

December 23, 2010

Office of Policy Analysis and Development  
National Telecommunications and Information Admin.  
U.S. Department of Commerce  
1401 Constitution Avenue, NW, Room 4725  
Washington, DC 20230

**RE: Extension of Time**

Dear Internet Policy Task Force:

The undersigned trade organizations respectfully request that the Department of Commerce extend the deadline for filing comments to the Department of Commerce (the “Department” or “Commerce”) Internet Policy Task Force Report, “Commercial Data Privacy and Innovation in the Internet Economy: A Dynamic Policy Framework” (the “Report”) to March 15, 2010. The Report seeks comments on a proposed comprehensive framework to govern commercial data privacy. Additional time will allow interested parties to more effectively prepare comments that will be helpful in assisting the Department with developing its final recommendations.

In addition to the Commerce report, on December 1, 2010, the Federal Trade Commission (the “Commission”) released its staff report, “Protecting Consumer Privacy in an Era of Rapid Change: A Proposed Framework for Businesses and Policymakers” which also seeks comments on a separate proposed framework governing the same issues. Comments on this report are due on January 31, 2010. Both reports have stressed the importance of participation by all of the stakeholders in the process, especially stakeholders from the private sector who collect and maintain consumer data and will be directly impacted by the proposed sweeping changes in the data privacy landscape. The undersigned trade organizations are leaders on the issues in the reports, representing thousands of member companies. Additional time will allow business to evaluate the potential impact on the proposals to important business operations and critical services to consumers. In addition, associations will have the opportunity to seek input from our members to better respond to the Department’s proposal. This process takes time and we believe that the short time frame provided to respond to the Department’s proposal, in particular during the holiday season is insufficient for effectively and thoroughly responding.

The important issues discussed in the Report warrant thorough consideration. By allowing members to fully digest the two proposals and provide thoughtful input in the form of additional comments, we believe we can provide the Department with more meaningful input

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from a broad spectrum of affected industries. The modest delay requested will ensure that the information provided will assist in shaping future proposals.

Thank you for your consideration. We look forward to working with the Department on these important issues.

Respectfully submitted,

American Association of Advertising Agencies  
American Advertising Federation  
American Business Media  
Association of National Advertisers  
Coalition for Healthcare Communication  
Consumer Data Industry Association  
Direct Marketing Association  
Electronic Retailing Association  
Interactive Advertising Bureau  
MPA—The Association of Magazine Media  
National Business Coalition on E-Commerce and Privacy  
National Retail Federation  
Network Advertising Initiative  
Newspaper Association of America  
Retail Industry Leaders Association  
Shop.org  
Software & Information Industry Association  
TechAmerica  
U.S. Chamber of Commerce

cc: Daniel Weitzner  
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