October 13, 2011

Ramanpreet Singh  
Outside the United States


Dear Mr. Singh:

Thank you for your comment on the Federal Trade Commission’s consent agreement in the above-entitled proceeding. The Commission has placed your comment on the public record pursuant to rule 4.9(b)(6)(ii) of the Commission’s Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration.

You express concern that Google Inc. (“Google”) users are unable to disable Google Buzz. This is an issue raised in the Commission’s complaint. The Commission believes that the proposed order prohibiting Google from misrepresenting the privacy or confidentiality of any users’ “covered information”\(^1\) will protect consumers going forward. The order also requires Google to establish and maintain a comprehensive privacy program. Google also is mandated by the order to obtain an assessment and report from a qualified, independent third-party professional, certifying that it has in place a privacy program that provides protections that meet or exceed the protections required by the order, every other year for twenty years. Further, should Google violate the terms of the final order, it could be liable for civil monetary penalties of up to $16,000 per violation (pursuant to Section 5(l) of the FTC Act). The Commission believes the order will provide substantial benefits to Google’s users.

The Commission suggests that you contact Google through its Help Center (http://www.google.com/support/) should you have further questions or desire additional information regarding Google’s Buzz service. If you have specific information suggesting that Google is not maintaining reasonable privacy or security of user information, you may contact the Consumer Response Center at (877) 282-4357 or file a complaint online at www.ftccomplaintassistant.gov.

\(^1\) “Covered Information” is defined in the order as “information respondent [Google] collects from or about an individual, including, but not limited to, an individual’s: (a) first and last name; (b) home or other physical address, including street name and city or town; (c) email address or other online contact information, such as a user identifier or screen name; (d) persistent identifier, such as IP address; (e) telephone number, including home telephone number and mobile telephone number; (f) list of contacts; (g) physical location; or any other information from or about an individual consumer that is combined with (a) through (g) above.”
In light of these considerations, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission’s website at http://www.ftc.gov. It helps the Commission’s analysis to hear from a variety of sources in its work, and it thanks you again for your comment.

By direction of the Commission.

Donald S. Clark
Secretary