

December 13, 2012

Chairman Jon Leibowitz
Commissioners Julie Brill, Maureen Ohlhausen,
Edith Ramirez, and J. Thomas Rosch
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Mr. Chairman and Commissioners:

On behalf of a broad community of child advocacy, health, parents, privacy, and consumer organizations, we are writing to offer our strong support for the Federal Trade Commission's proposal to update its rules under the Children's Online Privacy Protection Act (COPPA). COPPA has played a key role in protecting children's privacy since the beginning of the digital era, enabling parents to decide how their children will interact with companies on the Internet, and creating a clear set of principles and practices that have guided the development of the online children's marketing industry.

However, with the rapid expansion of digital media during the last decade, data collection and marketing practices have become increasingly sophisticated and much less transparent, undermining the ability of parents to make meaningful decisions for protecting their children's privacy and safety. Today's young people are growing up in a complex media environment, connected to a vast array of mobile devices, online games, personal computers, social networks, and real-time interactive marketing services.

As you know, the Commission has not updated its children's privacy rules since they were initially developed in 2000. These rule changes are not only essential, but also urgent, addressing a variety of techniques that are swiftly becoming commonplace, including: "cookies" and other "persistent identifiers" for following a child online, mobile and geo-location tracking, facial recognition software, and behavioral advertising.

The FTC's efforts to update COPPA are long overdue. These proposed rule changes are sensible and fair. We urge you to act decisively and soon to ensure that the law will continue to empower parents and protect children in the growing digital marketplace.

Sincerely,

Abine	Consumer Federation of America
Access Humboldt	Consumer Watchdog
Alliance for Childhood	Electronic Privacy Information Center
Alliance for Community Media	Essential Information
American Academy of Child and Adolescent Psychiatry	Family and Children Ministries of Disciples Home Missions, Christian Church (Disciples of Christ)
American Academy of Pediatrics	Free Press
American Heart Association	Global Action Project
American Psychological Association	Greek Orthodox Archdiocese of America
Benton Foundation	Latino Coalition for a Healthy California (LCHC)
Berkeley Media Studies Group	Media Action Center
California Center for Public Health Advocacy	Media Alliance
Campaign for a Commercial-Free Childhood	Media Literacy Project
Center for Digital Democracy	Momsrising
Center for Media Justice	National Assembly of School-Based Health Care
Center for Science in the Public Interest	National Association of County and City Health Officials (NACCHO)
ChangeLab Solutions	National Black Church Initiative
Children's Advocacy Institute	National Consumers League
Childhelp	National Foster Family-based Treatment Association
Children Now	National Human Services Assembly – National Collaboration for Youth
Common Sense Media	Oregon Public Health Institute
Community Initiatives	Prevention Institute
Consumer Action	
Consumers Union	

The Praxis Project

Privacy Times

Public Citizen

Public Health Advocacy Institute at
Northeastern University School of Law

Public Health Institute

Safe Communications, Inc.

Shaping Youth

Teachers Resisting Unhealthy Children's
Entertainment (TRUCE)

United Church of Christ, Office of
Communication Inc.

US Conference of Catholic Bishops

Voices for America's Children

Yale Rudd Center for Food Policy & Obesity

Young People's Healthy Heart Program at
Mercy Hospital