

000003

February 14, 2005



Federal Trade Commission  
Office of the Secretary  
Room H-159 (Annex Y)  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Re: Sliding Scale 2005, Project No. P054503

The Procter and Gamble Company is pleased to submit comments to the Federal Trade Commission on the issue of amending the Children's Online Privacy Protection Act (COPPA) Rule to make permanent a temporary provision in the Rule allowing operators of web sites and online services to collect personal information from children only for internal use to obtain verifiable parental consent via email.

P&G supports the FTC's proposal to make the "sliding scale" approach permanent for the following reasons:

- Secure electronic mechanisms are NOT currently available to facilitate verifiable parental consent, despite the expectation in 1999 when the rule was first drafted that technological solutions would be available at a future time;
- Infomediary services are NOT widely available to facilitate verifiable parental consent at a reasonable cost. Furthermore, there are concerns that infomediary services provide a "middle man" where the potential for misuse exists;
- The sliding scale approach encourages website operators to be good stewards of children's information by providing them with a low cost mechanism to obtain parental consent for purely internal uses of information. It further requires web site operators who wish to more broadly share children's information to obtain parental consent using a more rigorous approach;
- After more than four years of usage, the sliding scale approach appears to be working;
- By making the sliding scale approach permanent, the FTC creates a secure, transparent and consistent standard by which companies that are collecting children's data for internal purposes can plan for and follow.

Thank you for this opportunity to provide comments on this important rule.

Sincerely,

A handwritten signature in black ink that reads "Sandy Hughes" followed by a slash and the initials "ceb".

Sandy R. Hughes  
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