



October 18, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20544

RE: “Protecting the Privacy of Customers of Broadband and Other Telecommunications Services,” WC Docket No. 16-106

Dear Ms. Dortch:

On behalf of QuintilesIMS, we are writing to commend the Federal Communications Commission for what we understand to be the modification of the de-identification policies as described by the Federal Communications Commission (FCC) Fact Sheet on Chairman Wheeler’s “Proposal to Give Broadband Consumers Increased Choice Over Their Personal Information” (released on 10/6/2016). (QuintilesIMS is the recent successor to IMS Health, which submitted comments related to these de-identification provisions in connection with the earlier proposed rule).

Based on the summary in the released Fact Sheet, we assume that the full proposal (not yet public) aligns the FCC policy on de-identification of personal information with the existing de-identification standard set forth by the Federal Trade Commission (FTC). These modifications focus the FCC policy on developing an appropriate standard for the de-identification of individual consumer data in a way that provides appropriate privacy protections for consumers while still permitting data flow essential to today’s economy. This standard will promote consistency across different industries based on an overall goal of protecting individual consumer privacy while still permitting beneficial uses of consumer information where privacy interests have been minimized. The FCC approach identified in the Fact Sheet tracks the FTC standards (which also are consistent with the approach set forth in other laws), and therefore will provide the same kinds of protections that consumers see in a broad variety of other settings.



We thank the FCC for its considered response to the earlier comments made by IMS Health and others concerning the appropriate de-identification standard. We believe - based on many decades of experience in working with de-identified information – that this standard will protect individual privacy while still permitting additional and beneficial uses of important information.

Please let me know if you have any additional questions concerning these de-identification issues.

Sincerely,

Kimberly S. Gray, J.D., CIPP/US
Chief Privacy Officer, Global