

Analysis of Proposed Consent Order to Aid Public Comment
In the Matter of American International Mailing Inc., File No. 1523051

The Federal Trade Commission (“FTC” or “Commission”) has accepted, subject to final approval, a consent agreement applicable to American International Mailing, Inc. (“American International Mailing” or “AIM”).

The proposed consent order has been placed on the public record for thirty (30) days for receipt of comments by interested persons. Comments received during this period will become part of the public record. After thirty days, the Commission will again review the agreement and the comments received, and will decide whether it should withdraw from the agreement and take appropriate action or make final the agreement's proposed order.

This matter concerns alleged false or misleading representations that AIM made to consumers concerning its participation in the Safe Harbor privacy framework agreed upon by the U.S. and the European Union (“EU”) (“U.S.-EU Safe Harbor Framework”). The U.S.-EU Safe Harbor Framework allows U.S. companies to transfer data outside the EU consistent with European law. To join the U.S.-EU Safe Harbor Framework, a company must self-certify to the U.S. Department of Commerce (“Commerce”) that it complies with a set of principles and 467 0he

Parts II through VI of the proposed order are reporting and compliance provisions. Part II requires American International Mailing to retain documents relating to its compliance with