

**Commission on Online Child Protection (COPA)
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Members of the commission, distinguished guests, I am Tim Robertson, Founder and CEO of FamilyClick.com LLC; a nationwide Internet filter provider based in Virginia Beach, VA. I would like to thank you for the opportunity to speak with you today about the subject of protecting our children from the offensive material and predatory activity that is so prevalent on today's Internet.

I have personally been involved for a number of years with delivering family oriented programming, information and entertainment through the media. Before forming FamilyClick, I served as the President and CEO of International Family Entertainment (IFE) which was best known for its flagship network; The Family Channel. With its commitment to wholesome, family oriented programming, The Family Channel grew into one of America's most watched cable networks. In 1996, I served on the task force created by the National Cable Television Association to help craft the Television Parental Guidelines. In 1997, IFE was sold to Fox Kids Worldwide for \$1.9 billion.

Now, we are doing the same for the Internet as we did with cable. The same creative team that brought The Family Channel into America's living rooms has now created FamilyClick; a total solution that provides safe Internet access as well as a dedicated web site offering compelling and original family oriented content. By combining the best technology that industry has to offer with our own extensive in house experience and expertise, FamilyClick offers families the same peace of mind while browsing the Internet that The Family Channel brought to their television.

The Problem

The Internet has tremendous potential for today's children. Children today can access information that was out of reach just a generation ago. Through the Internet, reference material located on the other side of the world is just as close as the library around the corner. The Internet allows children to explore new worlds, meet new people and develop new skills. Never in history have children had access to such a powerful tool for learning, entertainment, communication and exploration.

But the Internet is also fraught with perils. Almost everyone has heard stories of grown men posing as teenagers in online chat rooms. According to a recent survey funded by

the National Center for Missing and Exploited Children (NCMEC)¹, one in five children between the ages of 10 and 17 has received a sexual invitation or approach on the Internet in the last year. One in thirty-three received an aggressive sexual solicitation. One in seventeen reported having been harassed or threatened over the Internet within the last year. One quarter of the young people reporting these incidents were distressed by them. And, not surprisingly, most incidents involving young people go unreported.

Many of us know someone who may have accidentally stumbled across a pornographic web site; perhaps some of us have had that unfortunate experience. Many of us have also received an unsolicited email message containing pornographic or otherwise offensive content. It is estimated that at least fifty-three percent of America's teenagers have encountered web sites featuring pornography, hate or violence². One in four have unwillingly accessed pictures of naked people or people having sex³. More than sixty-two percent of parents of teenagers are unaware that their children have accessed objectionable web sites⁴. There are more than 40,000 individual URL's containing child pornography, pedophilia or pro-pedophilia content⁵ and U.S. News and World Report states that there are at least 40,000 porn sites operating on the web today⁶. Actually, if it were possible to count them all, that number would be much higher. And at least 30 percent of all unsolicited email messages contain pornographic information⁷.

The statistics are alarming. But, the numbers do not tell the whole story. If we were to count the number of adult bookstores or the number of pornographic movies available today, we might come up with similar numbers. Pornography has a foothold in almost every segment of society, ranging from the red light district on the other side of town to the back room of your local video store. There have always been people seeking to prey upon young, innocent children. We all know that pornography is out there; it always has been and probably always will be. On the Internet, the problem isn't so much that pornography exists. The problem is the way in which online pornography is often intrusively marketed and the ease with which predators can access our young people.

You would probably be up in arms if your teenage son or daughter went out to get the mail and carried in a piece of junk mail containing a graphic advertisement for a recently released triple X rated film. You would most likely call the Postal Service or other authorities and demand that some type of action be taken. And action would be taken because there are laws and regulations that prohibit the distribution of pornographic material in that manner and those laws are aggressively enforced. Because of the enforcement of such laws and regulations, you are very unlikely to receive such material in the mail.

¹ National Center for Missing and Exploited Children, Online Victimization: A Report on the Nation's Youth, June 2000

² Yankelovich Partner survey, The Safe America Foundation; 9/30/99

³ National Center for Missing and Exploited Children, Online Victimization: A Report on the Nation's Youth, June 2000

⁴ Yankelovich Partners Study, September 1999

⁵ Safeguarding Our Children-United Mothers & CyberAngels "Our Kids In Danger List," 2000

⁶ U.S. News & World Report, 3/27/00

⁷ Choose Your Mail.com study, October 1999

But you are actually very likely to receive such an ad in an unsolicited email message. Someone who delivers pornographic or otherwise offensive material to your electronic mailbox is very unlikely to face legal action. The online pornographer is well aware of that fact. Using easily affordable bulk email software and an equally affordable mailing list, the online pornographer can quickly and easily get his message across to thousands, if not millions, of users. And these are far from being targeted mailings; the bulk mailer is simply interested in getting his message sent to as many people as possible. Your ten year old son is just as likely to receive such a message as is a 45 year old man.

While channel surfing in front of your television, how likely is it that you will stumble across deviant material like bestiality or child pornography? Not very. You are also very unlikely to accidentally catch a how-to show explaining the intricacies of constructing a bomb or a show asking that you send in your donations to a white supremacist group. Again, enforcement of broadcast regulations protecting you from this type of material serves as a deterrent to such abuses. Your cable or satellite provider knows very well that the switchboards will light up if any inappropriate programming somehow 'sneaks' in.

Even though some television programming today may not exactly qualify as family fare, you feel somewhat safe when sitting in front of your TV. You should not feel safe when sitting in front of a computer with unrestricted access. Web sites dealing with all types of pornography, hate, violence and other inappropriate subjects are readily available. These sites often hide behind deliberately misspelled or innocent sounding domain names such as www.whitehouse.com, www.watersports.com, www.boys.com and www.dinsey.com. Recently, children who had trouble spelling the word Pokemon ended up going to a graphic pornographic web site. The online porn industry has become adept at deceiving and luring people into visiting their web sites.

If a teenaged boy or girl walked through the front door of an adult bookstore, accidentally or otherwise, he or she would most likely be escorted back onto the sidewalk in a matter of seconds. But not in cyberspace. A visitor who wanders into the web's dark side is likely to be held hostage for as long as the porn operator can get away with it. Almost by reflex, we have been conditioned to hit the Back button on the browser when we want to leave a web site. But hitting the Back button to leave a porn site quite often results in the opening of another browser window featuring a suggestive, if not graphic, site. The reluctant visitor often leaves an adult web site by way of a dozen or more other offensive sites. In many cases, the attempt to leave an adult site results in the simultaneous launching of many new browser windows; each featuring a different pornographic site. This often locks up the user's computer, resulting in a necessary reboot.

Employing methods meant to deceive, lure, tease, trick and capture, porn operators can generate a steady flow of traffic to their site in a fraction of the time that it takes a legitimate web site to build the same amount of traffic. The methods that the online porn industry uses to attract business would not be tolerated away from the Internet. But in cyberspace, the rules of engagement that are allowed are vastly different.

The scope of the problem and the aggressive nature of those who would use the Internet to prey upon our children are why parents are demanding a one-stop shop service like FamilyClick. That is what drove us to create FamilyClick. We commissioned various market studies not only to judge the demand for a solution but also to help us understand parent's awareness of the problem. We found that 72% of wired homes with children agreed that objectionable materials on the Internet were a major problem and that 54% of homes with children expressed an interest in a solution such as that proposed by FamilyClick. Parents desire a complete technical solution that would provide worry free access to the Internet, the ability to unobtrusively monitor children's web activities and protect them against unsolicited e-mail.

The FamilyClick Internet Safety Philosophy

When we started FamilyClick, we began with a commitment to provide families with the safest Internet experience available on the market. To meet this commitment, we conducted extensive research into the dangers of the Internet, we consulted with the leading experts in the field, we carefully evaluated existing solutions to the problem and we assembled a talented team of engineers, content creators and technical experts with proven track records. Our goal was, and continues to be, to develop a total solution that would provide families with safe, cost effective and worry free access to the Internet.

Our initial aim was to identify and acquire the best existing solution and to add our own in-house expertise in order to create the FamilyClick service. We carefully examined a number of filtered Internet service providers and found that most of them lacked flexibility. The same level of filtering applied to the teenagers was also applied to younger children as well as to the parents. We quickly determined that content that is appropriate for an adult or older child is often not appropriate for younger eyes. We decided that the FamilyClick solution had to be flexible and allow the parents to customize the degree of filtering based on the maturity level of the member that is online. Rather than offering a 'one size fits all' solution, we wanted the decision of determining the access levels of children to stay where it belongs: with the parents.

In many of today's households, the kids are more computer literate than the parents are. It is quite common for a parent to purchase a software package for the home computer and hand it to one of the children to be installed. Desktop filtering systems, which reside on the users computer, are vulnerable to tampering by technically savvy teens. Simply modifying the proxy settings within the browser can often disable server based filtering solutions. We determined that the FamilyClick solution had to be tamper resistant.

Very few of the filtered Internet service providers that we looked at had any significant market share. Instead of finding the AOL of the filtered access market, we instead saw a number of small niche players, often serving specific areas of the country. We were, in fact, surprised at how many people had actually attempted to offer a solution for families. Most filtered providers that we looked at lacked the strong brand identification that builds trust. It became clear that our technical solution had to be married with a strong

marketing and educational program so that parents would be aware of both the problem and the solutions.

Just about every existing solution that we looked at concentrated on the web and completely ignored other protocols such as e-mail, chat and instant messaging, Usenet newsgroups and ftp. But most unwelcome sexual solicitations take place in chat rooms and message boards, unsolicited email messages frequently contain pornographic and offensive content and Usenet newsgroups are well known repositories of graphic material dealing with child pornography, bestiality and other offensive subjects. Filtering the web only solves part of the problem.

We live in a world where technology is advancing at a breakneck pace. In the time it takes to read this paper, someone will introduce a new time saving tool, a faster processor or a new network protocol. The online porn industry has historically been at the forefront of Internet technology; pioneering the use of streaming video and audio as well as community applications such as chat and instant messaging. Parents cannot possibly stay one step ahead of the porn industry; this has created a critical need for parent-industry partnerships like FamilyClick. As technology changes, so does the marketplace. High speed DSL access is now available to families that just a few short years ago accessed the Internet through a 14.4 modem. Companies that once thrived on selling access to the Internet now face stiff competition from competitors that provide access for free. Any effective solution that attempts to safeguard families Internet access must evolve to the changing marketplace and be able to quickly respond to new technological challenges.

The FamilyClick Total Solution

The FamilyClick Total Safety Solution offers cutting edge Internet safety by combining the best protective technologies currently available with our own proprietary safety technologies in order to build a "Superior Suite of Safety Services" and also delivers top quality, relevant content and entertainment to America's families. Our experienced team of Internet safety experts continues to evaluate and implement new technologies to ensure that FamilyClick remains at the forefront as an Internet safety service.

The FamilyClick Internet access service is a Plug-and-Play, one-stop solution that includes nationwide 56K-dialup access. In September, we will be introducing MyISP, which allows families that access the Internet via other providers to add the FamilyClick Total Safety Solution to their homes. FamilyClick MyISP will offer an unrestricted access level that will be password protected. Both products include the complete "Superior Suite of Safety Services" that makes FamilyClick the leader in the Internet safety market.

Safe Access

The FamilyClick Total Safety Solution begins with safe access to the Internet. Using server-based technology exclusively, FamilyClick offers families the assurance of

modern, state-of-the-art filtering technology with the flexibility demanded by today's families. FamilyClick uses a comprehensive, multi-step filtering process to safeguard access to the World Wide Web as well as e-mail, newsgroups and chat. Our multi-step filtering technique ensures that dynamic material, such as web based email and search engine results, can be handled just as effectively as static web pages. Parents have full control over the level of access that their children have and optional features may be turned on or off quickly and easily. E-mail messages are subject to many of the same filtering processes that web sites are and our Smart Search Engine delivers only the best and most relevant results.

Web Filtering Technology: Our two step filtering process first compares a requested URL against an extensive list of reviewed sites. These sites are reviewed both manually and by automated processes and are categorized into approximately sixteen different categories ranging from crime and pornography to weapons and illegal drugs. PICS ratings, when available, are also used to categorize sites. Our substantial database of sites is updated no less than daily and additions, deletions and corrections can be made on the fly. The complete list of FamilyClick content categories is available in Appendix A.

The second step in our filtering process is a dynamic filtering process called ClickReview. ClickReview scans pages in real time and scores each Web page based on a review of the relationship and proximity of words to other words on the page. For instance, ClickReview can distinguish between a site on "breast cancer" and a site on "girls with big breasts," and treats the phrase "sexual harassment" differently from "sexual pictures."

Due to its dynamic nature, ClickReview is able to deal with dynamically generated web pages that other filtering technologies leave behind. FamilyClick's filtering process is just as effective on a web-based email account or with an HTML based chat as it is with a web page that never changes. And because the content of web sites changes frequently, ClickReview helps to ensure that 'safe' sites that might become 'unsafe' will not be displayed to our subscribers.

FamilyClick only provides access to chat rooms that are HTML based. This allows our ClickReview process to scan the conversation and screen out any inappropriate language that may occur. Unfortunately, to our knowledge, there is currently no technology available that can detect a disguised predator who does not use offensive language.

FamilyClick's World Wide Web filter combines industry leading technology from Symantec with FamilyClick's own technology to provide a web filtering solution unmatched in the industry.

Smart Search Engine: Safety must be combined with delivery of relevant and easily accessible content. For searching the web, FamilyClick has partnered with LookSmart to provide a powerful search engine that filters out offensive material and returns only the best and most relevant results. Our Smart Search Engine is integrated with our

ClickReview process to ensure that only sites that have passed through our layered filtering system are accessible via the search results.

FamilyClick members are also free to use any search engine they choose with confidence. As all results are subject to our ClickReview process, families can rest assured knowing that the search results will be free of offensive material.

Multiple Access Levels and Full Parental Control: FamilyClick realizes that different families have different needs and that children have different maturity levels. The FamilyClick filter allows parents to determine the level of access that is appropriate for each member of the family. Our access levels have been carefully designed to accommodate individuals of all age groups and parents can easily change the access level of any family member at any time.

For its most restricted level, FamilyClick has developed the Children's Playroom. This is a 100% safe level of access recommended for children aged seven and younger. It allows access only to a pre-determined list of children's web sites that have been pre-selected and pre-approved by FamilyClick.

Our highest level of access provides protection against sites providing instructions on performing criminal activities, sites which advocate hate or intolerance, pornographic sites as well as sites advocating the use of illegal drugs, sites promoting online gambling and sites which advocate violence. In between, FamilyClick offers access levels appropriate for teens, pre-teens and older children. The complete list of FamilyClick access levels is outlined in Appendix A. FamilyClick's access levels allow parents to prevent young children from viewing material such as sex education while permitting access to older, more mature children.

It is FamilyClick's philosophy that parents and guardians are the best judges of what is appropriate for their children. FamilyClick offers parents complete control over the level of Internet access for each member of the family as well as access to features such as Usenet news, e-mail and personal web space. An easy to use web based interface gives parents the ability to add new family member accounts at any time and makes changing the access levels of individual family members quick and easy.

Filtered E-Mail: FamilyClick's world-class email service utilizes a two-stage system designed to identify and block spam and, optionally, scan incoming messages for pornographic or offensive content. At the first stage, the source address of each incoming mail message is compared against a database of known spammers. This database is updated in real time and is maintained by the well-known MAPS (Mail Abuse Prevention System) Project. This database includes the addresses of spam generators, open spam relays as well as potential dialup trespass spammers. FamilyClick also utilizes 'spam probes'; fake email addresses used to attract, collect and categorize unsolicited email messages. Our own list of well-known spammers is combined with the database provided by MAPS to provide one of the best barriers against spam available today.

If parents select FamilyClick's Mail-Block feature, the second stage scans incoming messages to detect pornographic or offensive content. Messages that break any of the content rules are returned to the sender and never appear in the users incoming mailbox. Parents can also decide whether to disallow e-mail messages containing attachments.

FamilyClick provides a fully featured web based interface to email which subjects each mail message to our two-step filtering process; filtering each message according to the access level of the recipient. Users also have the option of accessing their mail via the standard POP protocol using one of many popular desktop e-mail client programs. FamilyClick's e-mail service combines cutting edge software from Software.com with the time tested open source solution Sendmail to provide one of the safest and most effective e-mail solutions available today.

Newsgroup Filtering: Many users currently participate in Usenet newsgroups or discussion groups. HTML based news services such as Deja and Remarq offer users access to news, discussions and information covering literally thousands of topics. Because ClickReview has been designed to handle dynamically generated web pages, families can rest assured that the sometimes 'colorful' language found in these public discussion areas will not appear on their computer screens.

FamilyClick also makes available it's own news server which is accessible using any one of many popular NNTP clients such as Outlook Express or Free Agent. This news server carries a carefully chosen subset of the roughly 40,000 newsgroups that are publicly available and completely eliminates any groups dealing with pornographic, offensive or objectionable material. Articles sent to FamilyClick's news server are heavily filtered for offensive language and spam and any article containing a possibly pornographic binary image is rejected immediately. FamilyClick uses a proprietary password protected access control system to grant or deny access to its news server and parents have complete control over which of their family members have access to this service.

Instant Messaging Capabilities: FamilyClick allows users to access their favorite instant messaging packages including AOL Instant Messenger, Yahoo! Messenger and more. Although FamilyClick does not support these services, we provide safety instructions that may be applied to these and other instant messaging packages.

As with all aspects of the FamilyClick service, parents are given the option of turning instant messaging access on or off for their family and the default is always set to off.

Tamper Resistant Technology: The best protection in the world isn't of much benefit if it can be easily disabled. That's why FamilyClick has developed proprietary technology that helps ensure that the filter cannot be easily sidestepped. Users who dial into FamilyClick's ISP service are directly connected to FamilyClick's network; not to the Internet. Access to the Internet must be made through FamilyClick's array of filters. Families who use other access providers and choose FamilyClick's MyISP service are

also protected against tampering by proprietary technology developed by FamilyClick engineers.

World-Class Technical Support: FamilyClick's service is designed to be easy to install, easy to administer and practically transparent in normal use. Once a user is logged in, the FamilyClick system operates quietly as a background safety net and makes its presence known only when it needs to block inappropriate content. In the event that questions come up or problems occur, FamilyClick has established a world-class technical support system designed to handle everything from the simplest question to the most complex problem.

No filtering system is 100% effective. Although rare, some sites that should be blocked are not. There are also sites that may be blocked even though they are perfectly safe and appropriate. Should such events occur, customers have access to FamilyClick's Site Review. By filling out a simple web form, customers can report sites that should be blocked or can request that we unblock sites that should not be. FamilyClick reviewers will respond to the request by the next business day and the user will get a response by email. If the reviewer cannot honor the request, the user will receive a detailed explanation. Due to the flexibility designed into FamilyClick's filter, corrections to the database can be made in a matter of minutes.

When a user has a question or problem, chances are somebody else has already asked the same question or experienced the same problem. FamilyClick maintains an extensive collection of FAQs (Frequently Asked Questions) on our web site. Answers to most of the questions that users may have are described in a language that even a novice user can understand. Solutions to problems that families may experience are presented step by step using a clear, concise, easy to understand format with screenshots and other illustrations.

For questions or problems that cannot be handled with FamilyClick's Site Review or online FAQs, we offer email support to all users. Questions or problems submitted by email to our support staff normally get a response in less than five minutes. And for those times when a user just needs to talk to a real person, we offer toll free phone support.

Top Quality Content

Identifying and filtering out inappropriate content is only half the solution. Families not only want to be protected from offensive and inappropriate material, they also want to know where to find compelling, educational and entertaining content that can be enjoyed by the entire family. To address this need, FamilyClick has designed its web site at <http://www.familyclick.com> as a starting point for families exploring the Internet. The FamilyClick portal is freely available to everyone online and features original content as well as articles from some of the most trusted and respected names in the industry.

Ten Channels of Family Oriented Content: FamilyClick has arranged the content on its web site into distinct channels including ParentingClick, MoneyClick, SportsClick, KidzClick, TeenClick and LearningClick. In all, FamilyClick offers ten channels featuring original content as well as material from such respected names as Dr. Paula, Body By Jake and the Weather Channel. FamilyClick has featured articles by noted authorities like Dr. Katherine Kersey of Old Dominion University. In addition, each 'click' features a moderated message board where users can post questions and comments.

TopClicks Points Users in the Right Direction: Because one web site cannot possibly cover everything, FamilyClick's TopClicks section includes lists of reviewed and approved "best of the Web" sites to help families find appropriate sites covering almost every category of interest. Included in TopClicks are licensed "Net Mom Approved" sites which are personally reviewed and approved by Jean Armour Polly, the original Net Mom and author of [The Internet Kids and Family Yellow Pages](#).

FamilyClick completes the Internet experience by offering such features as personal web pages, games, news and weather updates and stock quotes.

Besides offering what we feel is the leading solution available today, FamilyClick has undertaken a nationwide marketing program designed not only to promote our offerings, but also to increase public awareness of the problem. Our goal is to make the FamilyClick brand one of the most respected and trusted names in the Internet protection industry. Our first national television commercial, featuring Leeza Gibbons, aired in May during the season finale of the CBS series "Touched By An Angel". Through our sponsorship of the Nascar Winston Cup stock car driven by Kevin Lepage, the FamilyClick brand is gaining national attention and recognition.

Conclusions

We all have an important responsibility to help safely bring the promise of the Internet to America's youths while protecting them from people and influences that we would never let through our front door. As the provider of a private sector solution, FamilyClick is part of a three-prong solution that shares the responsibility between the public, the technology industry and the legal community.

Despite the increased publicity that Internet predators and online pornography have received recently, many parents are of the opinion that inappropriate sexual encounters on the Internet only happen to somebody else's kids. Like the children's faces on a milk carton, the young victims of online abuse are usually anonymous; never the kids across the street or the sons or daughters of a co-worker. Sadly, few of us take any action until someone close to us has been involved and then it's often too late.

FamilyClick believes that education, awareness and empowerment are essential in ensuring that our children can gain all the benefits of the Internet without being exposed to the dangers. Libraries, schools, parents, teachers, churches and every person and organization that has a role in our children's lives needs to understand their responsibility toward protecting our children from the aggressive tactics of online pornographers and from online predators.

Technology plays its part by continuing to develop, implement and market strong technical solutions. Employers who choose to implement family friendly policies encourage the development of strong family values in the home. Access providers can help by not offering clearly illegal newsgroups and by cooperating fully with law enforcement agencies.

Government and law enforcement can help greatly by enforcing existing laws and by appropriately extending laws governing the physical world to the Internet. It would be clearly illegal for someone to launch a cable television network called 'The Bestiality Channel' yet web sites dealing with this subject abound and are easily accessible. Lack of aggressive enforcement as well as loopholes in existing laws means that the public and technology sectors are currently shouldering much of the burden of protecting kids in the online environment.

Rather than creating the Internet equivalent of televisions V-Chip, FamilyClick would like to see filtering services, such as ours, made available to all users by all access providers. An Internet rating system, which would depend on voluntary compliance by all Internet content providers, simply would not work. Education and awareness along with cheap and easy access to an effective filter, as well as the right not to use a filter, ensures that parents can make the final determination as to the best method of delivering the enriching content of the Internet to their families.

Thank you for giving me the opportunity to discuss this important matter with you today. FamilyClick looks forward to continuing to work with the commission on this issue and I will gladly answer any questions you may have.

Appendix A - FamilyClick Access Levels and Content Categories

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	Full FamilyClick Access	Teen	Pre-Teen	Kids	Children's Playroom
					Access to FamilyClick approved sites only
Exclude the following categories:					
Crime	X	X	X	X	
Hate Groups	X	X	X	X	
Pornography	X	X	X	X	
Illegal Promotion of non-medical Drugs	X	X	X	X	
Gambling Online	X	X	X	X	
Violence	X	X	X	X	
Chats not DDRTM Protected	X	X	X	X	
Personals		X	X	X	
Illegal Drug Promotion		X	X	X	
Unmonitored Chats		X	X	X	
Non-FamilyClick Email		X	X	X	
Revealing Attire			X	X	
Advanced Sex Education			X	X	
Weapons			X	X	
Games			X	X	
Basic Sex Education				X	