



UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WESTERN REGION

San Francisco, CA 94103  
(415) 848-5100

May 14, 2007

VIA FEDERAL EXPRESS

Robert C. Beasley, Esquire  
General Counsel  
Paws, Incorporated  
5440 E. County Road, 450 N.  
Albany, Indiana 47320-9728

Re: FTC Matter No. 062-3198

Dear Mr. Beasley:

As you know, upon referral from the Children's Advertising Review Unit of the Council of Better Business Bureaus, the staff of the Federal Trade Commission has conducted an investigation into whether certain websites operated by Paws, Inc., including [www.Garfield.com](http://www.Garfield.com) and [www.GarfieldGames.com](http://www.GarfieldGames.com), have violated provisions of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45(a), and the FTC's Children's Online Privacy Protection Rule ("COPPA Rule"), 16 C.F.R. § 312.

Upon review of the matter, we have determined not to recommend enforcement action at this time. Among other factors that we considered are that you have limited the personally identifiable information you collect online. In addition, you have revised your posted privacy policies to ensure that they accurately reflect your sites' information collection practices and that they inform parents of their rights under COPPA.

This action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

Very truly yours,

A handwritten signature in cursive script that reads "Jeffrey Klurfeld".

Jeffrey Klurfeld  
Regional Director