

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of Goggle, Inc. and BruinWatch™

NOTICE OF APPARENT LIABILITY FOR FORFEITURE

Adopted: May 1, 2022

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By the Chief, Enforcement Bureau:

I. INTRODUCTION

This report investigates the action of Goggle, Inc. of expanding information collecting practices into academia in a business agreement with the University of California, Los Angeles. Through implementation of the BruinWatch™ system, UCLA and Goggle have established the first education system where personal information has explicit monetary value, and is provided by students in exchange for Goggle's contribution to tuition costs. The BruinWatch™ system collects and aggregates student information, including grades, class attendance and the physical location of students on campus at all times. The Federal Communications Commission (FCC) send a Letter of Inquiry (LOI) requesting that Goggle provide the trends analysis information that was used to make the decision to establish BruinWatch™ at UCLA. Goggle provided the following statement:

In addition to rising intellectual talent, American college campuses are hotbeds for variables of young adult consumer behavior. The overflow of student information motivated Goggle to explore data-driven universities as a potential outlet for human resource recruitment and advertising sales. In pursuit of this goal, Goggle performed background research and a pilot digital identity management system, BruinWatch™ at a top data-driven university, the University of California at Los Angeles, over the last ten years.

Several trends were identified by the University and Goggle, which motivated the technology, communications, and advertising company to join forces with UCLA and partner with the aim of providing funding for the BruinWatch™ system in return for full access to the information given by students. Like other universities, UCLA had previously used similar ID cards to manage student activities like library and food services. This existing infrastructure simplified implementation of BruinWatch™. Additionally, over the past decade young adults have become used to sharing many data points of information through online activities like social networking, extending the potential to share information in return for educational services was a logical step. Thirdly, the University of California system has experienced extreme budget problems due to the lack of state funding, and was sitting on a mountain of rich student information without the ability to utilize it for revenue purposes. The establishment of the BruinWatch™ system and the business partnership between UCLA and Goggle allowed the University to remedy budget issues while providing students a common sense method of payment for tuition.