

Date: 10/21/15
Riyo Verified Limited
c/o Davis & Gilbert LLP
1740 Broadway
New York, NY 10019

Miry Kim
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Re: Riyo Verified Limited Application for Approval of a Verifiable Consent Method

Dear Ms. Kim:

On June 30, 2015 pursuant to Section 312.12(a) of the Children’s Online Privacy Protection Rule (the “Rule”), Riyo Verified Limited (formerly jest8 Limited) trading as Riyo (“Riyo”) formally requested approval of a verified parental consent (“VPC”) mechanism not currently enumerated in the Rule. We are providing the following additional information in response to your October 19, 2015 request.

Confidential Treatment Requested:

Riyo wishes to request confidential treatment pursuant to 16 C.F.R. § 4.9(c) for this document in its entirety. The basis for that request is that this document contains information implicating trade secrets and commercially sensitive proprietary information regarding the technology. This document addresses the request for information relating to [REDACTED]
[REDACTED]
[REDACTED] confidential information that is not required to be made public pursuant to the exemption in 16 C.F.R. § 4.10(a)(2).

1) Decisions made on scans of identification documents processed, by percentage

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

2) Success rates / false positives / false negatives

For the aforementioned reasons (FTC Questions Answered, 10/15/2015), [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

3) Success rates where implemented with a [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

4) Decision criteria for face match

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



CONCLUSION

We hope that the information provided here will be valuable as the Commission considers the Riyo application for a new verified parental consent mechanism. We remain open to discussion with the Commission regarding the points herein or any other questions it may have.

Kind regards,

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Tom Strange
Director
Riyo Verified Limited