

**Analysis of Proposed Consent Order to Aid Public Comment**  
*In the Matter of PDB Sports, Ltd., doing business as the Denver Broncos Football Club*  
*File No. 142 3025*

The Federal Trade Commission (“FTC” or “Commission”) has accepted, subject to final approval, a consent agreement applicable to PDB Sports, Ltd., doing business as the Denver Broncos Football Club (“the Denver Broncos

This matter concerns alleged false or misleading representations that the Denver Broncos (“the Denver Broncos”) made in connection with its participation in the Safe Harbor (“US-EU Safe Harbor Framework”). It is among several actions the Commission is bringing to enforce the provisions of the Safe Harbor Framework that companies make when they certify that they participate in the Safe Harbor Framework.

Part I of the proposed order prohibits the Denver Broncos from making misrepresentations about their membership in any privacy or security program sponsored by the government or any other self-regulatory or standard-setting organization, including, but not limited to, the U.S.-EU Safe Harbor Framework.

Parts II through VI of the proposed order are reporting and compliance provisions. Part II requires the Denver Broncos to retain documents relating to compliance with the order for a five-year period. Part III requires dissemination of the order now and in the future to persons with responsibilities relating to the subject matter of the order. Part IV ensures notification to the FTC of changes in corporate status. Part V mandates that the Denver Broncos submit an initial compliance report to the FTC, and make available to the FTC subsequent reports. Part VI is a provision “sunsetting” the order after twenty (20) years, with certain exceptions.

The purpose of this analysis is to facilitate public comment on the proposed order. It is not intended to constitute an official interpretation of the proposed complaint or order or to

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