

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

Office of the Secretary

October 13, 2011

Re: In the Matter of Google Inc., File No. 1023136, Docket No. C-4336

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)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration.

The Commission appreciates your support of the consent agreement. You also requested that the Commission require Google Inc. ("Google") to adopt certain measures in connection with the comprehensive privacy program mandated by Part III of the order. The Commission is committed to protecting consumer privacy and believes that the proposed order requires Google to build and maintain strong privacy protections for all of its products and services. As you noted, the consent order mandates that Google establish and maintain a comprehensive privacy program that addresses privacy risks related to new and existing products and services and that protects the privacy and confidentiality of "covered information," among other provisions.

While the proposed order sets forth several elements that the privacy program must include, some flexibility is afforded with regard to its implementation. This approach allows innovation in the area

¹ "Covered Information" is defined in the order as "information respondent [Google] collects from or about an individual, including but not limited to, an individual's: (a) first and last name; (b) home or other physical address, including street name and city or town; (c) email address or other online contact information, such as a user identifier or screen name; (d) persistent identifiers such as IP address; (e) telephone number, including home telephone number and mobile telephone number; (f) list of contacts; (g) physical location; or any other information from or about an individual consumer that is combined with (a) through (g) above"

In light of these considerations, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. It helps the Commission's analysis to hear from a variety of sources in its work, and it thanks you again for your comment.

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