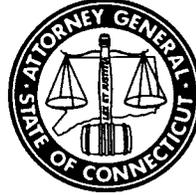


RICHARD BLUMENTHAL  
ATTORNEY GENERAL



MacKenzie Hall  
110 Sherman Street  
Hartford, CT 06105-2294  
(860) 808-5318

Office of the Attorney General  
State of Connecticut

Tel. No. (860) 808-5400  
Fax No. (860) 808-5593

November 23, 2001

Secretary  
Federal Trade Commission  
Room H-159  
600 Pennsylvania Avenue NW  
Washington, D.C. 20580

**Re: Children's Online Privacy Protection Rule Amendment  
Comment, P994504**

Dear Secretary:

As Attorney General for the State of Connecticut, I write in response to your invitation to comment on the Commission's proposed amendment to the Children's Online Privacy Protection Rule, 16 CFR Part 312. The Commission's proposal involves extending the end date for use of the "sliding scale" approach to parental consent from April 21, 2002, until April 21, 2004. As part of its invitation, the Commission requests comments on whether the sliding scale mechanism, "[r]ather than be extended, should . . . be kept in place indefinitely until the development of secure electronic mechanisms . . . to facilitate verifiable parent consent at a reasonable cost." I appreciate the opportunity to comment on this important rule.

If a prolongation of the "sliding scale" approach is warranted, the Commission should extend it to a fixed date rather than expanding it indefinitely. Protection of consumer privacy in general, and of children's privacy in particular, is obviously important to both of our agencies. This goal is best served by keeping the issue to the fore, with specified deadlines for review and advancement. If the Commission were to prolong the "sliding scale" mechanism until an indeterminate point, then review of the issue may, in fact, continually be postponed as other matters, with specific deadlines, present themselves. In sum, should the Commission determine that sufficient parental verification technologies do not presently exist to allow expiration of the "sliding scale" mechanism on April 21, 2002, then it should set a new *specific* date for that mechanism to expire. This approach will prompt further development in the field and ensure that the issue is revisited in a timely fashion.

November 23, 2001

Page 2

Thank you for your consideration in this important matter. I invite you to contact me with any questions or concerns, or your staff may contact Assistant Attorneys General Seth R. Klein or Gary W. Hawes. They may be reached at (860) 808-5400.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Richard Blumenthal', written in a cursive style.

RICHARD BLUMENTHAL

RB/SRK