November 14, 2011

Mr. Donald S. Clark
Office of the Secretary
Federal Trade Commission
Room H-135 (Annex E)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Request for Comment on Proposed Revisions to Children's Online Privacy Protection Rule;
Docket No. 100402174-0175-01

Dear Mr. Clark:

This letter is submitted in response to the FTC's request for comment on proposed revisions to
Children's Online Privacy Protection Rule. The undersigned parties, which represent a diverse
array of perspectives on COPPA, all plan to file separate comments in this inquiry but request
an extension of the current deadline (November 28) to Monday, December 19 at the earliest.
This would allow us to more fully comment on this complex issue. In particular, we believe
these additional three weeks would allow us and other interested parties to more adequately
address the issues raised by two major studies on how children use the Internet,[1] which have
driven public conversations about the implications of revising the COPPA Rule that are still
ongoing.

Respectfully,

Berin Szoka	Emma J. Llansó	Stephen Balkam
President	Policy Counsel	President & CEO
TechFreedom	Center for Democracy & Technology	Family Online Safety Institute
Anne Collier	Denise Tayloe	Shai Samet, CIPP
Co-Director	President & CEO, Privo, FTC-	Founder & President
ConnectSafely.org	Approved COPPA Safe Harbor	kidSAFE® Seal Program by Samet Privacy
Steve DelBianco	Rebecca Newton	
Executive Director	Chief Community & Safety Officer	
NetChoice	Mind Candy USA	

cc: Phyllis Marcus and Mamie Kresses

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[1] Danah Boyd, Eszter Hargittai Jason Schultz & John Palfrey, *Why Parents Help their Children Lie to
Facebook about Age: Unintended Consequences of the 'Children's Online Privacy Protection Act*.', Nov.
7, 2011, http://www.uic.edu/htbin/cgiwrap/bin/ojs/index.php/fm/article/view/3850/3075; Amanda Lenhart *et
al.*, Pew Internet & American Life Project, *Teens, Kindness and Cruelty on Social Network Sites*, Nov. 9,
2011, http://pewinternet.org/Reports/2011/Teens-and-social-media.aspx.