



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Office of Commissioner
Julie Brill

To: Don Clark
From: Yael Weinman
Date: December 17, 2012
Re: COPPA Rule: Comments to be placed on the public record

On December 17, 2012, I met with representatives from Apple in connection with the agency's proposed modifications to the COPPA Rule.¹

The Apple representatives expressed concern about the Commission's proposed definition of personal information collected "on behalf of an operator" as information collected "in the interest of, as a representative of, or for the benefit of, the operator." Apple is concerned that this proposal could create COPPA liability for Apple and other platforms that sell applications.

¹ The following representatives for Apple attended the meeting: Jane Horvath, Director-Global Privacy; Nick Ammann, Director-Gov't Affairs; and Erik Neunschwander, Privacy Engineer.