

Before the
DEPARTMENT OF COMMERCE
NATIONAL TELECOMMUNICATIONS AND INFORMATION ASSOCIATION
Washington, DC 20230

In the Matter of)	
)	
Multistakeholder Process to Develop Consumer Data Privacy Codes of Conduct)	Docket No. 120214135-2135-01
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**COMMENTS OF
THE UNITED STATES CONFERENCE OF CATHOLIC BISHOPS**

The United States Conference of Catholic Bishops (USCCB) strongly supports the National Telecommunications and Information Administration's (NTIA) initiative to convene a multi-stakeholder process on the development of enforceable codes of conduct that implement the full Consumer Privacy Bill of Rights.

As people of faith we believe that parents and faith community have primary responsibility for children's growth and formation. Therefore, it is essential they have access to all influences on their children, which in turn requires they have access to and fully understand the privacy policies for mobile apps their children use.

We are deeply concerned with the findings of a recent FTC study that parents cannot determine which app poses privacy risks to their children before downloading the app¹. We believe the baseline for mobile apps policies must be shifted to a standard of transparency, ease of access and clarity about all information collected about children. Therefore, we strongly support the development of a common set of practices that implement the Transparency principle in the Consumer Privacy Bill of Rights to provide guidance to mobile apps developers, operating systems, and apps stores, as well as better inform consumers about how mobile apps use personal data. Only an agency like NTIA can convene such an effort and we commend the Administration's leadership in this area.

Topics to be addressed in multi-stakeholder process

We believe the multi-stakeholder process should address the following issues:

¹ See, FTC, *Mobile Apps for Kids: Current Privacy Disclosures are Disappointing* (staff report), at 17, available at http://www.ftc.gov/os/2012/02/120216mobile_apps_kids.pdf.

- Strategies to educate parents, children, educators, leaders in faith communities and others who work with children on issues related to mobile apps and privacy.
- Process for updating the common set of practices that implement the Transparency principle in the Consumer Privacy Bill of Rights to keep pace with ongoing technology developments.
- Mobile apps that provide location-based services
- Accountability mechanisms (to enable companies to demonstrate how they are implementing the Consumer Privacy Bill of Rights)
- Online services directed toward teenagers (individuals 13 or older and younger than 18)
- Online services directed toward children (individuals under 13 years old)
- Trusted identity systems, such as those discussed in the National Strategy for Trusted Identities in Cyberspace
- The use of multiple technologies, e.g., browser cookies, local shared objects, and browser cache, to collect personal data

Openness

We applaud NTIA's desire for an open process. We suggest the process have at least two dimensions. The first is an online proceeding that is open to all. The second is an in-person process that follows the online input and is designed to probe more deeply into the issues raised in the online conversations. In both cases it is essential to have diverse representation from a wide spectrum of groups. Our experience is that in the past such proceedings are dominated by those groups who have the resources to participate. Therefore, especially in the in-person dialogues we believe it is incumbent on NTIA to ensure there is adequate representation of all

relevant groups, especially parent and child advocates. We recommend the following groups be considered:

- National Catholic Education Association
- National Federation for Catholic Youth Ministry
- Catholic Campus Ministry Association
- Knights of Columbus
- National Council of Catholic Women
- National Education Association
- National Parent-Teacher Association
- National Center for Missing and Exploited Children
- National Children's Advocacy Center

Conclusion

We commend the NTIA for its leadership in undertaking this process and stand ready to participate and assist in any way that we can to ensure a fair and complete development of enforceable codes of conduct that implement the full Consumer Privacy Bill of Rights.

Respectfully submitted,

Helen Osman
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