

Before the
FEDERAL TRADE COMMISSION
Washington, DC 20580

In the Matter of)	
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Request for Public Comment on the)	16 CFR Part 312, Project No. P104503
Federal Trade Commission's Proposed)	
Revisions for the Children's Online Privacy)	
Protection Rule)	
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COMMENTS OF THE UNITED STATES CONFERENCE OF CATHOLIC BISHOPS
AND
THE GREEK ORTHODOX ARCHDIOECSE OF AMERICA

The United States Conference of Catholic Bishops (USCCB) and the Greek Orthodox Archdiocese of America support the Federal Trade Commission's efforts to revise and update the Children's Online Privacy Protection Rule (COPPA Rule). We believe the revision of the Rule is greatly needed to ensure the protection of children on the Internet in a rapidly evolving online landscape.

We believe that care for the safety of children rests first and foremost with parents and families. Parents have the right to be informed about what information is being collected about their children and to decide what they believe to be appropriate. We are very concerned that currently there are many situations in which parents are unaware of the information that websites are collecting about their children. It is essential that the revisions to COPPA correct this.

We are particularly interested in those revisions to COPPA that address the following issues:

- Parents should have the final say about their children's online activity and particularly about the information that is collected about their children. Websites should clearly state what information they collect and make their data collection policies easy to find on the website and in a font that is of readable size.
- We are very concerned with the practice whereby operators "deanonymize" data and collect large amounts of information that can easily be used to identify individual children. These operators can claim they are collecting no personal information, thereby skirting the existing reporting requirements. We strongly believe the new COPPA regulations must address this issue.
- We support the Commission's proposed additions to the definition of personal information. This should include any type of information that can be used today to link to

an individual person. This includes online contact information, screen or user names, persistent identifiers, photos, videos and audio files, and geolocation information.

- We are concerned about the loss of privacy when children use social media to “share” content from a another site and authorize access to their social media account as part of this process. Granting access to their social media account for the purpose of sharing content can also provide these sites and apps with access to extensive personal data, photos, videos, information shared between users, and interpersonal relationships about an individual -- even when they are no longer logged in. Yet, a user cannot always selectively remove information they do not wish to share with a web site or app and sites. We believe that users should always be informed of the personal data that will be captured and able to decide how much of their information is collected and shared.
- Finally, we believe there is need for an active government regulatory presence with regards to protecting children’s privacy online. New technologies are appearing with accelerating speed and it is essential that the Commission play an active role in monitoring and regulating websites to ensure that children’s privacy is protected.

Respectfully submitted

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