

## **COPA Commission Hearing II**

### **Testimony given by Sheridan Scott, Bell Canada, Board Member, Internet Content Rating Association**

#### **Introduction**

Thank you, Chairman, for this opportunity to testify to this hearing of the COPA Commission. My name is Sheridan Scott and I am the Chief Regulatory Officer for Bell Canada and I am a Board member of the Internet Content Rating Association (ICRA).

#### **Background on ICRA**

ICRA is unique in the field of labelling and filtering. We are the only non-profit organization operating in this space. Further, we offer a self-rating or labelling service to content providers at our web site, [www.icra.org](http://www.icra.org) and a filtering service to parents that is embedded in two of the major browsers, Microsoft's Internet Explorer and Netscape's Navigator. Both of these services are free of charge. Our costs are met through a mixture of membership fees – currently \$25,000/year – advertising and licensing fees to third parties. Our eighteen members include many of the best known companies in the Internet sector, for example, Microsoft, IBM, AOL, Novell, Network Solutions, British Telecom and, of course, Bell Canada.

Our dual mission is to protect children from potentially harmful material while also protecting the free speech rights of content providers. Our system is voluntary – we do not seek government-mandated use of the system by content providers – instead we continue to work with the industry to create positive incentives to rate. To date over 150,000 sites have rated using our system and that figure increases by 4,000 sites a month. And with our efforts to internationalize the system, we believe that the number of sites rated will grow exponentially over the coming months and years.

ICRA owns and operates the RSACi rating system. The organization RSAC formally folded into the newly established Internet Content Rating Association in the spring of 1999. ICRA has offices in the US and the UK and has recently been awarded a grant from the European Union for \$650,000. The grant covers a number of work areas including: to expand the number of categories of the current system, to translate the rating questionnaire into at least five major languages, and to launch a major marketing and promotion campaign directed at both content providers and the general public – raising awareness of the system with ordinary parents.

## **How RSACi works**

I'd like to speak briefly about how the current RSACi system works. Firstly, a content provider comes to our site and fills in a content questionnaire which asks the applicant about the portrayal of content on their site under four categories: Nudity, Sex, Language and Violence. As the applicant fills out the online form, a rating level is recorded in each of the four categories and is converted into an html meta tag written in the PICS language. After the content provider has finished the questionnaire, they must agree to the ICRA Terms and Conditions, which include a statement that they have not wilfully misrepresented themselves.

At the completion of this process, the meta tag is displayed on the screen and instructions given on how to copy and paste it into the header of their home page and that label will cover the content for their entire site. They can, if they wish, label individual directories, pages or even images separately. Many sites also place the "We rated with RSACi" logo on their home page or, increasingly, the words, Content Policy next to their Privacy Policy.

The parent or concerned adult uses the filtering system in a very different way. They activate the parental controls within their browser and set the levels they feel are appropriate for their children. They use the Content Advisor controls within Internet Explorer and NetWatch within Navigator. After inputting a password, they can choose what levels of Nudity, Sex, Language and Violence they feel is appropriate for their child. In addition, they can choose to select the Do Not Go To Unrated Sites function. Should access to a site be blocked, the system explains why, gives the rating for the site and even allows the parent to override the blocking with a password. Further, a blocked site can be added to an Approved site list so that the child can access the site in future whether or not it is rated.

## **The revised system**

From the launch of the RSACi system in April 1996, content providers from around the world have used our self-labelling system. They have done so in spite of the fact that the questionnaire is written in American English and reflects a US-centric view of the world. In 1998, RSACi won the prestigious Carl Bertelsmann Prize from the Bertelsmann Foundation in Germany for recognition of outstanding innovation in the area of self-regulation on the Internet. The Foundation, together with our existing North American members and a number of key European and Japanese companies and associations, not only formed the international organization, ICRA, but have also worked on a revised system due to be launched in October of this year. Here is a summary of the new elements of this system:

- A new labelling vocabulary with detailed, objective descriptors
- New categories of concern, including: intolerance, alcohol, drug and tobacco use; the ability to block chat rooms and the introduction of Context in the questionnaire
- Filtering "templates" allowing parents to choose a familiar rating system, e.g., a movie rating system, which is mapped back to the ICRA labels
- The inclusion of black and white lists of acceptable or non-acceptable sites
- The system translated into at least five major languages of the world

- Greater simplicity of use for both content providers and parents

The final details of the system are still being finalized. Suffice it is to say that the views and comments, complaints and criticisms of many hundreds of our users, an international advisory board, a European consultative group and many from the press and media have helped us to form our revised system. There are plans to develop an ICRA search engine, to license the growing database of rated sites and to offer the revised system to other third parties around the world interested in using the questionnaire for rating traditional media, such as television, film and other converging media.

### **Monitoring, checking and auditing**

Alongside our developments of the rating system is our continued commitment to ensure that the system is not abused and that those attempting to cheat it are identified and dealt with. We use a number of methods to monitor and check up on sites including:

- An automated web crawler that checks the ratings in our database against the meta tags in a site's header
- Spot checking of sites on a daily basis, particularly sites with provocative URL names
- Responding to users complaints or reports on sites they feel have mis-labelled

Web masters must accept our Terms and Conditions of Use if they are to use our meta-tags. In the very rare number of instances where mis-labelling has occurred, we have contacted the site and they have either re-labelled their site or taken the label off altogether. As the number of sites increases and the job of auditing expands, we plan to utilize a neutral third party to take on this important monitoring work.

### **Achieving critical mass**

For ICRA, or any self-labelling content system, to succeed, there must be a critical mass of users labelling their sites and parents filtering web sites they don't want their kids to see. To achieve this, ICRA has identified three critical markets:

- Adult-only sites
- Children-oriented sites
- The Top 1000 sites

The early adoption of the existing RSACi system by adult entertainment sites is very encouraging. Playboy.com was one of the first sites to rate and 15% of all the RSACi rated sites are in what would be considered the pornographic category. Children sites are another top priority. Disney was an early supporter and ensured their sites were labelled. And the Top 1000 sites are of major importance, as they account for 80% of the traffic on the web.

For the ICRA system to become an integral part of the Internet landscape, public awareness campaigns must be launched and sustained in North America and throughout the world. Parents need to know that there are ways to protect their

children online. One of the greatest inhibitors to the growth of the Internet is fear – parental fear of what their children will see and experience on the net. We hope that the ICRA system proves to be a very useful tool in the toolbox of programmes and applications that can help parents to overcome their fears and bring their children the extraordinary benefits of being online.

### **Positive incentives to rate**

I stated earlier that the ICRA system is a voluntary one. We do not seek, nor would we want the COPA Commission to propose to the US or any government that there should be a legislated mandate to use the system. Instead, we wish to work with the Internet community to develop ways to encourage content providers to rate and for parents to filter without resorting to laws. Here are a few examples of existing and proposed incentives:

- The “do not go to unrated sites” option in the browser
- Sites that will only link to other rated sites (e.g., Disney)
- Search engines and hosting services that encourage their registered sites to rate
- Incorporation of the ICRA system in web authoring tools (e.g., FrontPage)
- Development of an ICRA search engine
- Providing legal protection from prosecution if an adult site is rated (as in Germany)

The US government has an important role to play in encouraging the concept and practise of self-regulation to flourish and grow. We sincerely hope that the COPA Commission will stress the need for government support and backing to our efforts and those of the parental filtering movement. While we oppose any government requirement to label a site, we would be keen to explore using existing or proposed legislation that backs up the use of the system – particularly as a defence against prosecution or as part of a co-regulatory regime.

Further, we can only stress the essential element of international co-operation and joint initiatives on this, the most multi-cultural of all media. Indeed, this Commission may wish to review and take into account a wide number of government/industry initiatives that have emerged in Canada, in Europe, in Australia and in Japan. Protection of children is a global pre-occupation and countries around the world are now focused on the need for internationally acceptable ways to deal with a range of difficult issues, including the means to protect children from material that is easily accessed, downloaded and distributed off the Internet. We wish you well in your deliberations.