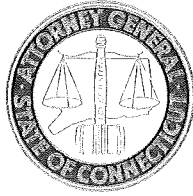


# State of Connecticut

RICHARD BLUMENTHAL  
ATTORNEY GENERAL



Hartford

June 15, 2010

*Sent via email: [swexler@google.com](mailto:swexler@google.com)*

Stacey Wexler, Esq.  
Senior Counsel  
Google, Inc.  
600 Amphitheatre Parkway  
Mountain View, CA 94043

Dear Ms. Wexler

As you know, my office is presently coordinating the investigative efforts of several state Attorneys General concerning the collection of payload data by Google's Street View cars. This letter is in regards to Google, Inc.'s letter dated June 7, 2010, responding to certain questions I posed concerning this matter.

While I appreciate Google's responses, as well as its cooperation with my office's ongoing investigation, those responses raised a number of additional questions. Accordingly, I ask that Google provide information and documentation responsive to the following by June 25, 2010:

1. Please explain in detail how and why the payload data was written to disk when the data frame was unencrypted but permanently discarded when the frame was encrypted?
2. Please explain in detail why a wireless transmission's signal strength and quality were captured and analyzed by Google?
3. Please describe in detail the date on, and circumstances in which, Google first learned that its Street View cars had collected payload data from unencrypted wireless networks.
4. Was the Kismet source code Google used modified or adapted in any way as part of the gstumbler project or gslite.
5. How many antennas were mounted on each Street View car in Connecticut?

6. Were the activities, performance or progress of the Street View cars audited or in any way analyzed by Google, internally or externally? If so, please describe the frequency and scope of each such audit or analysis.
7. Was there an expected, or budgeted, amount of storage space for the data collected by the Street View cars? If so, what was the original expectation or budget and what amount of space was used as of June 1, 2010?
8. Did Google ever perform an accounting or any other analysis of the amount of data being collected by the Street View cars? If so, please provide the details of each such accounting or analysis.
9. Was any data ever extracted from the payload data? If so, please explain in detail what data was extracted, when and why.
10. Please provide all documents that relate to Google's internal protocol and procedures relating to consumer privacy *vis a vis* the Street View cars data collection and the handling and use of the data collected by the Street View cars.
11. Please explain in detail how and when the engineers on the Street View mobile team gain access to the code that Google claims was responsible for the collection of payload data?
12. Please explain in detail the practices and procedures Google follows to ensure that no code not authorized by Google is intentionally or inadvertently inserted by engineers into Google products and services?
13. Has Google identified the engineer(s) who inserted the code at issue in this investigation?
14. Is Google aware of any other instance where an engineer intentionally or inadvertently inserted unauthorized code into a Google product or service resulting in exposure or capture of consumer data? If so, please explain in detail each and every such instance.
15. Please provide a copy of the complete patent application Google filed on or about November 26, 2008 relating to wireless network-based location approximation.

Please again provide your answers to the above questions and the requested documentation to the attention of Assistant Attorney General Matthew Fitzsimmons.

Thank you for your time and continued attention to this matter.

Very truly yours,



RICHARD BLUMENTHAL