



August 12, 2013

Donald S. Clark, Secretary  
Federal Trade Commission  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

Via Overnight Mail

Re: Second Revised Application Pursuant to Section 312.12(a) of the Final Children's Online Privacy Protection Rule for Approval of Parental Consent Method Not Currently Enumerated in § 312.5(b).

Dear Mr. Clark:

Pursuant to Section 312.12(a) of the Final Children's Online Privacy Protection Rule (16 CFR § 312.12(a)) (the "Rule"), Imperium, LLC ("Imperium"), hereby submits its second revised request for approval for a parental consent mechanism not currently enumerated in the Rule. We submitted our original request on July 1, 2013 and our revised request on July 22, 2013. Based on staff comments, we have revised paragraph 3 of the section entitled "Sign Up" hereinbelow.

Specifically, Imperium seeks approval for its ChildGuardOnline™ service. ChildGuardOnline uses a combination of methods for obtaining parental consent that are currently enumerated in the Rule as well as strengthened methodological and technological procedures that Imperium believes will further address the FTC's requirements for approval under Section 312.12(a).

Imperium is a technology services company specializing in data quality products for the market research, marketing services and allied industries. Through its suite of software solutions, the company has become the undisputed leader in its field and is the partner of choice for the world's leading market research and data collection firms.

We believe that ChildGuardOnline will address the FTC's requirements in a considerably more robust fashion than the standard use of "email plus" and the other enumerated methods by themselves. Specifically, the process used by ChildGuardOnline is described below:

## ≡ IMPERIUM

### Signup

1. When a child (under 13) visits a website or downloads a mobile web app and wishes to establish a user name and password for that site or app, he/she will be presented with a page that asks for the name and email address of a parent or guardian. The child will enter that information and be told that their parent or guardian will receive email with instructions for granting permission.
2. The parent will promptly receive an email informing them that the child has requested permission to establish an account on and provide personal information to the website or mobile app operator concerned. The URL will be furnished so that the parent can review the site. A link will be provided for the parent to use in order to grant permission.
3. When the parent clicks on the link they will be told that if they grant permission they may review or withdraw it at any time by visiting the ChildGuardOnline portal. To confirm their identity (and age) the parent will be asked for the last four digits of their Social Security number, name, address and date of birth. After verification, the system will delete the parent's social security information.
4. The system will verify the supplied information in real time. If the system verifies the information, it will tell the parent, while still on the page, that their child has been approved for the site. At the parent's option, the child will be sent an email advising of the approval.
5. If the supplied information is not verified the parent will be given the opportunity to respond to challenge questions. Challenge, or knowledge-based authentication methods present the parent with a number of "out of wallet" challenge/response questions to establish valid identification. Because the knowledge needed to answer the questions generated is difficult for anyone other than that specific person to know, it provides a highly secure method for validation. Challenge questions can include, for example, previous addresses, phone numbers, etc.
6. A variety of anti-fraud measures will be employed to assure that the same identity information is not "overused."

### Verification

1. When the child visits a website or mobile app to logon, the site will ping ChildGuardOnline via a web service to confirm that the furnished user name has been approved. The web service will instantly respond if the access has been approved.
2. If not approved, the child will be directed to Signup step 1 above.

# IMPERIUM

## Portal

1. A site will be available to enable parents to review and withdraw permissions previously given.
2. The parent will see all of their own children's sites and relevant dates for permissions given as well as withdrawn.
3. Permission for any site for any child may be easily withdrawn. At the parent's option, the child will be sent email advising of the withdrawal of approval.
4. If permission is withdrawn, the next time the child attempts to logon to the website they will be directed to Signup step 1 above. Optionally, they may be informed that permission has been withdrawn.
5. The website may also be advised if the account is approved, not approved or approval withdrawn.

Imperium greatly appreciates the FTC's time and consideration with respect to this application. We understand that pursuant to Section 312.12(a) this request will now be published in the Federal Register and that a written determination will be forthcoming within 120 days.

Sincerely,



Marshall C. Harrison  
CEO, Imperium, LLC

CC:

Duane L. Berlin, Esq.  
Lev & Berlin, P.C.  
200 Connecticut Avenue, 5th Floor  
Norwalk, Connecticut 06854