



# The Internet Association

September 30, 2014

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



**RE: AgeCheq Application for Parental Consent Method, Project No. P-14510**

Dear Mr. Clark:

The Internet Association (“The IA”) appreciates the opportunity to provide comments on AgeCheq Inc.’s (AgeCheq’s) voluntary application for approval of its online parental verification method under the Federal Trade Commission’s Online Privacy Protection Rule (“the COPPA Rule” or “the Rule”). The Internet Association represents the interests of leading Internet companies.<sup>1</sup> We are dedicated to advancing public policy solutions that strengthen and protect Internet freedom, foster innovation and economic growth, and empower users. As such, The IA is committed to maintaining child safety and protecting children’s privacy online.

We submit this comment in order to voice our support for COPPA common consent mechanisms in general, without specifically commenting on AgeCheq’s platform and technology. The need for common consent mechanisms is intuitive given current marketplace realities: the proliferation of apps across platforms and devices has created real challenges for COPPA compliance by app developers.

The concept of enabling one entity to obtain consent on behalf of operators that use its platform was suggested by a number of commenters in the Commission’s 2011 COPPA rulemaking

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<sup>1</sup> Our members include Airbnb, Amazon, AOL, Auction.com, eBay, Etsy, Expedia, Facebook, Gilt, Google, Groupon, IAC, LinkedIn, Lyft, Monster Worldwide, Netflix, Practice Fusion, Rackspace, reddit, Salesforce.com, SurveyMonkey, Sidecar, TripAdvisor, Twitter, Uber Technologies, Inc., Yelp, Yahoo!, and Zynga.



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proceeding.<sup>2</sup> In various submissions, commenters explained that a platform provider should be able to provide general notice and obtain parental consent on behalf of app developers and other third parties that utilize the platform to collect personal information for purposes that are specified in that notice. The Commission subsequently identified the benefits of such platforms when it revised in the COPPA Rule in 2013 and observed that common consent mechanisms hold “potential for the efficient administration of notice and consent for multiple operators.”<sup>3</sup>

We agree with the Commission’s observation. Enabling operators to leverage a common platform to provide notice to, and obtain verifiable parental consent from, parents substantially advances the Commission’s goal of ensuring that clear information is available to parents in a manner that they can easily understand and manage. Such mechanisms may also minimize the real time and opportunity cost to parents involved in providing consent multiple times through multiple channels. With respect to the app developers, COPPA common consent mechanisms may lower their development costs and consequently lower entry barriers into the app marketplace overall.

The Internet Association appreciates the opportunity to comment and looks forward to continuing our productive dialogue with the FTC on these important issues.

Respectfully submitted,

Abigail Slater  
VP, Legal and Regulatory Policy  
The Internet Association

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<sup>2</sup> See, e.g., Walt Disney Co., In re COPPA Rule Review 18 (Dec. 23, 2011); Ass’n for Competitive Technology, Reply Comments on COPPA Rule Review, 7-8 (Dec. 23, 2011).

<sup>3</sup> 78 Fed. Reg. 3989 (January 17, 2013)