



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Bureau of Consumer Protection
Division of Advertising Practices

January 24, 2011

VIA FEDERAL EXPRESS

Marc S. Roth, Esq.
Manatt, Phelps & Phillips, LLP
7 Times Square
New York, NY 10036

Re: GabbaCaDabra, LLC, FTC File No. 102-3229

Dear Mr. Roth:

As you know, the staff of the Federal Trade Commission's Division of Advertising Practices has investigated whether your clients, Wild Brain Entertainment, Inc. and GabbaCaDabra, LLC, violated the FTC's Children's Online Privacy Protection Rule ("COPPA Rule"), 16 C.F.R. § 312, through the operation of their website yogabbagabba.com. The COPPA Rule requires operators of websites or online services directed to children under the age of 13, and operators who have actual knowledge that they are collecting personal information online from such children, to provide notice of their information practices to parents and to obtain verifiable parental consent prior to collecting, using, or disclosing children's personal information.

We have determined not to recommend enforcement action against your clients at this time. Certain factors contributed to this decision, including that your clients: ceased the violative collection of personal information from children in connection with yogabbagabba.com's GabbaMail registration before the Commission opened this investigation; thereafter deactivated the "share" functions of the yogabbagabba.com site; deleted all personal information improperly collected from children; and revised the yogabbagabba.com Privacy Policy to reflect the changes made on the website. The staff appreciates your clients' prompt response and cooperation, and their commitment to ensure that they comply with the COPPA Rule in the future.

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 further action as the public interest may require.

Very truly yours,

A handwritten signature in cursive script that reads "Mary Koebel Engle".

Mary Koebel Engle
Associate Director