

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
Empowering Parents and Protecting Children in an ) MB Docket No. 09-194  
Evolving Media Landscape )

**COMMENTS OF THE  
FEDERAL TRADE COMMISSION**

**Introduction**

The Federal Trade Commission (FTC) supports the Federal Communications Commission’s (FCC) important initiative to examine the evolving media landscape with a view toward empowering parents and protecting children from inappropriate contact, conduct and content. The FTC uses its resources to enforce the nation’s consumer protection laws and to educate citizens of all ages about making smart choices, whether they are watching television, playing games, on their computers, or using applications on their phones.

An independent administrative agency, the FTC is charged with promoting consumer protection, competition, and the efficient functioning of the marketplace. Our law enforcement authority is based in Section 5 of the FTC Act, which prohibits “unfair or deceptive acts or practices in or affecting commerce.”<sup>1</sup> Section 5 encompasses a wide range of business practices, including advertising and marketing.

This comment describes the FTC’s existing law enforcement authority as it relates to protecting children in traditional and new media environments. It offers an overview of the agency’s recent education campaigns targeted to parents and children, teachers and mentors. In addition, it highlights recent FTC reports examining food, beverage and entertainment marketing targeted to children, and our recommendations that industry participants (and media companies involved in children’s marketing) ramp up their self-regulatory efforts to protect the nation’s youngsters. Finally, the comment describes the FTC’s 2009 report examining the incidence of explicit sexual and violent content in online virtual worlds and its recommendations to reduce the risk of children’s exposure to it on these websites.

**A. Protecting Children Through Vigorous Law Enforcement**

Making the Internet more secure for all consumers, including children, is central to the agency’s law enforcement mission. The FTC has used its general statutory mandate of preventing unfair and deceptive acts and practices to protect the right of consumers to avoid unwanted and potentially offensive content online. The FTC also has

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<sup>1</sup> 15 U.S.C. § 45(a).

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<sup>2</sup> *FTC v. Various, Inc. d/b/a AdultFriendFinder*, No. 5:07-cv-6181 (N.D. Cal. filed Dec. 6, 2007), available at <http://www.ftc.gov/opa/2007/12/afriendfinder.shtm>. See also *FTC v. Zuccarini*, No. 01-CV-4854 (E.D. Pa. filed Oct. 1, 2001), available at <http://www.ftc.gov/os/caselist/0123095/index.shtm> (alleging unfairness and deception against a defendant who registered various misspellings of a children’s cartoon site and a pop star to redirect users to sites showing pornographic images); *FTC v. Pereira*, No. 99-1367-A (E.D. Va. filed Apr. 14, 1999), available at <http://www.ftc.gov/os/caselist/9923264/990922comp9923264.shtm> (case alleging deception and unfairness against defendants who “hijacked” certain web pages and forced



Visitors to [www.ftc.gov/YouAreHere](http://www.ftc.gov/YouAreHere)

COPPA. [REDACTED] FTC issues guidance on specific topics, like the Rule's requirements for knowledge of online privacy and the COPPA "actual knowledge" standard. [REDACTED] maintains a list of frequently asked questions on this topic. [REDACTED] is a pediatrician and a pediatric surgeon.

**C. Pediatric Privacy Policy**

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