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June 21, 2010

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue, N.W.
Room H-135 (Annex E)
Washington, D.C. 20580

Re: **COPPA RULE REVIEW, P104503**
COMMENTS ON BEHALF OF THE WORD OF MOUTH MARKETING ASSOCIATION

The Word of Mouth Marketing Association ("WOMMA") respectfully submits these Comments in response to the request by the Federal Trade Commission ("FTC") for public comments on the implementation of the Children's Online Privacy Protection Act ("COPPA") through the Children's Online Privacy Protection Rule ("COPPA Rule"). *See Request for Public Comment on the Federal Trade Commission's Implementation of the Children's Online Privacy Protection Rule*, 75 Fed. Reg. 17089 (Fed. Trade Comm'n Apr. 5, 2010).

WOMMA is the leading trade association in the marketing and advertising industries that focuses on word of mouth, consumer-generated and social media platforms, including marketing techniques that include buzz, viral, community, and influencer marketing as well as brand blogging. WOMMA is committed to developing and maintaining appropriate guidelines for marketers and advertisers engaging in such marketing practices, identifying meaningful measurement standards for such marketing practices, and articulating "best practices" for the industry. Founded in 2004, WOMMA currently has approximately 300 members, which includes: (i) marketers and brands that use word of mouth marketing to reinforce their core customers and to reach out to new consumers; (ii) agencies that deliver word of mouth services and technologies; (iii) researchers that track the word of mouth experience, and (iv) offline and online practitioners.

Members of WOMMA must abide by a Code of Ethics and Standards of Conduct that is designed to assist in the development of compliance procedures and the evaluation and execution of marketing campaigns. Specifically, members of WOMMA share in their commitment to engage in practices and policies that promote an environment of trust between the consumer and marketer, and to comply with applicable laws, regulations, and rules concerning the prevention of unfair, deceptive, or misleading advertising and marketing practices that are designed to enable the reasonable consumer acting rationally to make better informed purchasing decisions.

A key value that WOMMA members adhere to is *responsibility*, and the Code of Ethics specifically provides that "WOMMA members believe that working with minors in marketing



Federal Trade Commission
June 21, 2010
Page 2

programs requires sensitivity and care, given their particular vulnerability to manipulation and deception.” Given that value of responsibility, Standard of Conduct Number 7 of the Code of Ethics specifically addresses marketing with children and adolescents, providing “A WOMMA member shall not include children under the age of 13 in any of its word of mouth marketing programs or campaigns, and shall comply with all applicable laws dealing with minor and marketing, including the Children’s Online Privacy Protection Act”

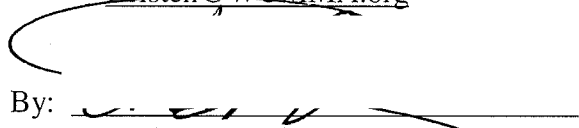
WOMMA submits that there is a continuing need for the Rule. There are obvious privacy and safety risks presented when children access the Internet, communicate through social networking sites, and use mobile web technologies. Indeed, given emerging technologies that are easily able to collect basic personal information such as names, addresses, e-mail addresses, and telephone numbers, those risks will be amplified. WOMMA looks forward to assisting the Commission in understanding the significant changes to the online environment.

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Respectfully Submitted,

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