

TACD

TRANS ATLANTIC CONSUMER DIALOGUE

DIALOGUE TRANSATLANTIQUE DES CONSOMMATEURS

February 29, 2012

Larry Page
Google, Inc.
1600 Amphitheatre Parkway
Mountain View, CA 94043

Dear Mr. Page,

We are writing to you on behalf of the Trans Atlantic Consumer Dialogue (TACD), a coalition of the leading consumer organizations in North America and Europe, to ask you simply and directly to suspend your March 1 plan to modify the terms of services for users of Google services. Our organizations have represented the interests of consumers on the Internet since before your company was founded. In policy recommendations that TACD has made to our governments and businesses, we have advocated for respect for privacy and the rights of consumers to control the collection and use of their personal information. Google's plan flies in the face of these recommendations.

It is both unfair and unwise for you to “change the terms of the bargain” as you propose to do. For the last several years, consumers in North America and Europe have helped make Google the most successful Internet company in the world. Consumers have supported your products with the revenue that their interests create for you and your advertisers. Google’s services have been adopted in schools, businesses, and organizations. And consumers have relied on your policies and your terms of services in choosing your products.

Over this time, you have also acquired a great deal of consumers' personal information. You record virtually every event of a Google user, in far more detail than consumers understand. We were alarmed to learn recently that the privacy settings in Internet browsers, including Safari and Explorer, have been purposely sidestepped. And we have become increasingly aware that services such as Street View may be operating in violation of many laws around the world.

Consumers in Europe, Canada, and Mexico have had the benefit of privacy law and privacy agencies. Consumers in the United States rely on a patchwork structure, including the US Federal Trade Commission, to protect their interests. And Internet users around the world rely on the integrity of your company, and on you, to do the right thing. Their eyes are all on you.

On March 1, you propose to combine data from all of your services, provided by your users in very different contexts and for very different reasons, into a single profile without user consent and without any meaningful opportunity for users to opt-out. This move has been widely criticized by US lawmakers, US Attorneys General, European lawmakers, European privacy officials, technical experts, and privacy organizations. The President of the French CNIL, on behalf of European privacy agencies, has said this week that the change will violate European Union data protection law.

Going forward with this plan will be a mistake. We ask you to reconsider.

Sincerely,

Susan Grant, Consumer Federation of America
Thomas Nortvedt, Norwegian Consumer Council
Co-chairs, TACD Information Society Policy Committee

REFERENCE DOCUMENTS

TACD, “Resolution on Behavioral advertising” (June 2011)
tacd.org/index2.php?option=com_docman&task=doc_view&gid=298&Itemid=40

TACD, “Resolution on Social Networking” (May 2010)
http://tacd.org/index2.php?option=com_docman&task=doc_view&gid=265&Itemid=40

TACD, “Resolution on Defending Consumer Rights and Fair Business Practices in the Digital Environment” (April 2010)
tacd.org/index2.php?option=com_docman&task=doc_view&gid=261&Itemid=40