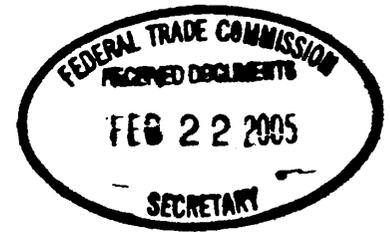


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Before the
Federal Trade Commission
Washington, DC 20580



In the Matter of:
Sliding Scale 2005
Project No. P054503

Comments of the Consortium for School Networking

The Consortium for School Networking (CoSN) is a non-profit organization that promotes the use of new technologies to improve learning in K-12 education and provides resources and support for ed-tech leaders at the state and local level. CoSN's membership includes national education associations, local school districts, state education agencies and individual leaders in ed-tech that are committed to integrating technology into the classroom.

CoSN supports the Commission's proposed rule change to make permanent the sliding scale system for determining parental consent in the Children's Online Privacy Protection Act (COPPA).

In the time that the sliding scale rule has been in effect, it has provided appropriate flexibility in obtaining parental consent and has appropriately balanced interests in the school context. Furthermore, as an organization whose membership includes education leaders on the school, district, state, and federal levels, CoSN has not witnessed any negative response to the current rules, and therefore does not believe there is any need for these rules to be augmented or changed.

Though there is no "silver bullet" to ensure that a child's personal information is always used appropriately and is in the right hands, the sliding scale approach responds appropriately to the diversity of Internet content, while allowing teachers to use this valuable content in the classroom. CoSN therefore urges the Commission to make permanent the sliding scale rule so that teachers can rely on the current flexibility afforded in the law.

We applaud the Commission's efforts on this issue.

Respectfully submitted,

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