



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

Office of Commissioner  
Edith Ramirez

To: Don Clark, Secretary  
From: Alyssa O'Connor  
Date: November 14, 2012  
Re: COPPA Rule: Comments to be Placed on the Public Record

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On October 3, 2012, Commissioner Edith Ramirez delivered remarks at the CARU Annual Conference in New York, New York and answered audience questions immediately afterward.

Sheila Millar, an attorney with the law firm of Keller and Heckman LLP, noted that a concern with COPPA is that it will unduly burden the business community and referenced the Toy Industry Association's public comments to the proposed supplemental modifications.<sup>1</sup> Ms. Millar stated that, in her view, the FTC's analysis in the supplemental NPRM did not thoroughly analyze the Rule's costs. Ms. Millar asked Commissioner Ramirez whether the FTC will further investigate COPPA's regulatory burden.

Commissioner Ramirez replied that the FTC's aim is to strike the appropriate balance between costs to businesses and benefits to children and parents. Commissioner Ramirez also noted that the Commission is still reviewing public comments on the proposed supplemental modifications and will determine what changes are appropriate.

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<sup>1</sup> See Comments of the Toy Industry Association (Sept. 24, 2012), *available at* <http://ftc.gov/os/comments/copparulereview2012/561789-00039-84206.pdf>. Ms. Millar is counsel to the Toy Industry Association.