

## Updated COPPA Rule Twitter Chat

On December 19, 2012, FTC staff hosted a Twitter Chat to answer questions about the updated Children's Online Privacy Protection Rule. Staff Attorneys from the Division of Ad Practices, Mamie Kresses and Phyllis Marcus, along with Senior Policy Advisor Paul Ohm, with the

@TechFTC: Q5: MT                    3rd party analytics 4 apps use own internal id system (not UDID) to track users over time. Is this problem? #COPPA

@TechFTC: A5 Any "persistent identifier" is covered, but collection for analytics is probably "support for internal ops" thus allowed. (cont) #COPPA

@TechFTC: A5 (cont): But, this internal id system cannot be used to behaviorally advertise to or amass a profile about a child. #COPPA

@FTC: Q6 RT                    What 3rd party companies must do under #COPPA to show that they "capable" of keeping info "secure and confidential"?

@FTC: A6 Rule does not prescribe particular procedures. Sufficient due diligence to ensure level of security needed. #COPPA

@TechFTC: Q7 MT                    IP addresses as persistent identifiers, is that just static IPs, or all? IPv4 vs. IPv6? Differences abound. #COPPA

@TechFTC: A7 Any IP addr that "can be used to recognize a user over time and across diff. websites" so v6/v4/static/dynamic all covered. #COPPA

@FTC: Note #COPPA chat participants. We missed Question 8 earlier, but posted answer. Will repost Q and A now.

@FTC: Q8 MT                    312(c) & sites not targeting children, must age query precede \*all\* other personal info requests 2 B compliant? #COPPA

@FTC: A8 Age screen 1st on 312(c) sites targeted 2 kids where primary audience not kids. For gen audience, no requirement 2 age screen. #COPPA

@TechFTC: Q9 MT                    If ops strictly liable for lettingg 3rd parties collect info, won't cause some to block users from embedding code? #COPPA

@TechFTC: A9 We can't predict whether the market will respond in this way. #COPPA

@FTC: Q10 RT                    app aimed at kids, you have screen for parents, that page contains email list signup or FB link, that break #COPPA rules?

@FTC: A10 Okay to have these links on page clearly targeted to parents. #COPPA

@TechFTC: Q11                    What are the FTC's COPPA enforcement plans between now

@TechFTC: A11 Old rules are in effect until July 1st and will continue to be fully enforced.  
#COPPA

@TechFTC: Q12 RT ques-Do you consider usernames PII, if they are used to  
buddy/gift/trade over multiple play sessions? #COPPA

@FTCThat's all the time we have. Thanks for your questions! Read Final Rule for more information: <http://go.usa.gov/gfTB>#COPPA