

I have an extensive background in online safety, security and privacy, worked at MSFT for 13 years with several years as the person responsible for consumer safety, have over 35 patents in online safety and emerging technologies, and the past president of the Safe Internet Alliance, have my own online safety software development and consulting firm, and am president of the LOOKBOTHWAYS Foundation- a 501c3 dedicated to educating youth, educators and families about online safety.

I have carefully reviewed Aristotle's proposed Children's Privacy Compliance Program and fully support their application. I am particularly supportive of the forward-looking and innovative parental consent methods proposed under Requirement 3, B that leverage up-to-date technologies previously unused by compliance programs.

In particular, I believe that leveraging MMS technologies to allow parents to take a photo and instantly send verification has unique merit due to two factors:

- 1) The convenience of using cellphones as a method of verification, approval/rejection, and transmission of this information to a service provider will be the least cumbersome means of communication for parents.
- 2) The ability to create and use an automated set of tools to review and validate the information sent by parents will provide several benefits including:
 - Increasing the speed in which youth can begin using a service (assuming the parents consented), providing youth and their parents with a much more satisfactory experience. For example, sending a letter, waiting for a response, then cataloging that response and entering it into a data system to allow the child access is a potentially 2 week process that is utterly unsatisfactory.
 - Streamlining the validation process for companies and eliminate confusion and data entry errors in the process.
 - Costing substantially less to operate.

I also believe that using face-to-face real-time communication tools (like Skype) has tremendous merit. These tools allow a visual check to see the person is a) an adult and b) that the person on the real-time communication tool actually matches the photo shown on their identity card. This method will require more of a parent (unless they have a real-time communication tool on their phone), and require more hands-on data entry, but this again is a vast improvement over the email, snail mail, and even website authentication mechanisms of the past - though these older methods will still be viable options for those who choose to use them.

In conclusion, using more up-to-date technologies to accomplish the core tasks of parental consent and verification accomplishes three goals: It keeps compliance requirements aligned vastly improves the parent and child's user experience, and, It improves the processes for obtaining and managing compliance for companies.

If you have any questions regarding these comments, do not hesitate to contact me for further information.

Respectfully,

Linda Criddle