



May 7, 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 pleased to support the proposed 'Safe Harbor' guidelines submitted by Privo Inc. in response to the Federal Trade Commission and provide this letter as my comments.

I believe that Privo's proposal fully adheres to the provisions of the Children's Online Privacy Protection Act (COPPA), and should be approved as a Safe Harbor by the FTC.

I have worked in the educational technology and interactive media fields for the past 14 years. My management and business development expertise has contributed to organizations such as GoBe Media, Electronic Arts, Arts Umbrella, TelCom Training, Knowledge Network, Open Learning Agency, BC Tel (Telus), Rogers Cablesystems and numerous government and non-profit bodies.

As Executive Director of New Media British Columbia, I actively work to support and grow the digital media industry. A key issue for online companies developing product for children is providing a safe way to access and interact online. As a background, New Media BC (British Columbia) is the association devoted to promoting and connecting BC's thriving digital media companies. Through networking events, peer-to-peer mentoring programs, advocacy work and marketing, New Media BC is building the new media community locally and promoting it abroad. The region's new media industry is made up of close to 700 companies with combined annual revenues in excess of \$1 billion. ([www.newmediabc.com](http://www.newmediabc.com))

I am also the National President of the Wired Woman Society – a non-profit society dedicated to empowering women to pursue careers in the technology sector. We provide networking, mentoring and education programs to women and girls across Canada. Our members are students, professional women and mothers. As such, we share a collective concern for issues of privacy management and online safety.

In my view and as related to my positions, issues of privacy and child protection online are of great concern to me. If we are to truly reap the benefits of the digital age we must ensure that children have a safe and guided way to engage with it. I believe that Privo offers such a solution and does so with integrity and responsibility.

Privo promotes parental empowerment, children's safety and privacy on the Internet, as a child registration and parental permission management service provider to industry. I also understand that Privo has great expertise in this area and has been a passionate advocate for children's safe



involvement with online activities. Privo is particularly helpful to busy parents, who will greatly benefit from a centralized service such as provided by Privo; parents can go through the verification process to get a username and password that they can use to authorize their child/ren to participate at other Privo-enabled websites or promotions.

Privo's proposal demonstrates its commitment to meeting the standards of COPPA. The Privo guidelines track the requirements for providing parental notice, choice, consent, data confidentiality and security. Their commitment to secure data management practices, offers privacy and security for family contact information.

I commend the FTC for leading the Safe Harbor initiative as a step to ensuring responsible permission based marketing. I am pleased to extend my support for the acceptance of the Privo program under the Safe Harbor provisions of COPPA and hope that you will fully consider their application.

Respectfully Submitted,

*Lynda Brown*

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