

June 30, 2010

Office of the Secretary
Federal Trade Commission
600 Pennsylvania Avenue, NW
Room H-135, Annex H
Washington, DC 20580

Re: 16 CFR Part 312 Request for Public Comment on the Federal Trade Commission's Implementation of the Children's Online Privacy Protection Rule

The undersigned organizations are pleased that the FTC has begun a comprehensive review of its children's privacy regulations. We believe the Children's Online Privacy Protection Act (COPPA) and the FTC rules implementing it have helped to protect the privacy and safety of children online. However, given the explosion of new technologies since COPPA's passage in 2000, we believe it is vital that COPPA rules be updated and clarified.

As faith communities that together represent millions of households in the United States, we strongly support efforts to keep America's families safe and to guard their privacy online. In the years since the Children's Online Privacy Protection Act was passed, adults and children are online in more ways, including mobile phones, gaming consoles, and interactive television. In addition, marketers have developed very sophisticated methods of collecting data and are using that data to target individuals with personalized marketing messages. These developments have increased the risks to children's privacy.

Some of the specific areas we recommend the Commission address include:

- Ensure that children's privacy is protected on new Internet-connected services, such as mobile phones and online games
- Update the definition of personally identifiable information to reflect the evolving world in which persistent cookies, IP addresses, geolocation data, and even seemingly anonymous combinations of data such as age, zip code, and gender are collected and used to track individuals and to target personalized market messages to them
- Increase efforts to minimize the overall data collection on sites targeting minors. We also ask the FTC to consider a new way to protect teen privacy [COPPA only covers children under age 13]

Our main focus in this filing is the protection of children and families. We recognize that there are likely other important issues that need to be addressed but are beyond our level of technical expertise. Therefore, we encourage the FTC to conduct a thorough review of the ways in which COPPA should be updated and to act to do so. The safety of America's families depends on it.

Sincerely,

Family and Children's Ministries, Disciples Home Missions, Christian Church (Disciples of Christ)

Office of Communication of the United Church of Christ (OC, Inc.)

United States Conference of Catholic Bishops