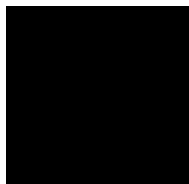


UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580



Office of the Secretary

March 2, 2011

Mr. John Hale
State of Arizona

Re: In the Matter of Twitter, Inc., File No. 092 3093, Dec No. C-4316

Dear Mr. Hale:

Thank you for your comment on the Federal Trade Commission's consent agreement in the abovementioned proceeding. The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(ii), and has given it serious consideration.

Your comment expresses several concerns with the Commission's enforcement

¹ See, e.g., In re EducResearch Ctr. of America, Inc., 135 F.T.C. 578 (2003) (consent order); In re Microsoft Corp., 134 F.T.C. 709 (2002) (consent order). The Commission notes that it has jurisdiction over companies that are organized for their own profit or that of their members, regardless of whether such profits materialize or derive from consumers directly. See Section 4 of the FTC Act, 15 U.S.C. § 45.

In response