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May 5, 2004

Donald S. Clark
Secretary
Federal Trade Commission
Room H-159
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Re: Privo Safe Harbor Proposal, Project No. P044506

Dear Mr. Clark:

I am delighted to add my support and endorsement for the proposed "Safe Harbor" Guidelines submitted to the FTC's notice for comment by Privo. I strongly believe that Privo's proposal fully adheres to, or exceeds, the provisions of the Children's Online Privacy Protection Act (COPPA) and should be approved as a safe harbor by the FTC.

I am the founding director of the UCLA Center for Communication Policy and have been committed for the past ten years to policy work that really touches and makes a difference in all citizens', but especially children's lives. I spent much of the 1990s working with members of the Senate and the American broadcast networks in understanding the impact of television programming, especially violent programming, on the lives of children. Each of our annual, national reports issued a strong set of recommendations to broadcasters, government, teachers and parents to improve the quality of programming for children. Our Center sponsored four conferences with Children Now looking at ways to improve the media images that children see day after day. I have served on the advisory board of the Entertainment Software Rating Board (ESRB) to ensure that the video industry's ratings meet the needs of children. For the past five years I have directed a multi-national, longitudinal research project looking at the impact of new communications technologies, especially the Internet, to generate primary data for policymakers to ensure that the Internet takes into account the needs of all Americans, but especially children.

I have followed the important work of Privo over the past few years and the problem of companies that knowingly attract youth, but that provide no parental permission mechanism. This gives kids no choice but to falsify their age when they try to sign in to the interactive features on their favorite brands' Web sites. Last fall I agreed to serve on Privo's advisory board and consider it an important force in ensuring that children properly enroll for online services, as well as a force in empowering parents to have actual knowledge of these services in order to decide which online activities are appropriate for their child and which are not. I have carefully evaluated the Privo service and feel it directly addresses the Safe Harbor Guidelines. Protection of children is of paramount importance to the nation; Privo's solution will offer companies an efficient way to provide parental permission mechanisms in full compliance with COPPA.

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The Safe Harbor provisions have added important components to COPPA and the FTC is to be commended for taking this additional step. The Safe Harbor provisions will do much to reassure Privo's industry partners that they are in compliance and also to reassure parents that their children have adequate protection. For this, Privo should also be commended and that is why I have agreed to serve on their advisory board.

Hopefully, the important work advanced by Privo will come to serve as a standard for child registration and parental permission management. All of us--online services, parents, the government and the public--stand to reap huge benefits through the protection of children in the online environment.

Privo's application represents the best example of the marketplace responding to social and technological problems. This is an excellent and satisfying solution. I strongly support Privo's application and encourage the FTC to quickly endorse this solution by offering Safe Harbor. This is a great use of technology and will be of immeasurable value to both parents and children.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey Cole". The signature is written in a cursive, flowing style.

Jeffrey Cole, Ph.D.

Director, UCLA Center for Communication Policy