



November 14, 2011

Donald S. Clark, Secretary
Federal Trade Commission
Office of the Secretary, Room H-113 (Annex E)
600 Pennsylvania Avenue, N.W.
Washington, DC 20580
DClark@ftc.gov

**RE: Request for Extension of Time, COPPA Rule Review, 16 CFR Part 312,
Project No. P104503**

Dear Secretary Clark:

The undersigned associations respectfully request that the Commission extend the deadline for filing comments on the proposed rule and request for comment published at 76 Fed. Reg. 59804 (Sept. 27, 2011), which proposes to amend the Commission's rule implementing the Children's Online Privacy Protection Act ("COPPA"). Specifically, we request that the comment deadline be extended from Monday, November 28, 2011, to Monday, December 19, 2011.

This modest extension would allow interested parties, including the undersigned associations, to collect and synthesize information from their respective members that the Commission has asked be included in comments to assist it in developing its final COPPA Rule. Both staff at the undersigned associations responsible for preparing comments, as well as key personnel at member companies critical to their preparation, will be on previously scheduled vacations during the Thanksgiving holiday week that precedes the current deadline. The short extension of the comment deadline that we seek will ensure that these key persons will have sufficient time to prepare useful comments for the Commission's consideration. In addition, the extension will provide the public an opportunity to evaluate a number of studies that may be relevant to the COPPA Rule review and that only recently have been published.¹ We understand that Commission staff have recently mentioned that these studies may provide useful information that would help inform the FTC's review of the COPPA Rule.

¹ See, e.g. Amanda Lenhart et al., "Teens, Kindness and Cruelty on Social Network Sites," PEW INTERNET & AMERICAN LIFE PROJECT (Nov. 9, 2011), <http://pewinternet.org/Reports/2011/Teens-and-social-media/Summary/Findings.aspx>; Danah Boyd et al., "Why Parents Help Their Children Lie To Facebook about Age: Unintended Consequences of the Children's Online Privacy Protection Act," FIRST MONDAY (Nov. 7, 2011), <http://www.uic.edu/htbin/cgiwrap/bin/ojs/index.php/fm/article/view/3850/3075>; Common Sense Media, "Zero To Eight: Children's Media Use in America" (Fall 2010), <http://www.common Sense Media.org/sites/default/files/research/zerotoeightfinal2011.pdf>.

The proposed rule and request for comment raise a number of important issues that warrant thorough consideration by a broad spectrum of affected industries. We believe the short extension requested will enable us to provide the Commission with more meaningful input.

Thank you for your consideration of this request, and we look forward to working with the Commission on these important issues.

Respectfully submitted,

Christian Genetski
Senior Vice-President and General Counsel
ENTERTAINMENT SOFTWARE ASSOCIATION
575 7th Street, NW, Suite 300
Washington, DC 20004

/s/ Linda I. Kinney

Linda I. Kinney
Vice President, Regulatory Affairs
Motion Picture Association of America
1600 Eye Street, NW
Washington, DC 20006

/s/ Jill Lockett

Jill Lockett
Senior Vice President, Program Network
Policy
National Cable & Telecommunications
Association
25 Massachusetts Avenue, NW
Washington, DC 20001

/s/ Dan Jaffe

Dan Jaffe
Executive Vice President, Government
Relations
Association of National Advertisers
2020 K Street, NW, Suite 660
Washington, DC 20006

/s/ Ross Schulman
Ross Schulman
Public Policy and Regulatory Counsel
Computer & Communications Industry
Association
900 17th Street, NW, Suite 1100
Washington, DC 20006

/s/ Morgan Reed
Morgan Reed
Executive Director
Association for Competitive Technology
1401 K Street, NW, Suite 502
Washington, DC 20005

/s/ Rachel Nywsander Thomas, CIPP
Rachel Nywsander Thomas, CIPP
Vice President, Government Affairs
Direct Marketing Association
1615 L Street, NW, Suite 1100
Washington, DC 20036

/s/ David LeDuc
David LeDuc
Senior Director, Public Policy
Software & Information Industry Association
1090 Vermont Avenue, NW, 6th Floor
Washington, DC 20005

cc: Phyllis H. Marcus, Division of Advertising Practices
Mamie Kresses, Division of Advertising Practices