



Office of the Secretary

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

August 12, 2019

Ms. Charity Crouse  
United States

*Re: In the Matter of SecurTest, Inc., File No. 182 3152*

Dear Ms. Crouse:

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled 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.

Your comment inquires whether there is any relationship between the SecurTest, Inc. settlement and any of the following: 1) an Executive Order, dated April 24, 2019, which transfers responsibility for background checks into Department of Defense personnel from the Office of Personnel Management to the Department of Defense; 2) intelligence or counterintelligence; or 3) the transfer of intelligence or other sensitive information outside the United States. In this case, the Commission alleged that SecurTest falsely claimed it was a certified participant in the EU-U.S. and Swiss-U.S. Privacy Shield frameworks. The Privacy Shield frameworks are programs that allow U.S. businesses to lawfully receive personal data transferred from the European Union and/or Switzerland.

Having considered all the facts of this case and all of the comments submitted in response to the proposed order, the Commission has determined that the public interest would best be served by issuing the Decision and Order in fin comonrmi tzh (s)-1 (nd O)-8y i bodifc iion out Unedn6 (n)2 (tle)44(c)6 (u)2 (rio)2 (n)2 ( a)6 (lle)6 apO sptifalp e