

## **CARU EXAMINES WWW.THISISMEDOLLS.COM**

*CARU Recommends Changes to Website; Operator Promptly Complies*

*New York, NY – Feb. 14, 2008* – The Children’s Advertising Review Unit of the Council of Better Business Bureaus has recommended that **Cepia LLC**, operator of the Website, [www.thisismedolls.com](http://www.thisismedolls.com), modify the site to better protect children’s privacy. The site operator has taken steps to do so.

CARU, the children’s advertising industry’s self-regulatory forum, examined the Website pursuant to CARU’s ongoing monitoring program. The Website presents information and pictures featuring the entire line of “This Is Me” fashion dolls. Visitors can read or download e-magazines, play games, learn where to purchase the products and view advertisements for the dolls. The Website’s homepage contains links to various highlighted sections, including one labeled “Sharing/Fun,” where visitors can share view stories or jokes sent in by readers. The Website encourages visitors to send in their own material to be published. The following statement is printed just above a long disclaimer, written in small type:

*If you've heard any really funny jokes or have a story to share, please email them to us! (Make sure your parent's are OK with it, and they've read our submission requirements listed below)*

*– We'll post the best ones we get every few weeks. So... keep 'em coming!*

The disclaimer states that, in submitting the material, the author consents to his or her name, address and e-mail appearing as the contributor of any submission. The privacy policy includes language stating that Cepia will use an e-mail address only to respond to a specific inquiry or comments contained in the e-mail, though it may keep an archive copy of the e-mail as part of its regular business records.

CARU questioned whether the disclaimer language in the “Sharing/Fun” section of the Website was in compliance with CARU guidelines and the federal Children’s Online Privacy Protection Act. CARU questioned also whether maintaining an archival copy of an e-mail sent to a child – without parental notification or an opportunity to opt out – complied with the guidelines and COPPA.

Cepia, in response to CARU’s inquiry, took immediate steps to modify the site. The company said it would delete the consent language in the disclaimer and delete, rather than archive email addresses. The operator further noted that it would no longer maintain archive copies of any email addresses collected from children either through entering the contest or via any other form of customer feedback.

CARU, in its decision, noted that the company’s revised privacy practices would fall within the one-time use exception to the need for prior parental consent under COPPA. CARU also appreciated Cepia’s willingness to bring the site into compliance with its CARU guidelines and COPPA.

The company, in its operator’s statement, said it accepted CARU’s decision and would comply.

**CARU’s inquiry was conducted under *NAD/CARU/NARB Procedures for the Voluntary Self-Regulation of National Advertising*. Details of the initial inquiry, CARU’s decision, and the advertiser’s response will be included in the next *NAD/CARU Case Report*.**

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**About advertising self-regulation:** The National Advertising Review Council (NARC) was formed in 1971 by the Association of National Advertisers, Inc. (ANA), the American Association of Advertising Agencies, Inc. (AAAA), the American Advertising Federation, Inc. (AAF), and the Council of Better Business Bureaus, Inc. (CBBB). Its purpose is to foster truth and accuracy in national advertising through voluntary self-regulation. NARC is the body that establishes the policies and procedures for the CBBB's National Advertising Division (NAD) and Children's Advertising Review Unit (CARU), as well as for the National Advertising Review Board (NARB) and the Electronic Retailing Self-Regulation Program (ERSP).

NAD and CARU are the investigative arms of the advertising industry's voluntary self-regulation program. Their casework results from competitive challenges from other advertisers, and also from self-monitoring traditional and new media. The National Advertising Review Board (NARB), the appeals body, is a peer group from which ad-hoc panels are selected to adjudicate those cases that are not resolved at the NAD/CARU level. This unique, self-regulatory system is funded entirely by the business community; CARU is financed by the children's advertising industry, while NAD/NARC/NARB's sole source of funding is derived from membership fees paid to the CBBB. ERSP's funding is derived from membership in the Electronic Retailing Association. For more information about advertising self regulation, please visit [www.narcpartners.org](http://www.narcpartners.org).