

# State of Connecticut

GEORGE C. JEPSEN  
ATTORNEY GENERAL



Hartford

April 26, 2011

Steve Jobs  
Chief Executive Officer  
Apple Inc.  
1 Infinite Loop  
Cupertino, CA 90514

Bruce Sewell  
Senior Vice President and General Counsel  
Apple Inc.  
1 Infinite Loop  
Cupertino, CA 90514

Dear Mr. Jobs and Mr. Sewell:

Recent published reports have indicated that Apple's iOS 4 software tracks consumers' location and stores that data in a file hidden on the iPhones and iPads. I am particularly troubled by the apparent lack of clear and conspicuous disclosures regarding these practices and failure to request authorization from users.

So that I may understand the extent and nature of the collection or access by Apple of consumer location information in Connecticut, I request that you provide the following information no later than May 5, 2011:

1. Please state whether Apple has ever collected, or inserted into any of its products technology that would allow it to collect location information or data from consumer devices.
2. If your answer to the previous question is anything other than an unqualified "no", then please:
  - a. state the date on which Apple first equipped any consumer device to allow it to do so.
  - b. describe the type and amount of information that Apple collected from consumer devices.
  - c. state the specific consumer devices which collect this information.

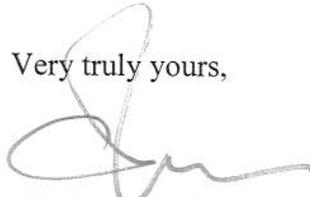
- d. state whether Apple obtained express authorizations from Connecticut consumers for Apple to collect or compile this information.
3. Explain in detail what steps Apple has taken to ensure that location information collected is protected, through encryption or otherwise, from unauthorized access.
4. Explain in detail why Apple collected location information from consumer devices including, but not limited to, the purported need and intended use for such information.
5. Explain in detail why only certain Apple devices were equipped with technology that would allow them to collect and store location information.
6. Explain in detail whether, and if so how, a consumer can turn off the location information collection in each separate consumer device that collects such information.
7. Please identify the length of time that the location information Apple collects is stored on a consumer device, or stored remotely by Apple, if applicable.
8. Is the location information collected by Apple and/or stored on consumer devices ever deleted or overwritten so that older information can no longer be accessed? If so, explain in detail the process by which this occurs.
9. If Apple possesses any location information obtained from consumer devices, explain whether Apple keeps such information separate or segregated in any way from other such information.
10. State whether Apple has sold or otherwise shared with any third party location information collected from user devices and, if so, please explain in detail.
11. State whether Apple has used in any product or service the location information collected from user devices and, if so, describe how Apple has used said information.
12. Please provide copies of all disclosures and requests for authorization related to Apple's collection and use of the location information.

Please provide your answers to the above questions by close of business on May 5, 2011 to the attention of Assistant Attorney General Matthew Fitzsimmons, Connecticut Attorney General's Office, 110 Sherman Street, Hartford CT 06105. If you have any questions, you may contact AAG Fitzsimmons at [Matthew.Fitzsimmons@ct.gov](mailto:Matthew.Fitzsimmons@ct.gov) or 860-808-5400.

Apple is also hereby requested, to the extent applicable and pursuant to the Electronic Communications Privacy Act, 18 U.S.C. § 2703(f), pending the potential issuance of a court order or other legal process, to preserve for a period of 90 days all records and other evidence related to its collection, use and/or disclosure of location or other information collected from consumers in Connecticut. This request includes, but is not limited to, documents, data, and

correspondence in your possession, including records stored on backup media, in a form that includes the complete record. This request applies only retrospectively. It does not in any way obligate you to capture and preserve new information that arises after the date of this request.

Thank you for your time and attention to this matter.

Very truly yours,  
  
GEORGE JEPSEN

GJ/pas