



UNITED STATES OF AMERICA
Federal Trade Commission

Office of the Secretary

November 4, 2014

Debbie Matties, Esq.
Vice President, Privacy
CTIA – The Wireless Association
1400 16th Street, NW, Suite 600
Washington, D.C. 20036

Re: In the Matter of Goldenshores Technologies, LLC, File No. 132 3087

Dear Ms. Matties:

Thank you for your comment, on behalf of CTIA – The Wireless Association, expressing support for the Federal Trade Commission’s consent agreement with Goldenshores Technologies, LLC, and Mr. Geidl (“respondents”), and enclosing a copy of the CTIA Best Practices and Guidelines for Location-Based Services. While your comment was placed on the public record, administrative glitches unfortunately prevented the letter from being considered before the Commission decided to adopt the Decision and Order in final form.

The Commission agrees with you that the Decision and Order in this matter will advance the Commission’s objective of safeguarding consumer privacy. In particular, Part I of the proposed order prohibits respondents from misrepresenting the extent to which its mobile applications collect, use, disclose, or share covered information. It also prohibits respondents from misrepresenting the extent to which users exercise control over the collection, use, disclosure, or sharing of information collected from or about them. Part II of the proposed order requires respondents to (1) disclose, among other things, that they collect or share geolocation information prior to the collection or transmission of such information, and (2) obtain consumers’ affirmative express consent to the transmission of such information. Part III of the proposed order requires the company to delete information already collected from consumers through the Brightest Flashlight App.

Accordingly, on March 31, 2014, the Commission determined that the public interest would best be served by issuing the Decision and Order in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission’s website at www.ftc.gov. We thank you again for your comment.

Sincerely,

Donald S. Clark
Secretary