



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

BY EMAIL

Russ Kick

(b) (6)

JUN 27 2018

Re: FOIA-2018-00387
Most recent Independent Assessor's
Report on Google's Privacy Program

Dear Mr. Kick:

This is in response to your request dated January 10, 2018, under the Freedom of Information Act seeking access to the most recent Independent Assessor's Report on Google's Privacy Program and updates on Google's initial compliance report regarding AdWords API Terms and Conditions. In accordance with the FOIA and agency policy, we have searched our records as of January 10, 2018, the date we received your request in our FOIA office.

We have located 58 pages of responsive records. I am granting partial access to the records, portions of which are exempt from disclosure under FOIA Exemption 4, 5 U.S.C. § 552(b)(4), because they constitute confidential commercial or financial information. *See Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992). Moreover, because Section 6(f) of the FTC Act, 15 U.S.C. § 46(f), prohibits public disclosure of this type of information, it is also exempt under FOIA Exemption 3, 5 U.S.C. § 552(b)(3), which exempts from disclosure any information that is protected from disclosure under another federal statute.

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580, or via email at FOIAAppeal@ftc.gov, within 90 days of the date of this letter. Please enclose a copy of your original request and a copy of this response.

You also may seek dispute resolution services from the FTC FOIA Public Liaison Richard Gold via telephone at 202-326-3355 or via e-mail at rgold@ftc.gov; or from the Office of Government Information Services via email at ogis@nara.gov, via fax at 202-741-5769, or via mail at Office of Government Information Services (OGIS), National Archives and Records Administration, 8601 Adelphi Road, College Park, MD 20740.

If you have any questions about the way we handled your request or about the FOIA regulations or procedures, please contact Jonathan Hill at (202) 326-2684.

Sincerely,

Dione J. Stearns
Assistant General Counsel

Enclosed: 58 pages