



November 9, 2018

Assistant Secretary David J. Redl  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Ave NW, Room 4725  
Washington, DC 20230

Re: Developing the Administration's Approach to Consumer Privacy

Dear Assistant Secretary Redl,

Amazon appreciates the opportunity to provide feedback to NTIA on the Administration's approach to consumer privacy.

Amazon's mission is to be Earth's most customer-centric company, a mission that aligns us fundamentally with NTIA's goal to protect users' privacy while fostering innovation. Our corporate philosophy is firmly rooted in working backwards from what customers want and continuously innovating to provide them with better service, more selection, and lower prices. We apply this approach across all areas of our business.

While compliance with applicable laws provides a baseline for our privacy decisions, our foremost concern when considering privacy issues is customer trust. We have known from our very beginnings as an online bookstore that maintaining customer trust is essential to our success. Our customers trust us to handle their data carefully and sensibly in a secure and appropriate manner in line with their expectations. Any privacy mistake would risk the loss of that trust and cause serious reputational damage even if there is no violation of privacy laws. From our customer-centric viewpoint, we would like to comment on several of NTIA's stated privacy outcomes and high-level goals.

First, we agree with NTIA's stated outcomes of transparency, control, and data minimization. Our customer-centric approach has led Amazon to follow privacy by design principles since our founding and we practice the principle of data minimization. From the very beginning stages of product development, we use privacy by design principles to make sure customers have the transparency and control they need, and that we are collecting their data in a way that maintains customer trust. We design our products and services so it is easy for customers to understand when their data is being collected and control when their data is shared. And we are not in the business of selling our customers' personal data.

We know that we must get privacy right in order to meet our customers' high expectations. We use our customer data to innovate and improve the customer experience, we focus on privacy at all stages of product development through privacy by design principles, and we provide customers with tools to limit collection, or delete their data. For example, we give customers control of their Alexa voice recordings in the cloud. Not only are customers able to see and play back the voice recordings associated with their account, customers can also delete those voice recordings one-by-one or all at once.

Second, we agree with NTIA that customers should have reasonable access to their data. We have for many years made it easy for customers to access their personal data, ranging from order history, content and devices, to voice recordings. Personal data varies by customer and may range from

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purchasing history to address and credit card information to customer service interactions. We provide access to personal and customer information in a manner most customers have found relevant and useful for the services they use.

Third, we support NTIA's goal to harmonize the regulatory landscape in order to avoid a patchwork of obligations that will burden organizations and confuse users. For the United States to lead on privacy, we need a consistent approach to privacy that provides clarity for American consumers and businesses. Privacy regulation should ensure that any additional overhead and administrative demands placed on organizations actually produce commensurate consumer privacy benefits. A patchwork of different privacy obligations diverts significant resources from inventing new features that will delight customers.

Finally, we agree with NTIA that any action addressing consumer privacy should be applied comprehensively across private sector organizations that use personal data. The distinction between "physical" and "digital" is increasingly blurring, and is now largely meaningless. What commenters refer to as the "digital economy" is best understood as a set of technologies that is diffusing throughout the economy in industries as diverse as advertising, agriculture, automotive, manufacturing, and retail. Industries not thought of as "digital" will reap huge benefits, as will society as a whole. Thus, treating tech-enabled businesses or innovation leaders differently makes little sense, particularly as new technology proliferates across different industries at a greater speed.

In conclusion, we welcome NTIA's effort to consider how the Administration can advance consumer privacy while allowing innovation to continue to flourish. Creating smart privacy policies and practices takes careful attention, and a strong focus on the customer makes it easier to make good policy. Customers should know how their data is being used and be empowered to make their own individual determination of the benefits they gain from choosing to use new services and technologies. We agree with NTIA's emphasis on maintaining the flexibility to innovate, focusing on meaningful transparency and control, and emphasizing regulatory harmonization. We believe that Amazon's approach to privacy is aligned with NTIA's goals, and we look forward to continued engagement with NTIA through this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Huseman". The signature is fluid and cursive, with a large initial "B" and "H".

Brian Huseman  
Vice President, Public Policy