



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

Office of Commissioner
Julie Brill

To: Don Clark
From: Kathleen Benway
Date: November 19, 2012
Re: COPPA Rule—Comments to be placed on the public record

On November 19, 2012, Jules Polonetsky of the Future of Privacy Forum (FPF) met with Commissioner Julie Brill and FTC staff to discuss the supplemental proposed amendments to the FTC's COPPA Rule.¹

Mr. Polonetsky described FPF's proposed change to the COPPA Rule. FPF's proposal is designed to address the problem of platform operators that would like to extend their services to children under 13. FPF proposes that platform operators be able to give notice and obtain parental consent on behalf of apps they host. FPF also proposes that platform operators should not be held liable for any COPPA violations by those apps, because platform operators do not have control over apps.

¹ In attendance from the FTC were Kathleen Benway, Attorney Advisor for Commissioner Brill and Matt McDonald, intern for Commissioner Brill.