



Office of the Secretary

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

February 20, 2013

Daniel Martin Bellemare, Counsel
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Benjamin Masse, President
Steerads Inc.
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Re: In the Matter of Compete, Inc., File No. 1023155, Docket No. C-4384

Mr. Bellemare and Mr. Masse:

Thank you for your comment, on behalf of Steerads Inc. (“Steerads”), regarding the Federal Trade Commission’s 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 proposes that the Commission modify the proposed consent order with Compete, Inc. (“Compete”). You have suggested that the data destruction requirement in the proposed order is incomplete unless it is modified to address data held by Compete’s licensees. In particular, you comment that licensees should be notified and ordered to destroy all collected information in their custody or control.

The Commission shares Steerads’s concern about the privacy and security of consumer information and believes the proposed order provides strong protections for consumers. In addition to requiring Compete to provide third parties a copy of the order, the proposed order prohibits Compete from collecting data either directly or through its software licensees unless they have provided adequate notification to, and obtained consent from, consumers prior to such collection. While the present order only addresses Compete’s conduct, we also note that the Commission entered a separate consent agreement with Upromise, which licensed Compete’s web-tracking software, earlier this year. That consent order includes a provision requiring Upromise to delete data. See [Upromise](#), File No. 102 3116 (Apr. 3, 2012) (final consent order).

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 are available from the Commission's website at <http://www.ftc.gov>. It helps the Commission's analysis to hear from a variety of sources in its work. The Commission thanks you again for your comment.

By direction of the Commission, Chairman Leibowitz and Commissioner Wright not participating.

Donald S. Clark
Secretary