

Illinois Credit Union League

P.O. Box 3107

Naperville, Illinois 60566-7107

630 983-3400

February 14, 2005

ATTN:Federal Trade Commission
Bureau of Consumer Protection
600 Pennsylvania Avenue N.W.
Washington DC 20580

Re: Sliding Scale 2005, Project No. P054503

We are pleased to respond on behalf of our member credit unions to the Federal Trade Commission's proposal to extend permanently the use of e-mail for parental consent. This proposed extension is in relation to the Children's Online Privacy Protection Act ("COPPA"), protecting children under the age of 13 from internet solicitations. The Illinois Credit Union League represents over 400 federal and state chartered credit unions.

On October 20, 1999, the Federal Trade Commission issued its final Rule implementing COPPA. The Rule required that website operators obtain verifiable parental consent prior to collecting, using, or disclosing personal information from children under 13 years of age. In 2001, the issue of e-mail consent arose again and the Commission decided to extend the e-mail consent provision for a period of three years, expiring in April 2005.

As you know, credit unions are already heavily regulated with regard to the privacy of a member's personally identifiable information. State and federally chartered credit unions are currently required to comply with the Gramm-Leach-Bliley Act and accompanying NCUA Regulations on the federal level and the majority of states have a Privacy Act, Illinois being one of the many, on the state level. Credit unions are currently required to disclose their privacy policy on-line to allow members or potential members the opportunity to review the policy and determine whether to proceed with the transaction. The privacy policy clearly states whether the credit union collects or shares personally identifying information internally or with third parties. Because of the high regard with which credit unions hold the privacy of member information, we are in agreement with permanently extending the parental consent by e-mail, as it appears not to be overly burdensome from an operational standpoint. For those website operators that will collect and use the personally identifiable information for internal purposes only, and not provide the information to third parties, an e-mail consent from the parent is appropriate.

We thank you for the opportunity to comment on the proposed permanent extension of e-mail consent from parents. Please contact me at 800-942-7124 ext.4263 with any questions concerning the above comments.

Very truly yours,

ILLINOIS CREDIT UNION LEAGUE

By: Niall K. Twomey
Technical Specialist

g:\officegc\reg\com-ltr\COPPA2-05E-MAIL.doc