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In the matter of))
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GOOGLE Inc.))

File No. 102 3136

COMMENTS OF COMSUMER WATCHDOG
May 2, 2011

Consumer Watchdog strongly supports the broad requirements for privacy protection outlined in the Commission's consent agreement with Google – that the company refrain from future privacy misrepresentations, that it implement a “comprehensive privacy program,” and that it submit to regular, independent privacy audits for the next 20 years.

But if it is to truly protect consumers' privacy, specific details of the comprehensive privacy program should be spelled out in the agreement. The plan should be based on well-established Fair Information Principle (FIPS). Key elements should include provisions requiring Google to:

- Limit data retention to the minimum time necessary, not more than three months in most cases.
- Routinely encrypt all cloud-based services (Gmail, Docs, etc.).
- Not disclose user data to law enforcement without a warrant.
- Allow users to use Google services anonymously.
- Stop behavioral profiling of Internet users.
- Limit Google's use of a website's Analytics data.
- Not require Google Accounts for Android phones.
- Not track Android users without explicit permission.
- Be transparent as to what data it collects on users.
- Allow users to control the information Google collects on them.
- Encrypt all Gmail to Gmail emails and chats using open standards like pgp.
- Refrain from offering facial recognition services.
- Incorporate a Do Not Track feature in its browser, Chrome.
- Honor Do Not Track requests from users.

Respectfully submitted,

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Consumer Advocate