UNITED STATES OFAMERICA FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580



October13, 2011

Faist onsent agreement in

the aboveentitled proceeding The Commission has placeduy comment on the public cond pursuant to rule 4.9 (6)(ii) of the Commission's Reds of Pratice, 16 C.R. § 4.9(b)(6)(ii), and has igren it serious considetion.

Your comment expresses compared bout the pivacy of your personal information. The Commission is committed to protecting consumer processing and believes the order will 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 the Goode establish and maintain comprehensive prively program that ddresse privacy risks related to new and xisting produts and services, and portects the privary and confidentiality of covered information. Under the order, the company also must give Google users noticeand obtain expressing fractive consent prior to share 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 collection. Finally, the orde requires Google to obtain an assessment and report from aqualified, independent third-party professional, cetifying 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 proposed seconsent or decontains strong elief that will protect the privacy of consumers that use Goodle's products and services.

¹ "Covered Information" is defined in the ordeas 'Information respondent [Google] collects from or about an individual, including ut 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 onlineountact information, such as a usedentifier or sceen nane; (d) persistent identifiersuch as P address; (delephonenumber, includinghome telephoneumber and mobile telephoneumber; (f list of contats; (g)physical location; or anyother information from or about an individual consumer that is combineith v(a) through (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 areavailable from the Commission's website at <u>http://www.ftc.gov</u>. It helps the Commission's analysis to hear form a variety of sources in its work, and it thanks you again for your comment.

By direction of the Commission.

Donald S. Clark Secreary