsel before replying in public.

Flagging is for content that breaks the platform's policy: spam, off-topic content, fake engagement, conflicts of interest, harassment, and the like. It is not a way to remove criticism that is accurate or merely harsh, and in our experience a platform is unlikely to remove a review just because the business disagrees with it. Keep a record of each flag with the date and the stated reason, because follow-up is often needed and the dashboard will not hold the history for you.

The FTC rule adds a hard limit to the other side of this. Its review suppression provision covers using an unfounded or groundless legal threat, a physical threat, intimidation, or a public false accusation made knowingly or with reckless disregard for its truth, in an attempt to prevent a review or have it removed. A threatening letter to a customer with a real, if unflattering, complaint is the kind of thing to avoid. Likewise, a non-disclosure or non-disparagement clause that stops customers from posting honest reviews can create legal risk under consumer-review laws. Have counsel check customer contract language before you rely on it.

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05

Review request and response checklist

Set this up once per business, then repeat the audit quarterly. Each step has a gate: nothing moves forward until the check can be shown, not merely claimed.

Step	Owner	Gate to pass before moving on
Map the current request flow, including any sentiment filter, private-feedback fork, or incentive	Marketing lead	A one-page diagram exists showing who receives the link and on what trigger

Step	Owner	Gate to pass before moving on
Remove gating and any incentive from every message, card, and script	Marketing lead	Every active template sends the same link to every completed job with no reward language
Set the trigger in the CRM or field-service tool	Operations lead	A test job marked complete sends one message and one reminder, then stops
Write and approve reply templates with at least three positive and three negative variants	Marketing lead and manager	Each template needs a slot for one real detail from the review and carries no promotional language
Name the reply owner and the escalation owner for each location	Regional manager	Both names appear on the tracker, with a backup for absences
Agree the escalation list: injury, legal, named staff, suspected fraud	Owner or counsel	List is written down and reviewed by someone qualified to give legal advice
Review customer contract and terms for clauses that restrict honest reviews	Counsel	Any non-disparagement or review-restriction language is removed or cleared in writing
Run the quarterly audit: reply times, flag log, response coverage	Marketing lead	Audit result recorded on the tracker, with open items assigned

06

Reporting without chasing a star average

Track what the process controls. Those are request volume (jobs completed against requests sent), reply coverage (the share of reviews answered inside your own target), time to first reply, and the count of escalations and their outcomes. Review count and average rating are results, and they move for reasons outside the process, such as a bad month for the service itself. Report them next to the controllable numbers and do not set a target on the star average, because a target on the average is how teams drift into gating.

A rating that stays low after a clean process is information about the business, not about the review flow. Read the actual text of the last twenty reviews and sort the complaints. If three of them mention missed arrival windows, that is a dispatch problem. No reply template fixes it, and no number of extra requests outpaces it. This guide covers how to earn and answer reviews honestly. It cannot substitute for the service being good, and it cannot repair a profile whose basics, such as name and category, are wrong. The multi-location profile guide covers those basics.

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Key Takeaways

- Ask every customer, not only the happy ones. Routing satisfied customers to Google and unhappy ones to a private form is review gating, and it is the practice the FTC's guidance warns about and, as we read it, Google's policy discourages.
- The FTC rule does not ban incentives outright, but it bans tying them to a positive sentiment. Google's contributor policy, as we read it, is stricter and does not allow incentives for reviews at all, so for a Google Business Profile the safe rule is no incentive of any kind. Confirm against the current policy text.
- Fake reviews, reviews written by staff or relatives without disclosure, and purchased reviews are what the federal rule at 16 CFR Part 465 targets. The business can be liable for reviews it should have known were fake.
- A reply is public marketing copy written for the next customer. Write it for that reader: specific, short, and never defensive.
- Threatening a reviewer with an unfounded legal claim to get a review taken down is itself a violation under the FTC rule. Report policy violations through the platform and leave the rest alone.

Sources

1. 16 CFR Part 465: Trade Regulation Rule on the Use of Consumer Reviews and Testimonials — <https://www.ecfr.gov/current/title-16/chapter-I/subchapter-D/part-465>
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