



Office of the Secretary

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

March 7, 2007

Mr. Ari Schwartz
Ms. Alissa Cooper
Center for Democracy & Technology
1634 I Street, N.W., Suite 1100
Washington, D.C. 20006

**Re: Zango, Inc., f/k/a 180solutions, Inc., Keith Smith, and Daniel Todd
FTC Matter No. 0523130**

Dear Mr. Schwartz and Ms. Cooper:

Thank you for the November 20, 2006 comment and November 30, 2006 comment addendum submitted on behalf of the Center for Democracy and Technology (CDT) regarding the above-referenced matter. Your comment and add

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You also request that the Commission require Zango to retract certain statements about its prior compliance with the terms of the proposed consent order. Because Zango did not mischaracterize the terms of the proposed consent order, the Commission does not believe requiring a retraction is necessary.

After considering your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. Respondents will be required to file compliance reports with the Commission, and will be subject to potentially large civil penalties if they violate the Order.

Thank you again for your comments. The Commission is aided in its analysis by hearing from a variety of sources in its work, and we appreciate your interest in this matter.

By direction of the Commission.

Donald S. Clark
Secretary