



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Anon Anon  
State of Florida

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about protecting your personal information. You also requested that your comment and the Commission's response be posted publicly.

The Commission shares your concerns about the privacy of personal information. The proposed consent order seeks to protect users' privacy by requiring Snapchat to cease misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. Once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These requirements will help ensure that your personal information is protected in the future.

As to your request that you do not want personal information withheld or collected by Snapchat, the Commission advises that you contact Snapchat's customer service support with this request.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and the Decision and Order in final form without any modifications. The final Decision and Order and other relevant materials, including your comment and this response, are available on the Commission's website at <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Michael Blackwell  
State of Ohio

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you would like to remain informed about the settlement. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. Additionally, the public may seek access to ordered compliance reports by making a request under the Freedom of Information Act. The Commission will make every effort to be transparent regarding the compliance reports, consistent with the applicable law. If the Commission determines that a report has been frequently requested, the agency will post such portions as may be released to the public on the FTC's website.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and the Decision and Order in final form without any modifications. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Cashen  
State of Florida

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about the proposed order's lack of monetary penalties.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

As to your concern about the lack of civil penalties, the Commission does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Anthony Castelbuono  
State of Nevada

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about Snapchat's alleged deceptive misrepresentations and you believe that Snapchat should be subject to harsher penalties.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order.

These requirements will help ensure that your personal information is protected in the future. As to your concern about the lack of civil penalties, the Commission does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Patrick Chu  
State of California

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about Snapchat's alleged deceptive misrepresentations and protecting private information online.

The Commission shares your concerns about the privacy of personal information. The proposed consent order seeks to protect users' privacy by requiring Snapchat to cease misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. Once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These requirements will help ensure that your personal information is protected in the future.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Edward Cooper  
State of South Carolina

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned that the proposed consent agreement does not include a harsh enough penalty.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

The Commission is a civil law enforcement agency that does not have authority to obtain penalties for an initial violation initially under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Cox  
Commonwealth of Virginia

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about the severity of the punishment contained in the proposed order. Specifically, you write that you want penalties that "will actually be felt...for many years."

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

As to your concern about the lack of civil penalties, the Commission does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Mario Cruz  
State of California

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about protecting your private information, and believe that Snapchat should be subject to harsher punishments. You also requested that Snapchat delete any of your personal information.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

The Commission does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

As to your request that Snapchat delete any of your personal information, the Commission advises that you contact Snapchat's customer support with this request.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. §4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Glenn Davis  
State of Tennessee

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you believe Snapchat should be subject to harsher penalties.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

The Commission does not have authority to obtain civil penalties for an initial violation of Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. §4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Desai  
State of California

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned that the proposed consent agreement may not prevent future deceptive misrepresentations by Snapchat. The Commission appreciates your concerns but believes the consent order adequately addresses Snapchat's conduct.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

As to your concern about the lack of severity of the order, the Commission does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Rand Diehl  
State of Indiana

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about Snapchat's alleged deceptive misrepresentations.

The Commission shares your concerns and believes the proposed order adequately addresses these concerns. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that users' online privacy is protected in the future.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Doe  
State of Illinois

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you believe that Snapchat should be subject to harsher penalties.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

The Commission does not have authority to obtain civil penalties for an initial violation of Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Dixon Francois  
Commonwealth of Massachusetts

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you believe that Snapchat should be subject to harsher penalties. Specifically, your comment states that this is "setting a precedent so that other companies can and should lie."

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

The Commission does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Mario Halkyer  
State of Pennsylvania

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you believe Snapchat should be subject to a harsher penalty.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

The Commission does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. §4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Johnston  
State of Washington

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you believe Snapchat should be subject to harsher penalties in order to deter future deceptive misrepresentations.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

As to your concern about the lack of penalties, the Commission is a civil law enforcement agency that does not have authority to obtain penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Kim  
State of Oklahoma

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment asks how Snapchat could be held liable for snaps that are saved using third party applications.

The Commission appreciates your concern. However, Snapchat is not being held liable for the actions of third parties. Snapchat is being held accountable for its own deceptive misrepresentations. Snapchat marketed its application's central feature as the user's ability to send snaps that would "disappear forever" after the sender-designated time period. Despite these claims, the complaint outlines several simple ways that recipient could save snaps indefinitely, including the use of widely available third-party applications. As alleged in the complaint, Snapchat was warned by a security researcher about this possibility, yet the company continued to misrepresent that the sender controls how long a recipient can view a snap. The Commission believes that companies that market privacy and security as key selling points of their product or service must be truthful and keep their privacy promises to consumers.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

King  
State of California

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about Snapchat's alleged deceptive misrepresentations, and you believe that the terms of the proposed order are "far too lenient."

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

The Commission does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Taylor Krekoski  
Outside the United States

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about protecting your personal information.

The Commission shares your concerns about the privacy of personal information. The proposed consent order seeks to protect users' privacy by requiring Snapchat to cease misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. Once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These requirements will help ensure that your personal information is protected in the future.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Christopher La Forest  
State of Minnesota

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you believe Snapchat should be subject to harsher penalties.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

As to your concern about the lack of penalties, the Commission is a civil law enforcement agency that does not have authority to obtain penalties for an initial violation of Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. §4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Ms. Christina Lotito  
Commonwealth of Massachusetts

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about Snapchat's alleged deceptive misrepresentations and protecting private information online.

The Commission shares your concerns about the privacy of personal information. The proposed consent order seeks to protect users' privacy by requiring Snapchat to cease misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. Once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These requirements will help ensure that your personal information is protected in the future.

The Commission also appreciates that you are concerned about not being able to stop companies like Snapchat from using your data in ways that you have not consented to. Under the laws that the Commission enforces, the Commission can take action against unfair or deceptive acts or practices. Companies engage in deceptive practices when they fail to live up to the promises they make concerning consumers' personal information. Companies engage in unfair practices when they cause or are likely to cause harm to consumers that is not reasonably avoidable and not outweighed by countervailing benefits. The Commission has also encouraged companies to implement best practices and to give consumers clear choices about the privacy of their data, along the lines that you suggest in your letter.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Marc Rotenberg, Executive Director  
Khaliah Barnes, Administrative Law Counsel  
Julia Horwitz, Consumer Protection Counsel  
Electronic Privacy Information Center  
1718 Connecticut Avenue, NW  
Suite 200  
Washington, D.C. 20009

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Dear Mr. Rotenberg, Ms. Barnes, and Ms. Horwitz:

Thank you for your comment on behalf of the Electronic Privacy Information Center (“EPIC”) regarding the Federal Trade Commission’s (“Commission” or “FTC”) consent agreement in the above-entitled proceeding. The Commission has placed your comment on the public record pursuant to rule 4.9(b)(6)(ii) of the Commission’s Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration.

The Commission’s complaint against Respondent Snapchat, Inc. (“Snapchat”) includes six counts alleging violations of Section 5 of the Federal Trade Commission Act (“FTC Act”). Count 1 alleges that Snapchat misrepresented that messages sent through its application would disappear forever after the user-set time period expires. Count 2 alleges that Snapchat misrepresented that it would notify senders if the recipient took a screenshot of a snap. Count 3 alleges that Snapchat misrepresented that it did not collect users’ location information. Count 4 alleges that Snapchat misrepresented that the only personal information Snapchat collected when the user chose to “Find Friends” was the mobile number that the user entered. Count 5 alleges that Snapchat misrepresented that the only personal information collected from users for purposes of finding friends was email, phone number, and Facebook ID. Count 6 alleges that Snapchat misrepresented that it employs reasonable security measures to protect personal information from misuse and unauthorized disclosure.

The proposed order contains provisions designed to prevent Snapchat from committing future violations similar to those alleged in the complaint. It prohibits Snapchat from misrepresenting: (1) the extent to which a message is deleted after being viewed; (2) the extent to which it can detect and notify senders when recipients have captured screenshots; (3) the categories of covered information collected; and (4) the steps it takes to protect against misuse or unauthorized disclosure of covered information. It also orders Snapchat to implement and maintain a comprehensive privacy program. The proposed order, which terminates after 20 years, includes standard recordkeeping and service provisions, as well as requirements for Snapchat to file compliance reports with the Commission.

Your comment expresses EPIC's support of the Complaint and the proposed consent order's directives, but urges the Commission to make two revisions.

First, you recommend that the Commission require Snapchat to comply with the substantive protections of the President's Consumer Privacy Bill of Rights ("CPBR"), including the provisions regarding individual control, respect for context, transparency, and access and accuracy. The Commission supports the goals laid out in the CPBR and believes that the privacy program mandated under the proposed order will require Snapchat to address many of the privacy principles discussed in your comment. To the extent reasonably foreseeable, material risks arise from certain practices, Snapchat must use reasonable and appropriate procedures to address these risks or it could face substantial civil penalties. However, the proposed order is designed to address specific conduct as alleged in the complaint, not to impose obligations that may not be tied to such conduct.

Second, you urge the Commission to make Snapchat's compliance reports publicly available. With regard to the third-party assessments required by many of our privacy and data security orders, the Commission agrees that there is a public benefit to providing transparency regarding a company's compliance with an FTC order. Thus, the public may seek access to ordered compliance reports by making a request under the Freedom of Information Act.<sup>1</sup> If the compliance reports contain any trade secrets or other confidential commercial or financial information, or information about consumers or other third parties, the Commission is prohibited from disclosing that information.<sup>2</sup> Upon receipt of a request for confidential treatment of all or part of the compliance report, the Commission will conduct a careful review to determine whether confidential treatment is warranted. We will make every effort to be transparent regarding the compliance reports, consistent with the applicable law. If the Commission determines that a report has been frequently requested, the agency will post such portions as may be released to the public on the FTC's website.

In addition, your comment references past comments that EPIC has submitted to the Commission regarding other settlements. As in past comments,<sup>3</sup> you state that the Commission's "failure to make any changes to proposed settlements based on comments" is: "(1) contrary to the explicit purpose of the statutory provision that allows the Commission to request comments from the public; (2) contrary to the broader purpose of the Commission to police unfair and deceptive trade practices; and (3) contrary to the interests of American consumers." (EPIC comment at 2-3, internal references omitted). The Commission Rules of Practice, 16 C.F.R. § 2.34, do not require that the Commission accept proposed changes filed by commenters. Rather, the applicable Rule of Practice directs the Commission to "receive and consider any comments or views concerning the order that may be filed by any interested person," and states that, thereafter, the Commission "may withdraw its acceptance of the settlement... [and] take such

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<sup>1</sup> 5 U.S.C. § 552 *et seq.*

<sup>2</sup> 15 U.S.C. § 46(f) ("the Commission shall not have any authority to make public any trade secret or any commercial or financial information which is obtained from any person and which is privileged or confidential"); Commission Rule of Practice § 4.10.

<sup>3</sup> *See, e.g.,* Comment of EPIC to the FTC on the Matter of Apperian, Inc., et al. (Feb. 20, 2014), *available at* [http://www.ftc.gov/system/files/documents/public\\_comments/2014/02/00004-88623.pdf](http://www.ftc.gov/system/files/documents/public_comments/2014/02/00004-88623.pdf).

other action it may consider appropriate.” The Commission carefully considers, and has a practice of responding to, public comments filed in reference to its administrative settlements, including comments filed by EPIC. The Commission has amended consent orders in response to public comments,<sup>4</sup> and will readily do so in the future when the Commission determines that proposed order modifications are in the public interest.

In light of these considerations, the Commission has determined that the public interest would best be served by issuing the Decision and Orders in the above-titled proceedings in final form without any modifications. The final Decision and Orders and other relevant materials are available from the Commission’s website at <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary

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<sup>4</sup> See Press Release, FTC, FTC Approves Final Consent Order in Matter of Sony BMG Music Entertainment (June 29, 2007), available at <http://www.ftc.gov/opa/2007/06/fyi07258.shtm>; Press Release, FTC, FTC Approves Modified Final Order Settling Charges against Marketer of Four Loko Malt Beverage (February 12, 2013), <http://www.ftc.gov/opa/2013/02/fourloko.shtm>; Letter from Matthew Jarrad, Georgia Department of Community Health, to G. Edward Alexander, North Albany Health Center, *In re* Request for Letter of Determination Regarding Facility Divestiture, at 2 (June 3, 2014) (explaining how information obtained after the Commission accepted a proposed consent decree led Commission staff to consider recommending that the Commission resume litigation), available at [http://scni.media.clients.ellingtoncms.com/news/documents/2014/06/04/DET2014033\\_Determ\\_Response.pdf](http://scni.media.clients.ellingtoncms.com/news/documents/2014/06/04/DET2014033_Determ_Response.pdf).



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. David McGuire  
Novustep LLC  
State of Colorado

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned that the proposed consent agreement does not include a monetary penalty.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order.

These requirements will help ensure that your personal information is protected in the future. As to your comment about the lack of civil penalties, the Commission does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Dan Ohlemacher  
State of Utah

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about the severity of the punishment contained in the proposed order. Specifically, you are concerned about the lack of a monetary penalty for Snapchat.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

As to your concern about the lack of civil penalties, the Commission is a civil law enforcement agency and does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Olander  
State of California

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about the lack of monetary punishment in the proposed order.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

As to your concerns about the lack of civil penalties, the Commission does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Marco Pennino  
Outside the United States

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about Snapchat's alleged deceptive misrepresentations and that you do not want Snapchat to store any of your personal information.

The Commission shares your concerns and believes the proposed order adequately addresses these concerns. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

As to your request that Snapchat delete any of your personal information, the Commission advises that you contact Snapchat's customer support with this request.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. David Raeker-Jordan  
State of Pennsylvania

Re: *In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned that, without a monetary penalty, the proposed order will not deter "future bad behavior" by Snapchat.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

As to your concern about the lack of civil penalties, the Commission does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Dave Rahardja  
State of California

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment suggests that the FTC should impose a fine on Snapchat, have an independent auditor for three years, and impose penalties unless there is evidence of consistent progress.

In some ways, the proposed consent order is more stringent than what you suggest. For example, instead of three years of independent audits, the order requires Snapchat to obtain biennial assessments from an independent third party for the duration of the 20-year order. The proposed consent order also prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. These requirements will help ensure that your personal information is protected in the future.

As to civil penalties, the Commission is a civil law enforcement agency and does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Joshua Reich  
Princeton University  
State of New Jersey

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about the severity of the punishment contained in the proposed order. Specifically, you are concerned about the lack of a monetary or criminal penalty for Snapchat or its executives.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order.

These requirements will help ensure that your personal information is protected in the future. As to your concern about the lack of penalties, the Commission is a civil law enforcement agency that cannot seek criminal penalties. The agency does have authority to obtain civil penalties, but it cannot do so for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Thomas Reimel  
Law Offices of Thomas W. Reimel  
State of Pennsylvania

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you believe Snapchat should be subject to harsher penalties.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

As to your concern about the lack of severity of the order, the Commission does not have authority to obtain civil penalties for an initial violation of Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Richardson  
State of Iowa

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned that the proposed consent agreement is "insufficiently punitive." You cite to an article that characterizes the proposed order as "an easily ignored formality" because "[n]o fines, restrictions or course-changing controls are to be imposed."

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

As to your concern about the lack of civil penalties, the Commission does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. §4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Ms. Soretta Rodack  
State of New York

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about Snapchat's deceptive misrepresentations and that you believe that Snapchat should be subject to harsher penalties.

First, your letter suggests that the FTC settlement "requests" that Snapchat stop lying. The order is not a request, but a mandate. Once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)) for any violation of the order. These civil penalties will help incentivize compliance with the order. In addition, the Commission understands your concern about the severity of the punishment. In your comment, you write that Snapchat's actions "merit criminal charges and severe punishment" and that "fines, restrictions or course-changing control" should be imposed. The Commission is a civil law enforcement agency that cannot seek criminal penalties. As to civil penalties, it is true that the order does not contain an initial requirement of civil penalties. This is because the Commission does not have the authority to obtain civil penalties initially under Section 5 of the FTC Act.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Ms. Nicole Rushworth  
Outside the United States

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are interested in protecting your personal data, and are concerned that Snapchat is "just being allowed to slide" if they are alleged to have violated federal law.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

The Commission does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Sandhu  
State of Michigan

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about protecting your private information.

The Commission shares your concerns about the privacy of personal information. The proposed consent order seeks to protect users' privacy by requiring Snapchat to cease misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. Once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These requirements will help ensure that your personal information is protected in the future.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Mr. Alex Sitaras  
State of Florida

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about the privacy implications of Snapchat's misrepresentations, and that you believe that Snapchat's executives should be held financially liable.

The Commission shares your concern about your privacy. The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

As to your concern about the lack of civil penalties, the Commission does not have the authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(1) of the FTC Act, 45 U.S.C § 45(1), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Ms. Sarah Stallworth  
State of Tennessee

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you believe that Snapchat should be subject to harsher penalties.

The Commission shares your concerns about your privacy, and the consent order is designed to address those concerns. The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

The Commission is a civil law enforcement agency that does not have authority to obtain penalties for an initial violation initially under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Szopinski  
State of New Jersey

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about the privacy implications of Snapchat's misrepresentations, and that you believe that Snapchat's executives should be held financially liable.

The Commission shares your concern about consumer privacy. The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

As to your concern about the lack of civil penalties, the Commission does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

Soody Tronson  
State of California

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that, (1) you are concerned that the proposed consent agreement does not include a monetary penalty, and (2) Snapchat should be forced to delete all user data.

The Complaint in this matter alleges that Snapchat made material misrepresentations, in violation of Section 5 of the FTC Act, and the proposed order is designed to rectify this misconduct. The proposed consent order prohibits Snapchat from misrepresenting the manner and extent to which it protects the privacy, security, or confidentiality of any covered information. It orders Snapchat to establish, implement, and maintain a comprehensive privacy program designed to address privacy risks related to Snapchat's new and existing products and to protect the privacy and confidentiality of covered information. Snapchat must also obtain biennial assessments from an independent third party for the duration of the 20-year order. These requirements will help ensure that your personal information is protected in the future.

As to your concern about the lack of a monetary penalty, the Commission is a civil law enforcement agency and does not have authority to obtain civil penalties for an initial violation under Section 5 of the FTC Act. However, once the order becomes final, Snapchat will risk civil penalties of up to \$16,000 per violation per day (as provided by Section 5(l) of the FTC Act, 45 U.S.C. § 45(l), as adjusted by 16 C.F.R. § 1.98(c)). These civil penalties will help incentivize compliance with the order. Accordingly, we believe the order provisions, along with the risk of substantial civil penalties for violating the order, appropriately address the conduct at issue.

As to your request that Snapchat delete all user data, the Commission advises that you contact Snapchat's customer support with any request to delete your own data.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary



Office of the Secretary

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

December 23, 2014

[Redacted by Request]  
Commonwealth of Virginia

*Re: In the Matter of Snapchat, Inc., File No. 1323078*

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. We are sorry to hear that you have been receiving unsolicited snaps through the Snapchat application, and we share your concern about the importance of user control over privacy settings. Please contact Snapchat's customer support to request assistance in blocking specific individuals from contacting you through the application.

The Commission has placed your comment on the public record, pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. §4.9(b)(6)(ii). The Commission has now determined that the public interest would best be served by issuing the Complaint and 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 <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

Janice Podoll Frankle  
Acting Secretary