The Internet Association

December 17, 2012

The Honorable Donald Clark
Office of the Secretary
Federal Trade Commission
Room H-113 (Annex E)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Supplemental Comment on COPPA Rulemaking, 16 C.F.R. 312
Project No. P104503

Dear Secretary Clark:

The Internet Association ("The IA") appreciates the opportunity to provide supplemental comments on proposed changes to the Children's Online Privacy Protection Act ("COPPA"). We are a newly formed trade association, representing leading U.S. Internet companies. Our mission is to protect Internet freedom, foster innovation and economic growth, and empower our global community of users. Because we launched in mid-September of this year, we were unable to participate in the Commission's last comment period on this issue. However, we are submitting this letter now because we are strongly committed to maintaining child safety and protecting the privacy of children online.

On September 24, 2012, many parties submitted comments on the Commission's most recent proposed changes to the Rule implementing COPPA. The comments raised several significant concerns regarding the unintended and profound effects of the changes proposed by the Supplemental Notice of Proposed Rulemaking ("SNPRM") will have on the greater Internet ecosystem. Following these comments and the meetings that Commissioners and staff have been holding with stakeholders, we write to highlight key issues raised in this proceeding and to emphasize their importance for the online ecosystem.

Many stakeholders highlighted the importance of ensuring that the Commission's final rule is consistent with the realities of how the Internet operates today. Commenters noted that the inclusion of persistent identifiers in the definition of "personal information" would present significant challenges. Commenters also emphasized that the Internet is designed to make it possible for users to seamlessly leverage content and services provided by many different companies at once – even in the space of a single web page – without the need for a business relationship or collaboration between those companies. The Commission's current COPPA policy has effectively empowered parents to make choices about how their children's sensitive data is used online while promoting the continued development of Web sites, plugins, and other powerful modes of Internet communication and innovation. We urge the Commission to decline proposed changes that would interfere with this effective approach.

We wish to commend both the Commissioners and the staff for their thoughtful consideration of the concerns raised throughout this process. We do feel that this proceeding has been productive, though we are concerned that some of the Commission's proposals are inconsistent with the structure of the online ecosystem today and exceed the Commission's statutory authority. To address those concerns, we respectfully suggest that the Commission incorporate the following recommendations when enacting its final rule:

- The Commission should decline to broaden the circumstances under which persistent identifiers would be defined as "personal information". Consistent with the underlying statute, persistent identifiers should not be defined as "personal information" unless they are either associated with other individually identifiable data elements or capable of independently contacting a specific child. The Commission should also broaden the "support for internal operations" exception.

- The Commission should modify its proposed definition of "Web site or online service directed to children" to make clear that COPPA only applies to general audience plugins, platforms, and website publishers when these operators have actual knowledge that they are collecting personal information from a child.

- The Commission should affirm that COPPA's notice and consent requirements do not apply to the collection of information from individuals 13 years of age or older, even when the information is collected on websites or services that specifically target children.

- The Commission should clarify that general audience online publishers, platforms, and plugin providers may rely upon neutral age-screens to ensure compliance with COPPA.

As described more fully below, we believe that these recommendations would substantially reduce the problems with the proposed rule, while ensuring that the Commission does not exceed its statutory authority.

I. The Commission Should Not Broaden the Circumstances Under Which Persistent Identifiers Constitute "Personal Information" Unless Such Persistent Identifiers Are Independently Capable of Contacting a Specific Child, and It Should Broaden the "Support for Internal Operations" Exception.

The FTC proposes to expand the definition of "personal information" under COPPA to include " a *persistent identifier* that can be used to recognize a user over time, or across different Web sites or online services, where such identifier is used for [certain] functions..."[1], even in situations where the persistent identifier is neither associated with another individually identifiable data element, nor capable of identifying a specific child. Persistent identifiers include data points such as IP addresses, random identifiers in cookies, and device identifiers.[2]

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[1] *See* 77 Fed. Reg. 46647.
[2] *Id.*

In its 2011 NPRM, the Commission first proposed this expansion; however, an "overwhelming majority of comments" from leading technology organizations opposed that proposal.[3] Despite the Commission's recent efforts to clarify its proposed definition of "personal information," The IA must also oppose the expansion of personal information to include persistent identifiers in the manner set forth by the Commission's proposed Rule. In response to the Commission's SNPRM, some of these organizations noted that the challenges presented by the proposed Rule stem from this potential expansion. We agree with these assertions as the expansion of the "personal information" definition would damage the existing Internet ecosystem, as well as stifle the future development of children's online services.

Congress limited the definition of personal information to encompass only specific, individually identifiable data or "any other identifier that the Commission determines permits the physical or online contacting of a *specific* individual."[4] Persistent identifiers, including IP addresses, random identifiers in cookies, and device identifiers, cannot identify a specific individual. Congress limited the FTC's discretion to modify the definition of "personal information" to circumstances where an identifier could identify a "specific" individual. Absent such functional use by a covered entity, an identifier is not "personal information" under COPPA.

In fact, the FTC itself has long interpreted "personal information" to mean "individually identifiable information." The Commission's Statement of Basis and Purpose regarding the original COPPA rule unambiguously made this point:

> One commenter asked the Commission to clarify that operators are not required to provide parental notice or seek parental consent for collection of non-individually identifiable information that is not and will not be associated with an identifier. ***The Commission believes that this is clear in both the Act and the Rule.***
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> One commenter noted that there are some persistent identifiers that are automatically collected by websites and can be considered individually identifying information, such as a static IP address or processor serial number. [...] ***The Commission believes that unless such identifiers are associated with other individually identifiable personal, they would not fall within the Rule's definition of "personal information."***[5]

Several commenters asked whether information stored in cookies falls within the definition of personal information. If the operator either collects individually identifiable information using the cookie or collects non-individually identifiable information using the cookie that is combined with an identifier, then the ***information constitutes "personal***

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[3] *Id. See* Computer and Communications Industry Association (comment 27), at 3–5; CTIA (comment 32), at 7–8; eBay (comment 40), at 5; Future of Privacy Forum (comment 55), at 2–3; Information Technology Industry Council (comment 70), at 3– 4; Intel (comment 72), at 4–6; IAB (comment 73), at 4–6; KidSafe Seal Program (comment 81), at 6– 7; TechAmerica (comment 159), at 3–5; Promotion Marketing Association (comment 133), at 10–12; TRUSTe (comment 164), at 4–6; Yahoo! (comment 180), at 7–8; Toy Industry Association (comment 163), at 8–10.

[4] 15 U.S.C. § 6502 (8)(c).

[5] *See* Children's Online Privacy Protection Rule, 64 FR 59888, 59892 (Nov. 3, 1999).

information" under the Rule, regardless of where it is stored.[6]

The Commission's recent proposal to expand the circumstances under which persistent identifiers constitute "personal information" not only conflicts with the Commission's longstanding view that identifiers themselves are not individually identifiable information, but it would also lead to grave ramifications for children's online privacy. Many of our member companies rely on persistent identifiers to deliver services and tools that avoid the collection of children's personally identifiable information. The Commission's proposal would present an unworkable situation where data collected is sufficient to trigger COPPA liability yet insufficient to comply with COPPA on its own.

To comply with this new definition of "personal information," operators may be forced to restrict their offered services. For instance, general Web site publishers rely on persistent identifiers in cookies to improve services offered by gathering information about their audience's preferences or interests of users based on websites visited, searches conducted, and online serviced used on their Web sites. Also, platform providers that use persistent identifiers might find it difficult to assess the audience for each of the millions of user-generated videos, blogs, or social networking pages. Thus, they may curtail the ability of users to create pages that could be viewed as directed at children. Further, sites that use non-personal persistent identifiers provide better content and features for children with the help of ad-supported content.[7] On the other hand, many websites for children that do not collect identifiable information might find it difficult to survive without the ability to provide relevant advertising.

In addition, the proposed rule actually may create incentives that run contrary to Congress's original policy goals. The Commission's proposed definition would create a perverse incentive for operators to collect *more* personal data from children to provide parents with notice about the use of anonymous identifiers. In addition, operators may lose the incentive to use passive, anonymous identifiers to provide parents with tools to monitor their children's online behavior, such as those that determine which sites children visit and for how long. This undermines the COPPA's policy goal of fostering a safe and privacy-sensitive online environment for children.

While we encourage the Commission to avoid future challenges by maintaining the current definition of personal information and not extending it to include persistent identifiers, we recognize that the Commission provides important "support for internal operations" exceptions to mitigate some of these concerns. The IA appreciates the Commission's willingness to revise this exception; however, we believe that the enumerated activities set forth by the Commission are still too narrow and would limit routine, internal first-party activities such as improvements made to Web sites and general innovation and product development. We recommend that the Commission's list of enumerated activities for this exception should be illustrative as opposed to exhaustive.

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[6] *Id.*

[7] *See* The Net Choice Coalition Comments at 6.

II. The Commission Should Modify the Proposed Definition of "Web site or Online Service Directed to Children" to Make Clear that COPPA Only Applies to General Audience Plugins, Platforms, and Web Site Publishers When the Operator Has Actual Knowledge that It Is Collecting Personal Information from a Child.

The SNPRM proposed modifying the definition of "Web site or online service directed to children" to include a new subsection (d) that provides:

> *Web site or online service directed to children* means a commercial Web site or online service, or portion thereof, that:
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> > (d) knows or has reason to know that it is collecting personal information through any Web site or online service covered under paragraphs (a)—(c).[8]

This modified definition also aims to characterize a Web site or online service as directed towards children if it is likely to attract an audience under age 13 (subsection b), or is likely to attract a disproportionally large percentage of under age 13 children (subsection c).[9]

These proposed changes would be problematic for many general website publishers. For instance, some of our member companies offer services that are directed to a general audience or a specific demographic such as teens. In addition, many of these services provide platforms for users to upload videos, social networking pages, and other content, and the users would be in the best position to understand the intended audiences for the uploaded content. These unclear guidelines would create major uncertainties for companies' compliance, which will negatively impact the development of many online services and features.

Also, previously submitted comments established that the proposed definition conflicts with COPPA's plain language because it could subject an operator (whether a first party, general audience site or a third-party, general audience plugin) to liability even though it does not have actual knowledge of the collection of personal information from individuals under the age of 13, nor does it target its services to children.[10] It is important to note that in most instances, providers of plugins or other embedded functionality and online publishers have no relationship with each other and are not aware of the other's actions. Therefore, we encourage the Commission to remove phrases that fall below the actual knowledge threshold such as "reason to know" from the proposed definition. Similar to "likely to attract," this phrase merely introduces ambiguity, and its inclusion is unsupported by the statute.

As the Commission is aware, many online services are expressly directed toward a general audience 13 years of age and older, and in fact prohibit children under 13 from using their services. These services do not intend to collect information from children. To enforce this restriction, these online services frequently require all individuals to provide their date of birth at

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[8] *See* 77 Fed. Reg. 46645.

[9] *Id.* at 46646.

[10] Direct Marketing Association, Inc. and Association of National Advertisers COPPA Comments at 7-9; IAB COPPA Comments at 6-7; Entertainment Software Association COPPA Comments at 9-13; Google COPPA Comments at 3-4; Facebook COPPA Comments at 7-8; Internet Commerce Coalition COPPA Comments at 7; Twitter Comments.

the time of registration and block any individual who is under 13 at the time of registration from using their services. Moreover, when these companies learn that a child under the age of 13 is using their services, they typically take steps to prevent future access and to delete any information submitted by the child.

Many online services also have developed and distribute neutral tools called "plugins" and other embedded functionalities that allow third parties to integrate their consent, services, or social communication tools into the third parties' websites. Most plugin providers make their plugins available in "stock" form for any website publisher or app developer to use on its own, without any customization or involvement by the plugin provider. The plugin provider does not select the websites that choose to use the plugins, approve of the pages where the plugins are placed, or decide which plugins are incorporated into a particular website. Those decisions are made entirely by third-party website publishers without the plugin providers' prior approval or knowledge. Additionally, in many instances, before an individual may use a plugin on a third party site, the user must individually log-in to the plugin provider's services using valid account credentials.

In addition, many online services provide platforms for user-driven videos, blogs, and other content. These general audience platforms do not select or prescreen the content that their users upload to the Web site. As a result, the companies providing these platform services do not know the intended or likely audience of the millions of videos, blogs, and other user-driven content that is constantly uploaded to their websites. In addition, these general audience platforms typically allow the viewing or reading audiences to remain anonymous, and as a result these companies purposefully avoid collecting identifying information from the audience.

When Congress' defined the term "directed to children," it did not give the Commission flexibility to impose COPPA obligations or liability on general audience online services that do not "target[]" children.[11] The Oxford Dictionary defines the term "targets" to mean, in relevant part, to "select as an object of attention"[12] – that is, an intentional action. The statute's focus on purposeful and intentional conduct is reinforced by Congress's decision specifically to exclude from the definition of "directed to children" those websites and services the merely refer or link to other child-directed commercial websites and online services through the use of "information location tools, including a directory, index, reference, pointer, or hypertext link."[13] Those websites and services, like general audience online services, plugins, and platforms for user content, cannot be considered "directed to children" because they are aimed at the general public and do not intentionally target individuals under 13 years of age.

In short, a service provider's general-audience plugins and content platforms are neutral tools that are not directed to any specific audience – and certainly not to children. Plugins do not

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[11] 15 U.S.C. § 6501(10)(A) (defining "website or online service directed to children" to mean "a commercial website or online service" or portion thereof "that is targeted to children").

[12] Oxford Dictionaries, Oxford University Press (2010), *available at*, http://oxforddictionaries.com/us/definition/american_english/target?q=target (last viewed Dec. 7, 2012).

[13] 15 U.S.C. § 6501(10)(B).

somehow become "child directed," as the SNPRM suggests,[14] simply because a third party makes an independent choice to include the plugin in its child-directed site. To the contrary, regardless of the publisher's targeted audience, the intended audience of *the plugin provider's* online service remains a general audience. And, for those plugin providers that age gate, their services are only available for individuals 13 years of age and older. Similarly, the intended audience of platform providers also remains a general audience, and their websites do not become "child directed" simply because some of the user-uploaded content might be viewed as material that might interest children.

In Section 230 of the Communications Decency Act,[15] Congress made a policy decision to shield interactive computer services from liability for third-party content on their platforms.[16] Instead, Congress imposes liability only on the content publisher. Although Section 230 does not concern COPPA specifically, it reflects Congress's recognition that growth and innovation in online services will be undermined if operators face the prospect of unlimited liability stemming from the content or actions of a third party.

To avoid these concerns and ensure that general audience Web sites, platforms, and plugins are not wrongly deemed to be "directed to children" when they do not intentionally collect – and, in fact, actively avoid the collection of – personal information from children, we urge the Commission to clarify that the proposed definition of "Web site or online service directed to children" extends only to those who have actual knowledge of the collection of personal information from a child, as follows:

> *Web site or online service directed to children* means a commercial Web site or online service, or portion thereof, that:
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> > (d) has actual and specific knowledge that it is ~~knows or has reason to know that it~~ collecting personal information <u>from a child</u> through any Web site or online service covered under paragraphs (a)—(c), <u>or has actual and specific knowledge that it targets its online service primarily to any Web site or online service covered under paragraphs (a)—(c).</u>

This revised definition properly distinguishes Web sites, platforms, and plugins that have actual knowledge that they are being used to seek out information from children (which should be covered by COPPA) from other operators, which do not knowingly collect information from children and are specifically designed *not* to collect such information.

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[14] 77 Fed. Reg. at 46645 ("The Commission continues to believe that when an online service collects personal information through child-directed properties, that portion of the online service can and should be deemed *directed to children*, but only under certain circumstances.").

[15] 47 U.S.C. § 230(c), (f)(3).

[16] 47 U.S.C. § 230(c).

III. The Commission Should Confirm that COPPA's Notice and Consent Requirements Do Not Apply to the Collection of Information from Individuals Who Are 13 Years of Age or Older, Regardless of Where the Collection Occurs

The SNPRM provides that websites and services that "knowingly target, or have content likely to draw children under 13 as their primary audience" must "***treat all users as children***, and provide notice and obtain consent before collecting any personal information from ***any user***."[17] We are concerned about the possibility that Commission staff would adopt regulations that would, for the first time, extend COPPA's notice and verifiable parental consent obligations to *all* users of child-directed sites, including users who are 13 years of age or older.

We respectfully maintain that it would be an unwarranted expansion of COPPA if the Commission enacted regulations that required a website or online service to treat individuals who are 13 years of age or older as children for COPPA purposes or that otherwise regulated the collection of information from adults under COPPA. COPPA's statutory language is quite clearly limited to regulating the collection, use, or disclosure of personal information obtained from individuals who are under 13 years of age. Specifically, COPPA directs the Commission to promulgate regulations that:

> [R]equire the operator of any website or online service directed to children that collects personal information ***from children*** or the operator of a website or online service that has actual knowledge that it is collecting personal information ***from a child*** . . . to provide notice . . . and to obtain verifiable parental consent for the collection, use, or disclosure of personal information ***from children***.

15 U.S.C. § 6502(b)(1)(A) (emphasis added).

COPPA's operative provision, which makes it unlawful for covered operators to "collect personal information ***from a child*** in a manner that violates the regulations prescribed [by the Commission],"[18] confirms Congress's express intent that the Commission's authority is limited to the regulation of information that is obtained "from children." Indeed, the Commission, itself, has recognized that "[i]n enacting the statute, Congress determined to apply COPPA's protections only to children under 13," "who are particularly vulnerable to overreaching by marketers," and who "may not understand the safety and privacy issues created by the online collection of personal information."[19]

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[17] Children's Online Privacy Protection Rule, 77 Fed. Reg. 46643, 46446 (proposed Aug. 6, 2012) (emphasis added) ("The effect of the proposed changes would be that those sites and services at the far end of the 'child-directed' continuum, *i.e.*, those that knowingly target, or have content likely to draw children under 13 as their primary audience, must still treat all users as children, and provide notice and obtain consent before collecting any personal information from any user."); Facebook COPPA Comments at 10-11.

[18] 15 U.S.C. § 6502(a)(1) (emphasis added). The statute's singular focus on children's information is reinforced repeatedly elsewhere in the statute. *See* 15 U.S.C. § 6501(4) (defining "disclosure" to require that the personal information that is released or made publicly available be 'collected from a child' (emphasis added)); *id* § 6501(9) (specifying that the mechanism must "ensure that a parent of a child receives notice" and that the notice is provided "before that information is collected from that child" (emphasis added)).

[19] FTC, Frequently Asked Questions About the Children's Online Privacy Protection Rule ("FTC COPPA FAQs"), FAQ #8, http://www.ftc.gov/privacy/coppafaqs.shtm (last visited Dec. 3, 2012).

The unambiguous statutory language leaves no room for the Commission to regulate the collection, use, or disclosure of personal information obtained from users 13 years of age or older, even where such information is collected on websites that "target, or have content likely to draw children under 13 as their primary audience." Accordingly, we respectfully submit that any regulation or rule that requires websites and online service operators to categorically treat "all users" of these sites as children, even ignoring information in their possession to the contrary, would exceed the Commission's statutory authority and not withstand judicial scrutiny. *See Chevron v. Natural Resources Defense Council*, 467 U.S. 837, 842-43 (1984) (courts are required to "hold unlawful and set aside agency action, findings, and conclusions found to be . . . in excess of statutory jurisdiction, authority, or limitations, or short of statutory right").

Even if the Commission had the authority to regulate the collection of information from those 13 and older on child-directed websites and services, the proposed approach would not withstand judicial scrutiny.[20] Many websites and services that "knowingly target, or have content likely to draw children under 13 as their primary audience" also offer invaluable services and resources to both children *and* parents. For example, a website that provides online developmental games for children with dyslexia may also provide instructional materials or forums for parents that provide support and guidance. Because of ambiguities in the SNPRM, the proposed rule could be read to suggest that a site operator is required to treat *both* the children and their parents as "children" under COPPA because the website knowingly targets children.[21]

This approach could cause operators to believe that the Commission expects them to obtain the consent of an adult's parent before collecting information from that adult. This awkward and inappropriate result cannot be what Congress intended. And it can be avoided by making clear in the final rule that websites and online services are not required to treat individuals who are 13 and over as children.

IV. The Commission Should Clarify That General Audience Web Site Publishers, Platforms, and Plugin Providers May Rely Upon Neutral Age-Screens to Ensure Compliance with COPPA.

Finally, because general audience Web site publishers, platforms, and plugins are not targeted to children, these operators can be held liable under COPPA only when they have "actual knowledge" that their services and tools are being used to collect information from children under the age of 13.[22] "Actual knowledge" is lacking where general operators employ a good-faith screening process to bar children's access to their services.

Indeed, the Commission proposed in the SNPRM that operators of services that are "likely to attract an audience that includes a disproportionately large percentage of children

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[20] 5 U.S.C. § 706(2)(c); *see also Katherine Gibbs School (Inc.) v. FTC*, 612 F.2d 658, 665 (2d Cir. 1979) (striking down provisions of a Commission rule "[b]ecause the Commission is attempting to exercise power 'inconsistent and at variance with the over-all purpose and design of the Act").

[21] 77 Fed. Reg. at 46446. *See also* 15 U.S.C. § 6502(b)(1)(B) (requiring the Commission to enact regulations that require operators of websites to "to obtain verifiable parent consent for the collection, use, or disclosure of personal information from children").

[22] 15 U.S.C. § 6502(a)(1).

under 13 as compared to the percentage of such children in the general population" can avoid being deemed "directed to children" by implementing an age-gating procedure. Specifically, the SNPRM proposes that operators of "child-friendly mixed audience sites" "will not be deemed directed to children if, prior to collecting any personal information, they age-screen *all* users."[23] Instead, the operators will be deemed to have actual knowledge under COPPA only when they collect information from individuals who self-identify as being under 13 years of age.[24] While "recogniz[ing] that many children may choose to lie about their age," the Commission concluded that an age-gate screening proposal in the context of a child-friendly mixed audience site "strike[s] the correct balance," in part because "it has been the Commission's law enforcement experience . . . that many children do truthfully provide their age in response to an age screening question on mixed audience sites."[25]

The conclusion that age-gating is a reasonable step that operators of general-audience websites and online services can take to avoid triggering COPPA is consistent with the Commission's longstanding view that a neutral age-gate process is an appropriate and reliable means of determining a user's age, even on child-directed sites and services. For example, since at least October 2008, the Commission has published a set of Frequently Asked Questions about the Children's Online Privacy Protection Rule on its website that advises operators of websites intended for teenager that they "can identify which visitors are under 13, for example, by *asking age when visitors are invited to provide personal information.*"[26] The age screen should "[a]sk age information in a neutral manner at the point where you invite visitors to provide personal information or to create their log-in user ID."[27] The Commission further provides that if the website operator "take[s] reasonable measures to screen for age," then it is "not responsible if a child misstates his or her age."[28] Operators of websites and online services have relied on this guidance in establishing age screens to deter children under 13 from accessing websites where personal information is collected.

We are concerned that the Commission may adopt a final rule that precludes operators of general audience Web site publishers, platforms, and plugins from reasonably relying on age screens to ensure that their services do not collect information from children. Such a conclusion would violate the bedrock principle that "[a]gencies must implement their rules and regulations in a consistent, evenhanded manner."[29] It would be arbitrary and illogical for the Commission to take the position that an operator of a plugin that is targeted to a general audience "target[s] children" for the purpose of COPPA's statutory definition – that is, seeks to reach them intentionally – but that an operator of a child-directed website lacks "actual knowledge" that an individual is a child when a neutral age-gate is applied.

Accordingly, to ensure that the Commission provides clear and consistent guidance on the use of age screens and avoid the untenable expansion of COPPA requirements to operators

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[23] 77 Fed. Reg. at 46646.
[24] *Id.*
[25] *Id.*
[26] *See, e.g.*, FTC, Frequently Asked Questions About the Children's Online Privacy Protection Rule, FAQ #38, http://www.ftc.gov/privacy/coppafaqs.shtm#teen (last visited Dec. 3, 2012) (emphasis added).
[27] *Id.* at FAQ #39.
[28] *Id.*
[29] *FERC v. Triton Oil & Gas Corp.*, 750 F.2d 113, 116 (D.C. Cir. 1984).

who do not intend to collect – or even affirmatively seek to *avoid* collecting – information from children, we request that the Commission clarify in the final rule that "mixed audience sites" (including general audience operators) may rely reasonably on the use of age screens to ensure that their services are not "directed to children." This approach – which focuses on "mixed audience" sites and tools – would not impact the Commission's elaboration on the circumstances under which a child-directed site would be imputed with knowledge that users of that site are children.

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As the Commission continues to deliberate, we encourage the Commission to set an effective date that gives companies a reasonable time period to adapt to any new Rule. We also urge the Commission to explicitly clarify that any new Rule will apply only to data gathered after the effective date. The Internet Association appreciates the opportunity to provide this additional input on the SNPRM. Please do not hesitate to contact us if you have any questions concerning these supplemental comments, or if there is any further information we can provide.

Respectfully submitted,

Michael Beckerman
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The Internet Association