

To whom it may concern:

I would like to express my concern over your proposed regulation requiring public institutions (libraries and schools) to implement mandatory web filtering on internet-capable computers. While I am in agreement that it is important that our libraries and schools maintain standards of decency when presenting material to children, I have grave concerns about the shortcomings of web filtering technology.

As a researcher at one of the nation's largest computer-industry R & D laboratories, I have had a great deal of experience with these technologies. It is a well-known fact that web filters are not foolproof, and are in fact likely to exclude large quantities of legitimate, inoffensive content while permitting significant amounts of "indecent" content to slip through. While one might argue that these effects are unavoidable in any sort of new technology, you would be hard-pressed to find an expert who would predict these difficulties could ever be completely avoided. Furthermore, many pieces of commercial filtering software rely on third-parties to make decisions about what is considered "decent". All users of that software are essentially at the mercy of those third-parties, whether they be a government agency or a commercial interest.

By requiring libraries and schools to adopt this sort of technology, you are essentially asking them to cede control over their own catalog to another party, whose standards and practices may not be in line with local policy. Furthermore, any "legitimate" content that is accidentally targeted by this technology would become inaccessible to students and patrons in much the same manner as if that institution had deliberately removed it from their catalog. Therefore, a great deal of material that is currently protected by communities and federal law would be explicitly banned from these institutions' internet-connected computers. While this might be acceptable for private institutions, libraries and schools are built and operated with public funds. Any decision to restrict expression based on content must therefore be made under full public scrutiny, something that current technology does not provide for.

I hope my concerns will have some influence on your final decision and I wish you luck.

Sincerely,
Matthew Green