

MasterfoodsUSA™

A Division of Mars, Incorporated

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Secretary
Federal Trade Commission
Room H-159
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: COPPA Rule Review 2005, Project No. P054505

Masterfoods USA, a division of Mars, Incorporated (Masterfoods USA) is pleased to submit these comments to the Federal Trade Commission (FTC) in support of making permanent the sliding scale mechanism (e-mail plus) for obtaining verifiable consent.

Masterfoods USA, the United States food, snack and petcare operations of Mars, Incorporated, is one of the world's leading food manufacturers, with more than \$5 billion in annual sales in the United States. Headquartered in Hackettstown, NJ, Masterfoods USA employs more than 7,000 associates in the United States, with 15 manufacturing facilities nationwide. The company owns some of the world's favorite brands, including M&M'S® Brand, SNICKERS® Brand, UNCLE BEN'S® Brand, PEDIGREE® Brand Food For Dogs and WHISKAS® Brand Food For Cats.

Masterfoods USA has participated in prior proceedings at the Commission to express its support for the goals and objectives of COPPA.

Masterfoods USA notes that the Children's Advertising Review Unit (CARU) of the National Advertising Division (NAD) supports making permanent the e-mail plus option and states "parents are comfortable with e-mail plus." Based on these and other reports that parents are comfortable with a sliding scale e-mail approach, Masterfoods USA supports making permanent the e-mail plus rule. Permitting website operators different methods for obtaining verifiable parental consent, depending on the degree of risk to a child, maintains the flexibility needed online.

We appreciate the opportunity to submit comments in this important proceeding.

Respectfully submitted,

Ellen O. Kollar
General Counsel, North America