

June 13, 2006

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Mr. Eric Holloway
Policy Analyst
Department of Commerce
Room 2806
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Dear Mr. Holloway:

On behalf of the Coalition for Global Information Flows, Morrison & Foerster LLP is pleased to submit the attached comments in response to the Department of Commerce's May 22, 2006 Federal Register concerning the development and implementation of cross-border privacy rules in the Asia Pacific Cooperation Group (APEC).

The Coalition for Global Information Flows appreciates the opportunity to provide its views on the use of global or enterprise-wide privacy rules ("Corporate Privacy Rules") and how they can correct the problems faced by consumers and organizations within the APEC region.

Sincerely,



Miriam Hauser Wugmeister