JOHN M. MORSE
President and Publisher

August 12, 2010

VIA FACSIMILE AND FEDERAL EXPRESS

(202) 225-3052
(202) 226-0092

Representative Edward Markey
2108 Rayburn House Office Building
Washington, DC 20515

Representative Joe Barton
2109 Rayburn Building
Washington, DC 20515

Re: Consumer Privacy Options Online

Dear Representatives Markey and Barton:

Thank you for your letter inquiring into the privacy practices of Merriam-Webster.com. Internet privacy is something we take very seriously, so we were glad to see a strong focus from two distinguished leaders in Congress on this issue.

As your letter points out, a recent series of reports by the *Wall Street Journal* has focused attention on privacy protection for Internet users by the online advertising industry. This has been an area of focus for us for a long time, and as a result we have taken a number of steps to protect our users' privacy, including:

- We collect no personally identifiable information unless you directly give it to us by subscribing to one of our products or features and type in your information. Even in the case of our subscribers, we never provide personally identifiable information to anyone except payment processors. This may differ from others in the industry, but it is something we think is important and take pride in.

- We respect the FTC Self-Regulatory Principles for Online Behavioral Advertising.

- We follow industry standards of self-regulation.

Merriam-Webster Inc.
47 Federal Street • P.O. Box 281 • Springfield, MA 01102 • Telephone (413) 734-3134 • Facsimile (413) 731-5979

- We only use flash cookies that function as typical cookies – they collect no personally identifiable information. We also provide a link to the Adobe opt-out from the privacy policy on our site.

- We post a link to our privacy policy very prominently on our Web site. It explains that we collect personally identifiable information only from registered users who affirmatively choose to give it to us – and from no one else. It also explains that third parties collect non-personally identifiable information from visitors to our site through the use of cookies and beacons, and it provides instructions on how to opt out of such data collection, including links to opt-out sites.

- Users have no obligation to provide personal data of any kind unless they voluntarily wish to subscribe to our free Word-of-the-Day offering or pay for access to our unabridged dictionary. The Word-of-the-Day free subscription is a service we provide to send subscribers interesting words every day to their e-mail address. Non-subscribers can also see this feature by visiting the site. Subscribers can quit any time. We never share subscribers' e-mail addresses or credit card data with anyone except for payment processers. We do not e-mail advertising on behalf of third parties to our subscribers. We do advertise directly to those subscribers who have opted to receive commercial e-mail from us, and we also advertise our products on our own site to all visitors.

- For behavioral advertising, our site uses Web beacons. These beacons monitor the traffic patterns of computers visiting our site, and other sites within the same advertising network to improve site performance and to deliver advertising messages based on online traffic patterns of those computers. None of the information we gather in this way is used to identify any individual who visits the site.

- We also attempt to ensure that our data collection practices are fully transparent and that our privacy policy explains to users how to opt out of each and every sort of tracking device. We do not attempt to match up personally identifiable information with non-personally identifiable information-.

In the absence of advertisements on our site, the more than 20 million monthly users we provide a free dictionary to would be forced to pay for this service. In order to continue to provide our audience of over 20 million users with free content, we are required to run advertisements. Advertisers that run advertisements on our site, and most major sites, require some targeting capabilities which are achieved through cookies and other tracking devices. Despite the needs of our advertisers, we take affirmative steps to protect the privacy of our users by not permitting the collection of personally identifiable information by third parties, by following all industry standards, and by prominently displaying our privacy policies.

We are in the business of providing a reference tool to tens of millions of users, and we are proud that we can do this free of charge. We know that the twenty million people who use our service want it to

remain free, and we work hard to balance the needs of advertisers, which is what allows the site to remain free, with the privacy needs of our users. We believe we have achieved the right balance.

Thank you again for reaching out to us about our work on privacy. We would be glad to work with you as you continue to help ensure that consumers are fully protected and informed about their privacy options online.

Sincerely,

John M. Morse
President and Publisher

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