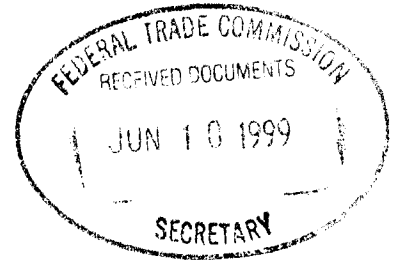


JUNKBUSTERS Corporation

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Secretary
Federal Trade Commission
Room H-159
Sixth Street & Pennsylvania Ave. N.W.
Washington D.C. 20580

7 June 1999

COPPA (FTC File No. 994504) -- Comment

Dear Sir

Junkbusters is pleased to respond to the FTC's call for comments on its Proposed Rule on Children's Online Privacy.

Our basic position was expressed in the attached is a press release of April 21, which is also available at <http://www.junkbusters.com/ht/en/nr22.html> on the Web. I would particularly stress the following paragraph.

Junkbusters urged the FTC to require companies to maintain records of all instances of purported consent and report their numbers periodically to the FTC. A verification program should be implemented to conduct random audits. If an audit finds that the percentage of parents who say they did not grant consent turns out to be above maximum levels set by the FTC, the company should be sued, heavily fined, or referred to a state Attorney General for prosecution.

Junkbusters has also endorsed the comments of the Center for Media Education. Apart from the central point that verifiable consent must be authentic and verified, they raise two important additional points. Existing lists of children must be permissioned before further use is made of them. Also, the Commission should be wary of attempts to share such data and to make permission transferable to other entities. Explicit affirmative consent must be required for each separate party.

Respectfully Submitted

Jason Catlett
President and CEO
Junkbusters Corporation

JUNKBUSTERS®

News Release

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FOR IMMEDIATE RELEASE

JUNKBUSTERS URGES VIGILANCE FROM FTC AND PARENTS TO PROTECT CHILDREN FROM CORPORATE SURVEILLANCE AND MANIPULATION

-- Privacy Advocate Calls for Strict Rules from Regulator, Encourages "Just Say No" Attitude from Parents Against Web Sites That Solicit Personal Data from Kids --

Washington, DC -- April 21, 1999 -- Junkbusters Corp. President Jason Catlett today urged Federal regulators and parents to stand firm against marketers who want to use the Internet to extract information from the nation's children. "From Microsoft to the 'young investor' site that asked kids to report on their parents' financial assets, Internet companies have demonstrated they cannot be trusted to respect anyone's privacy. Parents and regulators must vigorously defend our children against the electronic molestation of their identities," Catlett said.

The Federal Trade Commission is currently in the process of developing rules to implement the Children's Online Privacy Protection Act (COPPA), which was passed by Congress last year. The Act requires websites that attempt to collect information from children to obtain "verifiable parental consent." The FTC must define what constitutes a "reasonable effort" to do this.

"Big businesses have been lobbying the FTC to make the rules weak so they can minimize their costs and maximize the amount of data extracted from kids. Most children are too innocent to know that the smiling cartoon character on their computer screen asking their name is just a front for an organization that wants to know how to manipulate them more efficiently," Catlett said. "If companies sent men with clipboards dressed in Easter Bunny costumes to wait outside schools and ask kids highly personal questions, they would be chased out of town. But the same thing is occurring unhindered in cyberspace. Our children must be protected from these inhuman data hunters and gatherers."

Junkbusters urged the FTC to require companies to maintain records of all instances of purported consent and report their numbers periodically to the FTC. A verification program should be implemented to conduct random audits. If an audit finds that the percentage of parents who say they did not grant consent turns out to be above maximum levels set by the FTC, the company should be sued, heavily fined, or referred to a state Attorney General for prosecution.

"Parents must be empowered to control data collection from their children. Without verifiable and verified parental consent, children's privacy will continue to be compromised," said Kathryn

Montgomery, Ph.D., president of the Center for Media Education, whose 1996 report "Web of Deception" prompted the FTC to investigate online marketing practices aimed at children.

Junkbusters also called on the FTC to ensure that the rules give parents access to all data that companies associate with a child, not just the information collected directly from the child. "Once parents see the horribly intrusive psychographic data that direct marketers assemble and trade about their children and their household, they will want all information about them removed from corporate databases," Catlett said. "The FTC should also run spot checks auditing the disclosure and destruction of private information," he added.

The FTC is expected to accept comments via email on its proposed rules. Junkbusters urges parents and pro-family groups to tell the FTC they want to see the strictest standards and vigilant enforcement of the new law. Junkbusters Corp. helps consumers defend themselves against intrusive marketing and protect their privacy online. At <http://www.junkbusters.com> the company provides extensive free resources for stopping telemarketing calls, unwanted physical mail, junk email, and commercial invasions of privacy on the Internet.

This document is <http://www.junkbusters.com/ht/en/nr22.html>