

Coalition of Geospatial Organizations

February 18, 2011

The Honorable Jonathan D. "Jon" Leibowitz, Chairman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

RE: Public Comments on December 1, 2010 Preliminary FTC Staff Privacy Report

Dear Mr. Leibowitz:

The Coalition of Geospatial Organizations (COGO) is a coalition of 15 national professional societies, trade associations, and membership organizations in the geospatial field, representing more than 30,000 individual producers and users of geospatial data and technology. We are writing to provide our public comment to the FTC Preliminary Staff Privacy Report.

The geospatial community is one of the fastest growing in the marketplace. It has been identified by the U.S. Department of Labor as one of the "high growth" sectors of the U.S. workforce. There are numerous legitimate geospatial applications, in a rapidly growing market.

COGO is concerned with the December 1, 2010, Federal Trade Commission (FTC) report, *Protecting Consumer Privacy in an Era of Rapid Change*. The report targets internet-based cyber tracking of personal data. However, through the use of broad terminology without definition, and a failure of the report to limit its scope to specific problem areas, the restrictions suggested in the report would hamper the ability of the geospatial community to collect, use, share, or apply geospatial data.

We are concerned the report regulates the term "precise geolocation data". We believe this will result in serious and harmful unintended consequences for consumers, the broad geospatial community, and government programs. In addition, "precise geolocation data" is ***not defined*** in the FTC report. This serious flaw could thwart legitimate and desirable geospatial and location based activities; deny consumers the products, technologies and services they are demanding in the marketplace; and impose a significant new liability on the geospatial community. Moreover, many geospatial activities, technologies, and applications development could be deemed illegal.

We believe the geospatial community's precise geolocation activities should be excluded from the scope of the proposed regulation. Failure to do so would prevent some common, justifiable, and emerging uses of geospatial data for emergency response/post disaster remediation, insurance, environmental protection, E-911 & ambulance services, fleet management, broadband mapping, home security, navigation, mortgage foreclosure monitoring/early warning system, and many others.

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We are concerned that unintended consequences of such FTC regulation will stymie economic growth, job creation, and introduction of new consumer products enabled by geospatial technologies.

In conclusion, COGO respectfully urges the FTC to use extreme caution and not implement any enforcement or broad regulation that would have a harmful effect on the geospatial community.

Sincerely,

Geney Terry, GISP, MGIS
Chair, Coalition of Geospatial Organizations

cc: COGO Member Organizations

American Congress on Surveying and Mapping (ACSM)
American Society for Photogrammetry and Remote Sensing (ASPRS)
Association of American Geographers (AAG)
Cartography and Geographic Information Society (CaGIS)
Geographic Information Systems Certification Institute (GISCI)
International Association of Assessing Officers (IAAO)
Management Association for Private Photogrammetric Surveyors (MAPPS)
National States Geographic Information Council (NSGIC)
United States Geospatial Intelligence Foundation (USGIF)
University Consortium for Geographic Information Science (UCGIS)
Urban Regional Information Systems Association (URISA)

