



United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, DC 20580

Office of Chairman Jon Leibowitz

To: Don Clark, Secretary
From: Jillian Wagman
Date: October 12, 2012
Re: COPPA Rule: Comments to be Placed on the Public Record

On October 12, 2012, Chairman Jon Leibowitz met with Elliot Schrage of Facebook to discuss proposed modifications to the FTC's COPPA Rule. The meeting took place in Boston, Massachusetts.

Mr. Schrage referenced the written comments that Facebook had submitted and discussed the company's main concerns. He expressed concern about the obligations of plugin providers. Facebook provides plugins to website developers in a form that does not require any additional customization by Facebook. The company also does not preapprove websites that use the plugins, such as the "Like" button. Facebook collects data from its plugins and uses this data in Facebook's own service, only sharing the information with the website publisher that features the plugins if the user specifically chooses to allow access to the website publisher.

Mr. Schrage also discussed the possibility of a common mechanism for parental consent. This mechanism could take the form of a platform in which multiple operators participate to provide notice and obtain verifiable parental consent. With a common mechanism, Mr. Schrage said, parents would have a greater ability to control, understand, and supervise their children's online activities, further advancing COPPA's goals. The general notice provided by the platform would cover app developers and third parties that utilize the platform. The only time additional parental consent would be required is if a developer wants to handle information in different ways than what is covered by the platform's consent. Many other commenters have suggested that creating a common mechanism for consent would be beneficial. Mr. Schrage noted that modifying the COPPA rule to include common mechanisms for consent would not require another Supplemental Notice of Proposed Rulemaking, as there has already been ample notice through previous notices.

Finally, Mr. Schrage reiterated that Facebook's written submission expands on the company's concerns with the proposed COPPA modifications and includes suggestions that Facebook believes would support the online ecosystem while maintaining adequate protections for users under the age of 13.