

May 4, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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

Dear Ms. Dortch:

I appreciate the Federal Communications Commission's (Commission) commitment to protecting online privacy for consumers. That laudable goal underlies the Commission's March 31st adoption of Commissioner Tom Wheeler's proposal to create new privacy rules for broadband Internet Service Providers (ISPs). As a privacy expert, however, I am concerned that some foundational privacy questions have not been an integral part of the discussions to-date.

I have identified three overarching questions that warrant inclusion in the Commission's ongoing deliberations. The merit of these questions is supported by a January 2016 report by the Pew Research Center titled *Privacy and Information Sharing*. Two key findings of that report are that respondents want more control over their personal information yet feel they've lost control over the amount of personal information collected and the ways in which it is used.

I suggest that the Commission's efforts would benefit from assessing the three overarching questions I've identified. Including these questions among the threshold issues will help achieve the strong broadband privacy protections consumers deserve. The issues I've identified were outlined in an April blog I wrote which was published by the *Huffington Post*. I am submitting a copy of that blog as part of my comments.

Respectfully Submitted,

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