



Office of the Secretary

UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

March 25, 2014

Mr. Joshua Holman

Re: In the Matter of Apple Inc., File No. 1123108

Dear Mr. Holman:

Thank you for your comment on the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. The Commission has placed your comment on the public record pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration.

In your letter, you express support for the proposed settlement, and raise two questions. The Commission appreciates your support of the proposed order. The Commission is committed to protecting consumers from unauthorized charges, including those incurred by children. Your first question asks why the Commission has not asked Apple why it allows in-app charges to be made in children's apps at all, given that children might not understand the process for incurring charges. While the proposed order would not prohibit in-app charges in kids' apps, it would remedy the problem of unauthorized charges by kids by requiring Apple to provide basic information to parents, so that they can avoid charges by their kids or provide express informed consent to such charges. Your second question asks why the proposed order applies only to kids' apps. While the proposed complaint focuses on unauthorized in-app charges incurred in kids' apps, the proposed order requires Apple to obtain express, informed consent to in-app charges before billing for such charges in any app.

After reviewing your letter, other public comments filed with the Commission, and the investigative record, the Commission has determined that the relief set forth in the proposed order is appropriate and sufficient to remedy the violations alleged in the proposed complaint, and it is in the public interest to issue the Decision and Order in final form. The final Decision and Order and other relevant materials are available on the Commission's website at <http://www.ftc.gov/enforcement/cases-proceedings/112-3108/apple-inc>. It helps the Commission's analysis to hear from a variety of sources in its work. The Commission thanks you again for your comment.

By direction of the Commission, Commissioner Wright dissenting.

Donald S. Clark
Secretary