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Ms. Hannah Stires
Division of Financial Practices
Federal Trade Commission
600 Pennsylvania Ave., NW
Washington, DC 20580

Dear Ms. Stires:

As discussed in our telephone conference earlier this week, I am very interested in being part of the FTC's Advisory Committee on Online Access and Security ("ACOAS"). Thus, please consider this letter as a "self-nomination" to serve on the ACOAS. Please find attached a copy of my resume for your review. My additional qualifications are summarized below.

In my role as co-chair of Delta Air Lines' ("Delta") committee on the European Union's Directive on Data Protection (the "Directive"), I performed a systemic analysis of Delta's data collection, retention and processing policies, and made recommendations to improve these processes, and to increase our customers' ability to access the information held by Delta about them.

In addition, I have traveled to Brussels, Belgium to negotiate directly with representatives of the European Commission in order to determine how the Directive will impact the airlines. While in Brussels, I was heavily involved in drafting Recommended Practice 1774 ("RP 1774") for the International Air Transport Association ("IATA"), the industry organization to which all international airlines belong. RP 1774 is an attempt by the airline community to self-regulate in order to satisfy the requirements of the Directive.

On February 7 and 8, at IATA's Legal Symposium 2000 in San Diego, California, I will be presenting a paper on the impact and ramifications of the negotiations between the U.S. Department of Commerce and the European Commission for a "safe harbor" from the Directive, for U.S. industries that commit to adhere to certain consumer notice and data collection, retention and processing restrictions.

I also drafted, on behalf of the Air Transport Association ("ATA") and the industry generally, a response to a questionnaire sent out by the Attorney General's Consumer

Privacy Workgroup, which sought the industry position on various consumer privacy-related matters.

Additionally, I routinely handle all of Delta's privacy issues, both online and in other areas. This includes advising on issues of data security, consumer access and the implications of data collection, processing and retention both domestically and internationally. For instance, I took primary responsibility for drafting Delta's online consumer privacy and data access policy, and I am consulted on a continual basis about any online privacy issues that arise for Delta.

In short, I believe that I have built a knowledge base in privacy issues that would be of value to the ACOAS in its work.

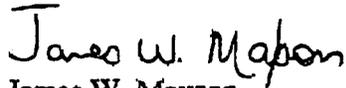
I also believe that my participation would be valuable because, even though the airline industry is, pursuant to 15 U.S.C. § Section 45(a)(2), not subject to FTC jurisdiction, these are nevertheless issues with which the airline industry will have to deal and respond to as we expand our activities in the online medium. My membership on the committee would give the committee access, through the ATA, to input on these issues from all domestic, and many foreign carriers, who are members of ATA.

Finally, I would be a valuable addition to the ACOAS because, as an in-house lawyer for a large corporation, I would be able to proffer an opinion from both a legal and industry perspective.

Because of my knowledge of the issues in the area of privacy, both internationally and domestically, and my unique ability to represent both industry and the legal profession, I believe that I would be a valuable addition to the ACOAS.

I appreciate your time and attention to this nomination, and I look forward to hearing from you. If you have any questions, please do not hesitate to contact me.

Sincerely yours,


James W. Maxson