

December 23, 2010

Donald S. Clark, Secretary
Federal Trade Commission
Office of the Secretary, Room H-113 (Annex W)
600 Pennsylvania Ave., N.W.
Washington, DC 20580

RE: Extension of Time

Dear Secretary Clark:

The undersigned trade organizations respectfully request that the FTC extend the deadline for filing comments to the Preliminary Federal Trade Commission (“FTC” or “Commission”) Staff Report, “Protecting Consumer Privacy in an Era of Rapid Change: A Proposed Framework for Businesses and Policymakers” (the “Report”) to March 15, 2010. The Report seeks comments on a proposed comprehensive framework to govern consumer data privacy. Additional time will allow interested parties to more effectively prepare comments that will be helpful in assisting the Commission with developing its final recommendations.

In addition to the FTC Report, on December 16, 2010, the Department of Commerce (the “Department”) Internet Policy Task Force released its report, “Commercial Data Privacy and Innovation in the Internet Economy: A Dynamic Policy Framework” which also seeks comments on a separate proposed framework governing the same issues. Comments on this report are due on January 28, 2010. Both reports have stressed the importance of participation by all of the stakeholders in the process, especially stakeholders from the private sector who collect and maintain consumer data and will be directly impacted by the proposed sweeping changes in the data privacy landscape. The undersigned trade organizations are leaders on the issues in the reports, representing thousands of member companies. Additional time will allow business to evaluate the potential impact on the proposals to important business operations and critical services to consumers. In addition, associations will have the opportunity to seek input from our members to better respond to the Commission’s proposal. This process takes time and we believe that the short time frame provided to respond to the Commission’s proposal, in particular during the holiday season is insufficient for effectively and thoroughly responding.

The important issues discussed in the Report warrant thorough consideration. By allowing members to fully digest the two proposals and provide thoughtful input in the form of additional comments, we believe we can provide the Commission with more meaningful input from a broad spectrum of affected industries. The modest delay requested will ensure that the information provided will assist in shaping future proposals.

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Thank you for your consideration. We look forward to working with the Commission on these important issues.

Respectfully submitted,

American Association of Advertising Agencies
American Advertising Federation
American Business Media
Association of National Advertisers
Coalition for Healthcare Communication
Consumer Data Industry Association
Direct Marketing Association
Electronic Retailing Association
Interactive Advertising Bureau
MPA—The Association of Magazine Media
National Business Coalition on E-Commerce and Privacy
National Retail Federation
Network Advertising Initiative
Newspaper Association of America
Retail Industry Leaders Association
Shop.org
Software & Information Industry Association
TechAmerica
U.S. Chamber of Commerce

cc: Maneessha Mithal