

XOOLoo

September 24, 2012

VIA ELECTRONIC DELIVERY

Mr. Donald S. Clark
Office of the Secretary
Federal Trade Commission
Room H-113 (Annex E)
600 Pennsylvania Avenue NW
Washington, DC 20580

Dear Secretary Clark,

Xooloo has over 10 years of experience in the field of parental control tools and Internet safety for children. The proposed revisions to the Children's Online Privacy Protection Rule lead us to respectfully submit comments on these game-changing orientations which in our opinion will greatly question the safety and privacy of children online.

1. The use of real names on websites and social networks is an open door for the collection and dissemination of data of children under the age of 13 in a context of increasing and often uncontrolled distribution of data online. As such, the use of "Full Names" is a severe breach in the security of the Internet for children under the age of 13 with all the easily imaginable drifts in the terms of security with the danger of identification of children by malicious individuals and of use of this information for commercial purposes.

2. The collection and storage of personal data potentially used for behavioral advertising must be formally prescribed. The tracking - on and outside websites accessible to children under the age of 13 - of their activity (which page they visit, what content they "like", comment or share...) should not be used to enrich databases on children, especially if "Full Names" are allowed. Finally, third party websites and services pose a high risk for data leaks.

3. The proposed revisions to the Children's Online Privacy Protection Rule make it possible for children under the age of 13 to access previously forbidden websites. On these sites, areas of the site "reserved for adults" and those "reserved for children" must be strictly separated:

- At level of connections between members: adult members must not have the possibility to be put in contact and interact with members under the age of 13 - with or without parental consent - to avoid risks of contact with malicious individuals out of the sight of parents.

- Also, content shared by adults and content shared by children should be strictly compartmentalized in order to avoid any exposure to inappropriate or harmful material.

4. The children's "social network", when children have filled out information about themselves, in case of connections with adults having filled out their profile with "Full Names", is a threat in terms of identification of the child, of his/her city, address and relatives that could be used for commercial or malicious purposes. We advocate for a separation of children and adults' "networks" and the use of unidentifiable "screen names". Any measure that would make it easier to identify children on the Internet would expose them de facto to more risks and contacts with malicious individuals.

5. We support the proposition to consider photos as "personal information", requiring as such a parental consent, as photos are a way to identify children and present risks of dissemination on the Internet. This is especially true with the development of "face recognition" technologies.

6. The proposed revisions to the Children's Online Privacy Protection Rule could notably reduce the capacity of parental control softwares to guarantee the safety of children online against malicious individuals and/or inappropriate or harmful contents.

We wanted to thank the Commission for the opportunity to comment the revision of the COPPA. We hope our objections and constructive comments will be taken into consideration for the children's peace of mind when they use the Internet.

Sincerely,

Grégory Veret
Chairman and CEO Xooloo