



December 23, 2011

Jon Leibowitz, Chair  
Federal Trade Commission  
Office of the Secretary, Room H-113  
600 Pennsylvania Ave., NW  
Washington, DC 20580

*Submission Via Online FTC Comment Form*

**RE: Comments of Scholastic Inc. on COPPA Rule Review, 16 CFR Part 312, Project No. P104503 (76 Fed. Reg. 59,804)**

Dear Chairman Leibowitz:

Scholastic Inc. (“Scholastic”), the world’s largest publisher and distributor of children’s books, and a global leader in online children’s literacy and reading programs, is pleased to provide the following comments on the Federal Trade Commission’s proposed amendments to the regulations promulgated pursuant to the Children’s Online Privacy Protection Act (“COPPA”).<sup>1</sup>

## **I. Background**

Scholastic was founded in 1920 with the mission of bringing “today’s” world into the classroom through quality, age-appropriate educational materials. Ninety-one years later, Scholastic is the world’s largest publisher and distributor of children’s books; during its fiscal year ended May 31, 2011, Scholastic published or distributed approximately half a billion children’s books worldwide. Scholastic has a longstanding commitment to quality children’s literature, as evidenced by the fact that many of its publications have received the top awards for excellence in children’s literature, including thirty-six Newbery Medals and Honors, numerous Caldecott Medals (most recently in 2008, for Brian Selznick’s *The Invention of Hugo Cabret*), and the 2008 National Book Award for Young People’s Literature. And of course, Scholastic is the U.S. publisher of one of the most popular book series of all time, *Harry Potter*. Scholastic reading materials are found in 97% of schools across all fifty states.

Scholastic is also a leader in the rapidly-emerging area of children’s online literacy and reading programs, dedicated to a mission of using technology to help children in the United States and around the world to read and learn. Large numbers of students use Scholastic’s online services in school settings under teacher supervision. Scholastic is a leading provider of technology-based formative reading and math assessment tools that track students in real time,

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<sup>1</sup> Children’s Online Privacy Protection Proposed Rule, 76 Fed. Reg. 59,804 (Sept. 27, 2011).

provide data and feedback to teachers, families and students on personalized dashboards, and help teachers tailor instruction to the needs of each student. Scholastic’s flagship reading intervention software program, [READ 180](#), is used by more than 1 million students who struggle with reading across the country every day. Scholastic is also a provider of digital and online reference tools for classroom and library use, including [Grolier Online](#), a comprehensive source of non-fiction content for grades 3 and up, such as world newspapers, award-winning encyclopedias and clickable maps.

Scholastic’s website for teachers, [Scholastic.com/teachers](#), is the most popular site for teachers on the Internet. More than 1.6 million visitors to Scholastic.com each week access over 100,000 pages of free content and teaching resources, including lesson plans, teaching themes and suggested student activities. One such student activity, You Are What You Read ([www.youarewhatyouread.com](#)), has been recognized as a Best Website for Teaching and Learning by the American Association for School Librarians. Currently, Scholastic is running the One Million Bookprints for One Million Books campaign through [Scholastic ClassroomsCare](#), encouraging teachers, parents and kids to create their “Bookprint” (a list of favorite books) at [You Are What You Read](#). For every Bookprint created, Scholastic Book Clubs will donate a quality book to a child in need through [Reach Out and Read](#) (up to one million books).

## II. Comments

Scholastic appreciates the overall effort of the Federal Trade Commission (“FTC”) to update the COPPA regulations in a manner that both protects children participating in online activities and encourages the growth of “engaging, diverse, and appropriate online content for children that includes strong privacy protections by design.”<sup>2</sup> Indeed, as a company whose educational products are designed primarily for use by children, Scholastic has been a leader in establishing rigorous safeguards for child-centered online materials. As a result, we believe that we have earned the confidence of parents, teachers, and educators across the country, not only in the educational value of our products, but in our commitment to keeping children safe online. Scholastic has collaborated closely with the FTC in the past in developing high-quality online children’s educational experiences — including the successful AdMongo.gov website — and we look forward to continuing this collaboration under the final revised COPPA rule in providing a safe and secure online learning and activity environment for children.

While Scholastic supports many of the proposed changes to the COPPA rule, Scholastic does have significant reservations regarding certain of the proposed changes, particularly those relating to the “sliding scale” method of parental consent. We believe that not only are these proposed changes unlikely to achieve the FTC’s desired outcomes in practice, but that such changes are also likely to have the counterproductive effect of reducing the availability of high-quality online content for children. In addition, Scholastic also believes that it would be valuable for the final rule to clarify several of the proposed changes, in order to assist operators in

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<sup>2</sup> *Id.* at 58,808.

ensuring that their data management and collection safeguards are fully compliant with FTC intent.

#### **A. “Email Plus” Has Significant Value and Should Be Retained**

Scholastic is concerned about the consequences of eliminating “Email Plus” as an option for obtaining parental consent. As the FTC is aware, Email Plus is an option only in those limited circumstances when an operator seeks to collect personal information solely for its *internal use*. Scholastic has found this option extremely valuable under such circumstances, and a number of Scholastic programs have integrated Email Plus into their program registration process in recent years. These programs range from reading challenges to essay contests, including [Scholastic Summer Challenge](#), Scholastic Book Fairs’ [Read 100,000 Program](#), [Clifford the Big Red Dog’s Be Big In Your Community Contest](#), and the [Jackie Robinson Breaking Barriers Major League Baseball Essay Contest](#). Approximately 100,000 of the children who registered for these programs did so using the Email Plus method of consent. In the absence of reliable and affordable alternatives to Email Plus — and in the absence of any evidence of fraud or misuse attributable to Email Plus — Scholastic believes that the elimination of Email Plus will do little to improve the protection of children’s personal information, yet will significantly hinder the ability of operators to deliver “engaging, diverse, and appropriate online content for children.”<sup>3</sup>

##### *1. Email Plus Continues To Constitute Appropriate “Reasonable Effort” Under COPPA.*

Congress itself acknowledges that no method of obtaining parental consent will ever be absolutely foolproof. Indeed, COPPA defines “verifiable parental consent” as “any reasonable effort (taking into consideration available technology) . . . to ensure that a parent of a child receives notice of the operator's personal information collection, use, and disclosure practices, and authorizes [the same]”<sup>4</sup> (emphasis supplied). In doing so, Congress clearly recognized the importance of striking a balance between strong verifiable parental consent procedures and encouraging operators to provide the very online children’s activities for which such parental consent is being sought. The FTC is on record as being in agreement, affirming that “[t]he Commission believes it is appropriate to balance the costs imposed by a method against the risks associated with the intended uses of the information collected.”<sup>5</sup>

In striking this balance, it is essential to recognize that, in the limited circumstances in which Email Plus is currently permitted, all stakeholders have acknowledged that the safety risk to children from the misuse of information used only for internal purposes is low. The FTC itself has noted (and reiterated in the proposed rule) that internal uses of information “present[] less

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<sup>3</sup> *Id.* at 58,808.

<sup>4</sup> COPPA § 1302(9).

<sup>5</sup> 64 Fed. Reg. 59,901.

risk than external disclosures of the information to third parties or through public postings.”<sup>6</sup> Information used only for an operator’s “internal purposes” is subject to internal systems controls and confidentiality obligations, where the operator has significant incentives (both legal and reputational) to ensure that these controls and obligations are met. In contrast, information that is used externally may, depending on the circumstances, be accessed by the general public with no restrictions, or by third parties not subject to confidentiality obligations, thus increasing the risk of misuse of the information (whether by unscrupulous marketers or predators).

An example of an “internal” use of information is the collection of a student’s school name and address, tied to the student’s anonymous user name, so that the student can log minutes in a reading competition and earn credit for her school, where the specific school information is never displayed publicly in connection with that user. Scholastic has done this as part of its Scholastic Summer Challenge program, described more fully below, and its Scholastic Book Fairs’ Read 100,000 program. An example of an “external” use of information requiring heightened parental consent would be open online forums where child users can post messages freely without moderation – something Scholastic has not done to date. As is evident, the distinctions between the two types of uses are significant in both scope and potential safety risk to the child. Scholastic is concerned that the proposed rule would improperly extinguish this highly relevant distinction between internal and external uses of information.

## 2. *The Use of Email Plus Has Not Resulted in Fraud or Abuse*

Having had extensive experience with Email Plus over the past several years, Scholastic is unaware of any evidence that Email Plus is being misused. Scholastic has utilized Email Plus as an integral component of a concerted effort to expand our free online literacy and reading activities and make them more engaging, interactive, and robust. In two years of using Email Plus, with over 100,000 registrations via Email Plus, Scholastic has never received a single complaint — from a parent, teacher, educator, regulator, competitor, or anyone else — alleging that the Email Plus verification process had been subject to misuse (for instance, by a child who posed as her parent). Importantly, several of our online activities use Email Plus to obtain parental consent at the outset, but subsequently require additional (and more stringent) parental consents to comply with the COPPA requirements for external uses of information. For instance, in the case of an essay contest in which the child’s essay submission may contain personally-identifiable information, Scholastic requires a signed affidavit from a parent before a child’s winning entry can be posted online and acknowledged publicly. In no such “follow up” instance have we ever received a complaint that the initial Email Plus verification was obtained improperly. In short, Scholastic is unaware of any evidence whatsoever — either from our own experience, or our discussions with other operators — that Email Plus is being misused or manipulated in any way.<sup>7</sup>

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<sup>6</sup> 64 Fed. Reg. 59,901; 76 Fed. Reg. 59,819 at n. 147.

<sup>7</sup> Scholastic notes that many of the commenting parties who encourage eliminating Email Plus (primarily on the basis of its alleged lack of reliability) appear to be vendors of proprietary identity verification software, and as such have a substantial vested financial interest in the elimination of an inexpensive, readily-available and reasonable means of parental verification such as Email Plus. See 76 Fed. Reg. 59,819 at n. 153-154.



3. *The Advantages of Email Plus — and the Likely Adverse Consequences of its Elimination — are Significant.*

Over the past eight years, Scholastic has enrolled nearly 3.4 million registrants in its online interactive literacy and reading websites. As more of Scholastic’s traditional activities have moved online, and as online activities have become more sophisticated, Scholastic has turned to Email Plus more frequently to obtain consent from parents to allow children under 13 to participate. For instance, the Scholastic Summer Challenge, which encourages children to track their summer reading progress online, enrolled 101,361 children in 2011 — 60,313 of whom enrolled via Email Plus. For the Summer Challenge campaign, we link users to their schools because, at the end of the summer, we publish the 20 schools with the most summer reading minutes in the *Scholastic Book of World Records*. We have heard from numerous school administrators across the nation that this competition has been a great motivator in encouraging students to engage in reading on their own initiative.

By enabling parents and teachers to easily approve participation by their children and students in the Scholastic Summer Challenge through an automated means that does not require manual processing by Scholastic staff, Email Plus makes it possible for large numbers of children to begin logging their “reading minutes” shortly after registering, and to begin contributing those minutes to their schools’ accounts in real time. The positive response Scholastic has received from parents, teachers and educators after making Email Plus available has demonstrated that they value the common-sense balance Email Plus strikes between protecting child safety and encouraging children to engage with online materials.

It is also important to note that many of the interactive online activities for which Scholastic uses Email Plus are specifically designed to promote literacy (such as Read 100,000 and Scholastic Summer Challenge) or encourage students to become involved in their community (such as Clifford’s Be Big in Your Community, a program that asks participants to submit a “big idea” to make the world a better place, with the chance to win a community grant to implement the winning proposal). These online initiatives are offered to children without charge. Moreover, once the online initiatives have been developed, the automated means of obtaining parental consent via Email Plus means these initiatives can easily be “scaled up” to reach large numbers of children at little or no marginal cost.<sup>8</sup>

If Email Plus were eliminated, Scholastic envisions several adverse consequences. Because Scholastic does not charge students for participating in its online literacy initiatives, the other primary alternative means of verification under COPPA — consent via a credit card transaction — is not an option. This means that parents, to enable their children to participate, will need to resort to more cumbersome methods of verification, including print-sign-and-send (or –scan) and telephone or video-conferencing verification. For operators, this means that

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<sup>8</sup> For an example of a child user’s logged-in experience on the Scholastic Summer Challenge, see Appendix A (Scholastic Summer Challenge — User View). For an example of a child’s experience of Read 100,000, see Appendix B (Read 100,000 — User View). To see how Email Plus consent is used in Scholastic Read 100,000, see Appendix C (Read 100,000 — Registration Process).

online programs will no longer be scalable with little marginal cost, and will instead likely require hiring additional dedicated staff to manually process thousands of verification requests. As a result, operators like Scholastic, whose website experiences for children are currently free at the point of use, may find it difficult to continue support for the enriching programs and activities that can be made available under such an operating model.

Similarly, parents may not have or be willing to expend the time to take the extra steps to make these literacy and other programs available to their children. From our own experience, we have found that busy parents frequently neglect to complete and send back, or object to having to send back, signed affidavits even when we award prizes for sweepstakes or contests. If Email Plus is eliminated, assuming the continued existence of these programs for children under 13, the likelihood that parents will be willing to take extra steps simply to enable their children to participate in free online activities is low indeed.

In addition, the FTC currently permits teachers to act in lieu of parents in giving COPPA consent. Scholastic has designed registration for several of its online literacy programs to enable teachers to register their students as a class, and to provide any necessary consents for Scholastic's internal uses of children's personal information via the quick and highly automated Email Plus method.<sup>9</sup> If Email Plus is eliminated, these teachers would instead need to provide an individual consent for each student via video chat, scanned signed consent forms, or constant telephone calls to phone banks. Given the limited child safety issues involved with the use of information collected by operators solely for internal purposes, Scholastic believes that this is simply not a realistic or proportionate demand to place on already-overworked teachers, many of whom are responsible for scores of individual students. Scholastic has designed its online opportunities to complement the needs of teachers and educators, and the children they serve, not to place disproportionate burdens upon them.

In sum, the elimination of Email Plus will not encourage the growth of valuable online content and programs for children, but is almost certain to decrease the number of children who can most benefit from having access to such content and programs, to the extent they continue to be maintained.

4. *There Is No New Consent Technology that is Both More Reliable And More Affordable than Email Plus.*

The FTC established the sliding scale in 1999, on the basis that this approach constituted an appropriate mechanism for implementing COPPA until other forms of electronic consent technology became “more reliable (and affordable)”<sup>10</sup> (emphasis supplied). The FTC reaffirmed

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<sup>9</sup> Scholastic notes that these programs are not programs made available through the school pursuant to a contract with the school or the school district for the use and benefit of the school and its students; rather, they are programs available for any child to use via the Scholastic website. Thus, these programs are not exempt from COPPA's consent requirements, as articulated in the FTC's COPPA FAQ #55. For an example of bulk registration by teachers, see Appendix C (Read 100,000 — Registration Process).

<sup>10</sup> 74 Fed. Reg. 59,819 & n. 149 (citing 64 Fed. Reg. 59,901).

this position in 2006 and extended the sliding scale approach indefinitely, announcing its intention to modify the COPPA rule “should an acceptable electronic consent technology develop.”<sup>11</sup>

Scholastic understands the FTC’s frustration that, despite advances in technology since 2006, “few, if any, new methods for obtaining parental consent have emerged since the sliding scale was last extended in 2006.” However, Scholastic strongly believes that the new alternative methods outlined in the proposed rule fail to meet either the reliability or the affordability standards articulated by the FTC for establishing an Email Plus replacement.

With respect to affordability, neither of the new proposed methods for obtaining parental consent — video-conferencing and returns of signed consent forms by electronic scan — are more affordable (or accessible) for parents and teachers than Email Plus. Both of these approaches require additional and expensive equipment to which many parents and schools simply do not have access. For instance, video-conferencing requires not only video-enabled devices, but access to broadband networks, to function effectively. Yet the federal government’s National Broadband Plan reports that 100 million Americans do not have broadband access at home, while a 2011 FCC survey determined that nearly 80% percent of American schools do not have adequate broadband access.<sup>12</sup> Indeed, in 2008, the National Center for Education Statistics reported that only 30% of all public schools in the United States had video-conferencing capacity at all.<sup>13</sup> Likewise, electronic scanning requires the purchase of additional hardware and software that many parents and schools, particularly in economically disadvantaged areas, either cannot access or cannot afford. Our own experience working with parents in other contexts indicates that a significant number of parents do not have access to scanners or know how to use them. A likely result is the inability of children, especially disadvantaged children, to gain access to literacy and other programs and activities that could most help them.

Nor would any of the current or proposed methods of consent be more affordable for operators to process than Email Plus. If operators are required to adopt the heightened consent methods previously used only for the collection of external data — paying staff to file print-and-send forms, training staff to evaluate the validity of (and properly handle) scanned drivers’ licenses, or hiring more trained telephone operators to confirm consent — the additional costs will be substantial and significant. Scholastic is proud of the fact that it currently provides much of its online content free of charge at the point of use, meaning that children and families have access without regard to their ability to pay. Given that the costs of verifying consent will increase if Email Plus is eliminated, the likelihood that Scholastic and other operators will be forced to consider reducing or eliminating certain free online resources increases dramatically. Moreover, if Scholastic did find it necessary to charge for some of its currently-free content (and “consent via credit card purchase” became the predominant consent method), many poorer families could find themselves doubly-disadvantaged: lacking the financial means to pay for the content, and lacking access to a credit card that would enable them to provide consent. In short,

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<sup>11</sup> 71 Fed. Reg. 13,254-55.

<sup>12</sup> <http://www.broadband.gov/plan/executive-summary/>; [http://transition.fcc.gov/010511\\_Eratereport.pdf](http://transition.fcc.gov/010511_Eratereport.pdf).

<sup>13</sup> <http://eric.ed.gov/PDFS/ED509397.pdf>, at 9.

far from encouraging the “growth of engaging, diverse, and appropriate online content for children,” the elimination of Email Plus would instead lead to a likely reduction in the availability of free educationally-oriented content.

There is also no evidence that the proposed alternatives are significantly more reliable than Email Plus. As explained above, Scholastic is unaware of any evidence that Email Plus is being abused or misused, or is an unreliable indicia of parental consent. It is always possible to hypothesize worst-case scenarios, but there is no indication that such hypotheticals have any basis in reality. Even in the hypothetical case of a child who wished to forge parental consent, the possibility of this occurring is no greater with Email Plus than it is with the process of reviewing mailed or scanned consent forms or government-issued identification. Indeed, there is no reason to believe that a child who is capable of registering for a duplicate email address is somehow incapable of forging a signature on a consent form (or borrowing a parent’s license from their wallet) and then operating a scanner or dropping a copy in the mail. While all of these scenarios present the possibility that an enterprising child could go to great lengths to subvert an operator’s reasonable efforts to obtain verifiable parental consent, in our experience there is no evidence that such activity occurs at all — much less with a frequency that would justify the elimination of Email Plus in favor of other available methods.

Finally, Scholastic has strong and significant reservations about a proposal to eliminate Email Plus but permit the use of government-issued identification as a permissible form of verifiable parental consent. Besides the fact that there is (again) no way for an operator to guarantee that the license of the individual is indeed being provided by that individual, the intent of COPPA is clearly to minimize the handling by operators of sensitive personal identification data. This new proposal, however, would increase the amount of sensitive personal information that operators are being asked to handle, and potentially subject operators to increased liability if such information were allegedly mishandled or is inadvertently retained. It is also unclear how operators would maintain a database of consents obtained through government IDs in a manner that would be simultaneously protective of the data provided therein, legal under all applicable laws, and susceptible to proof should the authenticity of such consents be challenged by a parent or a regulator. The “addition” of this option to the list of permissible methods is essentially illusory, given that the potential for significantly increased legal liability means that few — if any — operators are likely to adopt this method as a means for obtaining verifiable parental consent. Moreover, in our experience, parents are frequently reluctant to provide sensitive personal information like social security numbers, as may be required for tax reporting purposes when we award sweepstakes prizes, and will sometimes forfeit a prize rather than share this information. This suggests that parents will not embrace the use of government IDs as a means of giving consent for their children’s online activities.

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Overall, as Scholastic has articulated in the above comments, Email Plus has significant value and should be retained. Scholastic’s experience is that Email Plus continues to remain the most reasonable, reliable, and affordable consent method available, in that it provides important safeguards for children’s personally identifiable information without either imposing onerous

and disproportionate burdens on parents and teachers to provide consent, or disincentivizing operators from continuing to provide high quality children’s online activities.

**B. The Range of Alternative Electronic Payment Methods Permitted for Consent Should be Expanded**

Scholastic appreciates the confirmation in the proposed rule that monetary credit card transactions will continue to be permissible as a form of obtaining verifiable parental consent. However, Scholastic encourages the FTC to reconsider its per se position that other forms of electronic payment — notably, debit cards and online transaction accounts — are not yet reliable enough to provide verifiable parental consent.<sup>14</sup> While Scholastic agrees that not all alternative forms of electronic payment currently meet the criteria of § 312.5(b)(1), Scholastic believes that certain providers of alternative electronic payment options can meet the same stringent criteria as credit cards, and that those specific options should be deemed acceptable by the FTC for verifiable parental consent purposes.

An increasing number of parents and teachers are demanding (in part for security reasons) that operators like Scholastic offer alternative electronic payment method options (such as PayPal) in addition to the existing option of manually entering a credit card number. Operators should have the flexibility to enable parents and teachers to use other electronic payment method options and provide contemporaneous verifiable consent at the time of purchase. This is particularly important in the context of digital apps and other downloadable products that require COPPA consent, which parents and teachers may be purchasing in the same online order as physical products that will be shipped via traditional means. Few parents are likely to understand or benefit from a dual-online-checkout system — where one method of checkout (if the parent uses a credit card) permits the provision of consent, while the other (for all other forms of payment) does not.

In reaffirming the use of credit cards as a means for obtaining verifiable parental consent in 2006, the FTC acknowledged that, even though it is legally permissible for children under 13 to obtain credit cards, “principles of contract law would require the credit cards to be linked to a supervisory adult’s account. Through this link, parents can set controls on and monitor the account, ensuring that the children cannot use the credit cards without permission.” Moreover, the FTC reasoned that a credit card used in connection with a transaction provides “extra reliability, because parents obtain a transaction record that gives them additional notice of the consent provided. Parents thus are notified of the purported consent, and can withdraw it if improperly given.”<sup>15</sup>

Scholastic thus proposes that the FTC codify this simple test across all payment platforms. Where an operator can demonstrate that an alternative means of electronic payment provides separate notification of each discrete monetary transaction to the primary cardholder

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<sup>14</sup> 76 Fed. Reg. 59,817-18.

<sup>15</sup> 71 Fed. Reg. 13,254-55.

(for instance, via a mailed monthly statement or an online balance report), then the use of that specific product for a monetary transaction — in conjunction with provision of notice of the operator’s privacy procedures and request for consent — should be deemed permissible as a means for obtaining verifiable parental consent.

For instance, if an account at an online service (such as PayPal or iTunes) is linked to a credit card, and that online service is used in a monetary transaction, a record of the transaction will appear on the credit card statement of the primary cardholder. Notably, the purposes of these types of online services are not to change the fundamental nature of the credit card transaction, but are instead to provide customers with either additional data protection (PayPal, with 103 million active registered users,<sup>16</sup> is primarily designed to shield the cardholder’s actual credit card number from the merchant, thus increasing data security) or convenience (enabling cardholders to avoid having to re-enter their credit card number manually in order to make subsequent purchases). In either event, the outcome is exactly the same as with the single use of a manually-entered credit card number — a purchase made in a recorded transaction, with a separate notification made available to the primary cardholder.

Similarly, hundreds of millions of debit cards are currently in circulation in the United States, the vast majority almost certainly issued to adults. It is estimated that Visa and MasterCard alone had 520 million debit cards in circulation in the United States as of 2010.<sup>17</sup> Visa estimates the most recent annual payment volume from its U.S. debit cards at \$909 billion,<sup>18</sup> while MasterCard estimates the most recent annual payment volume from its U.S. debit cards at \$457 billion.<sup>19</sup> Debit cards are clearly being used as a primary means of completing billions of dollars’ worth of financial transactions, and many adults prefer debit cards to credit cards because they help prevent the accumulation of spiraling credit balances and damaged credit ratings. In the event that an operator can demonstrate that a given debit card meets the test articulated above — separate notification of discrete transactions made available to the legal cardholder — Scholastic believes it is counterproductive, both practically and as a policy matter, to continue precluding the use of debit cards to provide verifiable parental consent.

### **C. Clarification of User Name Exception**

Scholastic encourages the FTC to provide further clarification in the final rule concerning the circumstances in which screen and user names will remain exempt from the expanded definition of personal information. In its comments on the proposed rule, the FTC notes that, under the proposed exception (for screen or user names used “solely to maintain the technical functioning of the Web site or online service”), operators will be permitted to “allow children to

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<sup>16</sup> <https://www.paypal-media.com/about>

<sup>17</sup> <http://www.creditcards.com/credit-card-news/credit-card-industry-facts-personal-debt-statistics-1276.php>

<sup>18</sup> VISA 2010 Annual Report, at 43, *available at* <http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9NzZM5MjV8Q2hpbGRJRDR0tMXxUeXBIPtM=&t=1>

<sup>19</sup> MasterCard 2010 Annual Report, at 17, *available at* <http://investorrelations.mastercardintl.com/phoenix.zhtml?c=148835&p=irol-reportsannual>

establish screen names for use within a site or service” “to identify users to each other” without the need to obtain prior parental consent.<sup>20</sup>

Scholastic currently permits child users to register on certain of its Web sites by creating an anonymous user name comprised of un-editable common words selected by the child from a list or generated by an online spinning wheel, and may in some cases be combined with a randomly-generated number.<sup>21</sup> The user cannot replace these elements with customized text. The user names generated by this system (such as “bluetuna5”) enable children to communicate with other children about books, reading, authors and other subjects of interest through public profile pages with static artwork and pre-written, un-editable text provided by Scholastic, or postings that are screened by a moderator and stripped of personally identifiable information before they are posted. These profile pages and postings are not located in a password-protected area.

Scholastic believes that user names of this type and used in this manner do not fall under the FTC’s proposed revision to the definition of personal information under COPPA because they are not as portable to other, unrelated Web sites as user names that allow children to include information that is identifiable with them, such as words related to hobbies, favorite celebrities, personal characteristics or favorite sayings. Such operator-driven (as opposed to user-driven) user names do not pose a risk to child users in the way that a user name freely created by the child, while still anonymous, may pose by making it more likely that the child will be tracked across or contacted through different services. If our interpretation of the proposal is incorrect and these types of user names will indeed require consent going forward, such limitations will likely reduce teachers’ use (in the classroom setting) of many of the free online activities currently offered by Scholastic.

Scholastic requests that the FTC confirm our understanding that when i) the operator limits valid user names to those created through the use of an operator-established list of common words and/or a random generic word and/or a random number generator (in which the resulting user names are un-editable by the user), and ii) where no personal information (other than general information about the child or her family as described in Section 312.2(g) of the current COPPA rule) is either collected or paired with that user name, that those user names can be publicly displayed, and that users can identify each other (and post under such user names) within the Web site without obliging the operator to obtain prior parental consent.

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<sup>20</sup> 76 Fed. Reg. 59,810.

<sup>21</sup> For example, see Appendix D (THE STACKS — Registration Process). THE STACKS, the portion of Scholastic.com for kids ages 8-12 who love books and reading, sees 82 million monthly page views and 14 million monthly visits. See also Appendix C (Read 100,000 — Registration Process).

#### **D. Clarification of Definition of “Online Service”**

Scholastic also encourages the FTC to clarify the circumstances under which an operator constitutes an “online service” in the context of obtaining parental consent. The proposed rule suggests that the FTC’s primary concern is — as it should be — its ability to monitor how any given operator is managing and safeguarding the personal information it receives. In practice, a single operator often operates a family of Web sites pursuant to a common personal information collection policy. For instance, Scholastic currently operates Read 100,000, Scholastic Summer Challenge, Be Big In Your Community, The 39 Clues, You Are What You Read and other interactive sites that require COPPA compliance, all of which have unique URLs.<sup>22</sup>

Given this reality, Scholastic encourages the FTC to clarify that a single corporate entity operating a family of Web sites pursuant to a common personal information collection policy constitutes a single “online service” for COPPA purposes, and thus, for any given child’s unique user name, is required to obtain only a single verification (i.e., one that applies across all Web sites operated by that corporate entity and its business units and affiliates), rather than be required to collect multiple verifications (i.e., one for each individual Web site operated by that corporate entity and its business units and affiliates, even though they are all covered by the same privacy policy).

The alternative — requiring parental consent for each individual COPPA-compliant Web site operated by the same corporate entity or its affiliates — would in practice often lead to parents receiving multiple nearly-identical requests from the same entity or operator. This would likely cause significant unnecessary confusion (for instance, creating the erroneous presumption on the part of parents that subsequent consent requests were actually duplicates and could thus be ignored), and could have the inadvertent consequence of decreasing the ability of children to access online content.

We believe this is appropriate since, as the operator or co-operator of all of these related web sites, we have the same legal obligations and responsibilities, including those relating to the collection, use and security of personal information, in respect of each of them, as a collective whole.

#### **E. Clarification of Definitions Relating to “Persistent Identifiers”**

Scholastic notes that the proposed rule would expand the definition of personal information to include “persistent identifiers” when such identifiers are used for either “amassing data on a child’s online activities” or “online profiling.”<sup>23</sup> Scholastic encourages the FTC to provide further guidance in the final rule as to how it intends to interpret these otherwise vague terms, as Scholastic believes that it will be difficult (if not impossible) from the text of the

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<sup>22</sup> Several of these URLs are currently subdomains of www.scholastic.com, but could in future be identified under their own top-level domain names

<sup>23</sup> 76 Fed. Reg. 59,812.



proposed rule and the related comments for operators to determine with any certainty whether their existing technical data collection protocols require obtaining prior parental consent.

### *1. Clarification Relating to the Use of Analytics*

In particular, Scholastic observes that many operators routinely retain information about IP addresses in order to develop analytics about which third-party Web sites generate traffic for their own Web sites (whether through advertising or otherwise), which advertisements located on their own Web sites (promoting the Web sites of third parties) attract the most interest, or which emails or newsletters are most relevant for their users. Operators use these types of analytics to improve the internal operations of their own Web sites, as such information enables them to determine which third party websites provide them with the most effective visibility, as well as educating the operator as to areas of topical coverage that it may wish to expand or contract.

To illustrate with a concrete example, Scholastic recently placed advertising on multiple third party Web sites for a single new book release. To evaluate the success of these paid campaigns, Scholastic reviewed the click-through rate of those ad touts and also how many pages users viewed on Scholastic's Web site after clicking through that tout, on average. If an ad tout has a high click-through rate but only leads to one additional page view from a user, then we may consider it less successful than an ad with a low click-through rate but which leads to ten additional page views from a user. In order to make this kind of evaluation, we do not need to track the user across multiple sessions, but we do need to be able to track the user's behavior from a third party Web site to our Web site and then across our Web site.

We also analyze what features on our Web site are of most interest to users who come from different external sources. That information often becomes apparent only over time and multiple visits. For example, we may learn that users who come to our site from banner ads on third-party sites are more likely to sign up for newsletters, but that those banner ad-sourced users do not actually open newsletters as frequently as users who reach our site from newsletter sign-up widgets placed on third party sites.

Moreover, many operators operate websites that, while not devoted solely to children under 13, nevertheless attract enough children under 13 to require COPPA compliance. To require operators to obtain prior verification before any analytic data could be collected from any user — child or adult — would not only be technologically complicated and excessively burdensome, but would constitute precisely the type of interference with “the ordinary operation of Web sites or online services” that the FTC has expressly sought to avoid.<sup>24</sup>

As a result, Scholastic encourages the FTC to clarify that standard data analytics, even if they entail collecting information about a user as she moves from one website to another (provided they are not used for purposes of online behavioral advertising), neither constitute “amassing data on a child's online activities” or “online profiling,” nor are governed by the

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<sup>24</sup> 76 Fed. Reg. 59,812, & nn.80-81.

proposed definition of “an identifier that links the activities of a child across different Web sites or online services,” but are instead permissible under the FTC’s proposed express exception for “support for the internal operations of the Web site or online service.”<sup>25</sup> Scholastic believes that the alternative — requiring prior parental consent before collecting information on each such click-through — would mean that operators would effectively be prohibited from collecting any meaningful analytical information about the nature or general interests of its users. The unavailability of this data (which is crucial to the internal operations of the Web site and our ability to keep our Web site relevant and useful for our audience), would have a significant and adverse impact on the ability of operators to provide exactly the type of “engaging, diverse, and appropriate online content for children” that the FTC encourages.

## *2. Clarification Relating to Single-Operator Integrated Cross-Platform Applications*

In addition, Scholastic encourages the FTC to provide further clarification on how it intends to interpret the proposed subsection (h), which adds to the definition of personal information “an identifier that links the activities of a child across different websites or online services.” Scholastic notes that, increasingly, operators are developing applications that permit a single user to integrate their online experience across multiple platforms, all of which are operated by the same operator (for instance, allowing a single unique user name to access the same personalized content whether via a website, iPad application, or a Kindle e-book). Scholastic encourages the FTC to clarify that, when a single operator operates such integrated cross-platform applications, the common identifier used by the operator in such circumstances does not constitute a link between “different Web sites or online services” for the purposes of the proposed subsection (h).

### **F. Any Changes to the Rule Should be Effective Prospectively, With Sufficient Time Afforded for Implementation**

To the extent the FTC elects to proceed with changes outlined in the proposed rule, Scholastic encourages the FTC to confirm that such changes would be effective only prospectively. In particular, requiring operators to obtain new parental consents from every existing registered child user — over 3 million for Scholastic alone<sup>26</sup> — would create significant fiscal and logistical challenges. Such a requirement would also create serious practical disruptions for the thousands of students who participate in Scholastic’s online programs on a daily basis.

---

<sup>25</sup> 76 Fed. Reg. 59,812.

<sup>26</sup> Not all of these current users may actually be under the age of 13. However, because Scholastic’s method of assigning user names (and those user names themselves) have not been considered subject to COPPA to date, and no other personal information was collected from those users, not all of those users were age-screened when they created accounts. Thus, Scholastic would be required to verify and, where necessary, re-register, all of its current users.

In addition, Scholastic requests that operators be afforded sufficient time for implementation following the finalization of any changes to the rule. Any change to the existing standards, particularly in relation to Email Plus, will require operators to develop, test, obtain legal review of, and implement new privacy policies, new parental notice forms, and new consent mechanisms, as well as the potential need to redesign both the front-end and back-end of websites in order to ensure compliance. Scholastic encourages the FTC to be cognizant of this practical reality in establishing the effective dates for any changes to the existing rule.

### **III. Conclusion**

Scholastic acknowledges the significant time and effort that the FTC has committed to the process of revising the COPPA rule, and appreciates the opportunity to participate in this process by providing the FTC with the above comments. Scholastic is pleased to provide any additional information about our online programs and practices that may be of assistance, and would appreciate the opportunity to meet with FTC staff prior to the finalization of the rule to answer any questions you may have.

Scholastic looks forward to working with the FTC to continue implementing our shared goals: ensuring the safety of children online, while simultaneously ensuring that innovative online resources continue to be accessible and within reach of all children, regardless of their personal circumstances, who would benefit from them.

Sincerely,



---

Alexandra Aleskovsky  
Executive Vice President, Scholastic Inc. and President of eScholastic



## **Appendix A**

### **Scholastic Summer Challenge – User View**

Which **FIVE** books have **SPECIAL MEANING** for you?



Scholastic.com Home

# THE STACKS BETA

YOU, YOUR FRIENDS, YOUR READS!

Browse: [Characters](#) | [Books](#) | [Authors](#) | [FAQ](#) | [All](#)

SEARCH

HOME

BOOKS & AUTHORS

GAMES

BLOG

VIDEOS

MESSAGE BOARDS

PROFILE



Register >>

Login >>

Invite a Friend >>

## Read ★ Log Minutes ★ Earn Rewards

- ★ Choose what YOU want to read – then read as many minutes as you can!
- ★ Log your minutes here every day to enter the sweepstakes!
- ★ Spin the weekly Prize Wheel to win awesome stuff!

Sweepstakes!

Tout FPO

## Read for the World Record!

TOTAL MINUTES READ

03,109,498

In Summer 2010, kids logged 52,710,368 reading minutes. Can you help set a new world record?



## WHICH FIVE WILL YOU CHOOSE?



SEE MORE >>

## Who else is participating?

See how many minutes other schools, cities, states, and countries have logged!



Find your School by Name, City, State, or Country!

SEARCH >>

## Clash of the Titles

SEE THIS WEEK'S MATCHUP >>

PARTNERSHIP TOUT FPO

Charity Partner:



This site contains information and advertising about Scholastic and third party products.



Read Every Day. Lead a Better Life.



AD

Which **FIVE** books have  
**SPECIAL MEANING** for you?

you are what  
you read  
.com



Scholastic.com Home

# THE STACKS BETA

YOU,  
YOUR FRIENDS,  
YOUR READS!

Browse: [Characters](#) | [Books](#) | [Authors](#) | [FAQ](#) | [All](#)

SEARCH

HOME

BOOKS &amp; AUTHORS

GAMES

BLOG

VIDEOS

MESSAGE BOARDS

PROFILE

SCHOLASTIC  
**SUMMER  
CHALLENGE**  
★★★★

Log Minutes &gt;

Invite a Friend &gt;

Welcome, &lt;username&gt;!

WARNING: Your parent has yet to approve your registration

MY MINUTES

MY PRIZES



&lt;Username&gt;

Harding Elementary School  
Minneapolis, MN

Current Challenge Progress:

65/100 minutes

Read 100 minutes by DATE to unlock  
this week's badge and have a chance  
to win virtual rewards!

Total Minutes Logged This Summer:

386

ADD WIDGET TO MY STACKS PROFILE &gt;



Minutes Read

WEEK 1: May 1-7, 2011 &gt;

DAY	MINUTES
Sunday	15
Monday	20
Tuesday	30
Wednesday	???
Thursday	???
Friday	???
Saturday	???
<b>WEEKLY TOTAL</b>	<b>65</b>

LOG MINUTES &gt;



## Sweepstakes!

TOUT FPO

## Read for the World Record!

TOTAL MINUTES READ

03,109,498

In Summer 2010, kids logged  
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you help set a new world record?

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See how many minutes other schools, cities,  
states, and countries have logged!



Find your School by Name, City, State, or Country!

SEARCH &gt;

### Activity Feed



February 22, 2011 | 12:30 PM  
Gary231 just logged 210 minutes!



February 21, 2011 | 2:00 PM  
CoolGal253 just logged 70  
minutes!



February 21, 2011 | 11:40 AM  
ScienceKid45 just logged 80  
minutes!

### Message Boards

\_pie in a barrel\_ | Feb 22, 1:30 PM  
I'll have 100 minutes by the end of the week!

Weird\_Jeff | Feb 22, 1:25 PM  
I can't think of any books I haven't read yet, can  
someone make a suggestion?

Sir\_Booksman | Feb 22, 1:00 PM  
I am going to read all the new Animorphs books  
this summer!

MORE POSTS &gt;

you are what  
you read

### WHICH FIVE WILL YOU CHOOSE?

SEE MORE &gt;



Charity Partner:



## Clash of the Titles

SEE THIS WEEK'S MATCHUP &gt;

PARTNERSHIP TOUT FPO

This site contains information and advertising about Scholastic and third party products.

SCHOLASTIC

Read Every Day. Lead a Better Life.

Which FIVE books have SPECIAL MEANING for you?



Scholastic.com Home

THE STACKS YOU... HOME BOOKS... SEARCH... PROFILE



## Log My Minutes

### How to Log your Minutes

Lorem ipsum dolor sit amet, consectetur adipiscing elit. Proin interdum sollicitudin pretium. Aenean ut magna sed enim Imperdiet ullamcorper et tincidunt massa. Mauris venenatis orci eget augue venenatis bibendum.

← WEEK 1: May 1-7, 2011

DAY	MINUTES
Sunday	15
Monday	20
Tuesday	30
Wednesday	125
Thursday	
Friday	???
Saturday	???
<b>WEEKLY</b>	<b>65</b>

**LOG MINUTES »**



MY MINUTES  
 <Username>  
 Harding Elan  
 Minneapolis

Current Challenge Progress  
**65/100** minutes

Total Minutes Logged This Summer:  
**386**

Thursday	???
Friday	???
Saturday	???
<b>WEEKLY TOTAL</b>	<b>65</b>

**LOG MINUTES »**

<username>!  
 Approve your registration

**stakes!**

T FPO

World Record!

TOTAL MINUTES READ  
**03,109,498**

In Summer 2010, kids logged 52,710,368 reading minutes. Can you help set a new world record?

Who else is participating?  
 See how many minutes other schools, cities, states, and countries have logged!

From: [state/country] To: [state/country]

**SEARCH »**

Activity Feed

- February 22, 2011 | 12:30 PM  
Gary231 just logged 210 minutes!
- February 21, 2011 | 2:00 PM  
CoolDa253 just logged 75 minutes!
- February 21, 2011 | 11:40 AM  
ScienceKid45 just logged 80 minutes!

Message Boards

- \_pie in a barrel\_ | Feb 22, 1:00 PM  
I'll have 100 minutes by the end of the week!
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I can't think of any books I haven't read yet, can someone make a suggestion?
- Sir\_Bookman | Feb 22, 1:00 PM  
I am going to read all the new Animorphs books this summer!

**MORE POSTS »**

you are what you read

WHICH FIVE WILL YOU CHOOSE?

**SEE MORE »**

Charity Partner:

Clash of the Titles

**SEE THIS WEEK'S MATCHUP »**

PARTNERSHIP TOUT FPO



Which FIVE books have SPECIAL MEANING for you?

you are what you read

STACKS Blast Sign up for our newsletter!

Scholastic.com Home

# THE STACKS

HOME

BOOKS



## Are You Sure?

Wow! You logged:

- 125 Minutes for Wednesday

That's a lot of minutes, are you sure?

[Go Back](#)

[I'M SURE >>](#)



### MY MINUTES



<Username>  
Harding Ele  
Minneapolis

### Current Challenge Progress

65/100 minutes

Read 100 minutes by DATE to unlock this week's badge and have a chance to win virtual rewards!

### Total Minutes Logged This Summer:

386

[ADD WIDGET TO MY STACKS PROFILE >>](#)

Sunday	15
Monday	20
Tuesday	30
Wednesday	125
Thursday	???
Friday	???
Saturday	???
<b>WEEKLY TOTAL</b>	<b>65</b>

[LOG MINUTES >>](#)

## Read for the World Record!

TOTAL MINUTES READ

03,109,498

In Summer 2010, kids logged 52,710,368 reading minutes. Can you help set a new world record?

### Who else is participating?

See how many minutes other schools, cities, states, and countries have logged!



Find your location by school, city, state, or country

[SEARCH >>](#)

### Activity Feed



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[MORE POSTS >>](#)

you are what you read

[SEE MORE >>](#)

### WHICH FIVE WILL YOU CHOOSE?



Charity Partner:



## Clash of the Titles

[SEE THIS WEEK'S MATCHUP >>](#)

PARTNERSHIP TOUT FPO



Which FIVE books have SPECIAL MEANING for you?

you are what you read

STACKS Blast Sign up for our newsletter!

Scholastic.com Home

 **Success!**

Your minutes were logged!

[CONTINUE >>](#)



MY MINUTES

<Username>  
Harding Elementary School  
Minneapolis, MN

Current Challenge Progress:

**65/100 minutes**

Read 100 minutes by DATE to unlock this week's badge and have a chance to win virtual rewards!

Total Minutes Logged This Summer:

**386**

[ADD WIDGET TO MY STACKS PROFILE >>](#)



Minutes Read

WEEK 1: May 1-7, 2011

DAY	MINUTES
Sunday	15
Monday	20
Tuesday	30
Wednesday	???
Thursday	???
Friday	???
Saturday	???
<b>WEEKLY TOTAL</b>	<b>65</b>

[LOG MINUTES >>](#)



Sweepstakes!

TOUT FPO

Read for the World Record!

TOTAL MINUTES READ

**03,109,498**

In Summer 2010, kids logged 52,710,368 reading minutes. Can you help set a new world record?

Who else is participating?

See how many minutes other schools, cities, states, and countries have logged!



From your location: (zip, state, city, state, or country)

[SEARCH >>](#)

Activity Feed



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[MORE POSTS >>](#)

you are what you read

[SEE MORE >>](#)

WHICH FIVE WILL YOU CHOOSE?



Charity Partner:



Clash of the Titles

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PARTNERSHIP TOUT FPO

Which FIVE books have SPECIAL MEANING for you?

you are what you read

STACKS + Blast Sign up for our newsletter!

Scholastic.com Home

# THE STACKS

HOME

BOOKS



## Challenge Completed!

Lorem ipsum dolor sit amet, consectetur adipiscing elit. Donec malesuada sodales ultricies. Aliquam non lacus sit amet odio facilisis aliquam.



SCHOLASTIC SUMMER CHALLENGE

MY MINUTES



Current Challenge Progress

65/100 minutes

Read 100 minutes by the end of this week's badge and to win virtual rewards!

Total Minutes Logged

386

ADD WIDGET TO MY STACKS

<username>! Approve your registration

stakes!

T FPO

Record!

READ

9,498

10, kids logged reading minutes. Can you set a new world record?

### Who else is participating?

See how many minutes other schools, cities, states, and countries have logged!



Filter your search by School, City, State, or Country

SEARCH >

### Activity Feed



February 22, 2011 | 12:30 PM Gary231 just logged 210 minutes!



February 21, 2011 | 2:00 PM CoolDa253 just logged 75 minutes!



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MORE POSTS >

you are what you read

SEE MORE >

### WHICH FIVE WILL YOU CHOOSE?



Charity Partner:



Clash of the Titles

SEE THIS WEEK'S MATCHUP >

PARTNERSHIP TOUT FPO




Which FIVE books have SPECIAL MEANING for you?



Scholastic.com Home

**Choose Your Reward**

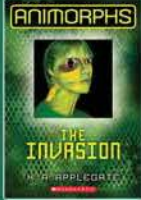
**Virtual Reward Title**

 Lorem ipsum dolor sit amet, consectetur adipiscing elit. Proin quis nisl enim. Pellentesque varius condimentum libero et malesuada.

**SELECT VIRTUAL REWARD >>**

**OR**

**Virtual Reward Title**

 Lorem ipsum dolor sit amet, consectetur adipiscing elit. Proin quis nisl enim. Pellentesque varius condimentum libero et malesuada.

**SELECT VIRTUAL REWARD >>**



MY MINUTES

<Username>  
Harding Elem  
Minneapolis

Current Challenge Progress

65/100 min

Read 100 minutes by the end of this week's badge and I'll win virtual rewards!

Total Minutes Logged

386

Who else is participating?

See how many minutes other schools, cities, states, and countries have logged!

SEARCH >

Activity Feed

- February 22, 2011 | 12:30 PM  
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MORE POSTS >

you are what you read

WHICH FIVE WILL YOU CHOOSE?

SEE MORE >

Harry Potter, Holes, Charlotte's Web, The Sandlot

Charity Partner: Reach Out and Read!

Clash of the Titles

SEE THIS WEEK'S MATCHUP >

PARTNERSHIP TOUT FPO

Which FIVE books have SPECIAL MEANING for you?

you are what you read

STACKS Blast Sign up for our newsletter!

Scholastic.com Home

# THE STACKS

HOME BOOKS



## Claim Your Badge

You Earned the 180 minute Badge!



Lorem ipsum dolor sit amet, consectetur adipiscing elit. Proin quis nisl enim. Pellentesque varius condimentum libero et malesuada.

[CLAIM BADGE >>](#)



### MY MINUTES

<Username>  
Harding Elem  
Minneapolis

### Current Challenge Progress

65/100 minutes

Read 100 minutes by DATE to unlock this week's badge and have a chance to win virtual rewards!

### Total Minutes Logged This Summer:

386

[ADD WIDGET TO MY STACKS PROFILE >>](#)

Sunday	15
Monday	20
Tuesday	30
Wednesday	???
Thursday	???
Friday	???
Saturday	???
<b>WEEKLY TOTAL</b>	<b>65</b>

[LOG MINUTES >>](#)

## Read for the World Record!

TOTAL MINUTES READ

03,109,498

In Summer 2010, kids logged 52,710,368 reading minutes. Can you help set a new world record?

### Who else is participating?

See how many minutes other schools, cities, states, and countries have logged!



Find your location by school, city, state, or country

[SEARCH >>](#)

### Activity Feed



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[MORE POSTS >>](#)

you are what you read

[SEE MORE >>](#)

### WHICH FIVE WILL YOU CHOOSE?



Charity Partner:



## Clash of the Titles

[SEE THIS WEEK'S MATCHUP >>](#)

PARTNERSHIP TOUT FPO



Which FIVE books have SPECIAL MEANING for you?

you are what you read

STACKS Blast Sign up for our newsletter!

Scholastic.com Home

# THE STACKS

HOME BOOKS



## Enter for a Chance to Win!

Lorem ipsum dolor sit amet, consectetur adipiscing elit. Donec malesuada sodales ultricies. Aliquam non lacus sit amet odio facilisis aliquam.

[No Thanks \(close window\)](#)

[ENTER >>](#)



MY MINUTES



<Username>  
Harding Ele  
Minneapolis

Current Challenge Progress:

**65/100 minutes**

Read 100 minutes by DATE to unlock this week's badge and have a chance to win virtual rewards!

Total Minutes Logged This Summer:

**386**

[ADD WIDGET TO MY STACKS PROFILE >>](#)

WEEK 1: May 1-7, 2011

DAY	MINUTES
Sunday	15
Monday	20
Tuesday	30
Wednesday	???
Thursday	???
Friday	???
Saturday	???
<b>WEEKLY TOTAL</b>	<b>65</b>

[LOG MINUTES >>](#)

TOUT FPO

Read for the World Record!

TOTAL MINUTES READ

**03,109,498**

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### Who else is participating?

See how many minutes other schools, cities, states, and countries have logged!



From your location (e.g., school, city, state, or country)

[SEARCH >>](#)

### Activity Feed



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[MORE POSTS >>](#)

you are what you read

[SEE MORE >>](#)

### WHICH FIVE WILL YOU CHOOSE?



Charity Partner:



Clash of the Titles

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PARTNERSHIP TOUT FPO

AD

# Which FIVE books have SPECIAL MEANING for you?



Scholastic.com Home

# THE STACKS BETA

## YOU, YOUR FRIENDS, YOUR READS!

Browse: [Characters](#) | [Books](#) | [Authors](#) | [FAQ](#) | [All](#)

- HOME
- BOOKS & AUTHORS
- GAMES
- BLOG
- VIDEOS
- MESSAGE BOARDS
- PROFILE



[Log Minutes >](#)

[Invite a Friend >](#)

Welcome, <username>!

WARNING: Your parent has yet to approve your registration

MY MINUTES

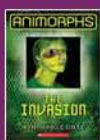
MY PRIZES



<Username>

Harding Elementary School  
Minneapolis, MN

Challenge Completed!



Virtual Reward Title

Lorem ipsum dolor sit amet, consectetur adipiscing elit.

[Download Now](#)

Total Minutes Logged This Summer:

# 511

[ADD WIDGET TO MY STACKS PROFILE >](#)



## Minutes Read

WEEK 1: May 1-7, 2011

DAY	MINUTES
Sunday	15
Monday	20
Tuesday	30
Wednesday	125
Thursday	???
Friday	???
Saturday	???
<b>WEEKLY TOTAL</b>	<b>190</b>

[LOG MINUTES >](#)



## Sweepstakes!

TOUT FPO

## Read for the World Record!

TOTAL MINUTES READ

# 03,109,498

In Summer 2010, kids logged 52,710,368 reading minutes. Can you help set a new world record?

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[MORE POSTS >](#)

## you are what you read

### WHICH FIVE WILL YOU CHOOSE?

[SEE MORE >](#)



Charity Partner:



## Clash of the Titles

[SEE THIS WEEK'S MATCHUP >](#)

PARTNERSHIP TOUT FPO



AD

# Which FIVE books have SPECIAL MEANING for you?



**STACKS Blast**  
Sign up for our newsletter!

Scholastic.com Home

# THE STACKS BETA

## YOU, YOUR FRIENDS, YOUR READS!

Browse: [Characters](#) | [Books](#) | [Authors](#) | [FAQ](#) | [All](#)

HOME

BOOKS & AUTHORS

GAMES

BLOG

VIDEOS

MESSAGE BOARDS

PROFILE



Log Minutes >

Invite a Friend >

MY MINUTES

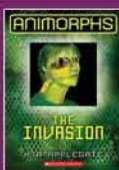
MY PRIZES

Showing:

VIRTUAL REWARDS

BADGES

### My Virtual Rewards



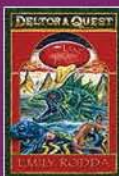
**Virtual Reward Title**  
Lorem ipsum dolor sit amet, consectetur adipiscing elit.

[Download Now](#)



**Long Virtual Reward Title**  
Lorem ipsum dolor sit amet, consectetur adipiscing elit.

[Download Now](#)



**Virtual Reward Title**  
Lorem ipsum dolor sit amet, consectetur adipiscing elit.

[Download Now](#)



**Come Back Next Week!**  
Check back next week for a new prize!

### Sweepstakes!

TOUT FPO

### Read for the World Record!

TOTAL MINUTES READ

03,109,498

In Summer 2010, kids logged 52,710,368 reading minutes. Can you help set a new world record?

### Who else is participating?

See how many minutes other schools, cities, states, and countries have logged!



Find your School by Name, City, State, or Country!

[SEARCH >](#)

### Activity Feed



February 22, 2011 | 12:30 PM  
Gary231 just logged 210 minutes!



February 21, 2011 | 2:00 PM  
CoolGal253 just logged 70 minutes!



February 21, 2011 | 11:40 AM  
ScienceKid45 just logged 80 minutes!

### Message Boards

\_pie in a barrel\_ | Feb 22, 1:30 PM  
I'll have 100 minutes by the end of the week!

Weird\_Jeff | Feb 22, 1:25 PM  
I can't think of any books I haven't read yet, can someone make a suggestion?

Sir\_Booksman | Feb 22, 1:00 PM  
I am going to read all the new Animorphs books this summer!

[MORE POSTS >](#)



### WHICH FIVE WILL YOU CHOOSE?

[SEE MORE >](#)



Charity Partner:



[SEE THIS WEEK'S MATCHUP >](#)

PARTNERSHIP TOUT FPO

This site contains information and advertising about Scholastic and third party products.

**SCHOLASTIC**

Read Every Day. Lead a Better Life.

Which FIVE books have SPECIAL MEANING for you?

you are what you read

STACKS Blast Sign up for our newsletter!

Scholastic.com Home

# THE STACKS

HOME

BOOKS



SEARCH

BOOKS

PROFILE

## MY BOOKPRINT

My Five Favorite Books



### Why I LOVE This book...

Edit Your Bookprint

I can read this book a hundred times and never get sick of it!

View Books You've Liked

Add Widget to STACKS Profile

### Books I Like



### Similar Users



you are what you read

GO NOW! >

SCHOLASTIC SUMMER CHALLENGE

MY MINUTES

### My Virtual R



Virtual Lorem amet adipiscing



Virtual Lorem amet adipiscing

### Who else is partici

See how many minutes other states, and countries have logged



From your location or by state, city, county, or country

SEARCH >

CoolDa253 just logged 20 minutes!

February 21, 2011 | 2:00 PM CoolDa253 just logged 75 minutes!

February 21, 2011 | 11:40 AM ScienceKid45 just logged 80 minutes!

Weird\_Jeff | Feb 22, 1:25 PM I can't think of any books I haven't read yet, can someone make a suggestion?

Sir\_Bookman | Feb 22, 1:00 PM I am going to read all the new Animorphs books this summer!

MORE POSTS >

you are what you read

### WHICH FIVE WILL YOU CHOOSE?

SEE MORE >



Charity Partner:



### Clash of the Titles

SEE THIS WEEK'S MATCHUP >

PARTNERSHIP TOUT FPO





## **Appendix B**

**Read 100,000 — User View**

Brought to you by Scholastic Book Fairs

Book Fairs Web site for  
parents and teachers



Home



Stats



About



Featured  
Books



Reading  
Calculator



Resources



Welcome to READ 100,000, a drive to set and reach a reading minutes goal for you and your school. Sign up, sign in, set a reading goal, and log reading minutes to achieve your goal!

## Kids

Record your reading minutes here!

Sign In!



Register for READ 100,000!

Sign Up!



## Reading Calculator

Estimate how long it will take to read 100,000 minutes!

Calculate!



## Featured Books

Discover the books coming to your Book Fair!

Discover!



## Resources

Find helpful resources to make your reading challenge a success!

Go Now!



## About READ 100,000

Answers to questions and tips about READ 100,000.

Find Out!





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Calculator



Resources



## Stats

Here you can enter your reading minutes, track reading minutes for your grade and school, and see how other schools are doing.

### Enter Your Minutes

Mon Tue Wed Thr Fri Sat Sun

--	--	--	--	--	--	--

#### Show Week:

DECEMBER 19 - DECEMBER 25

#### Your school is:

WACOG LK HAVASU HEAD START  
LAKE HAVASU CITY, AZ, USA  
Grade 1

Enter Minutes

Print Stats

My Stats

All Stats

### Your Stats

Total Grade

119

Total School Minutes

119

Your Total Minutes

114



**It's a drive  
to read  
100,000  
minutes at  
my school!**

---

### **My Stats**

**User Name:** FUNNYMONSTERPRIZE

**School:** WACOG LK HAVASU HEAD  
START

**Grade:** 1

**My Total Reading Minutes:** 114

**Grade Reading Minutes:** 119

**School Reading Minutes:** 119

### **Reading Log**

<b>Date</b>	<b>Reading Minutes</b>
9/13/2010	50
9/6/2011	5
9/7/2011	5
9/8/2011	5
9/9/2011	5
9/10/2011	5
9/11/2011	5
9/12/2011	23
9/13/2011	11

**Print Stats!**







Home



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## Stats

Here you can enter your reading minutes, track reading minutes for your grade and school, and see how other schools are doing.

Recently Updated

Schools 100k Reads

This information will not be retained by Scholastic

Powered by Google Maps

< search school by zip >

GO

Reset

St Barnabas and St Philips CE Primar	minutes	132
COLEBROOK ELEMENTARY SCHOOL	minutes	13,344
PLAINVIEW OLD BETHPAGE MID SC	minutes	5,060
DISCOVERY SCHOOL	minutes	3,990
STUART ELEMENTARY SCHOOL	minutes	20,784
Marrero Academy	minutes	263,477
MEADOW HALL ELEMENTARY SCHOO	minutes	28,540
PETERSBURG ELEMENTARY SCHOOL	minutes	24,073
ALIMACANI ELEM SCHOOL	minutes	6,674
MILTON SOMERS MIDDLE SCHOOL	minutes	32,903
UNION COUNTY TEAMS CHTR SCH	minutes	3,108
NORTH ROWAN ELEMENTARY SCHO	minutes	25,705
BRYSON ELEMENTARY SCHOOL	minutes	185,374
SCENIC ELEMENTARY SCHOOL	minutes	88,142



POWERED BY  
Google

Map data ©2011. Europa Technologies, INEGI - Terms of Use

My Stats

All Stats



## **Appendix C**

### **Read 100,000 — Registration Process**



Home



Stats



About



Featured  
Books



Reading  
Calculator



Resources



In order to sign up for READ 100,000 you will need to create a username and get permission from a parent or teacher. [Privacy Policy](#).

### Step 1:

Spin the wheel to get your user name

1. Spin the wheel.
2. The words in the middle row will be your username.
3. Don't like it? Spin again.

rocky	clock	tiger
wavy	grape	house
smart	shoe	kitty

SPIN THE WHEEL

Kids

Record  
minutes

Start

Featured  
Books

Discover the  
your Book

Discover



et and reach  
school.  
log reading

or

will take  
minutes!



READ

s and  
,000.







Home



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Calculator



Resources

In order to sign up for READ 100,000 you will need to create a username and get permission from a parent or teacher. [Privacy Policy](#).

### Step 1:

Spin the wheel to get your user name

1. Spin the wheel.
2. The words in the middle row will be your username.
3. Don't like it? Spin again.

super	sand	ant
planet	grape	jelly
green	peachy	hat

SPIN AGAIN

NEXT 

Don't forget to write this name down





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Calculator



Resources

**select your grade and give us your first name and a parent or teacher email address.** We ask for your grade so that your minutes can be credited to your grade. We ask for your first name and parent or teacher email so we ask your parent or teacher to give permission for you to participate in Read 100,000. We will ask your parent or teacher to give us the name of your school so that your minutes can be credited to your school. Privacy Policy,

### Step 2: Select your grade.

Choose Your Grade

### Step 3: Tell us your first name.

My First Name

### Step 4: Get permission

Tell us if you are sending a parent or a teacher email address by checking one box below. Then fill in the parent or teacher email address and click "NEXT".

Teacher Email

Parent Email

Enter Teacher or Parent Email

**NEXT**

[Privacy Policy](#)



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Resources

## Thank you!

Check back soon to see if your registration is active. After your parent or teacher approves your registration, you can log in your reading minutes.

While you wait, you can browse the Featured Books pages, test the Reading Calculator to estimate how many minutes you can read, or start reading!



Kids

Record  
minutes!

Sign

Feat  
Boo

Discover the  
your Book

Disc



et and reach  
school.  
log reading

or

will take  
minutes!



READ

s and  
0,000.





**Subject:** Scholastic Read 100,000 approval needed

Dear Parent or Teacher,

Your child or student Rebecca, FUNNYMONSTERPRIZE has signed up for the Read 100,000 activity on [www.scholastic.com/bookfairs/minutes](http://www.scholastic.com/bookfairs/minutes).

Read 100,000 is a free program from Scholastic Book Fairs to motivate kids ages 6 and up to strengthen their reading skills as part of a school team. Through Read 100,000, kids read books and log minutes of reading time on <http://www.scholastic.com/bookfairs/minutes>. This year, we have set a goal for schools to read at least 100,000 minutes during the 2011-2012 school year. Your child or student wants to help! Your permission is required to allow us to your child or student's minutes to his or her school, and to use your email address to communicate with you about this program.

You should review the Read 100,000 [Privacy Policy](#), which describes the information that has been collected from your child or student in connection with Read 100,000, what personally identifiable information we would like to collect from you regarding your child or student, how we may use it, how you can give consent and how you can access, change or delete your child/student's information.

For more information about activities available to students as part of Read 100,000, see our [Frequently Asked Questions](#). To read the Scholastic.com Terms of Use, go to: <http://www.scholastic.com/terms.htm>

To consent to participation by your child or student in Read 100,000 and to provide us with school information regarding your child or student as described herein, you must visit the following link: <http://scholastic.com/bookfairs/minutes/index.asp?id=19671> If you have more than one child or student signing up for Read 100,000, all registrations associated with your email address in any 24-hour period will be aggregated and listed on one approval page, on a rolling basis.

If you do not give the requested permission within 14 days, we will delete your child's registration (including your email address, unless we have received it separately, such as in connection with a newsletter sign-up, email update sign-up, a transaction on one of our stores or otherwise).

If you give permission and do not revoke it, we will retain your child's information (except the child's first name, which is deleted upon our receipt of permission) for the duration of the Read 100,000 program, which ends in Spring 2012, at which time it will be deleted (including the your email address, unless we have received it separately, such as in connection with a newsletter sign-up, email update sign-up, a transaction on one of our stores or otherwise).

Sincerely,

Scholastic Book Fairs Read 100,000  
Scholastic Inc.  
557 Broadway New York, New York 10012

Email: [custserv@scholastic.com](mailto:custserv@scholastic.com)  
For information specific to Read 100,000:  
Email: [read100khelp@scholasticbookfairs.com](mailto:read100khelp@scholasticbookfairs.com)  
Call: 1-800-874-4809 ext. 8405

For general inquiries:  
Email: [custserv@scholastic.com](mailto:custserv@scholastic.com)  
Call: 1-800-SCHOLASTIC  
Phone: 1-800-SCHOLASTIC

## Your child or student has created a username to register for READ 100,000.

Read 100,000 is a program created by Scholastic to strengthen students' reading skills by motivating them to read as part of a school team. Students can log and track every minute they read while aiming to meet a team goal of 100,000 minutes or more! It's easy and fun!

### Step 1: Select your state and school.

**Choose Your State**

**Enter Your School**

Start typing your school name. When your school appears in the menu, click on it. Don't see your school? Visit the [ABOUT](#) page to find out how to add it.

### Step 2: Activate child's registration.

Please click "Yes" below to activate the Read 100,000 registration for the children listed below, and then click the "OK" button. If you have more than one child or student signing up for Read 100,000, all registrations associated with your email address in any 24-hour period will be aggregated and listed on one activation page, on a rolling basis. If you do not activate registration within 14 days, the registration information collected will be deleted. See our [FAQs](#) and our [Privacy Policy](#).

Child's First Name	Child's Username	Grade	Yes, Activate

Yes, I would like to receive email updates about changes to Read 100,000 and other features on Scholastic.com that may be of interest to me and my child/students.

**OK** 



Subject: Confirmation Read 100,000

Dear Parent or Teacher,

Thank you for activating your child/student's registration for Read 100,000 on <http://scholastic.com/bookfairs/minutes/index.asp>

Scholastic is committed to protecting the privacy and security of its online visitors. Any personally identifiable information we collect from your child/student for the Scholastic Summer Challenge will be used solely by Scholastic Inc. and Scholastic Book Fairs, Inc. or their agents for internal purposes, and will not be sold or otherwise transferred to third parties.

For more information about Read 100,000, see the FAQs at <http://scholastic.com/bookfairs/minutes/about.asp>

To review the original notice and request for permission that was sent to you, go to: <http://scholastic.com/bookfairs/minutes/permission.asp>

To read the Read 100,000 Privacy Policy, go to: <http://scholastic.com/bookfairs/minutes/privacy.asp>

To read the Scholastic.com Terms of Use, go to: <http://www.scholastic.com/terms.htm>

If you give permission and later want to revoke it, you may do so at any time. To revoke Read 100,000 permission or to request to review or have deleted a child's or student's personally identifiable information from

Scholastic's records, and refuse to permit further use of a child's personally identifiable information, you may write to us at: e-Scholastic, 557 Broadway, New York, New York 10012, Re: Read 100,000 (to revoke permission for Read 100,000) or Re: Parent's Request for Information (general requests). We may ask for verification of identity to ensure that no personally identifiable information is provided to anyone other than the child's parent or teacher. To revoke Read 100,000 permission, you may also call Scholastic Book Fairs at 1-800-874-4809 ext. 8405.

Sincerely,

Scholastic Book Fairs Read 100,000  
Scholastic Inc.  
557 Broadway  
New York, New York 10012

For information specific to Read 100,000:  
Email: [read100khelp@scholasticbookfairs.com](mailto:read100khelp@scholasticbookfairs.com)  
Call: 1-800-874-4809 ext. 8405

For general inquiries:  
Email: [custserv@scholastic.com](mailto:custserv@scholastic.com)  
Call: 1-800-SCHOLASTIC

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## **Appendix D**

### **THE STACKS — Registration Process**

## THE STACKS - Registration

### THE STACKS – [www.scholastic.com/kids](http://www.scholastic.com/kids)

THE STACKS is Scholastic.com's website aimed at kids ages 8–12. The site allows kids to play games, take polls, watch videos, enter contests and get the latest news all about the books and celebs they care about most. Kids get access to exclusive “beyond-the-book” materials from authors and illustrators, such as first drafts, early sketches and multimedia messages. Plus, kids can stay up-to-date on hot happenings in the world of books and entertainment—such as sequel announcements, author tour dates, one-on-one actor and recording artist interviews and sneak peeks at upcoming releases. This free (advertising supported), kid-friendly site is a networking community to connect kids ages 8–12 through a shared love of books and reading.

### Registration Flow

Because our site is aimed at kids under the age of 13, THE STACKS have a custom registration flow that is different from registration for adult visitors to Scholastic.com:

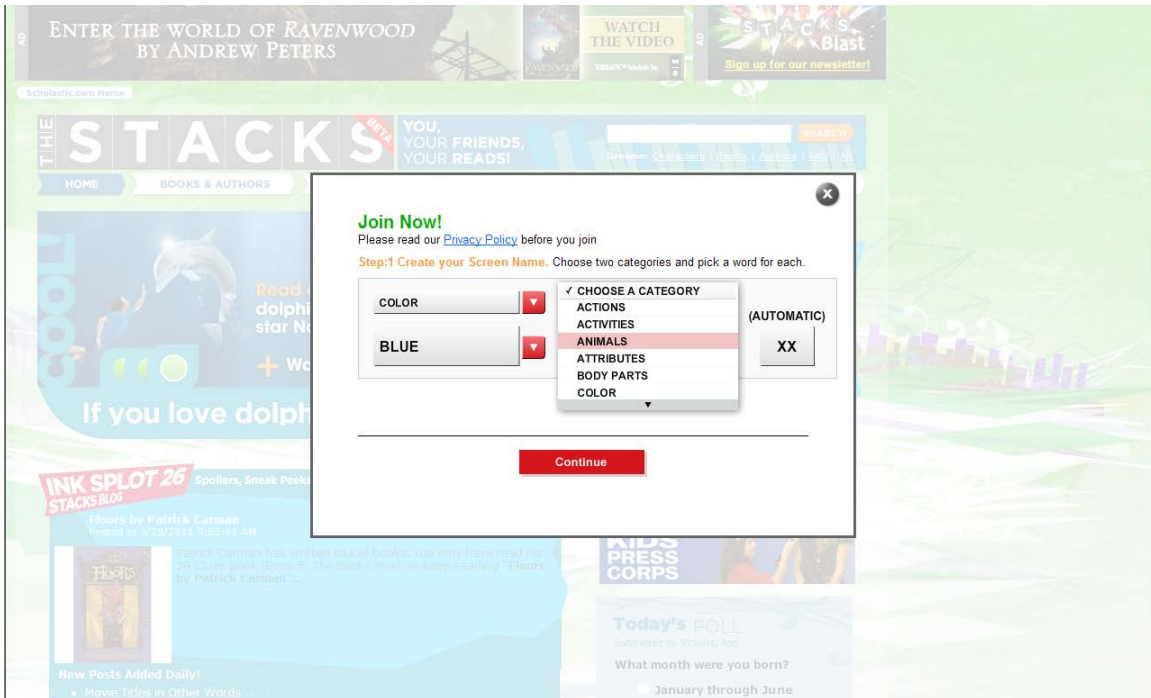
#### Step 1:

The user is asked to create a Screen Name by selecting from canned options.

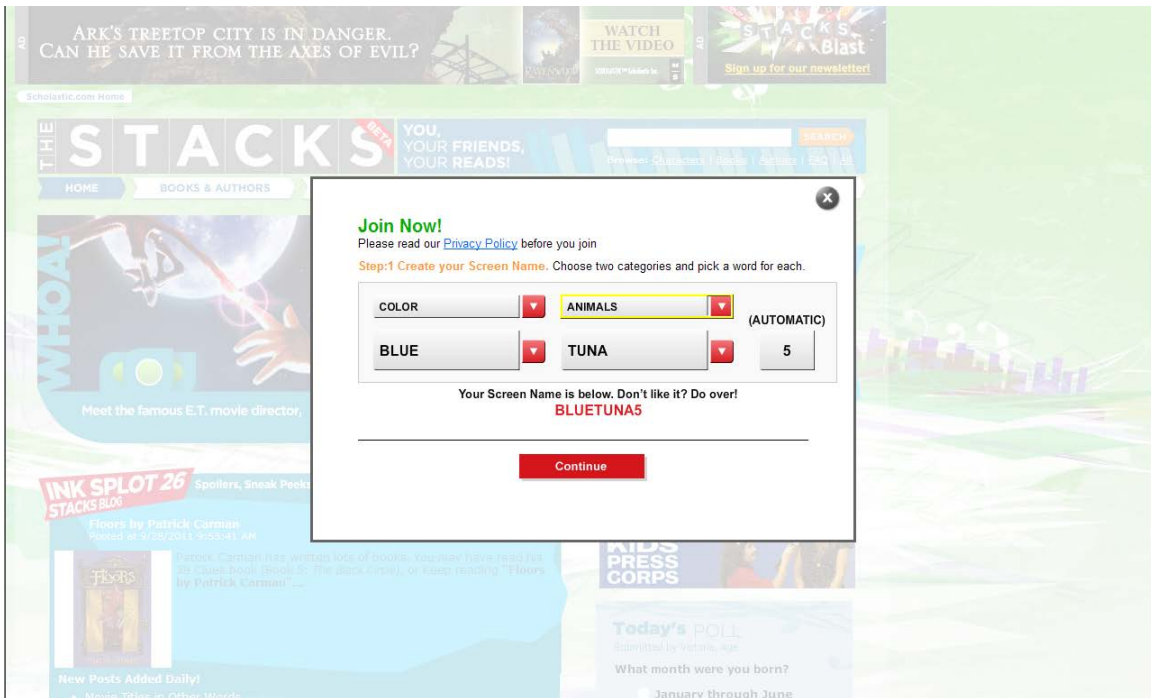
The screenshot shows a web browser window displaying the Scholastic.com Kids registration page. A modal window titled "Join Now!" is overlaid on the page. The modal contains the following text and form elements:

- Join Now!**
- Please read our [Privacy Policy](#) before you join.
- Step 1 Create your Screen Name.** Choose two categories and pick a word for each.
- Two dropdown menus labeled "CHOOSE A CATEGORY" with red downward arrows.
- Two input fields for selecting a word, each with a red downward arrow.
- An "(AUTOMATIC)" label next to the second input field.
- An "XX" button next to the second input field.
- A red "Continue" button at the bottom.

The background page shows a navigation bar with "HOME" and "BOOKS & AUTHORS" tabs, a search bar, and various content sections including "ENTER THE WORLD OF RAVENWOOD BY ANDREW PETERS", "WATCH THE VIDEO", "SITACKS Blast", "Meet the famous E.T. movie director", "INK SPLOT 26 STACKS BLOG", "Floors by Patrick Carman", "KID'S PRESS CORPS", and "Today's POLL".



Our system automatically assigns a number, once the user has put together her combination of words.



The user has the option to play with as many combinations as she'd like in order to create her Screen Name.

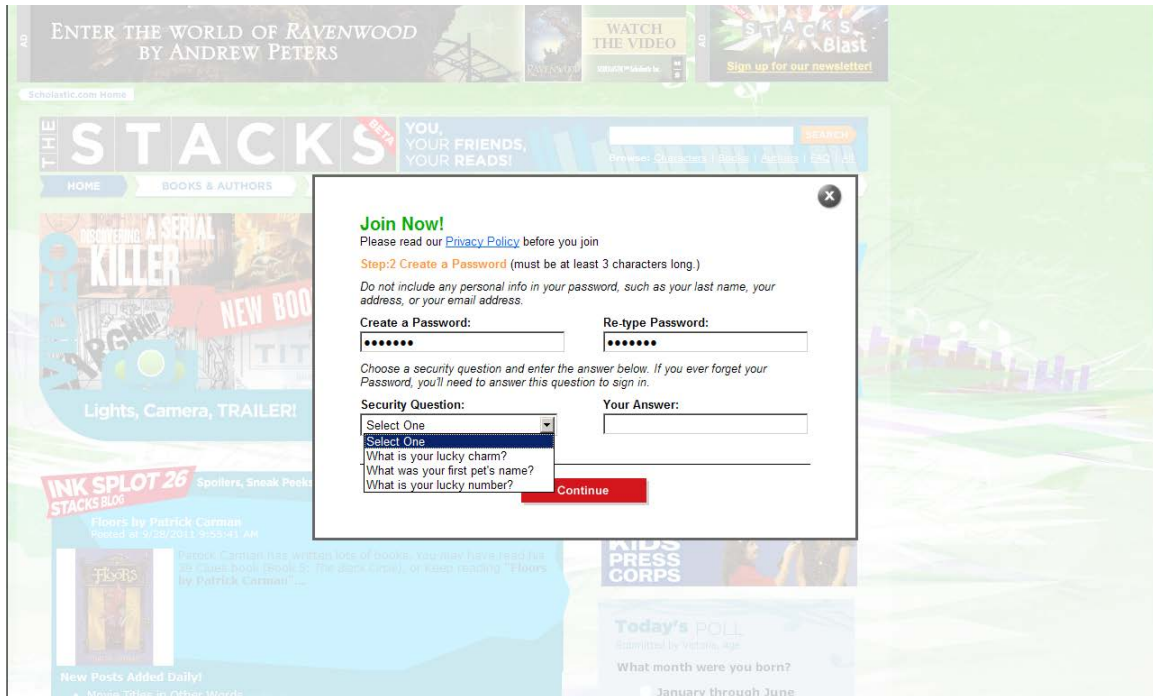


Step 2:

Once she is satisfied with her Screen Name, she enters a password, chooses a security question, and types in a security answer. The security question and answer are for retrieving a forgotten password.

The security question options are:

- What is your lucky charm?
- What was your first pet's name?
- What is your lucky number?

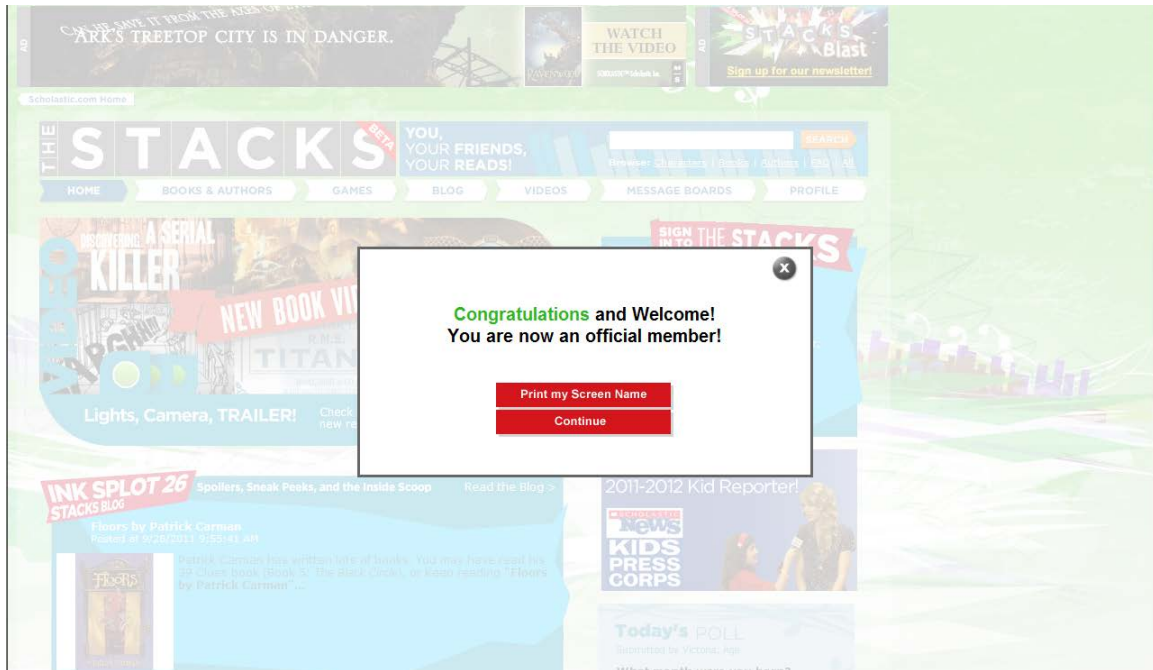


### Step 3:

The data collected in this step is not tied to individual users, just collected in aggregate to give us a sense of our audience. We ask for gender, age, and country/state.

The screenshot shows the homepage of 'THE STACKS' website. At the top, there are several promotional banners: 'ENTER THE WORLD OF RAVENWOOD BY ANDREW PETERS', 'WATCH THE VIDEO', and 'STACKS Blast Sign up for our newsletter!'. Below these is a navigation bar with 'HOME' and 'BOOKS & AUTHORS' tabs, a search bar, and a 'SEARCH' button. The main content area features a large graphic with the text 'WHOA!' and 'Meet the famous E.T. movie director'. Below this is a section for 'INK SPLOT 26 STACKS BLOG' with a 'Spillers, Sneak Peeks' tagline. A 'Join Now!' modal form is overlaid in the center, containing a privacy policy link, a 'Step 3 Additional Information' heading, a disclaimer, and four dropdown menus for 'Gender', 'Age', 'Country', and 'State/Province'. A red 'SUBMIT' button is at the bottom of the form. To the right of the form, there is a 'KIDS PRESS CORPS' section and a 'Today's POLL' section asking 'What month were you born?' with a radio button selected for 'January through June'.

At this point, registration is complete. The user has the option to print his Screen Name and password for future reference.



If we do ask for personally identifiable information from our users, we keep that completely separate from our centralized database of member accounts and ensure there is no way to connect the PII to any member accounts. This is true of our [newsletter sign-up](#) and [contests/sweepstakes](#) (for which we use the multiple contact exception under COPPA to notify the child's parent that the child has signed up, and to give the parent the chance to opt the child out of the activity).

## User Accounts

Users must register in order to:

- Post on our pre-moderated [message boards](#)
- Create and maintain a personalized [profile page](#) by choosing from canned options
- Create a customized avatar image by choosing from canned options
- Friend other users
- Participate in pre-moderated chat rooms
- Save the results of certain quizzes, games, and activities to their profile page

The screenshot shows a user's profile page on Scholastic.com, viewed in Internet Explorer. The page features a navigation bar with links for HOME, BOOKS & AUTHORS, GAMES, BLOG, VIDEOS, MESSAGE BOARDS, and PROFILE. The main content area is divided into several sections:

- MyPROFILE:** Includes the user's name (bluetuna5), a profile picture of a girl with blue hair, and a mood selector set to "cheerful".
- MyFriends:** Shows three friends: blueling, Karen Stacks, and Stacks Admin.
- Seen in the Scene:** A notification from Sep 28, 05:32 PM stating "lotrmariafan has just signed on."
- MYINFO:** A list of widgets including MySELECTS, MySHOUT-OUTS, and MyMESSAGE BOARD STATS.
- MYSTACK:** A list of widgets including WORD OF THE DAY, GET INTO HARRY POTTER, CANDY APPLE: SWEET OR SOUR, CANDY APPLE DAILY BITE, INK SPLOT BLOG, and STACK ATTACK!.
- PERSONALIZE YOUR PAGE:** A promotional banner encouraging users to add favorite characters and series, add widgets to their profile, and stick to their style.
- START STACKIN':** A list of widgets including CLICK-O-RAMA: BEWARE OF CAT, CLICK-O-RAMA: NO ONE THREATENS JULIAN!, and CLASH OF THE TITLES.



The screenshot shows the homepage of 'THE STACKS' website. The top navigation bar includes 'HOME', 'BOOKS & AUTHORS', 'GAMES', 'BLOG', 'VIDEOS', 'MESSAGE BOARDS', and 'PROFILE'. A search bar is located in the top right corner. Below the navigation bar, there is a 'STACKS BUZZ BOARD' section with a 'Reading Buzz Board' sub-section. A forum post titled 'Is anyone into the Alex Rider series?' is visible, with a reply from user '\_bemusedfire1\_'. The post content discusses the Alex Rider series by Anthony Horowitz. To the right of the forum post is a vertical advertisement for the book 'Wonderstruck' by R.J. Palacio, featuring the text 'START THE ADVENTURE' and 'GET WONDERSTRUCK!' along with the Scholastic logo.

In this way, we make sure that the robust community experience on THE STACKS is kept safe and comfortable for children under the age of 13. Because all users go through a centralized registration flow (detailed above), we ensure that no personally identifiable information is collected from users and kept as part of their account.