



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

Bureau of Consumer Protection  
Division of Advertising Practices

May 17, 2007

Michael Birch  
Bebo, Inc.  
142 10<sup>th</sup> Street  
San Francisco, CA 94103

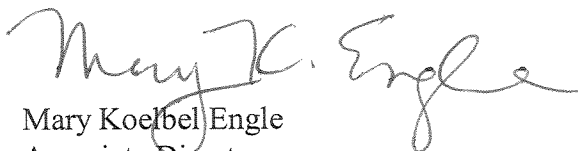
Re: *Bebo, Inc.* (FTC File No. 062 3154)

Dear Mr. Birch:

As you are aware, the staff of the Federal Trade Commission has conducted an investigation to determine whether your social networking website, Bebo, Inc., has violated provisions of the FTC's Children's Online Privacy Protection Rule (COPPA Rule), 16 C.F.R. § 312. In pertinent part, the COPPA Rule requires operators of websites directed to children under 13 years of age, or that have actual knowledge that they are collecting personal information online from such children, to provide notice of their information practices to parents and to obtain verifiable parental consent prior to collecting, using, or disclosing personal information from children under 13.

Upon review of the matter, we have determined not to recommend enforcement action at this time. This action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

Very truly yours,

  
Mary Koelbel Engle  
Associate Director

cc: J. Beckwith Burr, Esq.