

1. Please provide comments on any or all of the provisions in the proposed guidelines. For each provision commented on please describe (a) the impact of the provision(s) (including any benefits and costs), if any, and (b) what alternatives, if any, iSAFE should consider, as well as the costs and benefits of those alternatives.

I think that the I-safe program is a strong tool to protect children. Many times there is too much access to the internet that makes it difficult for parents and the prevailing laws to govern. Young children many times do not understand both what they are getting asked and what they are looking at, to have control by implementing password support and also VeriSign to verify age of someone either searching for information or purchasing an item. The benefits of the initiatives help protect children, protect families as a whole. It won't allow some information to be shared that a child may know but not have access too. It protects from 3<sup>rd</sup> parties being able to phish for information. It also does allow for safe areas to be created for children's sites. A child can play on the internet. An example would be "Club Penguin" A cost is it takes people it update and run the systems there is an expense that has to be accounted for. An alternative would be that each parent would have to set up their internet controls or buying personal computer software that would parent the web browser to replace some of these things. I think I-safe should not consider these alternatives because the internet is widely unregulated and that it needs to have a government outline not necessarily controlling the information but to protect individual rights and to develop system that can protect these rights both of the internet providers and users.

2. Do the provisions of the proposed guidelines governing operators' information practices provide "the same or greater protections for children" as those contained in Sections 312.2-312.8 of the Rule? Where possible, please cite the relevant sections of both the Rule and the proposed guidelines.

Yes, the following guidelines provide greater protection for children."Children's Online Privacy Protection Act, 15 U.S.C. 6501, *et seq*, which became effective on April 21, 2000. The Rule requires certain website operators to post privacy policies, provide notice, and obtain parental consent prior to collecting, using, or disclosing personal information from children. The Rule contains a "safe harbor"

3. Are the mechanisms used to assess operators' compliance with the guidelines effective? If not, please describe (a) how the proposed guidelines could be modified to satisfy the Rule's requirements, and (b) the costs and benefits of those modifications.

Yes they are effective as an internet basis for controlling content. What is considered should be up to the owner of the website to protect consumer's information. It is in their best interest to do this and needs to have the cost figured into the price of the purchase. If it is viewable content then I would say it is still up for debate as to what should be accessible and how. That might be modified someday as it has in the past. If it is something someone does not want to see they should have the ability to search with some safety. This could potentially be something that software should be available to a consumer to help protect themselves.

4. Are the incentives for operators 'compliance with the guidelines effective? If not, please describe (a) how the proposed guidelines could be modified to satisfy the Rule's requirements, and (b) the costs and benefits of those modifications.

I would say that they are not as people have found ways around this by file sharing on platforms and servers other than the original one that put the information out there in the first place. This is a problem because the servers may be based outside the U.S jurisdiction. The cost to this problem would be larger and harder to stop. It would have to be stopped at individual servers. China is the best to look at for this problem because they are one of the countries that limit this way the most. It is something that takes a lot of people to monitor and stop and censor information flow.

5. Do the guidelines provide adequate means for resolving consumer complaints? If not, please describe (a) how the proposed guidelines could be modified to resolve consumer complaints adequately, and (b) the costs and benefits of those modifications.

The guidelines will never completely resolve consumer complaints as long as the materials are so vast. It will however help with some of the main problems by addressing some content and protecting people's rights. It will also protect the consumer in financial ways along with personal information. The costs will be included and dealt with as things change. It will have to find a price median that will be affordable and abide by supply and demand rules.