



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

Office of Commissioner
Julie Brill

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

On December 17, 2012, Yael Weinman, attorney advisor to Commissioner Julie Brill, and I met with a representative from the Direct Marketing Association (DMA) to discuss the agency's proposed modifications to the COPPA Rule.¹

The representative expressed concern about the Commission's proposal to expand the definition of "personal information" to include persistent identifiers. The representative is concerned that this definition is too broad and it should instead be defined more narrowly to include only the particular activities the Commission hopes to prohibit.

The representative also expressed concern that the expanded definition of "operator" would result in child directed websites being held strictly liable for collection of personal information by third-party operators. The representative believes this would have a negative impact on innovation.

¹ DMA was represented at the meeting by Stuart Ingis, Counsel for DMA.