



Office of the Secretary

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

December 2, 2014

Ms. Catherine Callister  
State of Wyoming

*Re: In the Matter of Google Inc., File No. 122 3237*

Dear Ms. Callister:

Thank you for your comment on the Federal Trade Commission's 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 comment, you express concerns about your child making unauthorized purchases via the Google Play store. You also inquire about refunds. The proposed complaint and order here should help to address your concerns. The proposed complaint alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary



Office of the Secretary

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

December 2, 2014

Ms. Roxanne Crapser  
State of Nebraska

*Re: In the Matter of Google Inc., File No. 122 3237*

Dear Ms. Crapser:

Thank you for your comment on the Federal Trade Commission's 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 comment, you express concerns about your child making unauthorized purchases. If you have been charged for unauthorized in-app purchases made by a child via the Google Play store, the proposed complaint and order here should help to address those concerns. The proposed complaint alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you have incurred an in-app charge via the Google Play store and you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary



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Federal Trade Commission  
WASHINGTON, D.C. 20580

December 2, 2014

Ms. Sheli Echelberry  
State of Iowa

*Re: In the Matter of Google Inc., File No. 122 3237*

Dear Ms. Echelberry:

Thank you for your comment on the Federal Trade Commission's 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 comment, you express concerns about your child making unauthorized purchases via the Google Play store. The proposed complaint and order here should help to address your concerns. The proposed complaint alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary



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Federal Trade Commission  
WASHINGTON, D.C. 20580

December 2, 2014

Ms. Erika Fultz  
Commonwealth of Kentucky

*Re: In the Matter of Google Inc., File No. 122 3237*

Dear Ms. Fultz:

Thank you for your comment on the Federal Trade Commission's 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.

The Commission appreciates your support of the proposed order. The Commission is committed to protecting consumers from unauthorized charges, including those incurred by children. In your comment, you express concerns about your child making unauthorized purchases via the Google Play store. The proposed complaint and order here should help to address your concerns. The proposed complaint alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary



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Federal Trade Commission  
WASHINGTON, D.C. 20580

December 2, 2014

Ms. Jhonette Gamble  
Commonwealth of Virginia

*Re: In the Matter of Google Inc., File No. 122 3237*

Dear Ms. Gamble:

Thank you for your comment on the Federal Trade Commission's 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 comment, you express concerns about your child making unauthorized purchases via the Google Play store, and note that you were unaware that your credit card could be charged for in-app activities. You also inquire about refunds. The proposed complaint and order here should help to address your concerns. The proposed complaint alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

In your comment, you also raise concerns that your credit card information was stored in Google Wallet without your consent. Although the proposed complaint does not contain allegations specifically addressing this issue, the Commission is committed to protecting consumers from unauthorized financial transactions. The Commission has forwarded your comment to the FTC's Consumer Response Center. In addition, the Commission encourages you to report any other business practices that may allow for unauthorized charges by contacting the FTC's Consumer Response Center at (877) 382-4357, or by filing a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary



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WASHINGTON, D.C. 20580

December 2, 2014

Robin Gilcrest-Pollack  
State of California

*Re: In the Matter of Google Inc., File No. 122 3237*

Thank you for your comment on the Federal Trade Commission's 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.

The Commission appreciates your support of the proposed order. The Commission is committed to protecting consumers from unauthorized charges, including those incurred by children. In your comment, you express concerns about your child making unauthorized purchases via the Google Play store. You also inquire about refunds. The proposed complaint and order here should help to address your concerns. The proposed complaint alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary



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

December 2, 2014

Ms. Suzanne Marracelli  
State of Florida

*Re: In the Matter of Google Inc., File No. 122 3237*

Dear Ms. Marracelli:

Thank you for your comment on the Federal Trade Commission's 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.

The Commission appreciates your support of the proposed order. The Commission is committed to protecting consumers from unauthorized charges, including those incurred by children. In your comment, you express concerns about your child making unauthorized purchases via the Google Play store. The proposed complaint and order here should help to address your concerns. The proposed complaint alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary



Office of the Secretary

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

December 2, 2014

Ms. Abby McDonald  
State of California

*Re: In the Matter of Google Inc., File No. 122 3237*

Dear Ms. McDonald:

Thank you for your comment on the Federal Trade Commission's 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.

The Commission appreciates your support of the proposed order. The Commission is committed to protecting consumers from unauthorized charges, including those incurred by children. The proposed complaint alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you have incurred an in-app charge via the Google Play store and you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary



Office of the Secretary

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

December 2, 2014

Mr. Jeff Moore  
State of Nevada

*Re: In the Matter of Google Inc., File No. 122 3237*

Dear Mr. Moore:

Thank you for your comment on the Federal Trade Commission's 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 comment, you express concerns about unauthorized charges from Google. If you have been charged for unauthorized in-app purchases made by a child via the Google Play store, the proposed complaint and order here should help to address those concerns. The proposed complaint alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you have incurred an in-app charge via the Google Play store and you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary



Office of the Secretary

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

December 2, 2014

Dullah Morris  
State of North Carolina

*Re: In the Matter of Google Inc., File No. 122 3237*

Thank you for your comment on the Federal Trade Commission's 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 comment, you provide a receipt of a charge from Google Play. The proposed complaint here alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary



Office of the Secretary

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

December 2, 2014

Ms. Bellamy Printz  
State of Ohio

*Re: In the Matter of Google Inc., File No. 122 3237*

Dear Ms. Printz:

Thank you for your comment on the Federal Trade Commission's 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 comment, you express concerns about your child making unauthorized purchases via the Google Play store. You also inquire about refunds. The proposed complaint and order here should help to address your concerns. The proposed complaint alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary



Office of the Secretary

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

December 2, 2014

Ms. Trinity Ragan  
State of Florida

*Re: In the Matter of Google Inc., File No. 122 3237*

Dear Ms. Ragan:

Thank you for your comment on the Federal Trade Commission's 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 comment, you inquire about refunds for charges on Android devices. The proposed complaint here alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you have incurred an in-app charge via the Google Play store and you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary





Office of the Secretary

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

December 2, 2014

[Name Redacted]

*Re: In the Matter of Google Inc., File No. 122 3237*

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

In your comment, you express concerns about your child making unauthorized purchases via the Google Play store. The proposed complaint and order here should help to address your concerns. The proposed complaint alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary



Office of the Secretary

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

December 2, 2014

Jan Smetana  
Outside the United States

*Re: In the Matter of Google Inc., File No. 122 3237*

Thank you for your comment on the Federal Trade Commission's 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 comment, you express concerns that the money paid by Google as part of the consent order will go to the FTC rather than to consumers. The proposed order actually requires Google to refund consumers, and if the company refunds less than \$19 million, only then will it pay any money to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. The proposed order also requires Google to alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. If you are a United States account holder and have been charged for unauthorized in-app purchases made by a child via the Google Play store, and you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary



Office of the Secretary

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

December 2, 2014

Mr. William Taylor  
Commonwealth of Virginia

*Re: In the Matter of Google Inc., File No. 122 3237*

Dear Mr. Taylor:

Thank you for your comment on the Federal Trade Commission's 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 comment, you express concerns about charges in 2013 and 2014. If you have been charged for unauthorized in-app purchases made by a child via the Google Play store, the proposed complaint and order here should help to address those concerns. The proposed complaint alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you have incurred an in-app charge via the Google Play store and you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary



Office of the Secretary

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

December 2, 2014

Mr. Michael Watz  
State of Colorado

*Re: In the Matter of Google Inc., File No. 122 3237*

Dear Mr. Watz:

Thank you for your comment on the Federal Trade Commission's 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 comment, you express concerns about inadvertent purchases via the Google Play store. If you have been charged for unauthorized in-app purchases made by a child via the Google Play store, the proposed complaint and order here should help to address those concerns. The proposed complaint alleges that Google failed to obtain account holders' informed consent for in-app charges incurred by children. Under the proposed order, Google must alter its business practices going forward to obtain express, informed consent to in-app charges before billing for such charges. The proposed order also will require Google to provide full refunds to account holders who have been billed by Google for unauthorized in-app charges incurred by minors. If Google's payments total less than \$19 million, it would remit the difference to the FTC, to be used for additional consumer remedies or for disgorgement. To effectuate refunds, Google must send an electronic notice to its consumers within 15 days of entry of the final order that clearly and conspicuously discloses the availability of refunds and instructions on how to obtain such refunds. If you do not receive a notice from Google within 15 days of the date of this letter, please contact the FTC's Consumer Response Center at (877) 382-4357, or file a complaint online at [www.ftccomplaintassistant.gov](http://www.ftccomplaintassistant.gov).

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/122-3237/google-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 recused.

Donald S. Clark  
Secretary