UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION



WASHINGTON, D.C. 20580

the aboveentitled proceding The Commission has placedur comment on the public cord pursuant to rule 4.9 (6)(ii) of the Commission's Rules of Pratice, 16 C.FR. § 4.9(b)(6)(ii), and has gren it serious considertion.

Your comment expresses combabout the providing formation. The Commission is committed to protecting consumer pracy and believe the orderwill have substantial benefits for Google Inc.'s ("Google") users. The proposed order requires Google to use reasonable and appropriate procedures to protect the privacy and confidentiality of users' "covered information" going forward. Amongother provisions, the propose onsent orde mandates tha Goode establish and maintain comprehensive privay program that addresse privacy risks related to new and veisting products and services, and portects the privacy and confidentiality of covered information. Under the order, the company also must give Google users noticeand obtain expressfirmative consent prior to shiring their identified information with any third party in connection with a change to any product or service, where such sharing is contrary to stated sharingractices in effect at the time of colletion. Finally, the order equires Google to obtain an assessment and report from aqualified, independent third-party professional, caifying that it has in place privacy program that provide protections that mee or exced the protetions required by the orde, every other year for twenty years. The Commission believes that the proposeonsent ordecontains strong elief that will protect the privacy of consumers that use Google's products and services.

[&]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 usedentifier or sceen name; (d) persistent identifiers uch as P address; (delephone 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 (g) above"

In the future if you have specific information suggesting that Goode is not maintaining reasonable privacy or security of user information, you may contact the Consumer Response Center at (877) 282-4357, or file a complaint online at www.ftccomplaintassistantog.

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 form a valiety of sources in its work, and it thanks you again for your comment.

By direction of the Commission.

Donald S. Clark Secretary