

Comcast supports the development of Internet standards that promote transparency about the collection and use of user activity data and that permit web publishers and others in the Internet ecosystem to offer consumers choice about how their data is used.

Comcast has contributed technical resources, attention and analysis to the development of Do Not Track tools from very early in the process of developing these tools. For example, Comcast was the first company to work with TrustE to implement an online icon on a trial basis, to see whether icons would be a viable means for consumers to elect not to participate in certain uses of their online activity data. In the case of this trial, we were asked by TRUSTe to offer users an opt-out from behavioral advertising, even though there was no behavioral advertising on Comcast's participating website at the time of the trial. This trial took place before the advertising industry offered its own icon program through the Digital Advertising Alliance.

Comcast has been a participant in the W3C's Tracking Protection Working Group, participating in the development of a set of widely implementable technical standards for offering consumers choice about the use of their data. As a large distributor of online content, we believe we have the scale and technical expertise to represent web publishers and content distributors who have a key stake in the outcome of this process and to evaluate the practicality of implementing proposed standards.

We participate in the W3C's Tracking Protection Working Group because we believe that this standards work can be very valuable and can lead to greater awareness, choice, and control for users and greater innovation and opportunity for online publishers, distributors, and others in the Internet ecosystem. However, the W3C process may not be the best forum for addressing the many complex technical, policy, and philosophical perspectives all at once. The result of trying to accommodate all of these very diverse perspectives may unfortunately be to distort the process and make it difficult to create technical standards that make sense and will be widely adopted.

We would support privacy work by the W3C that strives for progress on pieces of the overall privacy environment, leading to meaningful incremental changes that can be evaluated and managed as pieces of a larger privacy environment are put together. By addressing several small components of user privacy separately, working groups are more likely to develop useful technical standards and tools that together can create a privacy toolbox for all members of the Internet ecosystem to use constructively.

Some areas worthy of consideration in the future include: methods for communicating data collection and retention practices separately from "do not track" options, consideration of standards for offering users a range of choices about privacy and data use (rather than making "do not track" a proxy for all user choices), offering those user preferences outside of an immediate transaction or installation, and considering how these preferences can be offered consistently by many different kinds of systems and interfaces. Comcast would welcome the opportunity to untangle some of these issues from Do Not Track and participate in the development of open and consistent voluntary standards that could be widely implemented and effective.