

August 22, 2012

Chairman Jon Leibowitz
Commissioner J. Thomas Rosch
Commissioner Edith Ramirez
Commissioner Julie Brill
Commissioner Maureen Ohlhausen



Federal Trade Commission
Office of the Secretary, Room H-113 (Annex E)
600 Pennsylvania Avenue
Washington, DC 20580

Re: Request for Extension of Time to File Comments, COPPA Rule Review, 16 C.F.R. Part 312, Project No. P104503

Dear Chairman and Commissioners:

The undersigned associations respectfully request that the Commission extend the deadline for filing comments on the supplemental notice of proposed rulemaking published at 77 Fed. Reg. 46643 (August 6, 2012), which modifies the Commission's September 2011 proposal to amend its Children's Online Privacy Protection Rule ("COPPA Rule"). Specifically, we request an extension from September 10, 2012, to October 15, 2012.

The additional time would permit the undersigned associations, in consultation with member companies and their technical personnel, to understand and evaluate more thoroughly the likely effects of the Commission's new proposals. The Commission's supplemental notice would regulate a complex online and mobile ecosystem. It proposes significant changes to the existing COPPA Rule while also amending important aspects of the Commission's initial proposal. Because the Commission's proposals are cumulative, commenters must consider the interaction of these new proposals with the unchanged aspects of the initial proposal. The Commission also poses numerous questions in its supplemental notice, including requests for detailed comments on any practical or technical challenges raised by its proposal. We believe that the requested extension will enable us to provide the Commission with more meaningful feedback on this major privacy regulation.

The Commission allotted over three months for the public to comment on each of its prior notices in this rulemaking review. In comparison, without the requested extension, the Commission's notice would provide just five weeks to respond to the supplemental notice. Moreover, the comment period falls during August and the Labor Day holiday week. Responsible staff at the undersigned associations, as well as staff members at member companies that would be affected by the Commission's proposal, will be away from their offices for previously-scheduled vacations during this time period. The modest extension that we request will enable key staff to participate in preparing relevant comments to the Commission.

Thank you in advance for your consideration of this request. The undersigned associations share the Commission's concern about children's online privacy and we look forward to continuing to work with the Commission on this important issue. If you have any questions regarding our request, please contact Stuart P. Ingis at 202.344.4613.

Sincerely,

American Advertising Federation
American Association of Advertising Agencies
Association of National Advertisers
Direct Marketing Association
Electronic Retailing Association
Entertainment Software Association
Interactive Advertising Bureau
MPA – The Association of Magazine Media
National Retail Federation
National Cable & Telecommunications Association
Newspaper Association of America
NetChoice
Online Publishers Association
Software & Information Industry Association
U.S. Chamber of Commerce