



Office of the Secretary

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

February 15, 2012

J. Blair Richardson, Esq.
General Counsel and Chief Privacy Officer
Aristotle International, Inc.
205 Pennsylvania Avenue, SE
Washington, DC 20003

Re: Application of Aristotle International, Inc.
Children's Online Privacy Protection Rule Safe Harbor Program

Dear Mr. Richardson:

This letter is to inform you that the Federal Trade Commission has approved the application of Aristotle International, Inc. ("Aristotle") to serve as a safe harbor program for purposes of implementing the protections of the Children's Online Privacy Protection Rule.¹ As you know, the Rule includes a provision enabling industry groups or others to submit self-regulatory guidelines to the Commission for approval as a safe harbor program.² Pursuant to this provision, Aristotle submitted an initial application for Commission approval of its Integrity Safe Harbor Compliance Program ("Integrity") on May 3, 2011. The Commission announced Aristotle's application in the Federal Register on June 27, 2011, and took public comment on the application through August 15, 2011.

As you know, the Commission received six comments in response to Aristotle's Integrity program safe harbor application. Several of these comments raised concerns regarding various aspects of the proposal, including the manner in which Aristotle will treat data collected from parents and children during the verification process, the components of member operators' privacy policies, and Aristotle's monitoring and enforcement of member operators. Aristotle reviewed these comments, met with the staff of the Federal Trade Commission to discuss commenters' concerns, and submitted a revised safe harbor application on November 22, 2011. The Commission believes that the concerns raised by the commenters have been adequately addressed through Aristotle's submission of revised materials.

To be approved by the Commission, self-regulatory guidelines must include: (1) a requirement that participants in the safe harbor program implement substantially similar requirements that provide the same or greater protections for children as those contained in the

¹ 16 C.F.R. § 312.

² 16 C.F.R. § 312.10.

Rule; (2) an effective, mandatory mechanism for the independent assessment of safe harbor program participants' compliance with the guidelines; and (3) effective incentives for safe harbor program participants' compliance with such guidelines.³ The Commission has determined that Aristotle's application for status as a safe harbor program and its self-regulatory guidelines satisfy these three criteria.

The Commission therefore is pleased to approve Aristotle's application as its fifth COPPA safe harbor program. This program will play an important role in expanding the implementation of the COPPA Rule, and we look forward to working with Aristotle and the other safe harbor programs to provide these important protections for children's online privacy. The Commission reserves the right to revoke this approval if at any time it determines that the approved self-regulatory guidelines and their implementation do not, in fact, meet the requirements of the Rule.

By direction of the Commission

Donald S. Clark
Secretary

³ 16 C.F.R. § 312.10(b).