Office offet Scretary

October13, 2011

The Honoable Marie Shroff New Zealand PrivacyCommissioner New Zealand

Re: In the Matter of Googlenc., File No. 1023136, Detet No. C-4336

Dear Commissioner Shroff

Thank you for your comment on the Federal Trade Commission's consent agreement in the aboveentitled proceeding. The Commission has placedur comment on the public cord pursuant to rule 4.9 (6)(ii) of the Commission's Ruels of Pratice, 16 C.FR. § 4.9(b)(6)(ii), and has igner it serious considerion.

We appreiate your support for the FTC's proposed consent orderin particular Part II of the order, which requires Goode Inc. ("Goode") to implement a complhensive private program to address private risks related to new and sisting products and services and to prote the privacy and confidentiality of "covered information." Part of a complete that the privacy and confidentiality of "covered information."

activities, and the pies of isk the companyaces. We argrewith your assesment that the consent order as awhole, and the provision requiring the comprehensive privacy program in particular, will provide benefits to consumers in NewTealand who use Godeg's products and services. We are lead our work can beof assistance your office and its objectives, and we look forward to continuingour collaborative relationship on important consumerivacy issues. We also appreciate your initiative and leadership in the agra of cross-border privacy enforcement cooperation, particularly in the context of the APEC Cross-border Privaceforcement Arrangement (CPEA) and the Global PrivaceEnforcement Nework (GPEN)

[&]quot;Covered Information" is deined in the ordeas 'Information respondent [Google] collects from or about an individual, includingut not limited to, an individual's: (a) inst 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 used entifier or sceen name; (d) persistent identifiers uch as Praddress; (et elephone number, including nome telephone umber and mobile telephone umber; (f list of contacts; (g) physical location; or anyother information from or about an individual consumer that is combine the value of the contacts of the contact of the contacts of the contacts of the contact of th

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 O