

STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL



MIKE COX
ATTORNEY GENERAL

P. O. Box 30212
LANSING, MICHIGAN 48909

June 15, 2010

Mr. Matt Sucherman, Esq.
Google
Vice President and Deputy General Counsel
600 Amphitheatre Parkway
Mountain View, CA 94043

Dear Mr. Sucherman:

Recent news reports have indicated that Google's "Street View" cars may have been collecting information transmitted over unprotected wireless computer networks, without the knowledge or permission of the affected and unsuspecting consumers whose information Google obtained. I, along with my colleagues in many other states, have grave concerns that your company's data collection practices may have violated, however unintentionally, the privacy rights of our citizens.

So that I may understand how any unauthorized access by Google of open wireless networks may have affected consumers in Michigan and elsewhere, I request that you provide the following information within ten days of receipt of this letter:

- 1) Please state whether Google "Street View" cars have ever collected information from wireless computer networks in Michigan;
- 2) Please state whether Google "Street View" cars have ever collected information from wireless computer networks in states other than Michigan, and if so, please list the states where Google "Street View" cars have ever collected information from wireless computer networks;
- 3) If your answer to the previous two questions are anything other than an unqualified "no," then please:
 - a) state the years and months during which Google's "Street View" cars collected information from wireless computer networks in Michigan and identify all Michigan municipalities in which such collection occurred;

- b) describe the type and amount of information that Google's "Street View" cars collected from wireless computer networks in Michigan;
 - c) state the number of wireless computer networks from which Google's "Street View" cars collected information in Michigan;
 - d) state separately the number of personal (non-business) and business wireless computer networks from which Google's "Street View" cars collected information in Michigan;
 - e) please provide a list of all business wireless computer networks from which Google "Street View" cars collected information in Michigan, including the name of each business associated with each wireless computer network, the location or address information for each business associated with each wireless computer network, and the amount and type of information collected from each business wireless computer network;
- 4) State the number of express authorizations from Michigan wireless computer network owners that Google received allowing Google "Street View" cars to collect information from the networks;
 - 5) Identify and describe the equipment that Google used to collect and observe information from wireless computer networks in Michigan;
 - 6) Explain what steps Google has taken to ensure that its "Street View" cars no longer collect information from wireless computer networks without the prior express permission of the owners of the networks;
 - 7) Explain in detail why Google's "Street View" cars collected information from wireless networks including, but not limited to, the purported need and intended use for such information;
 - 8) Explain why Google's "Street View" cars were equipped with technology that would allow them to:
 - a) access wireless computer networks; and,
 - b) view, capture, retrieve or download information from wireless computer networks;
 - 9) Identify when Google first equipped its "Street View" cars with the technology or code(s) that allowed them to obtain information from wireless computer networks;
 - 10) Identify whether Google possesses any information obtained from wireless computer networks and, if so, when Google began keeping said information, and where Google keeps said information;

Matt Sucherman, Esq.
Page 3
June 15, 2010

- 11) If Google possesses any information obtained from wireless computer networks, explain whether Google keeps such information separate or segregated in any way from other such information; and,
- 12) State whether Google has used any information that Google's "Street View" cars collected from wireless computer networks in Michigan or nationwide and, if so, describe how Google has used said information.

Please provide your answers to the above questions within ten days of your receipt of this letter to the attention of:

Suzanne Hassan
Assistant Attorney General
Consumer Protection Division
P.O. Box 30213
Lansing, MI 48909

Google is also hereby requested, 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 disclosure of personal information that its "Street View" cars collected from wireless networks in Michigan. 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,



MIKE COX
Attorney General