

Frankle, Janice Podoll

From: Ellen Bloom [REDACTED]
Sent: Friday, November 02, 2012 11:28 AM
To: Ohlhausen, Maureen; Davis, Anna
Subject: Consumers Union letter on COPPA
Attachments: Nov 01 2012 children online privacy ltr to ftc (1).pdf

Thought this would be of interest to you.

Thank you.

Ellen Bloom
Senior Director, Federal Policy & Washington Office
Consumers Union
p: 202-462-6262
f: 202-265-9548

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POLICY & ACTION FROM CONSUMER REPORTS

November 1, 2012

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

FTC Action Necessary to Update and Strengthen Children's Online Privacy Protection

Consumers Union, the public policy and advocacy division of *Consumer Reports*, supports the FTC's continuing goal of protecting children's privacy online, and we applaud work currently in progress to update and strengthen the Children's Online Privacy Protection Act (COPPA) Rule to protect the next generation of children and their parents.

The Commission's current COPPA Rule provides a solid framework for kids' privacy by empowering parents to make informed choices about the types of information companies can collect about their children. But 14 years after COPPA was first enacted, the online landscape is wholly different. More children spend more time on the internet than ever before. That is why we support current efforts to update the rule.

Parental consent and notice is crucial to making this rule work. Children do not have the same capability to make decisions about how their information can be collected and used online as adults. Parents and guardians are in a far better position to make informed choices.

As the Commission has proposed, websites servicing children should notify parents about all data collected, including third-party data collection. We also support the Commission's proposal to define "personal information" to include persistent identifiers, such as tracking cookies and behavioral advertising services, and geo-location, which ensures that parents will continue to have the ability to be informed and oversee data targeting practices directed at their children.

Consumers Union would like to thank the Commission for its commitment to the protection of children's privacy online. We look forward to continuing to support the work of the Commission in this area of great importance to children, families and consumers generally.

Sincerely,

A handwritten signature in black ink that reads "Ellen Bloom". The signature is written in a cursive, flowing style.

Ellen Bloom
Senior Director, Federal Policy & Washington Office
Consumers Union