

UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

Office of Commissioner Maureen Ohlhausen

TO: Don Clark  
FROM: Anna Davis  
RE: COPPA Meeting with Apple  
DATE: November 8, 2012

**Attendees:**

Jane Horvath, Apple, privacy officer  
Cathy Norvell, Apple, VP for Gov't affairs  
Nick Ammann, Apple, Gov't affairs

Maureen Ohlhausen, Commissioner  
Anna Davis, Attorney Advisor

Horvath: Apple is very concerned about kid's privacy. The Apple Store shows a strong commitment to parental choice. (Demonstration of two password protection systems). Apple believes it is being "swept" into misplaced liability. Same as holding a Target store liable for selling a computer game.

Apple is not interested in PII.

All developers who sell apps with Apple Store have binding contract and must comply or be shut out. Result of implementing new COPPA regs would likely be that Apple would eliminate under 13 content.

Current Apple procedures help with COPPA compliance.

Apps don't use cookies; not run on html. Similar to Do Not Track for apps.

Persistent identifiers: UDID consistently a problem

3 new identifiers:

1. 1 particular app
2. Vender ID
3. Advertising (supports app marketplace)