

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Service Rules for Advanced Wireless	)	WT Docket No. 07-195
Services in the 2155-2175 MHz Band	)	

To the Commission:

**REPLY COMMENTS OF  
THE INTERNET KEEP SAFE COALITION**

The Internet Keep Safe Coalition (“iKeepSafe”) submits these Reply Comments in support of the service rules advocated by the Family Research Council (“FRC”) in the initial comment round of this proceeding. iKeepSafe, one of the nation’s most active online safety organizations, is committed to working diligently with parents, teachers, caregivers, policymakers and industry leaders to ensure that all Americans have effective, easy to use technological tools at hand to protect our families from the dangers associated with broadband Internet connectivity. Accordingly, we encourage the Federal Communications Commission (“Commission”) to adopt service rules for the 2155 to 2175 MHz spectrum band that requires the delivery of a network based filter for indecent and pornographic content.

Providing filtered broadband service would be a major accomplishment for the Commission connecting millions of Americans to the broadband Internet.<sup>1</sup> For the first time it would be simple to for families to implement internet safety strategies rather than the current complicated model that requires

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<sup>1</sup> See Comments of U.S. Representative Danny Davis, WT Docket Nos. 07-16 & 07-30, at 2 (Submitted July 31, 2007); Comments of U.S. Representative Edolphus Towns, WT Docket Nos. 07-16 & 07-30, at 1 (Submitted January 30, 2007); Comments of the Antelope Valley Chambers of Commerce at 1, WT Docket Nos. 07-16 & 07-30, at 1-2 (submitted March 14, 2007); Comments of the Latino Coalition, WT Docket Nos. 07-16 & 07-30 at 2 (submitted Mar. 22, 2007)Comments of the Association of Community Organizations for Reform Now, WT Docket Nos. 07-16 & 07-30, at 1-2 (submitted Feb. 2, 2007); Comments of One Economy Corporation, WT Docket Nos. 07-16 & 07-30, at 2 (submitted Mar. 1, 2007); Comments of the California Association for Local Economic Development, WT Docket Nos. 07-16 & 07-30, at 2-3 (submitted February 28, 2007); Comments of the County Executives of America, WT Docket Nos. 07-16 & 07-30, at 1-2 (submitted February 27, 2007); Comments of The Public Technology Institute , WT Docket Nos. 07-16 & 07-30, at 1-2 (submitted February 27, 2007).

parents to be network administrators for every computer their child uses. That is why iKeepSafe has consistently supported network based filters as they are a superior and more reliable technology than software based solution that must be installed, updated, set and reset by busy parents at home. In our original filing to the Commission relating to this spectrum we explained that:

...network level filters are superior to those housed on individual computers as they cannot be easily circumvented by technologically savvy users. This is because indecent content will be blocked...before it ever reaches the user's computer thus eliminating one of the most common avenues for the online solicitation of minors: indecent websites.<sup>2</sup>

iKeepSafe is convinced that the best way to keep families safe online is to empower and inform parents, teachers and caregivers. Years ago, the issue of illicit pornography being available on mobile devices was raised at the Commission and little seems to have happened in the interim to protect children. Mandating that this valuable spectrum be used for a family-friendly wireless broadband Internet service would address this market failure and is entirely consistent with iKeepSafe's fundamental principles.

Furthermore, as FRC<sup>3</sup> demonstrated in its Comments, the Commission is empowered by Congress to establish such rules under section 230 of the Communications Act. With the statutory authority in place and the record support for additional protections for children, iKeepSafe encourages the Commission to establish a broadband service that is safe.

Respectfully submitted,



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January 14, 2008

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<sup>2</sup> See Comments of the Internet Keep Safe Coalition, (WT Docket 07-16 and 07-30)

<sup>3</sup> See Comments of the Family Research Council, (WT Docket 07-195) at 12 to 17.